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26th June 2019

Comments on DPS_021 Crown Estate, MIN02 'Restoration & Aftercare' ('encourage biodiversity')

Dear Sir / Madam

I wish to make this further submission on the Fermanagh & Omagh Local Development Plan 2030 (LDP), and the associated document, Local Development Plan Minerals (2018).

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

It is clear that Fermanagh & Omagh Council neither has the will nor the capacity to have these studies, and to supervise such activity for the life of the mine (or mines)

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

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

(and then) 'Undeveloped 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

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And on DPS 248 DfE (Minerals) DfE RESPONSE

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. Both Crown Estate and DfE offer the thought that 'care taken that the area should not be sterilised' (from point of view of minerals extraction) The area were certainly be sterile afterwards

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, many millenia 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 DfE.

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.

So, when DfE says ***"MIN04 Draft Policy – Unconventional Hydrocarbon Extraction.***

The wording of Draft Policy MIN04 – Unconventional Hydrocarbon Extraction is not consistent with either that applied to other Minerals Development in MIN01 or the text relating to the extraction of unconventional hydrocarbons in the SPPS.

In MIN01 it states that "The Council will support proposals for minerals development where it is demonstrated that they do not have an unacceptable adverse impact..." whereas the text in MIN04 states that "The Council will not permit exploitation of unconventional hydrocarbon extraction until it is proved that there would be no adverse effects on the environment or human health."

Paragraph 6.157 of the SPPS states that "However, in relation to unconventional hydrocarbon extraction there should be a presumption against their exploitation until there is sufficient robust evidence on all environmental impacts".

No evidence is given in the policy clarification in paragraph 4.89 to support the application of a policy that would require a development to prove that it would have no – i.e. zero – adverse effects on the environment

The persons writing that are apparently unaware of the proven facts of fracking and gas extraction. There are no positive aspects, not even financial, (since US experience is of failing companies and large losses). The fugitive emissions destroy any prior theoretical value as a cleaner lower carbon fuel.

In conclusion, the LDP to be effective, has to not just be bureaucratically or technically fitting within your 'sustainability' parameters, which it seems, are focused on passing bureaucratic markers, but rather be an integrated approach to how our population should prosper.

We all, as responsible adults, have responsibility for our actions or inaction. In the crises we (humanity) are in, it becomes clearer with each week that

(1) disruption of soil and bog is massively contributive to CO2 / methane emissions, (applicable to gold mining activities)

(2) our water supply, already under a certain amount of stress from intensified farming practice, will be destroyed with a 700 metre deep mine. The pumped water (in considerable volume) can never be treated to restore to its previous condition. Dalradian's planning application states that its operation requires 540 Tonnes of water every day. They can never safely clean that quantity of water daily. Claims of Dalradian on all these matters in their application are optimistic, or lies. Take your pick.

(3) With regard to fracking for natural gas, it's an investment in damaging the environment, both local to Fermanagh, but also more generally. In Fermanagh, the water aquifers will be destroyed; more generally, fugitive methane release (assented by the industry to be at a level of 7%, identified by critics as more like 15%+) is a major greenhouse gas, and our money (public purse) is wasted in that we will be stopped within a few years (<10 ?) from exploiting or using it. So the £ billions spent are just 'gone'

<https://www.scientificamerican.com/article/how-bad-of-a-greenhouse-gas-is-methane/>

Yours faithfully,

Colm Mc Ginn