

and turf which will come as part of their long held turbarry rights. I and my neighbours also use this as link road to the local GAA grounds and Community Centre.

I also believe there are access issues to a historic mass rock within the site boundary, and indeed the removal of priority 1 habitat active peat which are central to the application.

Proposal Failings

The application reference **LA10/2017/1249/F** was submitted in 2017 and has a number of issues as listed below:

1. The initial public consultation event venue at a local Community Centre (Rousky Community Centre) was changed at a late stage to one that was inaccessible and not neutral for the majority of residents (i.e. the site of the mine in Curraghinault) which was in close proximity to an active explosives store and had completely inefficient parking facilities – this caused much distress and was seen as a sham exercise and not meaningful;
2. The red line location plan is different from that shown at the public consultation event;
3. Information given at the first day of the first consultation to the general public was changes and different information given out at the second night of the first consultation. This caused much confusion and angst amongst local residents and those attending the event.
4. Information and Maps given to those attending the First Consultation event were incorrect, this included cases where houses closest to the site were not even shown on Maps!
5. In terms of site selection, a huge processing plant and waste facility (53m high) and covering in excess of 100 acres on active peat, in the AONB and an SAC surely could not have been the only choice of above ground facility location – I do not accept the site selection process contained within the EIA. It is clear that the primary objective for the applicant is to place the waste and plant as close to the resource as possible in order to maximise their profits with no regard for the sensitivity or protected nature of the landscape.

Policies

In terms of policies, the proposal is contrary to the following:

1. First and foremost to the Local Area Plan and its designation and protection of the AONB/SAC/ASSI;
2. The Site selection process has not been adequately explained and is clearly motivated solely by economic reasons with no regard given whatsoever to the active peat, SAC, ASSI and the AONB. The consideration given to other sites for the above ground dry stack facility and processing plant is not satisfactory and is at the expense of disregarding the AONB and the destruction of active peat. There has been no assessment of appropriate sites in the wider area that do not carry the same level of protection – surely an assessment of brown-field sites, docklands etc. should have been considered?
3. The application refers to economic compensation by way of section 76 agreement, the detail of which is not available to view. This seems like a clear admission of offering monetary compensation for the destruction of the environment.

I am aware that the proposed site as identified in the application is located in one of the most environmentally sensitive and most protected locations in Northern Ireland as confirmed in the applicants own Planning Statement.

The location in the Sperrins is in an Area of Outstanding Natural Beauty, a status designated to this beautiful part of our Country some fifty years ago. It is naturally rugged and relatively unspoiled with a large spread of active peat and priority habitat. The Owenkillew and Owenreagh Rivers lead on to the Foyle and contain Tributaries which are also designated Special Area of Conservation (SAC), a number of Areas of Special Scientific Interest (ASSI).

The increased potential for toxicity in air emissions emanating from the site due to wind carry and open operational activity is a very real and serious concern for communities within many miles of this development. Dust and harmful particles with the possibility of containing metal compounds and cyanide may be generated by many sources during the proposed operational phase of the project at the proposed infrastructure site. Air emissions from earthmoving and compaction activities, as well as emissions from vehicle movements on unpaved roads, handling of ore and other waste material will contain harmful carcinogenic properties and this is clearly demonstrated by the fact that the applicant is suggesting that 4'500'000 litres of diesel fuel will be used on the proposed site each year!!

The proposal is clearly contrary to Policies contained within PPS2 for the protection of an AONB where these policies state:

“permission will only be considered in the AONB when the proposal is of an appropriate design, size and scale for the locality and the siting and scale of the proposal is sympathetic to the special character of the Area of Outstanding Natural Beauty in general and of the particular locality, it respects or conserves features of importance to the character, appearance or heritage of the landscape; and it respects traditional boundary details, by retaining features such as hedges, walls, trees and gates.”

In simple terms, this proposal offends every part of this policy. It follows on that it offends the rural character and integration and design policies contained within Planning Policy Statement 21 and is reliant on a policy which is now over 25 years old. In consideration of how this proposal fits with the Planning Strategy for Rural Northern Ireland, this proposal still offends its Minerals policies which are designed to preserve the protected scenery, avoiding skylines and minimise visual impact. This submission fundamentally fails the protective landscape tests contained within the minerals policy.

It is clear on review that there are numerous failings and policy problems with the proposal. There is little point in having planning policy in place particularly within a designated AONB then not adhering to it and **therefore for this point alone**, this proposal should be refused.

The Sperrins / [Muintir Lúinigh](#) area has the highest measurements of annual rainfall in Northern Ireland at an annual average of 1600 mm. I am concerned that there is an increased potential for leaching of contaminated pollutants into local surface waters. I am extremely concerned about potential contamination and pollution of rivers, the water supply and drinking water from the discharge and seepage of industrial processes proposed as part of the mining process.

The Department must note that **Independent** Rain Fall Meteorological Data used by the applicant is recorded at Lough Fea which is 20 Km from site, Banagher which is 28 Km from site and Castlederg which is 22 Km from site. These are described as in close proximity to the site which is debatable, but arguments could be made that rain fall at the site could be even higher give its elevated location. This area and others very near us in the Sperrins suffered a once in a one thousand year storm in August 2017 and a number of other once in a hundred year storms since, is very obvious that these extreme weather patterns are becoming more of a norm than the exception. The most important aspect in this regard is that Dry Stack Tailings heaps are only suitable in areas where rainfall is less than 1000mm per annum.

