



Chief Executive

Fermanagh & Omagh District Council:

Brendan Hegarty



20th December 2018

Dear Mr Hegarty.

I wish to make this submission on the Omagh Local Development Plan (LDP) 2030, and the associated document, Local Development Plan Minerals (2018). Please forward this to councillors also.

I have to state that I found the online submission form opaque, and too difficult to use, and directing towards acceptance that 'the Area Plan was good and appropriate', and therefore uninterested in real engagement with ratepayers and citizens.

I ask you to note that there are no baseline studies, before mining development, relating to the Dalradian Gold mine at Greencastle, in terms of water and air quality, and without such, any permissions and stipulations are flawed. I also wish to point out that the previous council, Omagh District, proved unaware or incapable of gold mining supervisory commitments and responsibilities, and that their policy seems carried over to the new council, in that the Omagh Minerals / Galantas open cast mine project at Cavanacaw, Omagh has been without adequate supervision for its 25 years of existence, as evidenced in the court case taken by Bill Donnelly, a local resident, heard in October 2018 <https://www.irishtimes.com/business/energy-and-resources/tyrone-gold-mine-extension-based-on-inaccurate-maps-court-hears-1.3393709>

There are, still, no studies of water quality before the mine, and downstream of that mine

The overall Area Plan offers or suggests that council will be supportive only of sustainable development, and then dismisses that completely in phrase such as

"The Council will not permit development within the floodplain, unless it falls within one of the following exceptions:

(and then) 'Undefended Areas: 'the extraction of mineral deposits and necessary ancillary development'. (FLD 01, page 152)

Which is to mock the rest of the aspirations in the 300 page document

At another point, the defence of the policy to allow mineral extraction is because of strong economic case, something (it seems) implicit in the extraction of gold, from these planners point of view. That is a flawed concept, from any resident of Northern Ireland's point of view.

The reward is claimed in the example of Dalradian Gold project (the current live mining project at Greencastle) , to be total value \$1,000 million. The jobs (claimed to be) 350, for 15 years. The reward to Crown Estate, 4% - the Crown Estate being neither Crown nor State, but a private company with a duty to maximise profit, and without the corporate responsibilities that any other company has, in terms of governance.

As regards corporate profit, that is a flexible concept, and there may not be any Corporation Tax to levy. So the total reward is potentially \$40 million (CE levy), + ~ \$200 million (wages). The potential cost is the destruction of other activity in the region (tourism, farming, associated enterprises), and an ongoing environmental disaster of water pollution to be managed and (possibly) remediated, for any foreseeable future. Meaning, some hundreds of years. Those other costs are much larger than the ephemeral (15 – 25 years) mine, either of the two existing of the others planned or encouraged by GSNI and DfI.

On the subject of other mineral development, the implied acceptance of fracking for natural gas (methane) is multiply flawed. The technology, (HVHF) is only of total life (since invention) of ~ 20 years, being developed from earlier (low volume) fracking (1940s). The first use was in Texas, USA, where the water table is many thousands of metres below ground. It therefore was at least 'less' interfered with than in areas with high rainfall, such as Fermanagh and Tyrone (1.6 metres annual rainfall), and even so, health implications for residents of those area (e.g., Fort Worth, Texas) are strongly negative.

Yours faithfully,

Colm McGinn