

Armagh City, Banbridge &
Craigavon Borough Council

Local Development Plan 2035

Draft Plan Strategy

TECHNICAL SUPPLEMENT 13

Minerals Development

September 2026



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Armagh City
Banbridge
& Craigavon
Borough Council

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1.0 Introduction

Purpose of the Document

This Technical Supplement brings together the evidence base that has informed the preparation of the Armagh City, Banbridge and Craigavon Local Development Plan (LDP) 2035 draft Plan Strategy (dPS) in respect of minerals development. It is one of a suite of topic based Technical Supplements that should be read alongside the dPS to understand the rationale and justification for the planning policies proposed within it (i.e. MIN 1-8).

The evidence base collected to inform the draft Plan Strategy also forms the basis for additional assessments and appraisals required as part of the LDP preparation process, most notably the Sustainability Appraisal (SA).

This technical supplement provides an overview of minerals development in Armagh City, Banbridge and Craigavon Borough as well as of the key issues that are relevant. It also sets out the statutory and policy framework that the Council has taken account of.

This technical supplement includes key updates relating to minerals development which have emerged since the publication of the Council's original evidence base Preparatory Paper. Preparatory Paper No. 12 'Minerals' was one of 14 topic-based Papers that were prepared and presented to the Council's Planning and Regulatory Services Committee on 12 October 2016. These papers provided the baseline information that formed part of the evidence base for the Council's Preferred Options Paper (POP). The POP, published in March 2018, provided an overview of the Key Issues of strategic significance affecting the Borough and the Preferred Options to address them.

This document sets out the background to and rationale for the policy approach to minerals development contained within the Draft Plan Strategy, having had regard to representations received at POP stage, as well as through extensive engagement with stakeholders both within and external to the Council during the LDP process.

The Council has used the most up-to-date information available in formulating this technical supplement, unless otherwise stated. It has been derived from a range of sources, including from the Council's own evidence gathering and from responses from and engagement with statutory consultees and key stakeholders.

It is important to note that this Technical Supplement has been collated at a specific point in time and therefore it may be necessary for the Council to review and update its evidence base and/or approach as new or updated information/guidance is published, so to ensure that the LDP is founded on the principles of soundness. The Council will continue to work with consultees, other relevant stakeholders and neighbouring councils, during the LDP process and beyond, to ensure that its approach to minerals development is effective and appropriate, and that meets the needs of the minerals industry and Borough into the future.

This Technical Supplement is set out in the following sections:

- **Sections 2 & 3** provide a summary of the Legislative, Regional and Local Policy Context that is relevant to the topic of minerals development in the LDP;
- **Section 4** provides an overview of the minerals development profile of the Borough;
- **Section 5** summarises the approach to minerals development in the Preferred Options Paper (POP). It outlines the relevant Key Issue and Preferred Approach as detailed in the POP, alongside a summary of POP Commitments and of the POP responses that were received, with a focus on those offering suggestions in respect of policy development.
- **Section 6** provides an overview of the stakeholder engagement that has been carried out in preparation of the draft Plan Strategy policies. It also summarises the approach of neighbouring councils to minerals development.
- **Section 7** summarises how the Draft Plan Strategy policy approach to minerals development has been developed. It provides a rationale where amendments have been made to the existing planning policies to take account of regional direction, POP feedback, consultation and engagement, where it has been considered necessary and appropriate to do so.
- **Section 8** sets out how the dPS policies for minerals development have been prepared in accordance with the tests for soundness set out in the Department for Infrastructure's (DfI) Development Plan Practice Note 6: Soundness (Version 2, May 2017).

Introduction to Minerals Development and Planning

Minerals include all minerals and substances in or under land of a kind ordinarily worked for removal by underground or surface working, with the exception of turf cut for purposes other than sale (Planning Act (NI) 2011, Section 250). Minerals development consists of mining operations or involving the deposit of mineral waste (Section 129). Associated processing activities are deemed to fall under Economic Development Policies.

Minerals development is a very important industry within the Borough, that is essential to supporting economic growth and meeting development needs both locally and regionally. It provides the raw materials that are principally needed for construction, manufacturing and agriculture, and it is an important source of employment. The local industry makes up approximately 10% of mineral sites in Northern Ireland, with sandstone quarrying the dominant activity. Crushed rock aggregates, sand and gravel are the main local products.

By facilitating the ongoing exploitation of mineral resources in a sustainable manner, including a sufficient and steady supply of construction aggregates, the LDP will help support the economic and sustainability aspects of the Council's Community Plan 2017-2030 'Connected'.

By reason of their nature, scale and duration of operation, mineral developments can impact more severely on the environment than other forms of development. They can also have a significant visual impact on the landscape and an adverse effect on the amenity and well-being of people living nearby if not carefully managed. Minerals however can only be extracted where they occur, which can present challenges particularly where there may be limited opportunities for the consideration of alternative sites. The restoration and aftercare of minerals sites after completion of works is a further challenge, as is managing the risks associated with abandoned mines within the Borough.

In addition, it is important to consider the climate impact of minerals development, in terms of the opportunities to recycle and re-use materials, to help reduce the depletion of natural resources, and also to limit the transportation of materials (in line with the NI Executive's Sustainable Development Strategy - Everyone's Involved).

2.0 Legislative Context

The key pieces of legalisation relating to minerals development are summarised below, including that relating to a number of specific areas (under the sub-headings).

The Planning Act (Northern Ireland) 2011

The Planning Act (Northern Ireland) 2011 (hereafter referred to as the 2011 Act) is the principal planning legislation in Northern Ireland, which underpins the reformed two-tier planning system that commenced on 1 April 2015. It introduced the plan-led system, where the LDP is the primary consideration for decision making on all new development schemes and proposals will be required to accord with its provisions unless, exceptionally other material considerations indicate otherwise.

The 2011 Act describes minerals as ‘substances which are in or under land of a kind ordinarily worked for removal by underground or surface working except that it does not include turf cut for purposes other than sale’. Therefore, any substance which can be extracted from the ground can be classed as a mineral, other than turf which is extracted for personal use.

The Planning (Local Development Plan) Regulations (Northern Ireland) 2015

The Planning (Local Development Plan) Regulations set out the sequence in which the Council’s new LDP is to be prepared and provides detail on the content and procedure of each stage in the plan preparation process including independent examination.

The Planning (Local Development Plan) (Amendment) Regulations (Northern Ireland) 2016 amend the transitional provisions in the 2015 Regulations (above) to include development plans prepared and adopted by the Department under the Planning (Northern Ireland) Order 1972 within the definition of a departmental development plan under the Planning Act (Northern Ireland) 2011.

Rural Needs Act (Northern Ireland) 2016

The Rural Needs Act (Northern Ireland) 2016 provides a statutory duty on public authorities to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans, and when designing and delivering public services. The legislation came into effect for Councils in June 2017.

The Planning (Interim Development) Act (Northern Ireland) 1944 granted permitted development rights to quarries, under which they operated without planning permission until 1973 when the Planning (General Development) Order (Northern Ireland) 1973 stated that permitted development rights for quarries would only last for one year, effectively meaning that existing quarries had one year to apply for planning permission.

Climate Change Act (Northern Ireland) 2022

The Act puts in place a statutory framework for addressing the challenges of climate change. It sets an ambitious target of achieving net zero greenhouse gas emissions by 2050, with interim targets including at least a 48% reduction by 2030 and 77% by 2040. The Act also requires DAERA to make regulations that set carbon budgets and places a duty on it to establish a Just Transition Commission for Northern Ireland.

The Act requires that a set of sectoral plans will be brought forward for different areas of the economy, which will set out how the targets within the Act will be achieved by the sector. Section 16 requires the Department for Infrastructure (DfI) to develop and publish a sectoral plan for infrastructure, which must include proposals for planning and construction. Section 15 sets for the Department for the Economy a target at 80% of electricity consumption is from renewable sources by 2030.

Section 42 of the Act required the Department to make regulations that impose specified climate change reporting duties on specified public bodies. The Climate Change (Reporting Bodies) Regulations (Northern Ireland) 2024 came into effect on 3 May 2024, placing reporting duties on 40 large-sized public bodies – which include local councils.

Minerals Licensing

The Mineral Development Act (Northern Ireland) 1969 vested most minerals in the former Department of Commerce (which became the Department of Enterprise, Trade and Investment (DETI) and is now the Department for the Economy (DfE)). This enabled the Department to grant prospecting licenses and mining licenses for the exploration and development of these minerals. This licensing system is based on the provisions of the 1969 Act and on subsequent subordinate legislation. The provisions relating to prospecting for minerals are quite separate and distinct from those relating to the development of minerals. There is no automatic continuity between exploration and development work in terms of the licensing process.

The legislation covers all minerals with three main exceptions (the scheduled substances):

- gold and silver (which the Crown Estate is responsible for and were not vested in the Department);
- a few mineral deposits (mainly salt) which were being worked at the time of the 1969 Act and were not vested in the Department; and
- common substances including varieties of rock, sand and gravel, clay and agricultural soil.

Responsibility for gold and silver lies with the Crown Estate Commissioners (CEC) and companies wishing to prospect for, and then extract gold and silver, must apply to the CEC for a precious metal option, alongside a licence from DfE.

Planning permission will also be required for the mining (extraction) of minerals from the Council, or the Department for Infrastructure (DfI) if it is deemed regionally significant, whereas exploration activity may be permitted development (i.e. does not require planning permission) if it is within certain parameters set out in Permitted Development legislation.

See Page 18 for details of DfE Review of Minerals Licensing Policy.

Petroleum Licensing

With regard to oil or gas extraction, any person who wants to explore for, drill for or extract oil or gas in Northern Ireland must hold a petroleum licence granted by the Department for the Economy (DfE) under the **Petroleum (Production) Act (Northern Ireland) 1964**. Before any licensed extraction commences, planning permission must be obtained. Other consents and permits may also be required from other statutory bodies/Departments.

In line with the NI Executive's Energy Strategy (referred to on Page 16-17), on 5 December 2024, the Executive agreed to introduce a moratorium and eventual legislative ban on exploration and production of all forms of onshore oil and gas (petroleum). A moratorium on the acceptance and processing of petroleum licence applications was put in place, with legislation to be brought forward to enact a full ban. DfE has conducted research and public consultations to inform this policy, considering economic, environmental, and societal impacts.

In February 2026, the NI Executive announced approval to the introduction of the Petroleum Exploration and Licensing (Repeal) Bill – which would, if and when enacted (following NI

Assembly approval) remove DfE's statutory powers to grant licences for petroleum exploration and extraction.

A draft Bill to repeal current petroleum exploration and licensing provisions undertaken by the DfE is currently going through the legislative process.¹

DfE has confirmed to the Council that a future legislative ban on onshore petroleum exploration and licensing will include Lough Neagh, stating that petroleum in the strata beneath NI internal waters is vested in the Department. The new legislation however will not include strata beneath the territorial sea of the United Kingdom adjacent to Northern Ireland which is under the ownership of The Crown Estate.

Environmental Impact Assessment (EIA)

The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 implement the requirements of the EU Environmental Impact Assessment (EIA) Directive within the Northern Ireland planning system. The regulations require that an EIA is carried out for certain categories and thresholds of development, to ensure that the likely effects of new development on the environment are identified, assessed and taken into account before planning permission is granted. Where an assessment is deemed necessary, the applicant must prepare and submit an Environmental Statement.

The regulations are designed to support informed decision-making; promote sustainable development; improve transparency through consultation and publicity requirements; and avoid, reduce and/or mitigate environmental harm.

Information Gathering on Quarries (DfE Annual Minerals Return)

Under Article 18(1) of the **Quarries (Northern Ireland) Order 1983**, quarry operators (i.e. owners, occupiers or agents) are required to make an annual (calendar year) return to the Department (DfE), including details of the type, quantity and value of the mineral extracted/produced and the number of persons employed. DfE uses this information to collate an Annual Minerals Statement for Northern Ireland, which is published on its website.

Waste from Extractive Industries

The **Mining Waste Directive 2006/21/EC (MWD)** was adopted by the European Union in March 2006. It introduced measures to prevent or minimise adverse effects on the environment and risks to health from the management of waste from the extractive industries. In order to comply with this directive, the Planning (Management of Waste from Extractive Industries) Regulations (Northern Ireland) 2010 were introduced. These regulations were intended to ensure that all waste resulting from extractive industries was managed on a way which was compliant with the 2006 directive. The 2010 regulations were replaced by the **Planning (Management of Waste from Extractive Industries) Regulations (Northern Ireland) 2015** from 1st April 2015.

Regulation 4 (1)(a) of this legislation states that planning permission will not be granted until a waste management plan (WMP) (sometimes referred to as a 'Mine Waste Plan') has been submitted and approved by the Council. The WMP will be expected to outline how the

¹ Petroleum Exploration and Licensing (Repeal) Bill (NI Assembly Bill 31/22-27)

proposal will minimise, treat, recover and dispose of extractive waste generated at the mine/quarry.

Review of Old Mineral Permissions (ROMPs)

In line with Great Britain and the Republic of Ireland, the 2011 Act enables councils to start a process of an initial review of all mineral permissions granted in Northern Ireland thereby ensuring that their conditions meet modern expectations and current environmental standards.

The Environmental Impact Assessment (EIA) Directive has been in force throughout the EU since 1985. It was implemented in Northern Ireland by the Planning (Assessment of Environmental Effects) Regulations (Northern Ireland) 1989 and later by the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 1999 (revoked and re-enacted in a 2015 version). These pieces of legislation mean that when assessing applications for mineral development, there is a more stringent level of consideration given to the environmental impacts than was previously the case.

Because of the introduction of the 1989 Regulations, along with the formation of a specialised minerals planning unit within DOE Planning Service, it is accepted that planning permissions granted for quarrying development since the early 1990's have adequate environmental conditions attached. Permissions granted during the 1970s and 1980s, following the implementation of the 1973 Order may not be robustly conditioned as more recent permissions and therefore will need to be reviewed via the Review of Old Mineral Permissions (ROMPs). For instance, it is accepted that very few conditions granted in the 1970's have adequate conditions relating to amenity impacts attached.

The 2011 Act makes provision, in **Section 129 and Schedules 2 and 3**, for the review of old permissions to be undertaken and for Councils to cause periodic reviews of other mineral planning permissions. This legislation allows mineral sites to be classed as 'Phase 1 sites' if they had been granted approval before 31st December 1980 and 'Phase 2 sites' if they have been granted approval after 31st December 1980 but before 31st December 1993. The legislation states that all owners of Phase 1 and Phase 2 sites must apply to the planning authority to have the conditions to which their permission relates reviewed.

However, the 2011 Act (Section 129) requires further legislation in the form of an Order, before ROMPs can be undertaken. On 27 March 2022, DfI Minister Nicola Mallon announced that she would commence a review of ROMPs legislation. In recognising the concerns expressed by Councils in regard to the additional burden reviewing existing hard rock quarries will place on them, the Minister's published statement indicated that consideration would be given to a phased approach to the implementation of ROMPs and the introduction of a fee for ROMPs applications, where appropriate. It states that the legislation, when implemented, will secure improved operating and environmental standards for existing quarries.

Approximately 370 mineral permissions were granted across Northern Ireland between the 1960s and the early 1990s which are subject to ROMPs, with 23 within Armagh City, Banbridge and Craigavon Borough (approx. 6%).

Minerals Exploration Permitted Development

Under Part 16 of **The Planning (General Permitted Development) Order (Northern Ireland) 2015** there are certain permitted development rights afforded to mineral exploration. Subject to conditions, development is allowed on any land during a period not exceeding 4 months consisting of: (a) the drilling of boreholes; (b) the carrying out of seismic surveys; or (c) the making of other excavations. The conditions include that the operation is not within an area of special scientific interest (ASSI) or site of archaeological interest.

For the purposes of Part 16, mineral exploration means ascertaining the presence, extent or quality of any deposit of a mineral with a view to exploiting that mineral.

Petroleum Exploration - Removal of Permitted Development

The Planning (General Permitted Development) (Amendment) Order (Northern Ireland) 2020, Schedule 2 Substitution of Part 16 of the Schedule

This statutory rule, which came into operation on 21 December 2020, removed permitted development rights for the exploration of petroleum, including the drilling of boreholes.

Petroleum has the same meaning as in Section 1 of the Petroleum Act 1998 i.e. it includes any mineral oil or relative hydrocarbon and natural gas existing in its natural condition in strata, but does not include coal or bituminous shales or other stratified deposits from which oil can be extracted by destructive distillation.

Biodiversity

The Wildlife and Natural Environment (Northern Ireland) Act 2011 (the WANE Act)

This legislation places a statutory duty on public bodies (including Local Councils) to conserve biodiversity in the exercise of its functions. The legislation states 'conserving biodiversity' includes restoring or enhancing a population of a species of flora or fauna, or any type of habitat. This legislation is particularly relevant to the restoration and aftercare of minerals development sites.

3.0 Policy Context

Regional Policy Context

Programme for Government 2024-2027 - Our Plan: Doing What Matters Most (The Northern Ireland Executive, 2024)

The Programme for Government (PfG) 2024–2027 was agreed by the Northern Ireland Executive on 27 February 2025. It outlines the Executive's priorities to improve the lives of people across Northern Ireland, focusing on three core areas: doing what matters most today, building new foundations, and shaping a better tomorrow. The PfG is designed to deliver tangible outcomes in public services, economic development, infrastructure, and social wellbeing.

The PfG sets out 9 priorities to help deliver better wellbeing, long-term sustainability and a thriving economy (in line with the Missions of People, Planet and Prosperity). The priorities relevant to minerals development are:

- growing a globally competitive and sustainable economy, and
- protecting Lough Neagh and the environment.

In respect of growing a globally competitive and sustainable economy, the PfG acknowledges that productivity within Northern Ireland is below average and identifies that there is a need to improve the quality of available jobs, to provide the right infrastructure that will help to deliver a more productive and prosperous economy, improve rural and urban communities and support healthier and greener lives. In order to transform the economy, the Executive will seek to address low productivity, decarbonisation of the economy and to achieve self-sufficiency in renewable energy. The PfG sets out a range of proposed actions, aimed at addressing these challenges, including the development of new programmes to support high-productivity sectors, the introduction of new employment legislation and the publication of a Circular Economy Strategy which will be based on three principles - designing out waste, keeping products in circulation at their highest value for as long as possible and regenerating natural systems.

In respect of protecting Lough Neagh and the environment, the PfG acknowledges that Lough Neagh is one of our most important natural resources and is of economic, tourism and recreational importance. It identifies challenges including the significant blue-green algae blooms in Lough Neagh and beyond, and the impacts of climate change on the wider environment - recognising that if our natural environment is not looked after, there are likely to be many more environmental crises. In order to address these issues, the PfG sets out a range of proposed actions including the publication of the Lough Neagh Action Plan and the publication of a new environment strategy (as part of NI's first Environmental Improvement Plan (EIP)).

Additionally, in relation to climate action, the PfG commits to setting carbon budgets and the development of the first Climate Action Plan, which will set out cross-cutting steps to reduce carbon emissions, adapt to changing weather patterns, and work towards net zero.

