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**BY HAND & E-MAIL**

20 September 2019

Our Ref: MIN1000

E: [gavinmcg@clydeshanks.com](mailto:gavinmcg@clydeshanks.com)

Dear Sirs,

**REPRESENTATION TO LOCAL DEVELOPMENT PLAN (LDP) ANTRIM & NEWTOWNABBEY  
 DRAFT PLAN STRATEGY, STRATEGIC REPRESENTATION MINERALS**

I refer to the above matter and now enclose our strategic representation on behalf of our client, Bulrush.

The purpose of the representation is to set out our client's intention to review new sites for the extraction of peat within the borough given the depletion of the productive area of their existing extraction site at Ballylurgan Road, Randalstown. This representation follows on from our previous representation to the council's Preferred Options Paper (POP) submitted on 28 March 2017 (Council reference POP/PR/014) - see **Annex 1**.

**Introduction**

The draft Plan Strategy (dPS) published in July 2019 sets out a range of strategic planning issues and is the second formal publication in the preparation of the LDP for the Antrim & Newtownabbey (A&N) Council area. The dPS aims to stimulate public comment and facilitate meaningful engagement with the preparation of the LDP in order to help identify relevant local issues which should be considered at the outset.

The dPS is one of two development plan documents which, when combined with the Local Policies Plan (LPP) will form the LDP for the Borough.

**Strategic Matters**

The Draft Plan Strategy (DPS) presents the Council's Strategic Policy in respect of Natural Resources (SP9) and notably, specific to minerals it states at SP9.2 (p262);

*'To facilitate sustainable minerals development in the Borough, the Council will balance the need for a specific development against the need to safeguard local communities and the environment against the potential adverse impacts of such development. This will be achieved by:*

- a) identifying and protecting minerals reserves that are demonstrated to be of economic importance to the Borough;*
- b) operating a presumption against unconventional hydrocarbon extraction, until such times as there is sufficient and robust evidence regarding all the potential environmental impacts of such extraction;*
- c) operating a presumption against minerals development that would affect the following environmentally sensitive sites / designations unless it can be demonstrated, that there is a regional need for the proposed mineral that outweighs the importance of the site:*
  - *Strategic Landscape Policy Areas;*
  - *Coastal Policy Area;*
  - *Registered Historic Parks, Gardens and Demesnes; and*
  - *Sites of nature conservation importance (International, National and Local sites); and*
- d) supporting other proposals for minerals development where these accord with the provisions of Policy DM 43.*

The DPS also contains the Councils 'Detailed Management Policies' and Policy DM 43: Minerals Development – stipulates at DM 43.1 (p266) that;

*'In assessing proposals for mineral development, the Council will balance the case for the particular mineral working against the need to protect and conserve the natural and historic environment. The impact of a proposal on public safety, health and amenity will also be important material considerations. This policy will apply to all applications for minerals extraction, including extensions to existing sites, as well as to proposals for hydrocarbon extraction.'*

Furthermore, DM 43.2 (p266) states;

*'Proposals for new minerals workings or the extension of existing workings will generally be supported where the following matters have been addressed to the satisfaction of the Council:*

- a) Disturbance and disruption from noise, blasting and vibration and potential pollution of land, air and water;*
- b) The impact on the safety and amenity of local communities, residential property and businesses during and after development;*
- c) The impact on landscape character, visual amenity, the historic environment, and natural heritage assets during and after development;*
- d) The impact on surface and ground water resources, drainage and fishery interests;*
- e) Effective and sustainable waste solutions in the reuse of mineral waste or any secondary material;*

- f) *The cumulative effect of all of the above, especially if there are already two or more consented sites that could raise similar impacts within 5km of a nearby settlement;*
- g) *A Transport Assessment demonstrating that the development will not have a significant negative impact on the local road network;*
- h) *A site restoration scheme including where appropriate an aftercare programme to ensure the scheme will be fully delivered; and*
- i) *An appropriate method statement for undertaking the works proposed.'*

The Council has also published a number of evidence papers including 'Evidence Paper 12: Minerals'. At paragraph 9.29 (p29) the paper indicates that;

*'Should an operator apply for permission to extract peat, such an application would be considered on its individual merits and against planning policy.'*

The evidence paper goes on acknowledge at 11.14 (p39) that;

*'...DAERA has confirmed that the Borough does not hold a wealth of peatland, however a number of identified deposits are Priority Habitats. DAERA has confirmed that the peat deposit located northeast of Randalstown (Sluggan Moss), includes active peatland.'*

The Bulrush existing site at Ballylurgan Road is not identified as an environmentally sensitive site (although we acknowledge its proximity to active peatland at Sluggan Moss). In identifying potential new sites, we **advocate** the Council's position not to identify Areas of Mineral Constraints (AMCs) and general support for mineral developments which address the matters identified in DM 43.2.

