

Planning Department  
 Newry Mourne and Down District Council  
 Haughey House Unit 19  
 Rampart Road  
 Greenbank Industrial Estate  
 Newry  
 BT34 2QU

17<sup>th</sup> September 2025

Dear Sir/Madam,

**RE: Representation to Newry and Mourne District Council regarding the Local Development Plan Draft Plan Strategy 2035.**

Quarryplan Limited is instructed by its client, [REDACTED] to prepare and submit a representation to Newry, Mourne and Down (NMD) District Council Local Development Plan Draft Plan Strategy which is currently subject to public consultation. This submission specifically relates to policies MIN 5 Mineral Safeguarding Areas ('MSA's) and MIN 7 Restoration and Aftercare.

[REDACTED] The business has been supplying the construction industry in Northern Ireland for more than 60 years. [REDACTED] combined product portfolio and associated services consistently achieve a reputation for quality and value, unrivalled in the materials supply sector in Northern Ireland.

[REDACTED] Operations at the Site are permitted via a number of extant planning permission. The Site is currently dormant.

**Draft Policy MIN 5**

Draft Policy MIN 5 relates to MSA's and proposes that areas may be defined around mineral reserves whereby development which prejudices the future exploitation of these reserves would not be permitted. The draft policy states:

*"Mineral Safeguarding Areas (MSAs) may be defined around mineral reserves in Newry, Mourne and Down that are considered to be of economic or conservation importance. In the case of high value minerals, the economic importance will be demonstrated following assessment under a recognised reporting code. Surface development which would prejudice future exploitation of these mineral reserves will not be permitted."*

██████████ supports the principle of this draft policy however it has concerns with regards to its proposed wording. The use of the word “may” in the first sentence of the draft policy avoids any firm commitment to defining such areas. Given the importance of the minerals industry to the Northern Ireland Construction Industry and by association, the local and regional economy, it is considered prudent that the Council provides a firm commitment to safeguarding important mineral reserves.

Notwithstanding the proposed revised wording as referenced above, ██████████ supports the principle of the draft policy. Please find attached at **Appendix 1**, lands which we would propose are safeguarded in the vicinity of the quarry in order to safeguard the existing resource for extraction. We would encourage these lands to be designated under the above draft policy (MIN5) thus preventing any further encroachment in lands which may prejudice the future exploitation of the mineral.

### Draft Policy MIN 7

Draft Policy MIN 7 relates to Restoration and Aftercare and states the following:

*“Subject to meeting Policy MIN1, all applications for mineral development must be accompanied by restoration proposals to ensure the appropriate future land use following cessation of minerals extraction and/or processing operations.”*

Within the justification and amplification text however it is stated that:

*“A financial guarantee will be considered necessary where the implementation of a restoration scheme is in doubt.”*

The wording of the policy therefore appears contradictory to the wording of the amplification text, with the policy wording appearing to suggest that a restoration and aftercare bond will be required in all instances, whereas the justification and amplification text appears to be stating that such a financial guarantee will only be necessary where the implementation of a restoration scheme is in doubt.

The policy wording should therefore be revised in order to make it clear that a financial guarantee will only be required in exceptional circumstances where the restoration scheme is in doubt.

### Conclusion

Quarryplan Limited is instructed by ██████████ to prepare and submit a representation to Newry, Mourne and Down District Council Local Development Plan Draft Plan Strategy which is currently the subject of a public consultation.

██████████ largely support the proposals presented within the Draft Plan Strategy subject to the changes to the text described in this representation. In order to assist the Council with matters relating to Draft Policy MIN5, a plan is provided of lands which are considered appropriate for safeguarding in the vicinity of Magheraknock Road, Ballynahinch.



Trust in experience

We would welcome any feedback the Council may have with relation to this representation and would be grateful if the Council could continue to update us on the progress of the LDP.

I trust that the above is acceptable, however, if you wish to discuss any of the same, please do not hesitate to contact me.