The Regional Development Strategy (RDS) 2035

First published in 2001 and updated in 2012, RDS 2035 is the NI Executive's long term spatial strategy. It aims to deliver the spatial aspects of the Programme for Government, by providing an overarching strategic planning framework to facilitate

and guide sustainable development. Local councils must take account of the RDS when preparing their LDPs (Planning Act (NI) 2011 Act, Section 5 (2); Soundness Consistency Test C1, SPPS 5.16).

The RDS does not provide specific policy aims and objectives for minerals but does recognise, within its Guidance, the importance of sustaining rural communities and the need to facilitate the development of rural industries and enterprises at appropriate locations (SFG 13).

The need to conserve, protect and, where possible, enhance built heritage and the natural environment is a key guiding principle within the RDS (RG 11). This includes distinct and high quality landscape, special areas of protection for wildlife (e.g. Lough Neagh and Lough Beg Ramsar) and important geological and geomorphological features, as well as peatland.

The protection of soils and peat habitats is also identified as important in helping mitigate and adapt to climate change by reducing flood risk, filtering and cleaning water, and storing carbon (RG 9).

Strategic Planning Policy Statement 2nd Edition, 2025 (SPPS)

First published in 2015, and updated in December 2025 with new regional policy on renewable and local carbon energy, the SPPS sets out the Department's strategic direction and regional policy framework for securing the orderly and consistent development of land in Northern Ireland under the two-tier planning system. The provisions of the SPPS, and core planning principles, must be taken into account by Councils in the preparation of their Local Development Plans, and are also material to all decisions on individual planning applications and appeals.

In respect of Minerals Development, the SPPS recognises that minerals, including valuable minerals, are an important natural resource and their responsible exploitation is supported by Government. It also recognises that the minerals industry makes an essential contribution to the economy and to our quality of life, providing primary minerals for construction, such as sand, gravel and crushed rock, and is a valued provider of jobs and employment, particularly in rural areas (Para 6.148).

The SPPS acknowledges that there are a number of challenges arising from minerals development that fall to be addressed through the planning system. There can be significant adverse impacts on the environment and on the amenity and wellbeing of people living in proximity to operational mineral sites. The restoration of sites under completion of work associated with the extraction and processing of materials is another challenge (Para 6.150).

The regional strategic objectives for mineral development, as outlined in para 6.152, are to:

- facilitate sustainable minerals development through balancing the need for specific mineral development proposals against the need to safeguard the environment;
- minimise the impacts of mineral development on local communities, landscape quality, built and natural heritage, and the water environment; and
- secure the sustainable and safe restoration, including the appropriate re-use of mineral sites, at the earliest opportunity.

The SPPS also states that LDPs should:

- ensure that 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 which 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. However, where a designated area such as an Area of Outstanding Natural Beauty (AONB) covers expansive tracts of land, the LDP should carefully consider the scope for some minerals development that avoids key sites and that would not unduly compromise the integrity of the area as a whole or threaten to undermine the rationale for the designation.

Other key points in the SPPS include:

The LDP may also identify areas suitable for minerals development within the plan area. These areas will normally include areas of mineral reserves where exploitation is likely to have the least environmental and amenity impacts, as well as offering good accessibility to the strategic transport network (Para 6.156).

There will not be a presumption against the exploitation of minerals which are particularly valuable to the economy. However, the SPPS also makes clear that in considering a proposal where the site is within a statutory policy area, due weight will be given to the reason for the statutory zoning (Para 6.157).

The SPPS also states that there should be a presumption against unconventional hydrocarbon extraction until Government is satisfied that there is sufficient and robust evidence on all environmental impacts (Para 6.157).

Minerals development within or in close proximity to an area that has been designated (or is proposed for designation) to protect its landscape, scientific or natural heritage significance will not normally be granted permission where this would prejudice the essential character of the area and the rationale for its designation (Para 6.158).

The SPPS states that permission for the extraction of peat for sale will only be granted where the proposals are consistent with the protection of boglands valuable to nature conservation interests, and with the protection of landscape quality particularly in AONBs (Para 6.158).

The SPPS (Para. 6.163) states that minerals development proposals will be considered on a case-by-case taking account of normal criteria, including such considerations as: soil quality (where this is particularly suitable for agriculture), water quality (of rivers, lakes, reservoirs and groundwater), tree and vegetation cover, wildlife habitats, natural features of interest in the landscape and sites of archaeological and historic interest. Particular issues around traffic progression/road safety, visual intrusion, and safety and amenity, including appropriate means of mitigation, are addressed further in the chapter.

Whilst a general presumption against the granting of planning permission for the extraction and/or processing of minerals will apply in areas protected from minerals development in the LDP, planning authorities may consider whether particular proposals should be justified as exceptions to the LDP provisions. For example, an exception to minerals development could be justified within an area of constraint where the proposed operations are limited to short term extraction and the environmental/amenity impacts are not significant. In such cases, on-site processing of the excavated material is unlikely to be appropriate (Para. 6.164).

Applications for the extraction of minerals must include satisfactory restoration proposals, including the appropriate re-use of mineral sites (Paras. 6.161 and 6.167).

The Planning Strategy for Rural Northern Ireland (PSRNI)

Published in 1993, the PSRNI is a comprehensive planning framework tailored to the needs, protection and development of rural areas. Under the transitional arrangements of the SPPS, the remaining provisions of PSRNI have been retained as material considerations until the Council adopts its LDP Plan Strategy, after which these retained policies will be cancelled.

In the absence of a Planning Policy Statement, the PSRNI provides the current operational planning policies for the control of minerals development. It recognises the need to facilitate minerals development while also affording protection to the environment and other interests. This is carried forward into the SPPS.

The strategy refers to the significant impact that minerals development can have on the environment, landscape and people's living conditions. It applies a general presumption in favour of minerals development, with particular emphasis on incorporating acceptable mitigation. In considering a particular application account will be taken of the value of the mineral to the economy, the environmental implications of the proposal and the degree to which adverse effects can be mitigated in relation to the character of the local area.

The concept of sustainability underpins the strategy, however it recognises the difficulties that this can pose in the context of minerals development. The strategy recommends that the rate of consumption of fine minerals should be reduced by encouraging the use of renewable and recycled alternatives where ever this is practical and economically viable. The minerals industry should aim for the best use of the total aggregate resources by minimising wastage and avoiding the use of higher quality materials where lower grade materials would suffice.

There are eight PSRNI 'minerals' policies (MIN 1-8), as below:

Planning Strategy for Rural NI – Minerals Policies (Pages 80-83)	
Policy MIN 1 - Environmental Protection	To assess the need for the mineral resource against the need to protect and conserve the environment.
Policy MIN 2 - Visual Implications	To have regard to the visual implications of minerals extraction.
Policy MIN 3 - Areas of Constraint	To identify Areas of Constraint on Mineral Developments.
Policy MIN 4 - Valuable Minerals	Applications to exploit minerals, limited in occurrence or with some uncommon or valuable property, will be considered on their merits.
Policy MIN 5 - Mineral Reserves	Surface development which would prejudice future exploitation of valuable mineral reserves will not be permitted.
Policy MIN 6 - Safety and Amenity	To have particular regard to the safety and amenity of the occupants of developments in close proximity to mineral workings.
Policy MIN 7 – Traffic	To take account of the safety and convenience of road users and the amenity of

	persons living on roads close to the site of the proposed operations.
Policy MIN 8 – Restoration	To require mineral workings to be restored at the earliest opportunity.

PSRNI Policy PSU 10 (Page 112-114) addresses the issue of land instability within the wider issue of *Development at Risk*. It places a presumption against development in areas known to be at serious risk from instability or that would as a result of a proposed development present a risk elsewhere and where concerns associated with this cannot be overcome. Whilst not expressly referred to in the policy, this could include subsidence or landslides caused by abandoned mines or current mining operations. Policy PSU 10 has been superseded by Revised PPS 15 (Planning and Flood Risk) insofar as it relates to flooding.

Planning Policy Statements (PPSs)

The existing suite of regional Planning Policy Statements (PPSs) provide the operational policies on particular aspects of land use planning and apply to the whole of Northern Ireland. These are currently retained under the transitional arrangements of the SPPS, until such times as the Council adopts its LDP Plan Strategy.

Planning Policy Statement 21 (PPS 21) - Sustainable Development in the Countryside (June 2010)

PPS 21 sets out operational planning policies for development in the Northern Ireland countryside. Policy CTY 1 permits minerals development as an exceptional form of development in the countryside, in principle, subject to meeting the requirements of PSRNI Policies MIN 1-8.

Policy CTY 1 states that all proposals for development in the countryside must be sited and designed to integrate sympathetically with their surroundings and to meet other planning and environmental considerations including those for drainage, access and road safety. This is a material consideration when assessing minerals development proposals, in addition to PSRNI and other relevant policies.

A number of other PPSs will normally apply to minerals development proposals. These are:

Planning Policy Statement 2 (PPS 2) - Natural Heritage (July 2013);

PPS 2 sets out the Department's operational planning policies for the conservation, protection and enhancement of our natural heritage. For the purpose of PPS 2, natural heritage is defined as "the diversity of our habitats, species, landscapes and earth science features".

Policy NH 5 (Habitats, Species or Features of Natural Heritage Importance) is particularly relevant to proposals for commercial peat extraction. Active peatland is a recognised habitat and feature of natural heritage importance, as well as raised bog and lowland bog being on the NI Priority Habitat List.

Planning Policy Statement 3 (PPS 3) - Access, Movement and Parking (Feb 2005):

PPS 3 sets out the Department's operational planning policies for vehicular and pedestrian access, transport assessment, the protection of transport routes and parking.

Planning Policy Statement 3 (PPS 3) - Clarification of Policy AMP 3: Access to Protected Routes (Oct 2006):

This document provides clarification to Policy AMP 3: Access to Protected Routes of PPS 3 'Access, Movement and Parking', published in February 2005, and must be read in conjunction with the policies contained within this PPS.

Planning Policy Statement 6 (PPS 6) - Planning, Archaeology and the Built Heritage (Mar 1999, with Annexes B and C replaced and updated in DfC document 'Criteria for the Scheduling of Historic Monuments and the Listing of Buildings of Special Architectural or Historic Interest, with associated procedures' (June 2019):

PPS 6 sets out the Department's operational planning policies for the protection and conservation of archaeological remains and features of the built heritage (i.e. historic environment).

Planning Policy Statement 15 (PPS 15) - Planning and Flood Risk (Revised Sep 2014):

PPS 15 sets out the Department's operational planning policies to minimise and manage flood risk to people, property and the environment.

Other Relevant Strategies, Plans and Documents

NI Executive Sustainable Development Strategy – Everyone's Involved

The NI Executive launched the Sustainable Development Strategy for Northern Ireland, 'Everyone's Involved', on 27 May 2010. The strategy was designed to provide a framework to support and inform the decisions and actions taken by individuals, groups and organisations in progressing the sustainability agenda. Since then, the principles of sustainable development have been integrated into the work of all government departments and local councils through high level policies and strategies, including the Programme for Government. The Council must take account of the SDS NI when preparing the LDP (SPPS, 5.16).

Two of the six guiding principles of the SDS are particularly relevant to minerals development i.e. living within environmental limits; and achieving a sustainable economy. The SDS also contains six Priority Areas for Action. Priority Area 4 is particularly relevant to minerals development: Striking an appropriate balance between the responsible use and protection of natural resources in support of a better quality of life and a better quality environment. It highlights that we must be aware of our environment as a finite resource, of our need to live within environmental limits and how our consumption of natural resources affects the ability of the natural environment to support us in the future.

NI Executive Energy Strategy – The Path to Net Zero Energy

Published in December 2021, the Energy Strategy (led by DfE) outlines Northern Ireland's pathway to net zero carbon emissions by 2050 while ensuring that energy remains affordable and reliable, with strategic priorities and key actions for 2025 to drive renewable energy adoption and energy transition. Energy accounts for almost 60 per cent of Northern Ireland's greenhouse gas emissions, making this strategy central to climate and economic policy. The strategy sets out a pathway for energy to 2030 that will mobilise the skills, technologies and behaviours necessary to achieve the 2050 net zero vision.

The strategy is centred around delivering on 5 key principles.

- Placing You at the Heart of our Energy Future
- Growing the Green Economy
- Do More with Less
- Replacing Fossil Fuels with Renewable Energy
- Create a Flexible, Resilient and Integrated Energy System

In terms of **Replacing Fossil Fuels with Renewable Energy** [The First Principle], the Vision, Objectives and Key Policies are as follows:

Vision: We will phase out fossil fuels by growing our indigenous renewable base, supported by sustainable renewable imports and using these to decarbonise heat, power and transport.

Objectives:

- Meet at least 70% of electricity consumption from a diverse mix of renewable sources.
- Replace high carbon heating sources with lower and zero carbon sources in households and businesses.
- Support the transition to low and zero carbon fuels for vehicles.

Key Policies:

- Implement a support scheme to bring forward investment in renewable electricity generation.
- Phase out fossil fuel home heating oil.
- Phase out coal and certain solid fuels for home heating.
- Introduce support for low carbon heat technologies including heat pumps.
- Run trials and demonstrations on emerging heat solutions.
- Create a roadmap to a cleaner, greener transport system.

In June 2022, the Climate Change Act (Northern Ireland) 2022 obtained Royal Assent. The Act established that the Department for the Economy must ensure at least 80% electricity consumption from renewable sources by 2030 to supersede the 70% renewable electricity consumption target established in the Energy Strategy (2021) – see first Objective above.

In terms of **Growing the Green Economy** [The Second Principle], the Vision, Objectives and relevant Key Principle are as follows

Vision: We will create new jobs and grow a skills base for the low carbon economy through innovation, support and focussing on our competitive strengths.

Objectives:

- Double the size of our low carbon and renewable energy economy to more than £2bn turnover.
- Northern Ireland to become a leading low-carbon innovation hub.

Relevant Key Policy (third of three):

- Invest in green innovation and low carbon technologies.

DfE referred to the Energy Strategy's two principles of **Replacing Fossil Fuels with Renewable Energy** and **Growing the Green Economy**, in its recent Call for Evidence as part of its Review of Minerals Licensing Policy. It referenced that in order to achieve these two objectives and meet net zero goals within the Climate Change (NI) Act 2022, a secure and sustainable supply of raw materials is required, including a range of critical minerals. See Page 18.

DAERA Northern Ireland Peatland Strategy to 2040

Published in September 2025, The NI Peatland Strategy sets the direction of travel over the next two decades and beyond. It provides a framework to guide the conservation and restoration of peatland habitats in NI. Implementation of the strategy will also play an important role in DAERA's work in relation to biodiversity conservation, climate change and the wider Green Growth agenda.

Of particular note, Action 18 (of 26 in total) is for Local authorities to review planning policy and planning approvals to ensure reinstatement/restoration of extracted peatland sites. The Delivery Plan has no timescale set for this action to date.

In April 2026, DAERA launched the first NI Peatland Strategy Delivery Plan for the period April 2026 to December 2027. This Delivery Plan sets 14 short-term targets to help deliver peatland conservation, restoration and management until December 2027. It is intended that each subsequent Peatland Delivery Plan will align with the five-year cycles of NI Climate Action Plans. The next Delivery Plan will cover the period January 2028 - December 2032.

The Mineral Resources Map (MRM) for Northern Ireland

The Mineral Resources Map for Northern Ireland, produced in 2012, was developed by the Geological Survey of Northern Ireland (GSNI) in collaboration with the British Geological Survey. The maps show the geological distribution of all onshore (above low water mark) mineral resources. They are intended to assist strategic decision-making in respect of mineral extraction and the protection of important mineral resources against sterilisation. The maps comprise six sheets (at a scale of 1:100,000), one for each county.

Mineral Products Association Northern Ireland (MPANI) - Priorities for NI Government (Feb 2000)

MPANI is the representative body for the minerals industry in Northern Ireland. This document sets out what MPANI sees as the Government's and NI mineral industry's priorities going forward. These are detailed under eight headings:

- building confidence for building investment;
- boosting growth and productivity;
- strengthening NI's supply chain;
- enhancing industrial competitiveness;
- making industry taxation fairer and more efficient;
- improving regulation;
- meeting future demands for mineral products generated by economic growth and development; and
- improving the sustainability of the NI supply.

DfE Review of Minerals Licensing Policy

The Department for the Economy (DfE) is carrying out a review of the Minerals Licensing Policy in Northern Ireland, aimed at ensuring future policy supports sustainable economic development, contributes to the transition to low carbon technologies and reflects best practice in environmental stewardship, social responsibility and good governance. A key consideration of the review is the policy approach to critical minerals needed for a low-carbon economy.

Two key principles within the NI Executive's Energy Strategy (see Page 16-17) are: to replace fossil fuels with renewable energy and to grow a green economy. In order to achieve these two objectives and meet net zero goals within the Climate Change (NI) Act 2022, a secure and sustainable supply of raw materials is required, including a range of critical minerals. Both the UK Critical Minerals Strategy (Nov 2025) and the EU Critical Raw Materials Act (May 2024) set a clear strategic direction on the importance of minerals for future economic growth.

In September 2025, DfE Minister Caoimhe Archibald announced that a Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) had been commissioned as part of the review. Once those assessments are completed, DfE intends to introduce a moratorium on new mineral licences.

DfE closed a Call for Evidence on 28 June 2026. This sought views and evidence to inform the development of a future regional minerals licensing policy. The evidence gathered will inform the development of policy options. Those policy options will be subject to full public consultation and other appropriate assessments and screenings such as Section 75 Equality Screening. The CfE referenced a number of notable strategies and studies, including a Research Study into the potential economic, societal and environmental impacts of mineral exploration and mining in Northern Ireland, by Minviro Limited (April 2022).

A new minerals policy is expected to be published by April 2027, with legislation to follow in the next Assembly mandate.

Local Policy Context

Existing Development Plans

The existing four statutory Development Plans (Area Plans) covering the Borough, which were produced by the former Department for Environment (DOE), provide the local policy framework against which development proposals are currently considered. These are:

- Armagh Area Plan (AAP) 2004, including Armagh Area Plan (AAP) 2004, Alteration No 1: Countryside Proposals
- Banbridge, Newry and Mourne Area Plan (BNMAP) 2015
- Craigavon Area Plan (CAP) 2010
- Dungannon and South Tyrone Area Plan (DSTAP) 2010

Due to the varying ages of the extant Development Plans there are inconsistencies in approach with regards to a wide range of planning issues as well as the degree of emphasis in respect of the principles of sustainable development. However, the existing Plans are an important consideration in the LDP process, and as such have been taken into account in the development of the draft Plan Strategy. The policy approaches to minerals development in the respective Plans are set out below.

In line with the SPPS's transitional arrangements (1.10-1.16), the existing policies within the extant Plans will have effect and will be material considerations until such times as the Council adopts the LDP Plan Strategy. The SPPS (1.12) states that where there is a conflict between the SPPS and any retained policy, it must be resolved in favour of the provisions of the SPPS.