In closing, this representation seeks to supplement the position outlined at the POP stage and further advocates the Council's intention to consider applications for peat extraction on their individual merits.

I trust this representation is clear in setting out our advocacy of the strategic matters identified in the DPS and our agreement with the Council's approach not to designate any peatland sites as AMCs within the borough.

Should you require any further information and/or clarification, please do not hesitate to contact me.

Yours Sincerely



Gavin McGill  
Senior Planner

Enc.

Cc. Bulrush

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## ANNEX 1

### PREFERRED OPTION PAPER REPRESENTATION

Mr. John Linden  
Antrim and Newtownabbey Borough Council  
Planning Section  
Mossley Mill  
Carnmoney Road North  
Newtownabbey  
BT36 5QA

## BY POST

28 March 2017

Our ref: MIN1000

E: [gavinmcg@clydeshanks.com](mailto:gavinmcg@clydeshanks.com)

Dear Sirs,

## **ANTRIM AND NEWTOWNABBEY LOCAL DEVELOPMENT PLAN (LDP) 2030 – PREFERRED OPTIONS PAPER (POP) REPRESENTATION: STRATEGIC REPRESENTATION MINERALS**

I refer to the above matter and now enclose our strategic representation on behalf of our client, Bulrush.

Our representation specifically relates to Section 6. 'Planning Policy' of the PoP which addresses the matter of Minerals (pages 106-107) which was informed by the Councils Evidence Paper, 'Facilitating Economic Development' (pages 114 to 131) dated January 2017.

### **Background**

We represent Bulrush, who having established in 1979, is a leading producer of high-quality substrates for both professional and amateur growers i.e. peat products. Based in Northern Ireland, Bulrush is a wholly owned subsidiary of the Danish substrate producer, Pindstrup Mosebrug A/S and have a number of extractions sites across the island of Ireland.

Bulrush have one active site (see Annex 1) in the A&N Council area at Ballylurgan Road, Randalstown which was granted permission T/1979/0569 under the applicant name Bulrush Peat Co. Ltd. The site productive area is depleting and will further reduce over the period of the plan. With this in mind, Bulrush will seek to review new extraction sites in the area and want to ensure that the new plan does not place an embargo on same.

At a strategic and regional level (RDS 2035, SPPS, PSRNI, PPS2 and PPS18) there is an objective to manage soils and protect peat/priority habitat which is acknowledged and accepted by Bulrush.

This protection is, however, framed within a context that since the announcement of the Review of Old Minerals Permissions (ROMPs), there has been positive engagement with the Environment Agency with peat extraction companies regarding new extraction techniques/methodologies, aftercare monitoring (Inc. compensation) and proactive introduction of sphagnum.

This engagement has promoted the exploration of new sites which may represent candidates for new/extension sites for extraction/restoration.

### Strategic Matters

Our client advocates A&N Council's acknowledgement that minerals industry makes an essential contribution to Northern Ireland economy.

In preparing LDPs, the SPPS states that Councils should bring forward appropriate policies and proposals that:

- *Ensures sufficient local supplies of construction aggregates can be made available for use within the local, and where appropriate, the regional market area and beyond, to meet likely future development needs over the plan period;*
- *Safeguard mineral resources which are of economic or conservation value, and seek to ensure that workable mineral resources are not sterilised by other surface development which would prejudice future exploitation;*
- *Identify areas that should be protected from minerals development because of their intrinsic landscape, amenity, scientific or heritage value (including natural, built and archaeological heritage). There should be a general presumption against minerals development in such areas.*

Despite welcoming the Councils positive acknowledgement above, Bulrush are concerned that the narrative (pages 106 to 107) lacks any commentary nor analysis in respect of peat extraction sites, its contribution and the Councils view regarding potential Area of Mineral Constraints (AMCs).

While the Council may have reserved judgement in respect of allocating AMCs (as has been the case in other Council PoPs), the lack of any direction from A&N Council on this matter is of concern to our client which we trust will be reconciled following the PoP stage.

Furthermore we welcome the Councils stated endeavours to undertaken further research with regard to the extent of minerals and mineral developments in the Borough, the value of this sector to the local economy, and the potential impacts of such developments upon the environment and wider society.

Finally, Bulrush is one of the largest peat extraction companies which contribute economically to the NI economy and we therefore respectfully request that the Council carefully consider the content of this representation. We would recommend that the Council approach all stakeholders, particularly QPANI, to contribute to the PoP and the key issues deriving from Mineral/Peat Extraction in the Council area.

I trust this representation is clear in setting out our advocacy and observations of this strategic matter and look forward to hearing the Council.

Should you require any further information and/or clarification, please do not hesitate to contact me.

Yours sincerely,



Gavin McGill

**Planner**

Enc.

cc. Bulrush



Annex 1 – Site Location Plan