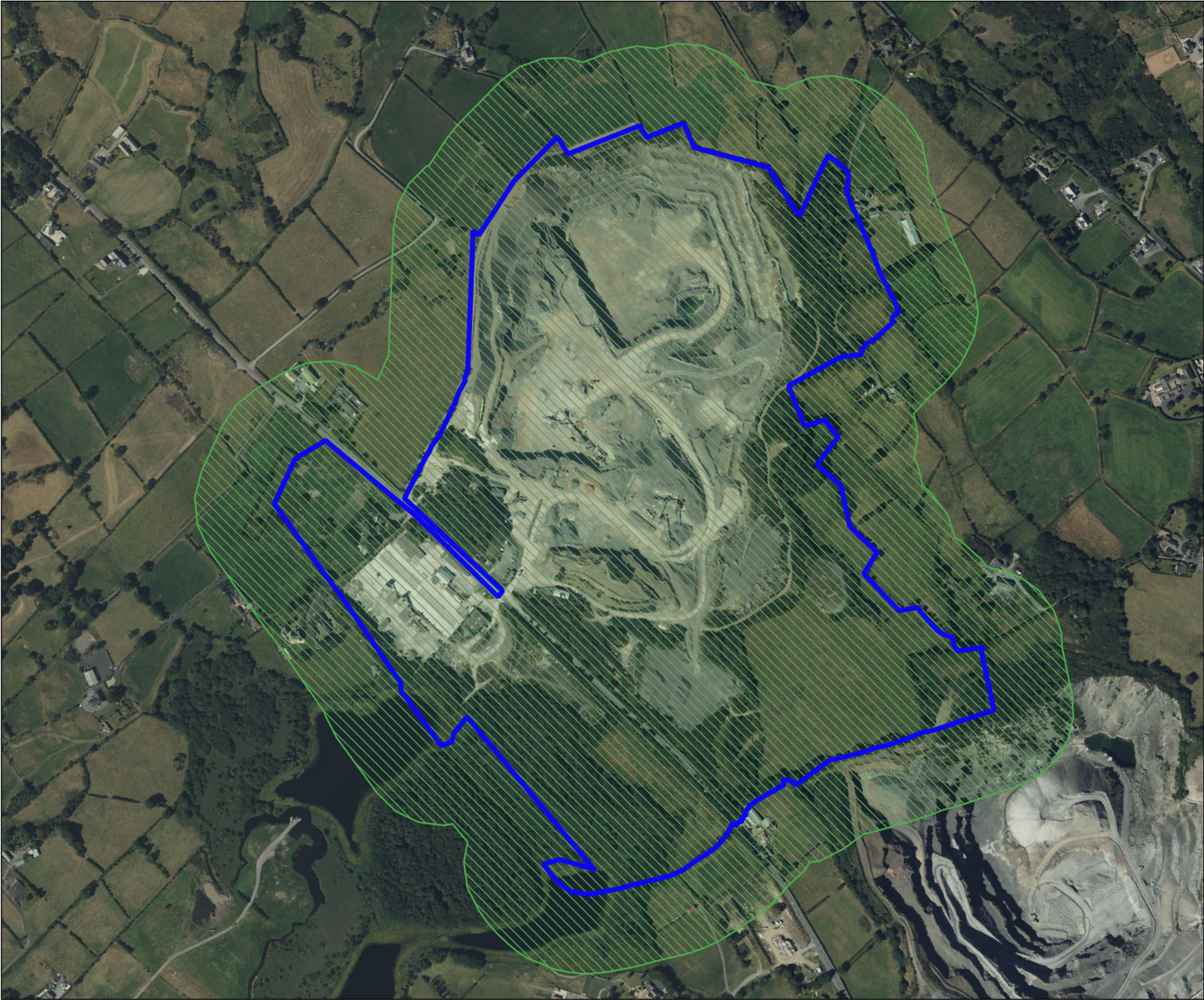
Yours sincerely,



**Quarryplan Limited**  
**Town Planner**

## Appendix 1





Notes: Bing Aerial Imagery  
Image ID: 033

### Legend

- Full Landownership
- 100m Buffer



Scale: 1:4500 @A3  
Dwg. No.: 001  
Drawn By: SC  
Date: 17/09/2025