Armagh Area Plan (AAP) 2004 including Alteration 1 (Countryside Proposals)

Adopted January 1995 and March 2001 respectively.

The Armagh Area Plan (AAP) 2004 and AAP Alteration 1 (Countryside Proposals) do not designate any Areas of Constraint on Mineral Development (ACMDs), but AAP (main document), Paras. 14.1-14.9 provides policy direction for minerals development applications in relation to:

- visual impact and the protection of landscape quality (14.3),
- the protection of the environment including designated sites (Areas of Special Scientific Interest (ASSIs), Nature Reserves and archaeological sites) and natural resources (14.4);
- safety and amenity (14.5);
- traffic generation and road safety (14.6);
- valuable minerals (14.7);
- the rehabilitation of sites to a safe and tidy condition (14.8);
- the extraction of peat for sale – favourable consideration will be given to (14.9)

The Plan recognises the important role of mineral resources both economically and the physical development of the district and region, but also the considerable amenity and environmental impacts that may be caused by minerals development. It stated that there were 14 active rock quarries within the district.

AAP designated the Borough's only current Area of Significant Archaeological Interest (ASAI) at Navan, west of Armagh.

Banbridge, Newry and Mourne Area Plan (BNMAP) 2015, adopted Oct 2013

The Banbridge / Newry and Mourne Area Plan (BNMAP) 2015 provides a planning framework for the former Banbridge and Newry and Mourne Districts that is in general conformity with the RDS 2035.

The Plan (Vol. 1, Strategic Plan Framework, Page 44) refers to mineral resources within Banbridge and Newry and Mourne Districts comprising greywacke/gritstones which are quarried at a number of locations from Cullyhanna in the south-west to Edentrillick outside Dromore in the north-east.

BNMAP does not contain any mineral policies or designate any ACMDs – the extant PSRNI policies and SPPS direction apply. It however may be a material consideration for Council in respect of a minerals development proposals due to potential impacts in respect of local spatial designations in the plan, including Special Countryside Areas (SCAs), Areas of Significant Archaeological Interests (ASAs), Sites of Local Nature Conservation Importance (SLNCIs) and Local Landscape Policy Areas (LLPAs).

Draft BNMAP (2015) Planning Appeals Commission (PAC) Public Examination Report (dated 26 March 2012)

DOE Planning Service proposed two ACMD Designations in the Draft BNMAP (NC 12 and BC 05)² - both outside the new Armagh City, Banbridge and Craigavon Council Boundary - however these were not supported by the PAC in its consideration.

The PAC determined that the Department did not provide sufficient information to justify the proposed designation boundaries and to demonstrate that it had carried out a balanced assessment of economic/minerals needs against environmental interests. No reasoning was provided for mirroring the boundaries of existing environmental designations. The PAC therefore concluded that the ACMD designations were not supported by a robust evidence base. It recommended that the need for and extent of the ACMD Designations should be reviewed by the Department and any revised designations should be published as an alteration to the Plan. No ACMD designations were brought forward.

The BNMAP PAC Report addresses the issue of ACMD Designations in Paras. 1.13.12 – 1.13.17 (Pages 169-171)). See link below. This matter is referred to further in Section 7.

Link to BNMAP Public Examination Report, dated 26 March 2012:

[Commission Reference:](#)

Craigavon Area Plan (CAP) 2010, adopted August 2004.

CAP 2010 (Page 65) refers to:

- the now closed basalt quarry at Cornamucklagh, north-west of Portadown;
- the now closed limestone quarry at Ballymakeonan, north-east of Magheralin;

² Draft BNMAP 2015 ACMD Designations NC 12 and BC 05 included two extensive areas which together covered most of South Armagh as far north as the Newry - Camlough Road and on the County Down side of Newry and Mourne District it follows an irregular line to the north of the Killowen – Kilkeel Road and incorporates other lowland Mourne areas, as well as the Newry Basin. All areas subject to International, European and National environmental designations as well as all proposed SLNCIs in the draft Plan were also designated as ACMDs.

- sand and gravel extraction from the bed of Lough Neagh, brought ashore at one shore-based site;
- the long history of peat extraction for horticultural purposes in the Lough Neagh basin, with workings concentrated near Maghera and The Birches.
- in the 1980s, a drilling programme was carried out to identify lignite seams at depth in the vicinity of Lough Neagh. This drilling programme identified a lignite presence along the southern shore of the Lough. There is no indication that these are economically viable deposits.

The Plan contains two Minerals Policies:

Policy MIN 1 Areas of Constraint on Mineral Developments

This policy designates two Areas of Constraint on Minerals Development (ACMD). These extend across Lough Neagh Ramsar Site [Internationally Important Wetland] and Montiagh Moss Nature Reserve [part SAC and ASSI], as well as SPA and National Nature Reserve Natural Heritage Designations within and south of Lough Neagh. See Minerals Resources Map in Appendix 1.

The policy does not contain any specific mineral policy, instead indicating that proposals for the development of mineral resources within these areas will be restricted in accordance with provisions of prevailing regional planning policy. Therefore SPPS direction and PSRNI Policy MIN 3 (Areas of Constraint) apply.

The amplification text states that ACMDs are designated in order to safeguard the most valuable areas and features of the environment, within Craigavon Borough, from the detrimental effects of mineral extraction. Their identification has taken account of nature conservation interests, the archaeological and built heritage, landscape quality and character, visual prominence, amenity value and geological interest.

Policy MIN 2 Hydrocarbon Exploration

The policy states that in the event that hydrocarbon exploration identifies the possibility of commercially viable reserves of oil or gas, applications for planning permission to sink wells, for the purpose of appraising the nature or extent of the discovery, will be considered in the context of the long-term suitability of the site for production purposes.

The policy relates to the exploration of oil and gas, minerals which are particularly valuable to the NI economy. It explains that the Department will not operate a presumption against their exploitation in any part of the Borough including ACMDs. Applications will be treated on their merits having regard to the impact on nearby residents and sites, features or areas designated for their scientific, landscape or heritage interests.

Dungannon and South Tyrone Area Plan (DSTAP) 2010, adopted March 2005

The Dungannon and South Tyrone Area Plan (DSTAP) 2010 applies insofar as it relates to the County Armagh portion of the former Dungannon and South Tyrone Borough Council area.

Of relevant to the Borough, DSTAP 2010 (Page 80) refers to:

- commercial peat extraction also takes place in the east of the Borough in the low-lying areas around the south-west areas round the southwest shores of Lough Neagh.

The Plan contains three Minerals Policies:

Policy MIN 1 Area of Constraint on Minerals Development (ACMD)

This policy designates ACMDS at:

Lough Neagh Western Shores – within Armagh City, Banbridge and Craigavon Borough (aligning with the boundary of the Lough Neagh and Lough Beg Ramsar Site [Internationally Important Wetland] as in CAP 2010) – and in five other locations outside the Borough (now within Mid Ulster District). These are Clogher Valley, Benburb ASSI, Fardross Stream ASSI, Glenmore Wood ASSI and Slieve Beagh ASSI. See Minerals Resources Map in Appendix 1.

This policy does not contain any specific mineral policy, instead indicating that proposals for the development of mineral resources within these areas will be restricted in accordance with provisions of prevailing regional planning policy. Therefore SPPS direction and PSRNI Policy MIN 3 (Areas of Constraint) apply.

The amplification text states that ACMDS are designated in order to safeguard the most valuable areas and features of the environment, within Dungannon and South Tyrone Borough, from the detrimental effects of mineral extraction. Their identification has taken account of nature conservation and earth science interest, the archaeological and built heritage, landscape quality and character and visual prominence.

Policy MIN 2 Minerals Reserve Policy Areas

This policy designates two MRPA's to protect mineral reserves at:

1. Derraghadoan (adjacent to the north edge of Dungannon, for shale extraction to supply the cement industry;
2. Derry (adjacent to the edge of Coalisland) to supply the clay brick industry.

Both of these lie outside Armagh City, Banbridge and Craigavon Borough.

Surface development within these areas that would prejudice the future exploitation of these reserves will be restricted in accordance with the provisions of prevailing regional planning policy (J&A explains that PSRNI MIN 5 is applicable).

Policy MIN 3 Hydrocarbon Exploration

This is the same policy wording as CAP 2010 Policy MIN 2, referred to above.

The provisions of the SPPS, in relation to hydrocarbon exploitation, now take precedence over this plan policy.

Other Relevant Council Strategies, Plans and Documents

Armagh City, Banbridge and Craigavon Borough Council Corporate Plan 2023-2027 – ‘Our People, Our Place, Our Future’

The Corporate Plan sets out the Council's vision, values (3) and key priorities (5), which align with the Community Plan. Each of the priorities has three commitments outlining what the Council are going to do, with a number of actions listed (not exhaustive) at how the Council aims to achieve the commitments. The Corporate Plan recognises the LDP as the spatial outworking of the Corporate Plan and one way in which the Council's ambitions can be achieved.

The Council has 5 key Priorities in the Corporate Plan that it will focus on:

1. Environment and Place
2. Community Wellbeing
3. Economic Growth
4. Service Delivery
5. Staff, Leadership and Resources

Priority 3 - Economic Growth – is most relevant to minerals development. The Council's Commitments on this priority are to:

- Maximise the potential of our MSW Growth Deal and Regional Economic Strategy;
- Provide and facilitate opportunities for growth, investment, productivity and skills development in our local economy;
- Seek investment in infrastructure and connectivity.

Actions for Priority 3 include, through the MSW Deal, developing business cases for investment of reinvigoration in Armagh Gaol, Green Energy District in Carn/Seagoe and an Agri-Bio Innovation Centre by 2030; developing an Inclusive Growth Strategy and Plan by 2025; delivering opportunities in growth and investment; increasing the value of the Borough's tourism economy by 10% annually; delivering the Agriculture Strategy by 2027; developing an Infrastructure Strategy to evidence the need, priority, and deliverability of critical infrastructure across the Borough; and facilitating the delivery of schemes that will increase access to sustainable and active transport, providing links to key local amenities and improving connections between settlements.

Sustainability, productivity and connectivity are seen as the cornerstone of economic growth moving forward. The Council's Departments, including Planning, will engage directly with potential and local businesses to support their growth and development.

Priority 1 – Environment and Place – is also relevant, with one of the Council's commitments to actively respond to the climate crisis and support others to do likewise. Actions for Priority 1 include the development of a Climate Action Plan and the creation of a community and business climate tool kit and associated green initiatives.

Armagh City, Banbridge & Craigavon Borough Community Plan 2017-2030 – ‘Connected’

Councils across Northern Ireland have a statutory responsibility to participate and lead in Community Planning. The Local Government (Northern Ireland) Act 2014 and the Planning Act (Northern Ireland) 2011 create a statutory link between the Community Plan and the LDP. It outlines that the LDP will provide ‘the spatial expression of the Community Plan.’

The Council's Community Plan ('Connected'), which was launched on 4 May 2017, is an overarching strategy for the Borough. It provides a strategic framework for collaborative working, helping to integrate other local and regional strategies (including the Programme for Government) and the delivery of positive change for communities. The Community Plan has been taken into account throughout the preparation of the LDP, to provide the spatial reflection of the Community Plan.

Local councils must take account of the Community Plan when preparing their LDPs (Local Government Act (NI) 2014, Section 77 (2); Planning Act (NI) 2011, Section 8(5)(aa); Soundness Consistency Test C2; and SPPS 5.19).

The Community Plan makes no specific mention of minerals development, however under the cross-cutting theme of 'Sustainability' it seeks to improve everyone's quality of life economically, environmentally and socially, without compromising future generations' ability to develop, grow and flourish. Under 1 of the Plan's 9 long term outcomes, a 'Revitalised Place', it is acknowledged that the rural character across the Borough must be preserved and developed for everyone to enjoy.

Mid South West Regional Economic Strategy (MSW RES, 2000)

The RES sets out the 'direction of travel' in relation to the vision and ambition for the region; it identifies the opportunities and challenges faced; and sets out the priority 'pillars' around which future investment and actions to realise ambitions should be framed. Furthermore, it provides an early, high-level indication of potential specific projects/ interventions that may sit under each of these 'pillars' - which will be the subject to ongoing development during the completion of the RES.

The RES will underpin the case for the Growth Deal funding for the Mid South West Region announced by the UK Government in October 2018 and referenced in the 'New Decade, New Approach' Deal published in January 2020 by identifying the projects/ interventions most suited to maximising the potential of the Growth Deal funding. Importantly, the ambition to 'supercharge' the growth of the MSW economy and ensure inclusive prosperity in MSW extends beyond the Growth Deal funding. Accordingly, a core assumption is that other resources/funding sources and policy changes will come into effect to underpin the full realisation of the RES.

Armagh City, Banbridge and Craigavon Borough Recovery & Growth Framework

The ABC Recovery and Growth Framework was launched in February 2021 and focuses on how the Council can create the right social and economic conditions to help the Borough recover from the covid pandemic and drive sustainable long-term growth for the region.

The Framework sets out a series of aims which will meet the needs of companies within the Borough, such as boosting tourism and footfall in towns, and delivering support to business of all sizes, as well as longer-term interventions which will boost efficiency and competitiveness. The Framework emphasises the regional focus on driving economic investment for Northern Ireland around key sectors such as; agrifood, health and life sciences and advanced manufacturing, where the borough already excels and which, with support to improve skills, connectivity, and productivity, can become global exemplars.

It addresses the need for a specific focus on the case for investment in sustainable roads and rail infrastructure, for urban regeneration and rural development; for education and training to upskill the talent pool; for support of technological developments including Industry and

investment in manufacturing research & development; and a commitment to driving regional competitiveness through the development of a start-up and innovative business ecosystem. These targeted actions are aimed at accelerating the borough's recovery and set it on a path of renewed inclusive growth and prosperity.

LDP Landscape Character Assessment

The SPPS states that the LDP process 'will play an important role for councils in identifying key features and assets of the countryside and balancing the needs of rural areas and communities with the protection of the environment. This should include an environmental assets appraisal and landscape assessment which will provide the evidence base for the purposes of bringing forward an appropriate policy approach to development in the countryside (Para. 6.76)'. The SPPS emphasises that this evidence base should consider Landscape Character Assessments.

The Council's **Landscape Character Assessment (LCA)** in Technical Supplement 9 provides an updated understanding of the Borough's landscapes, building on the Northern Ireland Landscape Character Assessment (2000). The assessment identifies and evaluates the key characteristics, condition, value, vulnerability and sensitivity of landscape character areas located wholly or partly within the Borough and considers the extent to which they have been influenced by development pressures, land use change, renewable and low-carbon energy development, agricultural practices, recreation, infrastructure provision, and wider social and environmental trends.

The LCA provides an objective and evidence-based understanding of landscape character and its contribution to local distinctiveness, sense of place, cultural heritage, visual amenity and the well-being of residents and visitors.

The findings of the LCA have informed the policy approach to landscape at Draft Plan Strategy stage and will further inform landscape designations and any associated policy at Local Policies Plan Stage. In doing so, the LCA will help ensure that the LDP promotes sustainable development, protects and enhances important landscape assets and provides clear guidance for future decision-making so that landscape change is positively managed for current and future generations.

4.0 Borough Profile – Minerals Development

Economic Importance of Minerals

The mineral products sector is a major industry in Northern Ireland. According to the Mineral Products Association Northern Ireland (MPANI), there are around 160 quarries, mines and sand pits in Northern Ireland. The construction industry, which contributes around 10% of the region's GDP, is completely reliant on mineral products. The quarry products industry employs around 5,600 people in Northern Ireland. Three quarters (75%) of all quarries are in areas of Targeted Social Need, thus providing employment opportunities in these areas.

The MPANI circulated an information brochure to Councils in 2016 which highlighted that Northern Ireland was an important source of high-quality aggregates for use in road surfaces across the UK and Europe, as well as producing high-quality limestone and chalk³. The turnover of the quarry industry in Northern Ireland at that time was approximately £650 million - equivalent to approximately 2.75 % of the region's total GDP.

According to MPANI annual demand for aggregates in Northern Ireland is approximately 24 million tonnes. These mineral products support:

- the building of new homes;
- school/university building and maintenance programmes;
- hospital building and maintenance programmes;
- maintenance of road and rail network;
- improvements to water and sewage services;
- the upgrading and maintenance of our airports; and
- supplies of special sands and aggregates for gardens and parks.

In addition, MPANI states:

- that every year nearly 14 tonnes of aggregates are needed per head of the population in Northern Ireland (NI) and a typical family indirectly demands three lorry loads of aggregates each year;
- a new house requires some 60 tonnes of aggregates.

The NI Census of 2021 shows that of the 849,100 people in employment in Northern Ireland, 1,765 work in mining and quarrying. Of the 101,262 people in employment within the Armagh City, Banbridge and Craigavon Borough, 245 work in mining and quarrying. It should be noted however, that these figures relate to those directly employed at mines and quarries and not those employed in related activities, such as concrete works, etc.

Overview of Minerals in Armagh City, Banbridge and Craigavon Borough

Geology: Armagh City, Banbridge and Craigavon Borough has quite a diverse geology relative to other council areas in Northern Ireland. The dominant bedrock lithology is the Palaeozoic aged marine sediments of the Longford-Down terrane. These provide extensive sandstone resources that are exploited by a number of quarries in the council area. Rocks of the Newry granodiorite are located in the region from Katesbridge to Rathfriland in the south-east of the council area. The north-west is dominated by marine sediments of Carboniferous to Permian age with limited occurrence of the Triassic Sherwood Sandstone in the north-east near Lurgan. These sediments are in turn overlain by younger Tertiary basalts marking the

³ High-quality gritstone – which is a significant local export product, particularly for use in road-surfacing – and limestone are produced in Armagh City, Banbridge and Craigavon Borough.

southernmost reaches of the Antrim Plateau. The youngest rocks in the area comprise the Oligocene aged lignite and clay units of the Lough Neagh Clays Group. The underlying geology of the Borough is shown in Appendix 1.

Minerals production in the Borough currently comprises three main types: sandstone; limestone; and sand and gravel.

Sandstone: Sandstone is the most commonly extracted material from hard rock quarries within the Borough. Extraction is carried out by open cast mining. Counties Armagh and Down produce the vast majority of Northern Ireland's sandstone (Source: DfE Annual Minerals Statement). An extensive belt of sandstone extends across the southern half of the Borough, from east to west, with other significant areas to the north and north-west of Armagh City. Sandstone is mainly supplied as a crushed rock aggregate, with a number of local operators producing high-quality gritstone, including for export to GB. These are high Polished Stone Value (PSV) aggregates that offer good skid resistance in asphalt production and specialist surfacing.

Limestone: Limestone geology mainly extends north/north-east and west of Armagh City. There are three operators currently extracting limestone within the Borough. Extraction is carried out by open cast mining. Limestones are commonly worked for construction aggregate and building stone. They are also valued for their chemical properties in applications such as cement manufacture, glass making, iron ore smelting, flue gas desulphurisation, as a soil conditioner, food supplement and white filler. Much of the limestone is produced as a building aggregate for use as coated stone or fill material but together with shale, high grade limestone is the principal raw material for the production of cement.