As a farmer, I am concerned if pollutants get into water abstraction wells and mains used by humans and also to feed livestock on surrounding farms within the catchment area; there is a concern that this will harm or worse kill humans or livestock. If and when the water quality is affected, this will have will have a knock-on effect on the eco-system, water cycle, biodiversity and most disturbingly human health and animal welfare.

There will be very large explosions a number of times each day (7 days per week / 365 days per year) which will create a great risk of subsidence or structural damage to nearby property as well as large

amounts of toxic dust coupled with noise pollution and a further risk of stress to residents and farm livestock in the area.

A similar toxic dust will be created from crushing and grinding as aside from the rock that will be sorted and crushed underground, mineralisation from the mine will be delivered by haul truck to the crushing area where it will be either placed on a Run-of-Mine (ROM) stockpile or processed directly. A jaw crusher will reduce the size of the mineralisation for processing in the grinding circuit. Waste rock is then stockpiled on top of the land at the designated Dry Stack Facility. I believe this facility will contribute significantly to harmful air emissions as treated rock is exposed for an extended period. I am concerned with regards to the potential contaminated composition of the waste rock surface and the risk of particles dispersing into atmosphere from this exposed stockpile by the wind. All these industrial processes have the potential to create significant air emissions and harmful particulates that could carry extensive distances, particularly onto fields in the area from which I farm and my herd feed from. I know that wind can carry particulates and dust significant distances and this will certainly settle on my agricultural land and many others surrounding which is directly the site.

Another area of concern is the site can be clearly seen from large parts of Aughaboy, Binnafreaghan, Cashel, Fallagh, Greencastle, Barony (A505) roads and one side of the Owenreagh valley. Dalradian are suggesting that the Dry Stack waste facility will hide the plant from these locations. Surely this would only be the case if a proposed mine was nearing its end of life. At the start there will only be a sloping hillside. The suggestion by the Applicant appears to be that a Dry Stack Waste Pile will be used to hide or camouflage any proposed processing plant. This suggestion has repeatedly been put forward as being of great visual benefit to our beautiful rugged landscape. Frankly, this can only be described as a ludicrous suggestion and I find it difficult to understand how this proposal could be taken seriously with this suggestion in mind!!

From living in the surrounding area, the increase in volume and nature of traffic will be unacceptable. The road infrastructure is already poor and can barely handle the existing volume of traffic the proposal can only make this worse. I and many others have serious concerns for road safety and large HGV traffic encroaching onto opposite side of road when turning. The Lorries cannot turn left when exiting from the Camcosy Road as the junction is too sharp and Dalradian have attempted to mitigate against this by ensuring Lorries exit to the right and then turn at Lenagh Road. The Lenagh Road / Drumlea Bridge turn is equally as sharp a junction, which has restricted views and poor site lines and the resultant traffic will affect a greater area.

The road network cannot safely absorb the proposed uplift in vehicle trips including large HGVs associated with the proposed gold mine. The level and volume of traffic on small rural roads will make it unsafe. The Transport Assessment states that 85% of the journeys will be 'new' to the adopted road network (1.11). Overall, this comprises 260 vehicle trips per day attending the site. This increase of vehicles on narrow country roads is unacceptable. This proposal is contrary to the Planning Strategy for Rural Northern Ireland (PSRNI) as in this case the mineral resource - gold - is in an area where the public road network is unsuitable for the volume of heavy traffic which mineral developments will generate. The proposal will prejudice road safety and inconvenience road users.

In consideration of this proposal Department for Infrastructure must consider and recognise of the intrinsic value of the local landscape and environment and its fundamental importance for the local community, not only for those who live here but also for those who visit to appreciate the unique landscape we treasure and is worthy of protection. Despite the controls measures proposed to be implemented, the high quantity of wastes and use of aggressive chemicals are simply uncontrollable.

It must be noted that the applicant removed the proposed use of cyanide from their original planning application following a record number of objections and the direct and very public intervention of Doctor McBride from the PHA, most importantly, it should also be noted that the infrastructure to house all the equipment for the Cyanide process remains completely unchanged.

This leads to the well-founded concern that if approved that cyanide will be introduced at a later date to ensure the viability of any project. I have huge concern around the possible use of cyanide in the future owing to a number of reason, primarily the possible contamination of the water table

as the Applicant suggested in their original application that they will return any Cyanide tailings or waste product back underground by the way of a concrete paste mix, considering our water starts its journey from natural springs underground and continues its journey through natural falls, into burns or streams and on into rivers (from which large volumes of drinking water are extracted and treated) ending in the Foyle or Lough Neagh, **secondly** and with an equal amount of worry and concern is the transportation of huge volumes (20 -30 tons per week) of Cyanide on a daily or weekly basis on small, narrow rural roads which are unsuitable and inappropriate for this purpose and **thirdly** my concern also extends to the storage of huge volumes of Cyanide on a proposed rural hillside location with other heavy duty industrial chemicals as well as large quantities of high-grade industrial explosives being stored on the same site.

These three concerns coupled with the fact that other potentially toxic chemicals being stored and used during the Flootation process on site should raise a huge red flag for any Government body or enforcement agency. Cyanide use is banned in many countries and the European Parliament voted in April 2017 - 566 in favour and 8 against for the European Commission to ban the use of cyanide-based mining in the European Union as soon as possible.

[Redacted]

Thanks in advance for taking the above into consideration.

Yours Sincerely,

[Redacted]