Sand and Gravel: Extraction of sand and gravel takes place in Lough Neagh, with two operators within the Borough landing it at sites on the southern shores of the Lough, at Derryclone and Derryadd. Extraction is carried out using dredgers. The current approved area of extraction lies outside the boundary of Armagh City, Banbridge and Craigavon, and within Mid Ulster District Council. Sand and gravel is an important commodity, primarily used in construction and the manufacturing of concrete products.

Mineral Reserves: There are no quantifiable details in relation to the amount of mineral reserves that lie within the Borough. There is also a lack of information on the amount of permitted mineral reserves i.e. existing permissions which are still being worked. Although the Mineral Resource Maps for Northern Ireland provide information regarding the location, extent and nature of the minerals resource in each county, the data as depicted on the maps show only the inferred extent of a mineral resource. Inferred resources are those defined from available geological information and assumed but not verified geological continuity. Thus the inferred boundaries shown are approximate and only indicate the areas within which potentially workable minerals may occur. The economic potential of specific sites can only be proved by a detailed evaluation programme. Such an investigation is an essential precursor to submitting a planning application for a mineral working.

Active Mineral Sites

There are 16 active minerals operations within the Borough that are known to the Council. These include 14 working hard-rock quarries and 2 landing sites associated with sand and gravel extraction in Lough Neagh. A list of these active operators is contained in Appendix 2. The location of these active operations is shown in Appendix 3 (Active Minerals Sites and Environmental Designations Map). The 2 landing sites (labelled Nos. 15 and 16) are located

within the current ACMDs (as referred to on Page 21). The 14 active hard rock quarries are all located outside these current ACMDs.

Nine of the 16 active operators are members of the Minerals Product Association Northern Ireland, based on their website. MPANI, which is affiliated to the Mineral Products Association (GB), is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. It was formerly known as QPANI, Quarry Products Association Northern Ireland. The Council's LDP Team has engaged with MPANI during the plan process, including in relation to gathering responses to the Council's Annual Minerals Return.

DfE Annual Minerals Statement

DfE publishes an Annual Minerals Statement covering all of Northern Ireland, based on annual returns from operators⁴. As demonstrated by Table 1 below, the response rate is low - averaging at approx. 51% between 2017 and 2024 (8 years). The Statement therefore does not give a full and accurate picture of quarry activity and output etc. DfE previously advised in discussions that enforcement action has not been taken on operators who have not responded.

Table 1: Responses Received by DfE to the Annual Mineral Statement Questionnaire

Survey Year	Quarries contacted	Responses received	Active Quarries	Inactive with existing reserves	Closed. No remaining reserves	Closed	% Response
2024	179	85	71	12	0	0	47%
2023	189	71	Information not provided on Statement				38%
2022	186	89	81	8	0	0	48%
2021	154	73	66	7	1	0	47%
2020	183	85	75	7	3	0	46%
2019	188	77	69	7	1	0	41%
2018	157	115	105	4	2	4	73%
2017	134	90	52	3	2	2	67%

Source: Department for Economy (DfE)

Armagh City, Banbridge and Craigavon Borough Council Annual Minerals Return

For the purposes of gathering information on the Borough's mineral resources, quarry production and destination, reserves and related matters, the LDP Team carries out a survey of all known local operators involved in quarrying, including sand/gravel dredging.

The survey was initiated in Autumn 2017. 29 consultations were issued in October 2017 (mainly based on the list in LDP Preparatory Paper 12, Oct 2016, Appendix 1), with 9 operators returning a response to this pre-POP Survey. This first survey list also included a number of businesses involved, or thought to be involved, in peat extraction.

⁴ There is a statutory requirement for operators to make an annual return to the Department, under Article 18(1) of the Quarries (Northern Ireland) Order 1983.

In 2022, the Council recommenced the survey (for the 2020 year), based on a cleansed list, and has carried it out in each of the last five years, up to 2026. The survey has been issued to the 16 operators currently active in the Borough (as detailed in Appendix 2), along with a previous respondent to the 2017 Survey (who had confirmed that his operation had ceased). The survey now focusses on hard rock quarries / aggregate producers.

The survey covers a calendar year (1 January to 31 December) to align with the period of the annual Mineral Statement survey carried out by the Department for Economy (NI). Questionnaires are issued by email to all operators. The lag period between the survey timeframe and the issuing of the survey is designed to give operators time to finalise returns.

The response rate to the Council's survey has been poor, with an average response rate in the last five years (2020-2024) of **31.25%** (from the 16 active operators). Only 1 operator has responded to all 5 annual surveys, 1 to 4 surveys, 3 to 3 surveys, 2 to 2 surveys, 3 to 1 survey, and 6 have not responded to any of the surveys.

Table 2 below summarises the level of response from the 16 active operators to the Council's Annual Minerals Return Survey, in the last 5 years.

Table 2: Summary of Annual Minerals Return (2020-2024)

Year of Survey	Date of Issue	Total Responses	Percentage Response Rate
2020	28 Feb 2022	4	25.00%
2021	2 March 2023	5	31.25%
2022	1 March 2024	7	43.75%
2023	3 March 2025	6	37.50%
2024	3 March 2026	3	18.75%

A copy of the questionnaire survey issued to operators is contained in Appendix 5. This was amended slightly in the most recent survey (2024) to request detail on extractive waste, end use and plans post-2035 (Questions 7, 9 and 15 respectively).

MPANI fed back on and agreed the Council's Annual Minerals Return survey template. They were also advised of the issuing of the survey each year and asked to chase their members to respond. This had limited success, generating only a small number of additional responses.

25 out of a possible 80 responses have been received in the last 5 survey years (2020-2024). These cover 10 of the Borough's 16 operational sites. These sites confirmed extraction of:

- limestone - 2 sites averaging 48055.5 tonnes annually;
- sandstone - 7 sites averaging 197520 tonnes annually;

Some of the returns specifically refer to the extraction of gritstone (4) and greywacke (2) i.e. types of sandstone.

- sand (1 landing site averaging 175958.33 annually over 3 years)

In summary, the Council has not been able to gather complete information from the Annual Minerals Return in relation to the minerals profile of the Borough, including production data and employment breakdown, due to the very low response rates. This is despite liaising with MPANI annually to encourage their members to respond. The survey however has helped provide detailed information on some active sites, including remaining reserves and future plans.

The Council will continue to engage with operators through its annual minerals survey, with the aim of improving response rates ahead of the preparation of the Local Policies Plan.

High Value Minerals

High value minerals, which are particularly valuable to the economy, tend to be limited in occurrence and with some uncommon or valuable property. High value minerals are metalliferous and non-metalliferous minerals licensed by the Department for the Economy (DfE) or The Crown Estate. Metalliferous minerals include precious metals such as gold and silver, and other base metals such as lead and zinc. Non-metalliferous minerals are generally industrial minerals other than metallic ores and mineral fuels.

Companies wishing to prospect for base metals must apply to the Department for the Economy (DfE) and those wishing to prospect for gold and silver must apply to the Crown Estate Commissioners (CEC). Mineral Prospecting licences normally run for a 6-year term.

The Borough has a history of small-scale mining of lead and silver in the mid-west Armagh area, dating back to the 1800s.

Minerals prospecting is actively being carried out by *Conroy Gold and Natural Resources* across an area of mid-west Co. Armagh, southwards from Armagh City. The prospecting, which dates back to the mid-1990s, is targeting a potential gold concentration as well as other base and precious metals. To date no economic deposit has been identified, however the area remains to be fully evaluated for its mineral potential. Other mineral evaluation is being conducted through academic studies.

The extent of the two exploration areas, licenced to CGNR by DfE (subject to renewal), can be viewed in Appendix 6 (Refs. C1/25A and C3/25A). One falls entirely within the Borough. The other extends to and mainly falls within Newry, Mourne and Down District.

Hydrocarbons

Hydrocarbon resources, often known as fossil fuels (or energy minerals), include natural gas, oil and lignite (brown coal). Hydrocarbons (i.e. organic compounds that mainly comprise carbon and hydrogen) are mostly found deep underground in porous rock formations, such as sandstone, limestone and shale. Oil and gas can be extracted by conventional methods or unconventional methods depending on the nature of the deposit. The potential use of unconventional methods (e.g. hydraulic fracturing (fracking)) has been a matter of some public concern for environmental and safety reasons. This is reflected in the SPPS (6.157), which applies a presumption against such methods until there is sufficient and robust evidence on all environmental impacts.

The Craigavon Area Plan Lignite (CAP 2010) states in the 1980s, a drilling programme was carried out to identify lignite seams at depth in the vicinity of Lough Neagh. This drilling programme identified a lignite presence along the southern shore of the Lough. The Plan stated that there is no indication that these are economically viable deposits.

It should be noted that a large proportion of the lignite resources identified on the Minerals Resource Map (Appendix 1) are located in or close to the European RAMSAR site at Lough Neagh and the surrounding wetlands which also include SAC & SPA nature conservation designations. These would therefore be important considerations relating to the exploitation of any lignite reserves in the area.

Any person who wants to explore for, drill for or extract oil or gas in Northern Ireland must hold a petroleum licence granted by the Department for the Economy (DfE) under the Petroleum (Production) Act (Northern Ireland) 1964. There are no active petroleum licences within the Borough for extraction or exploration, nor is there any history of extraction for oil or gas. No oil or gas has been commercially produced in Northern Ireland (NI) to date, meaning that NI is entirely dependent on imports to meet its oil and gas requirements. Both oil and gas remain the main fuel source for the NI energy market.

An application for a Petroleum Licence was submitted to DfE on 6 June 2016 (Ref. PLA1/16) by EHA Exploration Ltd. and remains to be determined. It covers an area of 1134km² across the 'South Lough Neagh Basin', spanning 5 council areas from Belfast to Mid Ulster (including Armagh City, Banbridge and Craigavon). However, it is unlikely that a licence will be granted by DfE given the direction of travel towards a legislative ban on the exploration and production of all forms of petroleum, as outlined on Pages 6-7.

Land Instability

Northern Ireland is generally composed of stable ground with some areas deemed to have variable degrees of land instability that are, for example, related to landslides and compressible ground. The majority of landslide events occur naturally but can be triggered by human activity, particularly new development in susceptible areas. The most common forms of landslide are mudflows, peat bog bursts, rock falls and debris flows.

There are no known subsidence issues identified in the Borough, however the surface lands over abandoned mines may be susceptible as a result of mine collapse (see further below). Also, landslide occurrences are not significant locally (Source: DfE, Jan 2018). In recent years, a landslide is known to have occurred at Baraban Hill, Dromore Town on a steep slope – appearing to have been caused by construction works associated with a housing development. This was not related to minerals development however.

Geological Survey Northern Ireland (GSNI) has indicated that there are no known areas at risk of land instability. GSNI advise that Geohazard spatial layers are in development. There are plans for a general Landslide Susceptibility Map to be released in 2026/27, subject to resources. A Peat Slide Susceptibility Map will be developed for Planning Departments in 2026 to inform developments on peatland, specifically wind-farm proposed developments.

Abandoned Underground Minerals Sites

There are 55 known abandoned underground mine workings within the Borough, mainly associated with historic lead extraction. These are generally small scale and shallow, with vertical shafts. The largest concentrations of these are south of Keady Town in the south-west of the Borough. The location of these is shown in the map in Appendix 4 (Note that there is overlapping of sites). These abandoned mine workings can be viewed on the publicly available *GSNI GeoIndex Map Viewer* (via the GSNI webpages, Geological Survey of Northern Ireland).

All abandoned historic mines in Northern Ireland are vested by DfE and are managed by the Northern Ireland Mines Oversight Committee (NIMOC).

The shafts may not be visible on the ground due to reworking of the surface. Adits on the other hand tend to remain visible after abandonment, however the extent of the underground mine itself may not be known. They have the potential to collapse and cause the release of harmful mine gases and contaminated water.

This local evidence base has informed new draft Policy MIN 8, which seeks to ensure that all potential risks from nearby historic mines are properly considered, before a development is deemed safe to build. See Page 53.

Groundwater

DfE provided information to Council on groundwater as part of their Pre-POP Information Paper (2018), as summarised below. The location of aquifers and access to groundwater supply will be an important consideration at Local Policies Plan stage in terms of the zoning of economic development lands.

Groundwater is water that is underground in both the loose material above bedrock and in bedrock, rather than underground streams and lakes. It fills the void space between grains of material or cracks in the ground. The proportion of voids affects how much water can infiltrate down through the ground to form what are known as aquifers. The greater the proportion of voids, the larger and more productive the aquifer will be.

Groundwater is a natural resource that requires careful protection, but it is also an important water source to support economic development and growth. It is important that both aspects are given consideration so as to look after the valuable resource and to use it sustainably. Also, groundwater is essential for sustaining river flows and aquatic life during sensitive dry periods. Groundwater levels can be managed using monitoring and modelling, to ensure that the rate of abstraction does not exceed the rate of natural recharge minus the ecological flow requirements of terrestrial water bodies.

Although groundwater quality is variable across Northern Ireland, in general, groundwater is naturally found in a condition that is suitable for drinking without the need for any treatment, given the natural attenuation processes (dissolving minerals).

Borough Overview of Groundwater Armagh City, Banbridge and Craigavon Borough covers an area with a wide variety of groundwater conditions. It contains the most regionally significant aquifers in Northern Ireland, with outcrops of the Sherwood Sandstone (SSG) aquifer east of Lurgan and north-west of Armagh (shown orange in Figure 1). The prospects for a reliable and significant water supply from these aquifers are high, such that they have been used extensively for water supply for the last hundred years.

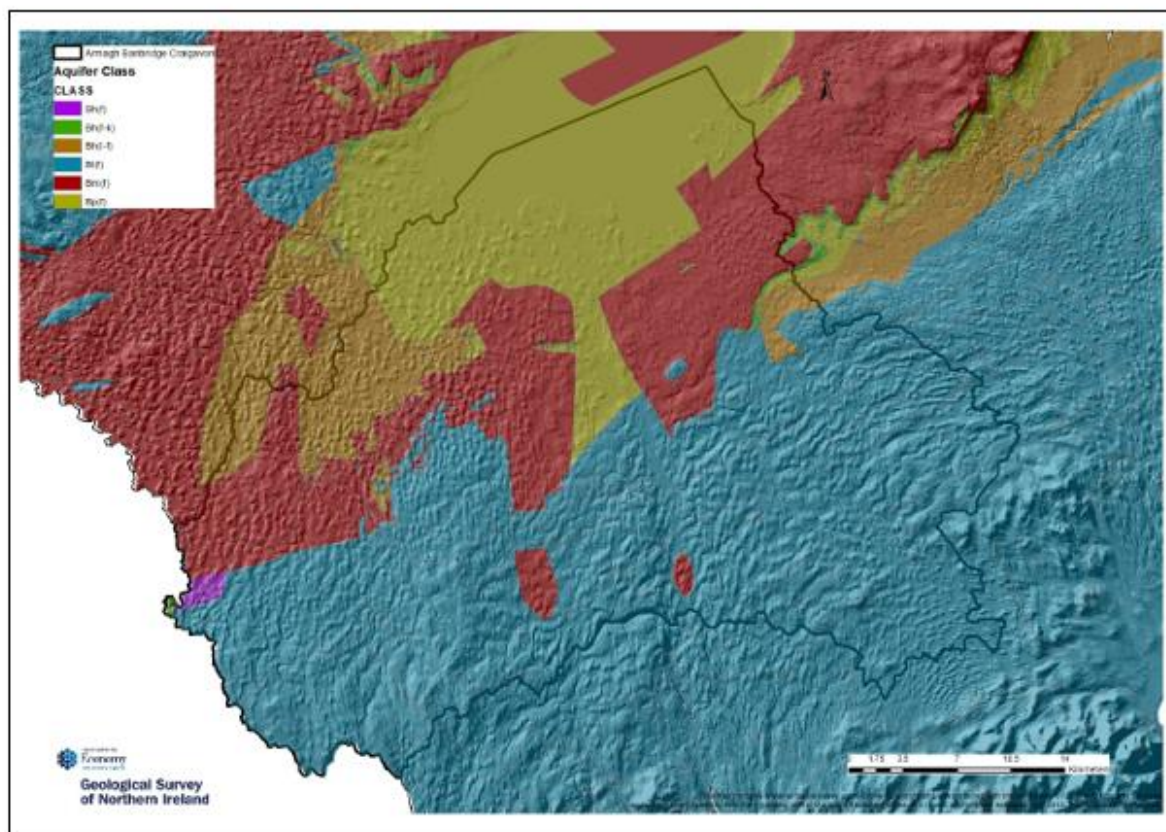
Other areas to the west, middle and north-east of the Borough (shown red in Figure 1) underlain by basalt rocks and carboniferous limestones and sandstones, whilst not presenting prospects as good as the Sherwood Sandstone aquifer, have been exploited successfully by low to medium sized businesses and used for public supply in recent years. Also, many farms in this area use groundwater pumped from boreholes for a range of agricultural activities.

The southern and eastern part of the Borough (shown blue in Figure 1) which is underlain by tight rocks commonly referred to as greywacke present limited prospects for groundwater supplies. However, some farms and isolated properties not served by mains water in this area use groundwater pumped from boreholes. Groundwater is stored and transported in discrete fractures making it difficult to drill a reliable borehole. The area coloured mustard in Figure 1, to the north of the Borough, represents mudstone bedrock which does not present reliable prospects for obtaining a groundwater supply.

Current Status of Aquifers Little is known about the groundwater resources within the Borough, but all of the aquifers are in a healthy condition. The Sherwood Sandstone aquifer (SSG) is the most utilised. Some local industrial businesses depend heavily on it for their

production. There are still significant prospects available for new abstractions to take place from the SSG aquifer. The area to the north-east of Armagh is particularly promising. Elsewhere, the basalts, carboniferous limestones and sandstones are also under-utilised (to the west, middle and north-east of the Borough).

Figure 1:
Aquifer Classification across Armagh City, Banbridge and Craigavon Borough



Groundwater and LDP Considerations The prospects for groundwater abstraction within the Borough are said to be significant. In particular, the Sherwood Sandstone (SSG) aquifers have historically provided reliable water supplies for over a hundred years and are not being abstracted to the same extent as in the past. Groundwater level monitoring suggests that these aquifers can sustain the current demand and are likely to be capable of supplying significantly greater abstraction.

Some SSG aquifers are understood to lie below current zoned economic development lands. The coincidence of any land zoned or otherwise deemed suitable for economic development, in particular industrial use, above the SSG aquifers would present an attractive prospect to businesses either seeking to expand, locate or relocate. Ensuring that such lands remains available for groundwater abstraction is important to ensure the resource remains accessible.

Groundwater Regulation Groundwater abstraction is regulated by the Northern Ireland Environment Agency (NIEA), with all abstractions of groundwater over 20 cubic metres per day requiring an abstraction licence. Extracting water for the purposes of agriculture, by engineering operation, can be permitted development (without the need for planning permission).

Groundwater quality is also regulated by measures brought in by the EU Water Framework Directive. These include Nitrate Action Plans to regulate mainly diffuse pollution by land

spreading; and the Pollution Prevention Control Regulations which require businesses to operate a licence for the appropriate and careful management of all substances (hazardous and non-hazardous).

5.0 Preferred Options Paper

The Council published its Preferred Options Paper (POP) in March 2018. The main purpose of the POP was to promote focused debate on key issues of strategic significance likely to influence the direction of future development within the Borough, so to inform the next stage in the LDP process, the Plan Strategy. This input would then inform the next stage of the LDP - the Stage 2 Plan Strategy.

The POP outlined the vision and strategic objectives of the Plan, along with 38 Key Issues and the possible options available to address them, including the Council's Preferred Option. These issues were drawn from the evidence base; from engagement with Elected Members and Section 75 Groups; and from both formal and informal consultation with statutory consultees. A preliminary review of operational planning policy was also undertaken to inform the POP, with a commitment to carry out a more detailed review ahead of the Plan Strategy.

The POP did not cover every issue, policy and proposal intended to be included in the LDP. Instead, it concentrated on the most significant planning matters identified through evidence gathering, stakeholder consultation, workshops with Elected Members, and the Community Plan process. One **Key Issue, ECN 11**, dealt with minerals development.

During the 9-week public consultation period, the Council received **201** responses to the POP from statutory consultees, members of the public and a range of other stakeholders. These submissions provided a wide range of feedback on the POP itself, its supporting documents, and the consultation process.

Key Issue

Key Issue ECN11 in the POP was 'Supporting Sustainable Minerals Development'.

Preferred Option

The Council's preferred approach to Key Issue ECN 11 was Option ECN 11A:

Preferred Option ECN 11A:

Support a balanced approach between the need for mineral resources and the need to protect the environment and other interests of acknowledged importance, in line with existing policies and further regional direction, by designating Mineral Safeguarding Zones (MSZs) and Areas of Constraint on Minerals Development (ACMDs) where appropriate.

The preferred approach is in line with existing policies (PSRNI, MIN 1-8 and PSU 10) and regional direction in the SPPS, in terms of striking an appropriate balance between the need for minerals extraction and the need to protect and conserve the environment. It encourages a locally tailored approach that supports the local supply chain long-term, but in a manner that is sustainable and that minimises negative impact on local communities. It allows for mineral reserves to be identified for exploitation; valuable resources to be safeguarded within designated Mineral Safeguarding Zones; and the Borough's most sensitive environments to be protected in designated Areas of Constraint on Minerals Development.

Summary of POP Commitments

The POP's main commitments in respect of minerals development (Preferred Option) are:

- **Areas of Constraint on Minerals Development:** The existing two ACMDs (CAP and DSTAP) would be reviewed and new areas could be designated in the LDP, with evidence-based justification. This review would include consideration of mineral reserves. It would also take account of any sensitive landscapes (including any new proposed designations as considered in Key Issue ENV 4) or other sites in need of safeguarding, as well as Priority Habitats and Species for conservation action. Certain areas might be considered at particular risk from minerals development. A review of the current ACMDs could also help address any inconsistency in approach across the existing Area Plans.
- **Minerals Safeguarding:** Safeguarding would be used to protect mineral resources of economic or conservation value. These could be designated around certain mineral deposits to ensure their long-term conservation. These could also be used to ensure that workable mineral resources are not sterilised by other surface development. The need to safeguard areas would be informed by a review of minerals workings as well as the latest mineral resource information.
- **Development Management:** Suitable policies would be adopted to manage development in both ACMDs and MSAs. Development proposals would otherwise be considered against set criteria, to ensure that permitted operations do not have an unacceptable impact. These would cover a broad range of issues including the impact on the natural environment and on built heritage, visual impact, road safety, public safety, residential amenity as well as restoration proposals. These will be in line with the existing PSRNI Policies MIN 1-8 but updated to reflect the provisions of the SPPS and the Borough's particular resources, constraints and circumstances. Policy considerations will include land instability (including in relation to abandoned mine workings), the management of extractive waste and cumulative impact.

POP Representations

Of the total 201 responses received in respect of the POP, 28 made reference to Key Issue **ECN 11** – a response rate of approx. 14%. 24 (86%) of these responses were categorised as being generally supportive of the preferred approach (ECN 11A), 1 (3%) were considered to be non-committal (or unclear), and 3 (11%) were categorised as unsupportive.

Overall, the ECN 11 POP representations show broad acceptance that a balanced minerals policy is required, but there are differences, some significant, over where the balance should sit between industry needs/economic considerations and environmental and other interests.

The key issues raised in respect of minerals development are categorised as follows:

- **Balance between Economic Growth and Environmental Protection:** Differing views on the balance between economic and environmental/other considerations (including landscape and heritage). Industry respondents seek greater recognition of economic benefits, mineral supply needs and operational viability, while environmental interests argue that economic growth should not exceed environmental limits.
- **Minerals Safeguarding:** Strong support for minerals safeguarding from industry respondents so as to prevent sterilisation of mineral resources and protect existing quarry operations and future potential. One respondent calls for wider safeguarding zones to allow for exploration potential. Safeguarding areas must be supported by an accurate and reliable evidence base. DFC HED states that the location of heritage assets should be considered when identifying constraints safeguarding areas.

- **Areas of Constraint on Mineral Development (ACMDs):** Some respondents support ACMDs for sensitive landscapes and environmentally sensitive areas. Industry respondents consider the existing designations insufficiently evidenced, too extensive and unsound. They caution against blanket restrictions and request more detailed assessment of economic and local need factors.
- **Evidence Base:** Concerns raised regarding the robustness of the POP evidence base, in terms of incomplete quarry output data, outdated ACMD evidence, previous challenges to similar designations, and the need to quantify existing reserves and future demand before finalising policy. One respondent states that landbanks should be used as a monitoring tool to provide the Council with early warnings of possible disruption to provision of aggregates.
- **Existing quarry operations and future growth:** Industry respondents seek stronger protection for existing quarry operations, including support for sustainable expansion, mineral processing, long-term site planning and protection from nearby incompatible development. They argue that existing sites can reduce need to open new sites.
- **Natural Environment including biodiversity and peatlands:** Environmental interests and consultees emphasise the need to protect designated sites, habitats and species, biodiversity and peatlands, with calls to restrict new or extended peat extraction and secure effective restoration measures.
- **Historic Environment:** Heritage interests (DFC HED) welcome recognition of potential impacts on the historic environment and request that heritage assets, historic landscapes and sensitive areas be considered when identifying minerals safeguarding areas (MSAs) and Areas of Constraint (ACMDs). They also highlight opportunities for restoration and for protecting historic quarries linked to traditional building stone.
- **Transport Infrastructure, Traffic Impacts and Road Safety:** One respondent suggests that minerals operators contribute to infrastructure affected by operations, such as resurfacing roads or improving junctions. DfI highlighted the need to consider road network suitability, road safety and traffic progression in decision-making.
- **Other Impacts** DfI welcomed reference to and raises issues around flood risk, groundwater protection, land instability, abandoned mine workings and public safety issues within minerals policy and decision-making. Mineral extraction in flood-prone areas should only proceed where risk is understood and mitigated.
- **Regulation / Enforcement / Monitoring:** Industry respondents stress that minerals operators are already subject to extensive regulation and standards. Other respondents call for more effective and robust monitoring and enforcement of minerals sites and quarrying activity, particularly in relation to impacts on natural and built heritage.
- **Restoration and Aftercare:** Strong support was received for robust restoration and aftercare requirements, including opportunities for biodiversity enhancement, habitat creation, recreation and tourism. It was stated that restoration plans must be regularly inspected to ensure they are followed through to delivery.
- **Hydrocarbon Development:** RSPB sought clarification on the Council's position regarding unconventional hydrocarbon extraction, stating that it should replicate regional direction (SPPS 6.157) i.e. there should be a presumption against their exploitation until there is sufficient and robust evidence on all environmental impacts.

- **Regional and cross-boundary minerals planning:** Industry respondents support greater regional and cross-boundary coordination on mineral supply, demand and aggregate monitoring. Suggests joined-up working across council boundaries and a Regional Aggregate Working Party model (similar to England and Wales).
- **Stakeholder Engagement:** Industry respondents call for engagement with minerals operators, statutory consultees and other stakeholders to inform policy development and implementation.
- **ROMPs:** Clarification was sought on the Council's timescale for implementing the Review of Old Minerals Planning consents (ROMPS).

Consideration of Preferred Option

Following consideration of the POP representations, which included those from within the industry, statutory consultees, environmental interests and other bodies, the Council has sought to bring forward an approach that is broadly consistent with the POP Preferred Option. However, where the draft policy approach is not fully in accordance with the POP, this is due to the need to take account of all relevant and up to date regional policy direction, the most recent evidence base, consultee engagement and the requirement to ensure that the draft Plan Strategy is robust, effective and sound.

For further detail on the POP responses, and the Council's consideration, refer to the POP Public Consultation Report, available on the Council's website:
www.armaghbanbridgecraigavon.gov.uk

6.0 Stakeholder Engagement

Internal Stakeholders

Planning Officers in Development Management/Enforcement Sections

Consultation was carried out with officers within Development Management and Enforcement Sections in the Council's Planning Department as part of the policy review process to establish any difficulties they experienced in the application of existing planning policies and to provide an opportunity to critique the draft policies. Officers' views were taken into account when finalising the draft policies prior to being presented at Council Members Workshops.

Feedback from DM/Enforcement mainly sought clarity around terminology and the need for clear definitions within J&A/Glossary.

Other Council Departments

Engagement has taken place with a number of Council Departments during the LDP process to date, to ensure that proper account has been taken of the Council's Community Plan as well as other relevant Council strategies, plans, publications and initiatives.

A meeting took place with the Project Management Team. The PMT comprised officers across a range of Council Departments, including Community Plan, Tourism, Economic Development, Environmental Health and Environmental Services.

Elected Members

Section 8 (7a) of Part 2 (Local Development Plans) of the Planning Act (Northern Ireland) 2011 requires the Plan Strategy to be adopted by resolution of the Council. As such, Elected Members have been engaged throughout the LDP process, including during the preparation of the draft dPS policies.

Engagement with the Elected Members has been facilitated through a series of workshops held between 2019 and 2026. That engagement included discussion on the draft Minerals Development Policies MIN 1-8, as well as other policies insofar as they relate to minerals development, in particular the General Policies GP 1-4.

Elected Members agreed the draft policy wording and wider approach to minerals development in May 2022.

External Stakeholders

Government Departments/Agencies

Section 8 (5) of Part 2 (Local Development Plans) of the Planning Act (Northern Ireland) 2011 requires the Plan Strategy to take account of the RDS, any policy and guidance issued by the Department and any other matters prescribed or directed by the Department. The Council has engaged with Government Departments/Agencies in the preparation of the draft Plan Strategy policy approach in relation to minerals development.

Two meetings were held with DfE Minerals and Petroleum Branch and Geological Survey of Northern Ireland (GSNI) to discuss specific issues including the gathering and sharing of

information on mineral resources, as well as draft policy wording. The Council has also shared information with DfE on active quarries within the Borough.

Pre-Strategy Informal Consultation with Statutory Consultees: An informal consultation process was also carried with relevant statutory consultees on the draft minerals policy ('Batch 1') on 30 March 2023. Those consulted were:

- DfI Strategic Planning and Policy Division;
- DfI Rivers Agency;
- DfI Roads Southern Division;
- DfI Transport Planning, Policy and Modelling Unit;
- DAERA Natural Environment Division/NIEA;
- DfC Historic Environment Division (HED);
- DfE (Economy), Minerals and Petroleum Branch (MPB), including GSNI.

97 comments were received to this consultation, which helped inform the finalising of the draft policy approach and the wording of the operational policies. The comments were overall largely supportive, but raised a number of issues that lead to minor adjustments to policy and J&A wording.

Of note, General Policies GP 1-4 and Design /Place-making Policies were also consulted on 13 May 2025 ('Batch 2 and 2A').

Regional Minerals Working Group: Engagement has also taken place as part of the Minerals Working Group, led by DfI and DfE and attended by Councils, with 4 meetings held to date (14 June 2018, 26 Sept 2019, 17 November 2022 and 17 June 2026).

The Terms of Reference of the Group state the Working Group will consider:

- supply held for aggregates across each council and NI as a whole;
 - understand the local/regional demand for aggregates;
 - broader consideration of mineral development issues including potential for high value and industrial minerals: and
 - raising awareness of the Minerals Licensing Regime and Annual Minerals Return and potential economic benefits as well as environmental protections.
-
- Initial work will focus on agreeing and validating the baseline data held by Central and Local Government.
 - once this initial work has been undertaken engagement with industry will be necessary.

Other Stakeholders

MPANI: The Council has engaged with Minerals Products Association (MPANI) – the trade association for the local mineral products industry – during the LDP process. This included a meeting on 8 Sep 2021, to discuss the key issues affecting local operators and how to improve engagement with them as part of the preparation of the LDP. MPANI has also attended, and presented at, a number of Strategic/LDP Working Groups attended by DfI and Local Councils in recent years.

Conroy Gold and Natural Resources Plc: The Council met with CGNR during the LDP process to help understand their ongoing licensed exploration activity in the Borough and their future plans for the 'Clay Lake Target' – an extensive gold target north-west of Keady, mid-west Co.

Armagh, near Clay Lake. CGNR advised that its mineral licences covered other precious metals, with the potential for zinc and lead in the area also.

The potential for the sterilisation of land was the main concern raised by CGNR. However, the LDP Team advised that the safeguarding of such an extensive target area would be difficult to defend with there being no definite plans for extraction as yet. Whilst the drilling programme indicates good prospects, there is no certainty over whether there is a viable resource to safeguard as yet, or where it would be targeted.

CGNR advised in an update in October 2021 that the results from their gold programme continue to be encouraging, showing increasing indications of potential for the Keady area to host a significant gold resource.

Cross Boundary Context and Consideration of Neighbouring Council Approaches

In developing the draft planning policy approach for Minerals Development, consideration has also been given to the approaches of neighbouring Councils (Planning Act (NI) 2011, Section 3(4) and Soundness Tests C4 and CE 1, See Section 8.0).

The Borough adjoins the boundary of five neighbouring Council areas:

- Antrim and Newtownabbey Borough Council (ANBC), due to a shared boundary within Lough Neagh;
- Newry Mourne and Down District Council (NMDDC);
- Mid Ulster District Council (MUDC);
- Lisburn City and Castlereagh City Council (LCCC); and
- Monaghan County Council, in the Republic of Ireland.

The Preferred Options Papers (POPs), supporting evidence base, draft Plan Strategies (where published) and adopted Plan Strategies of adjoining Councils have been taken account of, in addition to regional guidance, in order to identify any cross-boundary issues / conflicts.

Table 3, below, outlines the approach of neighbouring councils in relation to minerals development.

Table 3 Approach of Neighbouring Councils to Minerals Development

Adjoining Council	Position
Antrim and Newtownabbey Borough Council (ANBC)	On 3 July 2025 the Council adopted its LDP 2030 - Plan Strategy. DfI issued the Council with a Direction on 28 October 2025 instructing the Council to make changes to its adopted Plan Strategy in relation to the Abbey Centre. An Independent Examination was conducted by the Planning Appeals Commission (PAC) in May and June 2022. • Strategic Policy SP 9: Natural Resources – key points: SP 9.1 The Council will seek to ensure the sustainable use of natural resources. Development will be supported where it is demonstrated that the proposal will not have an unacceptable impact on the environment, amenity or public

	safety and otherwise accords with the wider Strategic Policy and LDP. SP 9.2 The Council will balance the need for the development against the need to safeguard local communities and the environment against potential adverse impacts. This will be achieved by: (a) Identifying and protecting mineral reserves of economic importance; (b) operating a presumption against unconventional hydrocarbon extraction until such times as there is sufficient and robust evidence on all potential environmental impacts; (c) operating a presumption against MD that would affect the following sites/designations unless there is a regional need for the mineral that outweighs the importance of the site: Strategic Landscape Policy Areas; Coastal Policy Areas, Historic Parks, Gardens and Demesnes, Sites of nature Conservation Importance (Intern., National and Local); and (d) supporting other proposals that accord with Policy DM 43. SP 9.3 A Mineral Reserve Policy Area has been identified for the proven strategic lignite reserve to the south-west of Crumlin. Precise details of the boundary of this and any other MRPA's will be confirmed at Local Policies Plan stage. Two operational policies for mineral development are contained within Part 2 of the Plan Strategy. They include: • DM 43: Minerals Development The overall approach is to balance the case for mineral development, against the need to protect and conserve the natural and historic environment, as well as the impact on public safety, health and amenity. DM 43.2 list 9 criteria for proposals to address, covering: - disturbance and pollution impacts; - safety and amenity; - landscape character, visual amenity, historic environment and natural heritage assets; - surface and groundwater, drainage and fishery interests; - mineral waste; - cumulative impact – especially within 5km of a settlement; - Transport Assessment/impact on local road network; - site restoration; and - an appropriate method statement. • DM 44: Mineral Reserve Policy Areas. The Council will operate a presumption against proposals within a MRPA that would prejudice the future exploitation of the mineral, with exceptions (a – improvement, extension or replacement of an occupied dwelling; b) development related to and necessary for an established business where this would not significantly intensify the use of the site).
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	Detailed boundaries of MRPA's will be identified in the Local Policies Plan. Proposals within 250 metres of identified reserves will also be carefully scrutinised to determine whether: (a) the operations necessary to recover the mineral or its processing would be prejudiced by the proposal; and (b) the proposal itself may be adversely impacted or suffer nuisance as a result of future mineral exploitation.
Lisburn and Castlereagh City Council (LCCC)	On 26 September 2023 the Council adopted its LDP 2032 Plan Strategy. An Independent Examination was conducted by the Planning Appeals Commission (PAC) during March to May 2022. DfI issued a Direction on 28 June 2023 directing the Council to adopt the dPS with the modifications specified in the Direction. Strategic Policy 13: Mineral Development: The Plan will support development proposals that: a) facilitate a sufficient supply of minerals through balancing the need for the mineral development against the need to safeguard the environment, taking account of appropriate designations; b) allow for careful exploitation of minerals; and c) provide for the sustainable and safe restoration and reuse of mineral sites. The operational policies for mineral development in Part 2 of the Plan Strategy closely reflect PSRNI Policies, other than separating out MD 5 Unconventional Hydrocarbon Extraction. The policies are: • MD1: Environmental Protection; • MD2: Visual Impact; • MD3: Areas of Mineral Constraint; • MD4: Valuable Minerals; • MD5: Unconventional Hydrocarbon Extraction; • MD6: Mineral Safeguarding Areas; • MD7: Safety and Amenity; • MD8: Traffic Implications; and • MD9: Restoration Proposals. Further work in identifying Mineral Safeguarding Areas and Areas of Mineral Constraint will be taken forward at the Local Policies Plan (LPP) stage.
Mid Ulster District Council (MUDC)	On 22 February 2019 the Council published its Draft LDP Plan Strategy. The draft Plan Strategy was submitted to the Department for Infrastructure in May 2021.

	MUDC's strategy is to facilitate appropriate mineral development whilst also protecting important landscapes and areas of nature, scientific, conservation and heritage interest. ACMDs will be identified, where there will be a presumption against mineral exploitation; in line with SPPS 6.150, Bullet Point 1, with some limited exceptions and with certain caveats e.g. a short-term extraction. 4 Mineral Resource Policy Areas are designated to protect known minerals deposits of economic importance (Policy MIN 1). These are all within or close to settlements. Surface development will not be permitted within the MRPA's so as not to prejudice future extraction. A precautionary approach will be adopted to applications for valuable minerals and hydrocarbons (Policy MIN 3), by placing the onus on the developer to demonstrate that there will be no significant environmental impacts or significant risks to human health. MUDC's draft operational policies are as follows: • MIN 1: Mineral Reserve Policy Areas (4 designations); • MIN 2: Extraction and processing of hard rock and aggregates; • MIN 3: Valuable Minerals and Hydrocarbons; • MIN 4: Peat Extraction; • MIN 5: Restoration of Mineral Sites; and • MIN 6: Mines, Shafts and Adits.
Newry, Mourne and Down District Council (NMDDC)	Published its LDP Draft Plan Strategy (dPS) on 27 June 2025. The LDP Minerals Strategy promotes the sustainable development of mineral resources in such a way that protects the environment and supports economic growth. The DPS contains an ACMD which has been expanded from that within the Ards and North Down Plan to protect wider sensitive, including parts of the Mourne and Ring of Gullion. Strategic Policy MS1 Minerals Development, sets out: Proposals for minerals development will be restricted within Areas of Constraint on Mineral Development (ACMD). The Plan will only support the exploitation of valuable minerals within Special Countryside Areas or the Undeveloped Coast where proposals are of national or regional importance. A presumption against unconventional hydrocarbon extraction will also apply. Mineral Safeguarding Areas may be defined around mineral reserves that are considered to be of economic or conservation importance. None are defined in Plan Strategy. There will be a presumption against commercial peat extraction. All minerals development must include the proposed details of restoration and aftercare of the site.

	The LDP will seek to support appropriate minerals development that aim to balance the need for minerals against the need to protect and conserve the environment. The Minerals Policies are: • MIN1 Minerals Development; • MIN2 Areas of Constraint on Mineral Development; • MIN3 Valuable Minerals; • MIN4 Unconventional Hydrocarbon Extraction; • MIN5 Mineral Safeguarding Areas; • MIN6 Peat Extraction; and • MIN7 Restoration and Aftercare.
Monaghan County Council (Republic of Ireland)	The Monaghan County Development Plan 2025–2031 was formally adopted on 26 May 2025 and came into effect on 7 July 2025, except for areas affected by a Draft Ministerial Direction issued by the Minister for Housing, Local Government and Heritage following recommendations from the Office of the Planning Regulator (OPR) – not related to ‘extractive industry development’. On 21 October 2025 the Minister of State for Local Government and Planning issued a final Direction directing the Council to make the specified amendments. The Plan provides a comprehensive framework for the proper planning and sustainable development of the county over a six-year period, that aligns with national and regional planning policies, including the National Planning Framework and the Regional Spatial and Economic Strategy for the Northern and Western Region. The objectives for minerals development (Extractive Industry Objectives) are as follows (Section 4.9, Page 79): • MEO 1 To promote development involving the extraction of mineral reserves and their associated processes, where the Planning Authority is satisfied that any such development will be carried out in a sustainable manner that does not adversely impact on the environment or on other land uses. Consideration in this regard shall be given to the impact of the development on the local economy. • MEO 2 To safeguard all identified locations of major mineral deposits in the County for future extraction. • MEO 3 To identify and map the location of quarries and minerals resources. In addition to setting out a range of National Guidance Documents that applications shall have regard to, Policy EIP 1 (in Chapter 15, Development Management Standards) includes:

	In recognition of the important contribution extractive industries make to the local economy, development proposals located in close proximity to existing extractive sites or sites which have significant resource potential, will be resisted where such development would limit the future exploitation of these sites. Proposals for extractive industry shall normally be resisted in the following circumstances: a) Where it is located within an Area of Primary or Secondary Amenity, Special Protection Area Special Area of Conservation, Natural Heritage Area or Proposed Natural Heritage Area, Architectural Conservation Area or on or near protected structures, recorded monuments and places, unless in exceptional circumstances where the Planning Authority is satisfied that the need for the resource outweighs the environmental impact. b) Where it is located in close proximity to existing developments where potential sources of nuisance are considered to be incompatible. c) Where it may have a detrimental impact on the natural or built environment or matters of acknowledged public importance. The policy also sets out minimum information requirements (a-f) for proposals for extractive industry. These include details of any other [extractive industry] development within 1km of the application site, an assessment of cumulative impact when taken with any other extractive operations in the vicinity; proposed mitigation of likely environmental effects and details of restoration and aftercare proposals.
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The Council has responded to neighbouring Council Preferred Option Papers and draft Plan Strategies, as they have been published, as well as to the Monaghan County Council Draft Plan 2025-2031 Consultation.

Although there are differences between our Council's policy approach to minerals development as set out in the Draft Plan Strategy, with that of neighbouring Councils, the Council considers that there are no conflicts.

The Council will continue to engage with neighbouring Councils after publication of the Draft Plan Strategy and throughout the preparation of the LDP.

7.0 Draft Plan Strategy Approach

As analysed above, the Council's draft minerals development policies and relevant draft policy provisions within the suite of General Policies, Design and Placemaking Policies and other policies, have evolved from a review of extant regional planning policies, other key policy and guidance documents, the POP, responses to the POP and a series of engagements with key stakeholders, including the following:

- DfE Minerals and Petroleum Branch, DfI and other key statutory consultees;
- Elected Members of the Council;
- Officers from the Development Management and Enforcement Sections of the Council's Planning Department; and
- Officers from other relevant departments of the Council.

In developing the draft policies, the Council has taken account of a range of relevant matters, including the following:

- the RDS (in particular Regional Guidance RG 9 and RG 11, and Spatial Framework Guidance SFG 13 and SPPS (6.148-6.167);
- Policies MIN 1 – MIN 8 in the Planning Strategy for Rural Northern Ireland (PSRNI) in relation to Minerals;
- the four extant development plans within the Borough (AAP, BNMAP, CAP, DSTAP);
- the Council's Community Plan 2017-2030, 'Connected' 2017-2030;
- the adopted/draft Plan Strategies of neighbouring councils – the draft policies are not considered to conflict with any of those;
- other draft policies in the Draft Plan Strategy to ensure alignment.

In line with the POP (Preferred Option ECN 11), the approach to the Minerals Development policy set is in line with existing policies (PSRNI Policies MIN 1-8), tailored to reflect regional direction in the SPPS and to meet local circumstances. It will support the sustainable exploitation of minerals by balancing the need for minerals development against the need to safeguard the environment, landscape and local communities. A new policy is proposed in relation to Development at Risk associated with Past Underground Mineral Extraction (MIN 8), in response to the local evidence base.

The Council's rationale for the policy approach to the topic is set out below under each of the Policies MIN 1-8. Other key policies of relevance are summarised after Policies MIN 1-8, including the new General Policies and Design/Place-making Policies⁵, Environmental Pollution (EP 1) and Land Contamination (EP 2) Policies.⁶ These include a number of new considerations to enable effective assessment of development proposals.

⁵ The new General Policies and Design and Place-making Policies consolidate and update a number of considerations that were repeated across a number of Planning Policy Statements and subject policy areas, as well as introduce a number of new considerations that are common to many types of proposals. This is to improve the structure, clarity and usability of the Plan.

⁶ Exceptions to the General Policies and Design and Place-making Policies are set out in the Draft Plan Strategy.

The Draft Plan Strategy brings forward the following operational policies:

- MIN 1 Minerals Development;
- MIN 2 Areas of Constraint on Minerals Development;
- MIN 3 Minerals Safeguarding;
- MIN 4 High Value Minerals;
- MIN 5 Hydrocarbon Development;
- MIN 6 Peat Extraction; and
- MIN 7 Restoration and Aftercare of Mineral Sites.
- MIN 8 Development at Risk associated with Past Underground Mineral Extraction

The Draft Plan Strategy also identifies two potential designations in line with the SPPS and existing PSRNI Policies:

- Areas of Constraint on Minerals Development (ACMDs); and
- Minerals Safeguarding Areas (MSAs).

The position of the Council in relation to these designations is set out under Policies MIN 2 and MIN 3 respectively.

MIN 1 Minerals Development

MIN 1 consolidates and updates existing PSRNI Policies MIN 1 Environmental Protection, MIN 2 Visual Implications, MIN 6 Safety and Amenity, and MIN 7 Traffic, into one policy, taking into account the SPPS. The policy provides a framework for the assessment of minerals development proposals, that is focussed on minimising environmental and other impacts to an acceptable degree. These impacts are covered under 6 criteria (natural environment; historic environment; water environment; landscape character and visual amenity; safety, human health and amenity; and transport considerations. Where the impact is unacceptable, permission will normally be refused. The policy encourages the extension of existing operations over new workings on greenfield sites, to minimise environmental disturbance.

The policy takes account of proposed designations, in addition to existing designations (landscape, amenity, scientific, or heritage (natural, built or archaeological) value), in line with the SPPS, where this would adversely affect the integrity of or threaten to undermine the rationale for the designation.

The policy includes an additional criterion on the management of waste (Criterion g) to align with the requirements of the Planning (Management of Waste from Extractive Industries) Regulations (NI) 2015. Regulations 6 and 7 require for a management plan for extractive waste (i.e. 'Mine Waste Plan (MWP)') to be submitted to and approved by the Council. All minerals development proposals will be required to demonstrate the sustainable management of extractive waste and how it takes account of the efficient use of minerals resources. This policy requirement aligns with Strategic Policy SP 1 Furthering Sustainable Development and Climate Change Resilience and General Policy GP 1, Criterion d) in relation to resource efficiency.

The policy also includes a specific criterion on cumulative impact (Criterion h). This may be a material consideration when determining new proposals (including extensions) due to the proximity, nature, scale and potentially lengthy duration of this type of development. The proximity of two or more such developments could amplify various impacts on the local environment, landscape and/or community to an unacceptable degree. The local evidence base shows there are four locations in the Borough where two operating quarries are within a distance of 1km, with the distances much less in two of these cases. Consideration shall be

given to existing, approved and/or planned minerals development in the locality, as well as the existence of any nearby dormant minerals sites, that could potentially recommence.

MIN 2 Areas of Constraint on Minerals Development (ACMDs)

MIN 2 brings forward and updates the current PSRNI Policy MIN 2 and aligns with the SPPS (Para. 6.155, Third Bullet Point). It seeks to protect any valuable or sensitive areas from the impacts of minerals development, where appropriate.

The ACMDs will be designated at Local Policies Plan stage, where there is evidence to support them, taking account of other statutory and policy designations that provide protection including any proposed designations.

In addition, to high value minerals and hydrocarbons (In line with the SPPS), the policy proposes two exceptions.

Exceptional Criterion c) allows for an appropriate minor expansion of an existing mineral working or landing site within the ACMD. This gives flexibility to the policy, to allow for economic considerations to be weighed against the environmental, landscape and amenity impacts, and to take account of individual circumstances. The use of the term 'appropriate' will act as a safeguard against an inappropriate or over-sized expansion.

Exceptional Criterion d) allows for an appropriate short-term extraction. This aligns with the SPPS – where the term 'appropriate' replaces the SPPS terminology where 'the environmental / amenity impacts are not significant'.

Background / Evidence Base for Areas of Constraint on Minerals Development (ACMDs)

Two of the four extant Area Plans covering the Borough (Craigavon Area Plan and Dungannon & South Tyrone Area Plan) contain designated ACMDs⁷. These two designations at Lough Neagh/Lough Beg and Montiaghs Moss overlay other environmental designations i.e. Ramsar and SAC (International); SPA, ASSI (National) and/or National Nature Reserve Natural Heritage Designations within and south of Lough Neagh.

The former Department for Environment (DOE) was criticised by the Planning Appeals Commission (PAC) for providing insufficient justification for its draft ACMD designations in a number of its later area plans, leading to the DOE not proceeding with these designations in the adopted plans. Examples include the Magherafelt Area Plan 2015 (MAP), Banbridge / Newry & Mourne Area Plan 2015 (BNMAP) and Belfast Metropolitan Area Plan (BMAP, which has since been found to be unlawful). In all these cases, the DOE had taken a blanket approach to designating environmental designations as ACMDs, but failed to provide adequate justification for them, in particular their extent. The Department was criticised for failing to demonstrate that it had carried out a balanced assessment of economic/minerals needs against environmental interests.

⁷ *Craigavon Area Plan (CAP) 2010* designates 2 ACMDs in Policy MIN 1 around the Lough Neagh and Lough Beg Ramsar area (Internationally Important Wetland) and Montiaghs Moss Nature Reserve (part SAC part ASSI).

Dungannon and South Tyrone Area Plan (DSTAP) 2010 (which relates to the County Armagh portion of the former D&ST Borough Council area) designates 1 ACMD in our Borough (Policy MN 1), south-west of Lough Neagh (within the boundary of the Lough Neagh and Lough Beg Ramsar area as in CAP 2010). The Lough Neagh and Lough Beg Ramsar ACMD extends across two plan areas but is counted as one.

Most notably, the draft Magherafelt Area Plan (MAP) included extensive areas of Lough Neagh and adjacent to and part of Lough Beg as draft ACMDs, similar to the existing ACMD designations in our Borough.

The PAC Reports on BNMAP and BMAP contain similar criticisms and recommendations to the Department as in the MAP Report. See summary of BNMAP ruling on Page 20. The PAC findings on MAP were also highlighted in a POP representation on behalf of a number of minerals operators.

The Council is of the view that the Local Policies Plan is the appropriate stage at which to review the existing ACMD boundaries. When doing so, the Council will take account of this evidence issue, including the POP representations raising it. On this basis, the current ACMDs will be brought forward in the Draft Plan Strategy (until the LPP review).

It is important to note that none of the 14 active quarries extracting are within the ACMD, nor is the area of licensed minerals prospecting (Conroy Gold and Natural Resources, to the south-west of the Borough).

MIN 3 Minerals Safeguarding

MIN 3 brings forward and updates the current PSRNI Policy MIN 5 Mineral Reserves in respect of safeguarding areas from surface development where these would prejudice future minerals development, and it reflects the SPPS (Para. 6.155, Second Bullet Point) by including reference to safeguarding minerals of both conservation and economic value.

Minerals Safeguarding Areas (MSAs) may be designated at Local Policies Plan stage, depending on the evidence available to support them. See further consideration of evidence base under sub-heading below.

Similar to other NI Councils, the new policy introduces a list of types of non-minerals development (or application) that would have a negligible impact on the future potential to exploit the safeguarded resource and will be exempt from the presumption against set out in the policy and will therefore be permitted within a MSA boundary. These include development types (or applications) that would not result in significant ground works or intensification of activity and temporary permissions. This is deemed a balanced approach.

Evidence Base for Minerals Safeguarding

There are no current safeguarded reserves designated in the legacy Area Plans. Whilst Minerals Safeguarding Areas (MSAs) would be welcomed by local minerals operators, as indicated in POP Responses and local minerals survey returns, there is currently insufficient information available to the Council to inform the designation of MSAs around minerals resources.

Response rates to the Council's Minerals Survey have been low (as outlined on Pages 28-30). Similarly, the DfE Annual Minerals Statement also provides an incomplete picture in relation to both the local and regional market. As a result, there is a lack of information on the extent of reserves (both approved and future potential) and rates of extraction across sites to enable a balanced assessment on whether safeguarding is necessary and appropriate over the plan period.

The Council will revisit the issue at Local Policies Plan stage, when more information may be available to inform considerations in relation to the need and potential for safeguarding areas.

This places an onus on local operators to engage with the Council and provide information that can inform the Council's evidence base. An agreed methodology across all NI Councils for designating MSA boundaries would be very helpful.

MIN 4 High Value Minerals⁸

MIN 4 brings forward and updates the current PSRNI MIN 4 Valuable Minerals and SPPS (Para. 6.157) in respect of minerals that are particularly valuable to the economy, both of which state that there will not be a presumption against their exploitation in any area, however in considering a proposal where a site is within a statutory policy area due weight will be given to the reason for the statutory zoning. Hydrocarbons are separated out in Policy MIN 5.

The policy has amended the terms 'statutory policy area' and 'statutory zoning' (in the SPPS) to 'statutory or policy designation, or a proposed designation' – as the term 'designation' covers those in the LDP as well as those designated through legislation. It also gives weight to proposed designations in line with SPPS Para. 6.158, which reads consistently with Policy MIN 1 Minerals Development.

The policy title has been changed from 'Valuable Minerals' to 'High Value Minerals', in consultation with DfE, to distinguish metalliferous and non-metalliferous minerals from common minerals - as it could be argued that all minerals, including aggregates, are valuable to the economy.

MIN 5 Hydrocarbon Development

Hydrocarbons⁹ are a distinct category of minerals of particular value to the economy, in addition to those covered by Policy MIN 4 High Value Minerals. Policy MIN 5 is consistent with the policy approach set out in PSRNI MIN 4 (as above) and the SPPS (Para. 6.157) in respect of hydrocarbon extraction. MIN 5 signposts back to Policy MIN 4 whereby proposals for hydrocarbon development, involving both exploration and extraction using conventional methods¹⁰, must comply with Policy MIN 4 (and all other relevant LDP policies).

MIN 5 is also in line with the additional direction in SPPS (6.157) by applying, in all locations, a presumption against the extraction of hydrocarbons by unconventional methods¹¹ until there is sufficient and robust evidence on all environmental impacts.

⁸ For the purposes of the policy, high value minerals are metalliferous and non-metalliferous minerals licensed by the Department for the Economy (DfE) or The Crown Estate. Metalliferous minerals include precious metals such as gold and silver, and other base metals such as lead and zinc. Non-metalliferous minerals are generally industrial minerals other than metallic ores and mineral fuels.

⁹ Hydrocarbons which are often known as fossil fuels or energy minerals include oil, natural gas, coal and lignite (brown coal)).

¹⁰ Conventional hydrocarbon extraction involves 'conventional' (traditional) methods of drilling a well down to oil and gas reservoirs within porous subsurface rock formations where it can be extracted using naturally occurring pressure or pumping mechanisms.

¹¹ Unconventional hydrocarbon extraction involves non-conventional techniques to release and recover oil and gas from low-permeability rock formations, such as shale, where conventional vertical well extraction (drilling) cannot be used. These more complex techniques, which include horizontal drilling and hydraulic fracturing (also known as 'fracking'), allow for previously inaccessible reserves to be exploited. Hydraulic fracturing (also known as 'fracking') is the process of generating fractures in rocks below the earth's surface by injecting fluid at high pressure into the rock, via a wellbore, used in particular to help release natural gas and oil for extraction.

The policy has been expanded out to cover hydrocarbon development i.e. both extraction and exploration, as both require planning permission following the recent removal of permitted development rights for the exploration of petroleum, including the drilling of boreholes.¹²

Whilst there is a direction of travel away from hydrocarbon development entirely at regional level, with DfE's introduction of legislation to remove powers to licence petroleum development (see Page 6-7), it makes sense that the policy aligns with current regional planning policy direction in the SPPS until such times as it is revised.

The separation of 'hydrocarbons' from 'high value minerals' into a stand-alone policy in Policy MIN 5 is considered logical given the direction of travel away from hydrocarbon development and is consistent with DfE's Energy Strategy (2021) commitment to phase out fossil fuels, as well as the targets set out in The Climate Change (NI) Act 2022.

MIN 6 Peat Extraction

MIN 6 is consistent with PSRNI MIN 1 Environmental Protection and the SPPS (Para. 6.158) in respect of commercial peat extraction, both of which state that the extraction of peat for sale will only be granted where proposals are consistent with the protection of bogland valuable to nature conservation interests and the protection of landscape quality. The policy wording brings forward a presumption against commercial peat extraction but is more explicit than PSRNI MIN 1 and the SPPS in the interests of clear interpretation, by stating that commercial peat extraction will only be permitted where the peatland can be demonstrated to be significantly degraded and is not reasonably capable of restoration. The J&A goes on to clearly define what is meant by 'not reasonably capable of restoration' in line with EU Directive 92/43/EEC.¹³

The policy is consistent with the wider environmental and climate change objectives within the LDP Plan Strategy, in terms of conserving peatland and supporting the restoration of degraded sites at every opportunity. In drafting the policy, the Council has taken account of the DAERA Peatland Strategy to 2040 (Sept 2025).

The policy has built in appropriate safeguards, by ensuring that damage caused by fire, drought or erosion would not be considered permanent impediments to regeneration and therefore would not be reasons to permit commercial peat extraction as an exception.

Policy MIN 7 Restoration and Aftercare of Minerals Sites

MIN 7 brings forward and updates current PSRNI Policy MIN 8 Restoration and reflects the policy direction of SPPS in terms of seeking sustainable and safe restoration, including the appropriate re-use of mineral sites.

The policy/J&A seeks to raise the standard of restoration and aftercare proposals in line with LDP objectives. It contains a number of key elements:

¹² The Planning (General Permitted Development) (Amendment) Order (Northern Ireland) 2020, Schedule 2 Substitution of Part 16 of the Schedule, came into operation on the 21 December 2020.

¹³ Peatland that is 'not reasonably capable of restoration' is defined as that where it is beyond the point where the hydrology can be repaired and there is no reasonable expectation of re-establishing vegetation with peat-forming capability within 30 years through appropriate rehabilitation management. This is in line with the definition for degraded raised bogs deemed 'capable of natural regeneration' in the European Commission's Interpretation Manual for European Union Habitats (Directive 92/43/EEC).

- it requires the restoration, or where possible, enhancement of landscape character through suitable details (referred to in J&A);
- it refers to restoring, or where possible, enhancing the environment (including biodiversity). This aligns with the Council's biodiversity duty under the Wildlife and Natural Environment (Northern Ireland) Act 2011 (i.e. the WANE Act) and is consistent with Policy GP 1 Mitigating and Adapting to Climate Change, Criterion c);
- it promotes future beneficial use(s) to the local community where possible (e.g. access to nature);
- it seeks to reduce environmental impacts by promoting progressive restoration at the earliest opportunity, using inert materials within the site as far as possible, limiting heavy lorry traffic movements and preventing invasive species and contamination;
- it requires the Restoration Management Plan to be accompanied by a programme of works, setting out timeframes for completion (including phasing) to be agreed with the Council;
- it addresses the important issue of site safety and security, in the public interest. Former quarry sites can attract recreational swimmers in warmer weather, which can cause danger.
- it includes the potential for a financial guarantee (administered through a Section 76 Planning Agreement) to be requested, where there are concerns that the restoration scheme may not be fully implemented in accordance with planning conditions and/or planning agreement. The bond/financial provision would cover the cost of completing the site restoration, where the owner/owner fails. See further consideration below of approach to Financial Guarantees.

Consideration of approach to Financial Guarantees

The use of financial guarantees has been addressed by a number of other NI Councils in their 'Restoration and Aftercare' policies. The main issue to come out of the policy development process is whether to state that the financial bonds 'may' be used or 'will' be used in every case.

In the absence of NI regional direction or guidance on this matter, account was taken of English National Planning Policy Guidance (Dept. for Levelling Up, Housing and Communities; and Ministry of Housing, Communities and Local Government) which includes 3 exceptional provisions for when a financial guarantee will normally only be justified. The proposed policy wording reflects one of these, with the other two considered less applicable to local circumstances.

The NPPG includes provision for 'where there is reliable evidence of the likelihood of either financial or technical failure, but these concerns are not such as to justify refusal of permission'. The exceptional provision in the Council's policy wording regarding 'where there are concerns' and the amplificatory text which expands on this (where the concerns relate to the operator's financial security, or where the operator has a history of non-compliance of restoration conditions) is consistent with this, and considered a balanced and reasonable response to the issue. The Council does not have any recorded evidence of past failure to complete restoration works, to support a stronger 'one size fits all' approach. It could also be argued to be disproportionate and unfair on responsible operators and burdensome on the planning application process itself, in terms of administering the financial guarantee. The policy approach however allows for each case to be considered on its merits. The encouragement of progressive restoration within the policy, through phasing, is also seen as a helpful mitigation.

A number of other NI Councils require a financial guarantee with all restoration proposals (e.g. Fermanagh & Omagh DC and Derry City & Strabane District Council). Whilst these approaches were found to be sound by the PAC, it is not considered an appropriate approach by our Council.

MPANI confirmed in February 2023 by email that MPANI members/operators in Northern Ireland do not have access to a Restoration Guarantee Fund, to cover the cost of completing a site restoration should they fail to implement a previously agreed restoration plan, like MPA members in England, Scotland and Wales have.

MIN 8 Development at Risk associated with Past Underground Mineral Extraction

MIN 8 is a new policy that is a response to the local evidence base (GSNI) i.e. 55 known abandoned underground mines in the Borough (see map in Appendix 4). The policy also reflects existing Policy PSU 10 Development at Risk insofar as it relates to land instability.

The policy aims to manage the risks associated with abandoned underground mines (including associated shafts and adits¹⁴) by considering the safety of an application site as well as any risk to the surrounding area as a result of the proposed development. Risks associated with abandoned mines include land instability caused by potential collapse as well as the release of harmful gases and contaminated water.

All development proposals within areas of mine risk (agreed with GSNI as within 100 metres of a mine entry point) will be required to be accompanied by a Mine Risk Assessment.

The policy closely aligns with the GSNI 'Guidance for Planning Developments in Areas of Abandoned Mines'¹⁵, including the listed exemptions to the policy. These include minor forms of development that do not involve significant ground from the policy requirements.

The policy provides a signpost to the online GSNI GeoIndex Mapping for applicants and interested parties to view the location of the abandoned mines and areas of mine risk.

Other key policies of particular relevance to Minerals Development:

GP 1 Climate Change Mitigation and Adaptation

The provisions of GP 1 in respect of tree-planting (Criterion b) and biodiversity (Criterion c) are particularly important as part of restoration and aftercare proposals. Resource efficiency (Criterion d) and waste management (Criterion e) are also relevant to minerals development proposals. Policy GP 1 takes account of the SPPS (Paras. 3.10-3.13) and builds on the LDP's Strategic Policy SP 1- Furthering Sustainable Development and Climate Change Resilience.

GP 2 Infrastructure Requirements for New Development – Criterion a) Transport Infrastructure considerations will be particularly relevant to new and expanding minerals development sites, to ensure that the transport network is able, or will be adequately upgraded, to accommodate the traffic and other users that the development will generate, having considered its cumulative impact alongside relevant existing, approved and other planned development. This reads with Policy TRAN 6 Transport Assessment.

GP 3 Public Safety and Human Health

This policy shall be considered alongside Policy MIN 1, Criterion e) in respect of public safety and human health considerations. Impacts on livestock as a result of blasting would fall under

¹⁴ A shaft is a vertical or near vertical passage (portal) to an underground mine for the purposes of access, drainage, ventilation and transporting minerals. An adit is a horizontal or inclined passage (portal) for the same purpose.

¹⁵ Available on Geological Survey of Northern Ireland (GSNI) website.

Policy MIN 1, Criterion e). Policy MIN 8 also reads consistently with General Policy GP 3, which has similar aims in terms of managing risk to public safety across all development.

GP 4 Amenity This policy shall be considered alongside Policy MIN 1, Criterion e) to ensure the amenity that the amenity of occupants and users of nearby buildings and land uses, including within the proposed development, will not be impacted to an unacceptable degree.

DES 3 Trees and Hedgerows This policy promotes a net gain in trees and hedgerows, which will be an important consideration as part of restoration and aftercare proposals.

Policy NH 5 Habitats, Species, Biodiversity or Features of Natural Heritage Importance This policy is particularly relevant to proposals for commercial peat extraction. Active peatland is a recognised habitat and feature of natural heritage importance, as well as raised bog and lowland bog being on the NI Priority Habitat List.

Policy EP 1 Environmental Pollution

This policy shall be considered alongside Policy MIN 1, Criteria a) and c) in respect of protecting the natural environment and water environment. Policy EP 1 states that planning permission will be refused for a development proposal where it would have an unacceptable adverse impact on the environment as a result of air, noise, light or water pollution.

Policy EP 2 Land Contamination

This policy considers the issue of ground pollution (i.e. land contamination), which has the potential to cause significant harm to human health, property, and the natural environment (including pollution of the water environment) because of the presence of particular substances in, on, or under the ground.

In conclusion, the draft policies are deemed to be appropriate response to the evidence base which includes baseline information contained in this Technical Supplement, the POP, responses to the POP and subsequent engagement with consultees and other stakeholders.

The draft policies have been subject to a Sustainability Appraisal (SA), the findings of which are set out in the accompanying SA Environmental Report.

8.0 Soundness

The LDP has been prepared in accordance with the tests of soundness set out in DfI's Development Plan Practice Note 6: *Soundness* (Version 2, May 2017). The draft Plan Strategy, insofar as it relates to the minerals development policy approach, is considered to be sound, as it satisfies the relevant tests of soundness, as summarised in Table 4 below:

The policy approach to minerals development is primarily covered in Policies MIN 1-8 and the General Policies, in particular GP 2(a) Transport Infrastructure; GP 3 Public Safety and Human Health; and GP 4 Amenity.

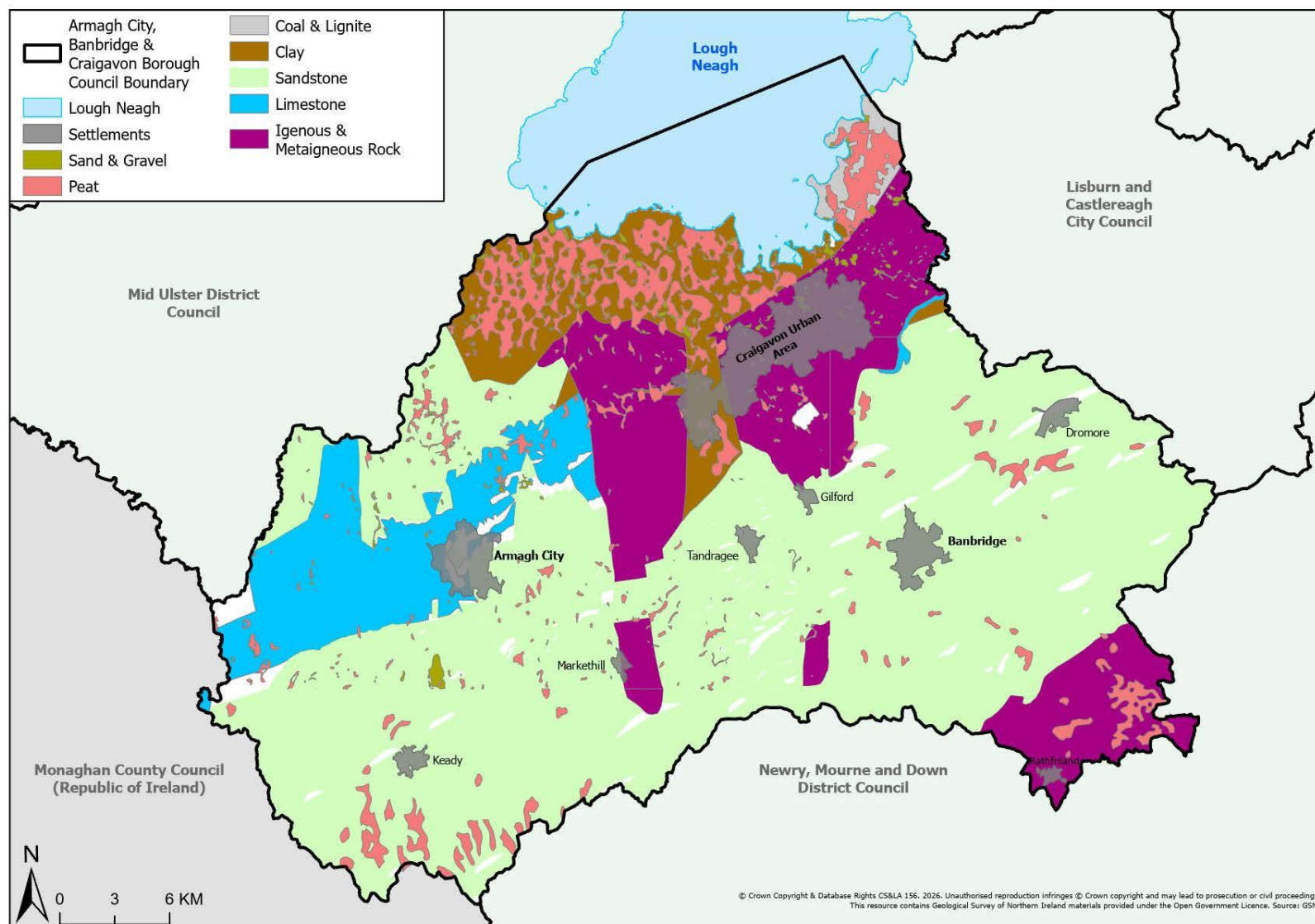
Table 4: Consideration of Soundness

Procedural Tests	
P2	The policy approach to minerals development has evolved from the POP and has taken account of POP representations and further consideration within the POP Consultation Report.
P3	Policies MIN 1-8 and other policies applicable to minerals development have been subject to Sustainability Appraisal, including a Strategic Environmental Assessment. Further details are included in the Sustainability Appraisal Report.
Consistency Tests	
C1	The policy approach to minerals development has taken account of the RDS and in particular Regional Guidance RG 9 and RG 11, and Spatial Framework Guidance SFG 13.
C2	The policy approach to minerals development has taken account of the Council's Community Plan, particularly in terms of the cross-cutting theme of 'Sustainability' and the long-term outcome of a 'Revitalised Place', which acknowledges that rural character must be preserved and developed for everyone to enjoy.
C3	The policy approach to minerals development has taken account of existing regional direction in the SPPS, in particular paragraphs 6.148 - 6.167, and current PSRNI Policies MIN 1-8. Regard has also been had to existing Planning Policy Statements (PPSs) applicable to minerals development proposals, including PPS 21 Sustainable Development in the Countryside, PPS 2 Natural Heritage and PPS 3 Access Movement and Parking (and its associated Clarification relating to Protected Routes).
C4	The policy approach to minerals development has had regard to relevant plans, strategies, other publications, and initiatives relating to the Borough, including the existing development plans within Armagh City, Banbridge and Craigavon Borough. The policy approach has also had regard to the neighbouring council context, including in the Republic of Ireland.
Coherence and Effectiveness Tests	
CE1	The policy approach to minerals development has taken account of the emerging LDPs of our neighbouring Councils in Northern Ireland and our neighbouring council in the Republic of Ireland (Monaghan County Council) and are not considered to be in conflict with these.

CE2	The policy approach to minerals development, including Policies MIN 1-8 and other relevant policies, are based on the best available evidence which includes the baseline information contained in this Technical Supplement, the POP and responses to it and subsequent consultation with consultees and key stakeholders. The policy approach is deemed to be realistic, appropriate to local circumstances and robust. The Local Policies Plan is deemed to be the appropriate stage at which to review existing Areas of Constraint on Minerals Development (ACMDs).
CE3	The Monitoring Framework in Part 4 of the LDP Plan Strategy outlines under Strategic Objective 12 that minerals development proposals will be used to monitor the number of economic development approvals in the countryside (Policies MIN 1-8), with it deemed to be no need for a trigger. There are no other indicators in relation to minerals development. The need for furthering monitoring can be reviewed at Local Policies Plan stage, following a review of existing ACMDs and further consideration to designating Minerals Safeguarding Areas (MSAs) where there is evidence to support them.
CE4	The policy approach to minerals development can be reviewed at Plan Review stage. There will be flexibility for the Local Policies Plan to review existing/designate new ACMDs and to designate any MSAs, provided this is supported by robust evidence.

Appendices

Appendix 1: Minerals Resources (Underlying Geology) Map

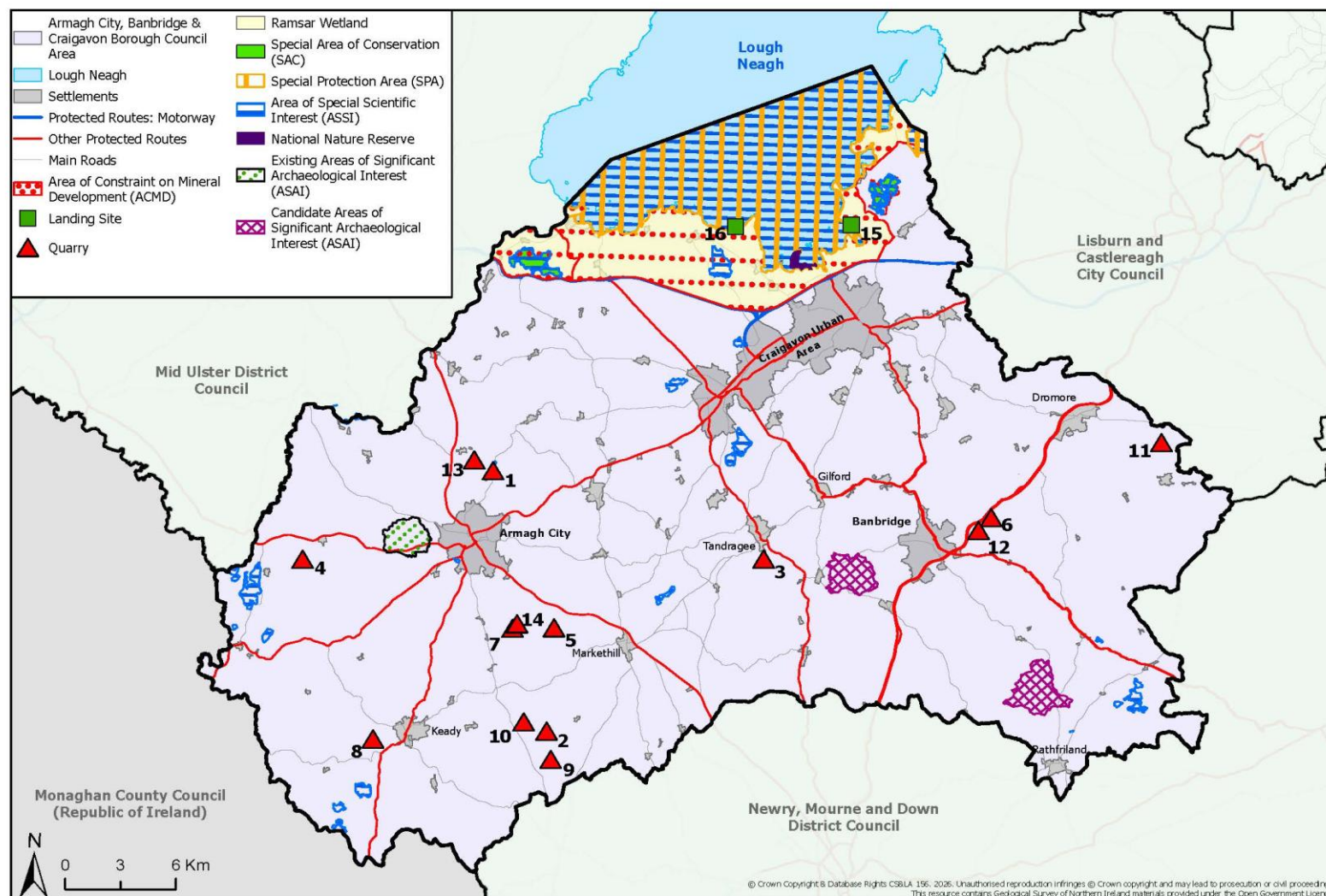


Appendix 2

Active Minerals Operators in Armagh City, Banbridge and Craigavon Borough

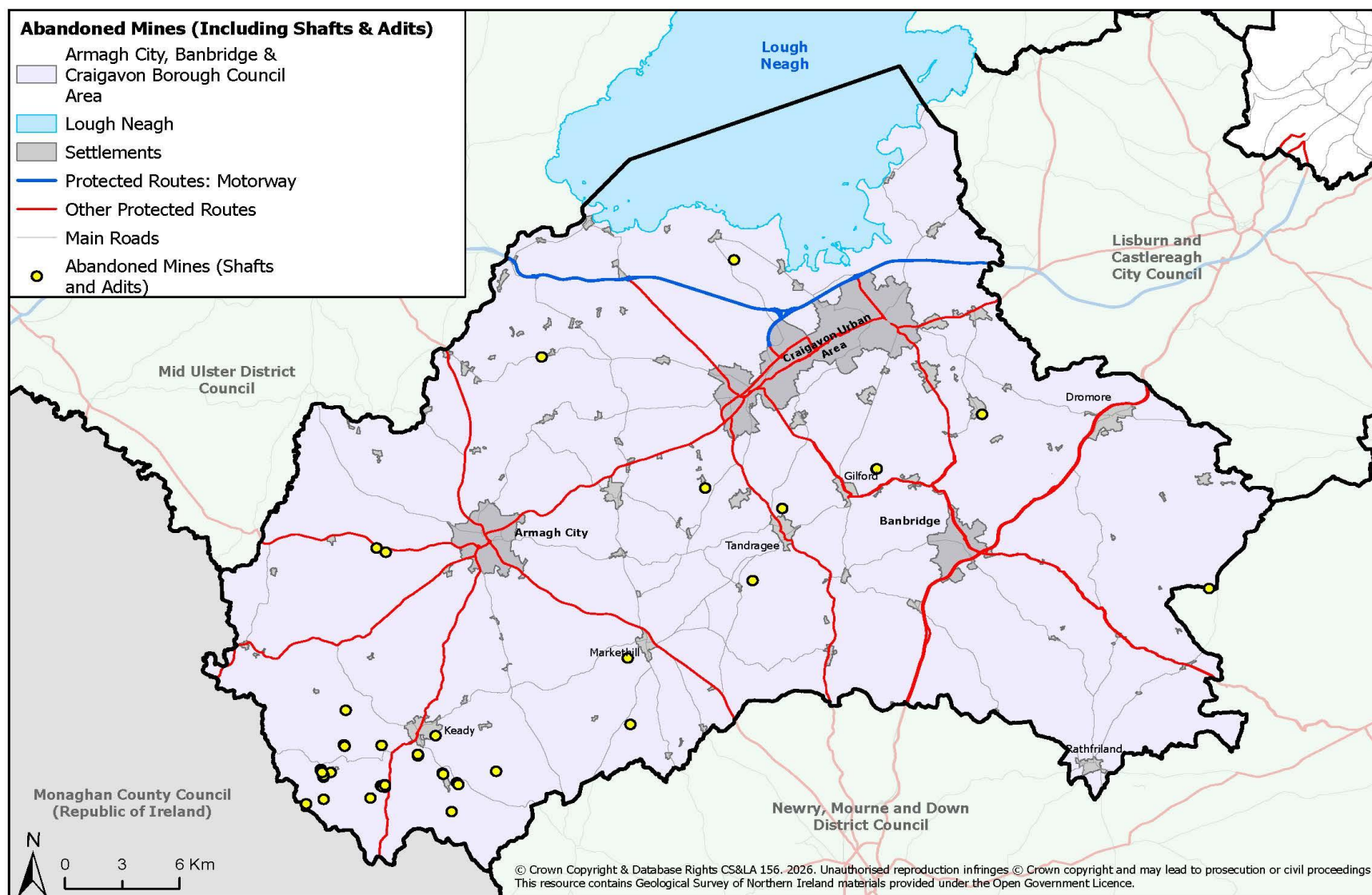
No.	Operator Name	Quarry / Operation Site Address
1	Armagh City Quarries	Annacramph Quarry, 154 Loughgall Road, Armagh, Co. Armagh, BT61 8ET
2	Clady Aggregates Ltd.	Clady Quarry, 22 Blackquarter Road, Clady, Co. Armagh, BT60 2HD
3	Collen Bros. (Quarries) Ltd.	Glebe Hill Quarry, 30 Glebehill Road, Tandragee, Co. Armagh, BT62 2DP
4	D. Acheson (Navan Quarries) Ltd.	Tynan Quarry, Cavanapole Road, Killylea, Co. Armagh, BT60 4NG
5	F. P. McCann Ltd.	Cootes Quarry, 56 Redrock Road, Cavanagrow, Armagh, Co. Armagh, BT60 2BL
6	Gibson Bros. Ltd.	1 Kilmacrew Road, Banbridge, Co. Down, BT32 4ES
7	King Bros. Quarry Ltd.	87 Killycapple Road, Collone, Armagh, Co. Armagh, BT60 2AL
8	Leer Quarries Ltd.	Leer Quarry, 34A Lagan Road, Keady, Co. Armagh, BT60 3ES
9	Loughran Rock Industries (N.I.) Ltd.	Cladybeg Quarry, 55 Friary Road, Cladybeg, Co. Armagh, BT60 2HE
10	B. P. McKernan Contracts Ltd.	Rear of 19 Corran Road, Tassagh, Keady, Co. Armagh, BT60 2RB
11	McQuillan Quarries Ltd.	Edentrillick Quarry, 17 Lagangreen Road, Dromore, Co. Down, BT25 1EL
12	Tullyraine Quarries Ltd.	Tullyraine Quarry, 122 Dromore Road, Banbridge, Co. Down, BT32 4EG
13	W. G. Mills & Son	Grange Quarry, 88 Salters Grange Road, Loughgall, Co. Armagh, BT61 8EU
14	W. J. & H. Crozier	Outlack Quarry, 19 Outlack Road, Armagh, Co. Armagh, BT60 2AN
15	A. E. Mullholland & Sons	South of 29 Derryclone Road, Gawley's Gate, Craigavon, Co. Armagh, BT67 0BN (LANDING SITE)
16	Norman Emerson Group Ltd.	Emerson's Quay, Opposite 116-118 Ardmore Road, Derryadd, Craigavon, Co. Armagh, BT 66 6QP (LANDING SITE)

Appendix 3: Active Minerals Sites and Environmental Designations Map



Note: The current Areas of Constraint on Minerals Development (ACMDs) in CAP 2010 and DSTAP 2010 align with the Ramsar Wetland, SAC, SPA, ASSI and NNR Designations to the north of the Borough and/or over Lough Neagh (i.e. northwards from the M1 Motorway).

Appendix 4: Abandoned Underground Mines Map



Appendix 5



Local Quarry Return Form – Year 2024 (1 January – 31 December)

Please answer all questions below and overleaf, for the 2024 calendar year only, and return the form by the deadline provided in covering letter.

The information you provide in relation to your quarry operation will be used by the Council's Planning Department to inform the preparation, monitoring and future review of the Council's Local Development Plan process and to inform other relevant planning matters. No part of the survey should be interpreted as to how the Council will deal with individual sites in the future.

Details of how the Council will process **personal data** can be found at the end of the form.

Operation/Quarry Details

1. Name of Operator	
2. Name of Quarry and Site Address (including postcode)	
3. Business Office Address (if different from the site address)	
4. Contact Details (details of best person to contact)	a. Name: b. Tel/Mob Number: c. Email Address:

For those operators who have received this form by post, you are asked to provide an email address (in 4c above) for ease of communication in the future.

Quarry Status

5. Status of quarry during 2024 Please mark Y/N as relevant.	Active – in production	
	Inactive – not currently worked but reserves still contained	
	Not commenced – planning permission received but quarry not yet active	
	Closed – reserves exhausted (if so, please state when the quarry closed)	
	Other – Please specify	
Please provide related Planning Application Reference(s), as applicable.		

Employee Details

6. Number of employees (directly employed at each ABC site as appropriate). Please specify full-time and part-time staff.	Full-time	Part-time	Total

Output

7. Minerals extracted during year 2024 (1 January – 31 December)				
Type of mineral (e.g. basalt and igneous, sandstone/gritstone, limestone, sand and gravel etc.)	Quantity extracted (metric tonnes)	Extractive Waste (Extractive Waste Plan Ref.) (metric tonnes)	Average value per tonne (£/tonne) (before tax, levy, costs and profit (i.e. the production cost))	Turnover (including added value)

Destination of Product (Extracted Material)

8. Please indicate below the quantity of mineral product that you supplied during 2024, locally within ABC, within each of the other council areas across Northern Ireland, and/or outside of NI.

NI Council Area	Type of Mineral/Material	Quantity Sold/Supplied (in metric tonnes)
Armagh City, Banbridge & Craigavon		
Antrim and Newtownabbey		
Ards and North Down		
Causeway Coast and Glens		
Belfast City Council		
Derry City and Strabane		
Fermanagh and Omagh		
Lisburn and Castlereagh		
Mid and East Antrim		
Mid Ulster		
Newry, Mourne and Down		

Question 8 continued.

Exported Outside NI	Type of Mineral/Material	Quantity Sold/Supplied (in metric tonnes)
Republic of Ireland		
Great Britain		
Other		

9. Describe the end use for the extracted mineral in question within the market, including supplies to value added plants (concrete, mortar, coated road stone etc.)	
---	--

Imported Minerals

10. Please indicate below the type and quantity of any minerals you imported on site in 2024, if any, along with the place of origin and for what purpose (i.e. as end-user or supply).

Type of Mineral / Material	Quantity (metric tonnes)	Imported from (within ABC; other named NI Council area; or outside NI)	Purpose (specify end-use or for supply)

Remaining Reserves

11. How much of the current permitted reserve is left? Please specify in metric tonnes, that your business has permission to extract. Please detail related Planning Reference:	
12. When is the permitted reserve likely to be fully depleted? (i.e. anticipated closure date based on planning permission and current extraction rate)	

Other Potential Reserves / Future Demand

13. Is there potential to expand the current quarry site? If yes, please provide further details (including known constraints e.g. environmental, landscape or infrastructure)	
--	--

Please indicate any potential expansion on a map, as a guide (for information only).	
14. What is the estimated additional resource available, as referred to in Q12 above, subject to planning permission? Please specify for each mineral in metric tonnes.	
15. Do you intend to expand the current permitted quarry site <u>before</u> the end of 2035? Yes/No/Unsure? (Please explain)	
16. Do you intend to expand the current permitted quarry site <u>after</u> 2035? Yes/No/Unsure? (Please explain)	

17. Are there any other areas of minerals outside of the current permitted quarry site that you may be considering for future extraction? If so, please provide location(s) and map(s), for information. The map should separately highlight (a) existing permitted reserves; (b) other known reserves; and (c) areas of potential future expansion. Please advise of the timescale that you may plan to extract from here.	
18. Are there any proven mineral reserves of economic or conservation value that merit safeguarding? If so, please provide details of the nature, location and extent of the reserves, for information, along with a justification as to why they would merit safeguarding.	

Other processing or operations

19. What other processing or operations are carried out on site, or elsewhere within ABC Borough, if any? Please specify the location and what this entails (e.g., recycling of specific materials, distribution/supply of products etc.)?	
--	--

Additional Information / Comments

20. Please provide any other information that you consider the Local Development Plan Team should be aware of relating to your company's future operations and needs (a) up to the end of 2035; or (b) beyond 2035.	
--	--

Thank you for taking the time to complete this survey.

Declaration

By returning this survey, you confirm that the information provided is true and accurate to the best of your knowledge and ability.

Personal Data

Your personal data will be handled in accordance with the UK GDPR and Data Protection Act 2018. The lawful basis for processing personal data requested in the Minerals Return Form is as a public task (under Article 6 (1) (e) of the UK GDPR), as the processing is necessary for Council to perform this task as part of its official planning functions.

We will only use personal data (such as contact name, email address and phone number) to contact you if we require any additional information regarding your return form. No personal data will be published or shared with any third party, including with other internal council departments. Your return form and any accompanying information, including personal data, will

be stored in secure servers. Personal data will be retained as long as necessary and disposed of securely in compliance with the Council's Retention and Disposal Schedule.

Further general information, including your rights, is available on the Council's website at [Privacy - Armagh City, Banbridge and Craigavon Borough Council](#).

Contact Details

Armagh City, Banbridge and Craigavon Borough Council – Local Development Plan Team

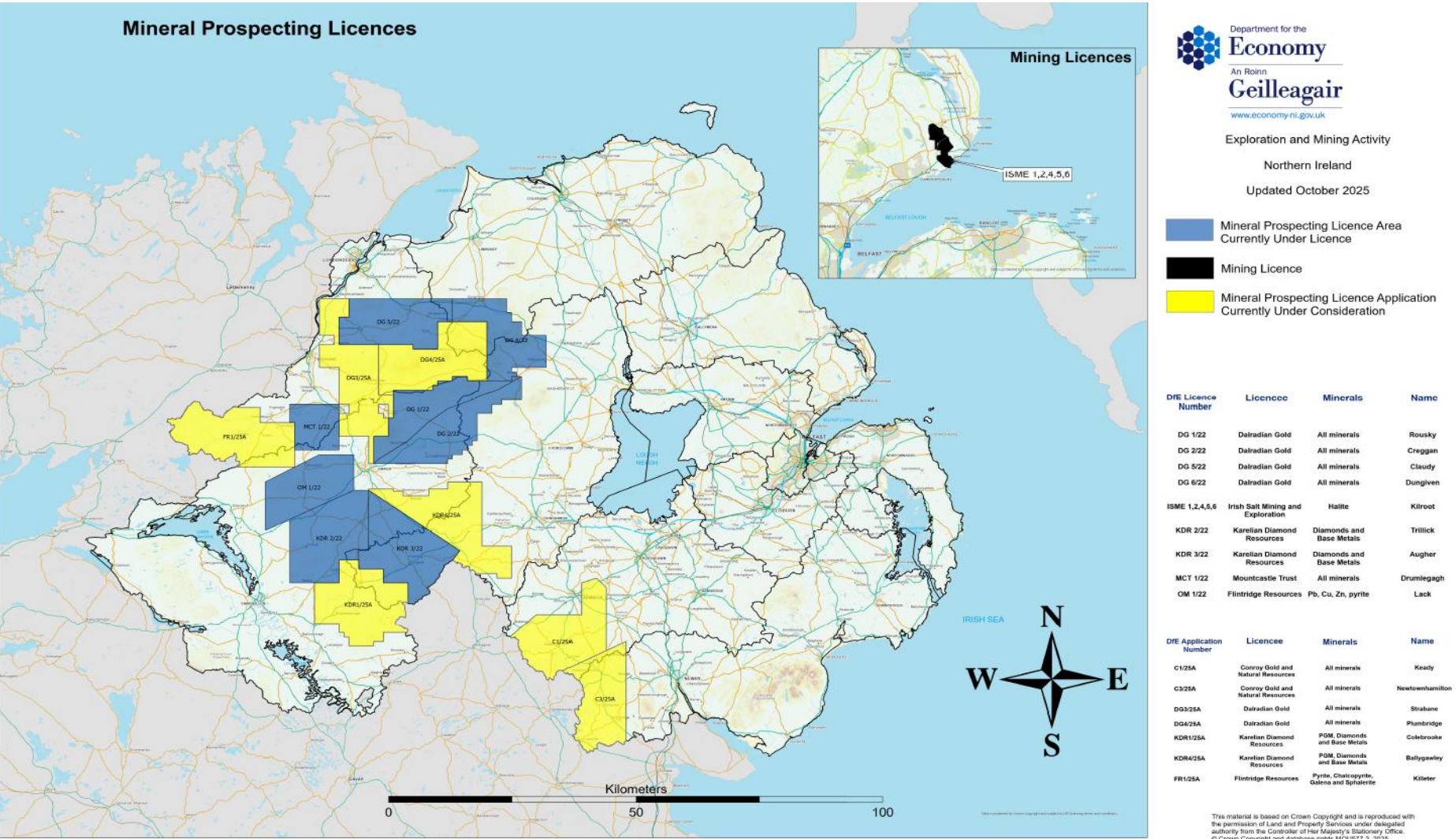
The Civic Building | Downshire Road | Banbridge | BT32 3JY

Email ldp@armaghbanbridgecraigavon.gov.uk

Telephone 0300 200 7830 (NI General Planning Number); 0300 0300 900 (Main Council Number)

March 2026

Appendix 6: DfE Mineral Prospecting Licences Map



INTERESTED IN DEVELOPMENT

in the Armagh City,
Banbridge and
Craigavon Borough

Please contact

ABC Planning Department - Local Development Plan Team
at Armagh City, Banbridge & Craigavon Borough Council

 0300 0300 900

 ldp@armaghbanbridgecraigavon.gov.uk

 armaghbanbridgecraigavon.gov.uk

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