

**Ards and North Down Borough Council**

**Local Development Plan 2032**

**Representation made on behalf of:  
Northstone Materials Ltd**

**December 2025**



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## **1.0 INTRODUCTION**

The representation hereby submitted has been prepared by Quarryplan Limited (Quarryplan) on the instruction of its Client, Northstone Materials Ltd (Northstone).

Northstone is a leading producer and supplier of construction materials across Northern Ireland, with multiple well-established quarries located within the Ards and North Down Borough Council (ANDBC) area. Northstone has been supplying the construction industry in Northern Ireland for more than 60 years and its combined product portfolio and associated services consistently achieve a reputation for quality and value unrivalled in the materials supply sector in Northern Ireland.

This representation provides comments on the draft policies of the ANDBC Local Development Plan (LDP) 2032 Draft Plan Strategy (DPS). While Northstone is broadly supportive of the DPS, a number of amendments are proposed to ensure clarity, coherence, and consistency in the minerals development policies over the plan period.

Comments are provided on several draft policies with reference to the LDP tests of soundness, as set out in Development Plan Practice Note 6 (DfI, May 2017).

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## **2.0 NORTHSTONE OPERATIONS IN ANDBC**

Northstone Materials Ltd, headquartered in Dunmurry, is a subsidiary of CRH plc the international building materials group. CRH plc is a leading global diversified building materials group, employing 80,000 people at 4,000 operating locations in 28 countries.

Northstone has a wealth of experience and directly employs around 370 people across a network of fixed and mobile sites in the UK. The business's portfolio and services span aggregates, asphalt, construction, civil engineering, limestone, readymix concrete, road contracting services, roofing contracting services, mortar and roof tiles. This unique combination of people, skills and experience enables it to offer customers unrivalled choice, innovation and flexibility.

As a CRH company, Northstone is committed to doing business in a sustainable, responsible and ethical manner with its customers, suppliers, business partners, local government and communities, shareholders, subcontractors and employees alike, building lasting relationships based on trust and underpinned by its core values of integrity, honesty and respect for the law.

Northstone has 4 Sites within the ANDBC area, as follows:

<b>Northstone Quarries in ANDC</b>	<b>SITE ADDRESS</b>
North Down Quarry	61 Ballybarnes Road, Newtownards Co. Down
Carrowdore Quarry	Carrowdore Quarry, 41 Manse Road, Carrowdore
Craigantlet Quarry	Craigantlet Quarry, 73 Hollywood Road, Craigantlet.
Cairnhill Quarry	Cairnhill Quarry, Ballyskeagh, 27 Hollywood Road, Newtownards

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These quarries collectively represent a substantial proportion of the mineral operations within the Borough (4 of the 7 quarries listed in Technical Supplementary Paper 8). While not encompassing all the mineral operations within the Council area, Northstone accounts for a significant share of the land-based mineral extraction, employment, and material production within both ANDBC and Northern Ireland more widely.

## **2.1 North Down Quarry**



**Figure 1 – North Down Quarry**

North Down Quarry is a greywacke/ gritstone quarry located a 2km northwest of the Newtownards town centre, and approximately 2km to the south and west of the A20 arterial route into Belfast.

The mineral planning history for North Down Quarry was updated in April 1997 when Application X/96/0237, accompanied by an Environmental Statement was approved by the Department of Environment. This permission provided a lateral extension and provided for a continuation of the maximum extraction depth through the existing quarry footprint of 80mAOD. A later application

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X/2001/1362 granted in 2002, provided for new conditions for the entirety of the site and deepening to a revised floor level of 37mAOD.

A series of planning consents have also been issued for ancillary activities at the quarry including:

- Importation of bituminous waste, storage and introduction into coating plant;
- Replacement Asphalt Plant; and
- Revised specification asphalt plant.

The annual rate of extraction at North Down Quarry is c.200k tonnes per annum. The quarry has a £2.5 million turnover and employs 17 people.

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## 2.2 Craigantlet Quarry



**Figure 2- Craigantlet Quarry**

Craigantlet quarry is a gritstone/greywacke quarry located c.3km northeast of Dundonald on the eastern side of the Holywood Road. The Site is c.27ha in size with the main quarry void and plant site located in the eastern part of the Site and Asphalt Plant, offices and other ancillary development located in the western part.

The mineral planning history for Craigantlet Quarry dates back to an overarching 1974 planning consent, which was varied in by a consent granted in February 2002, which in turn for releasing previously constrained resources to the northwest, a quarry floor datum of 93mAOD was established. A subsequent extension consent in former Forestry Service lands was granted in August 2008 which assisted in 'squaring off' the quarry void.

A series of planning consent have been granted for ancillary activities post the issue of the 1975 issued consent and covered the following items:

- 
- Office accommodation
  - Office and weighbridge
  - Replacement crusher and screening bins
  - Erection of Coating plant and shed and
  - Proposed Concrete batching plant

The extant mineral planning consents pertinent to Craigantlet Quarry are:

- **W/2001/0610/F-** Application to develop Craigantlet Quarry, without complying with condition 8 of permission W/0136/74; and
- **W/2006/0525/F-** Proposed Lateral extension to Craigantlet Quarry.

In November 2023, planning permission was granted by ANDBC for the erection of a Coated Roadstone Plant and RAP processing at the quarry (Planning Permission Reference LA06/2022/0689/F). The Plant has since been constructed and is now operational.

The quarry is also notable for its high-PSV (65+) greywacke reserves, a material of significant value and importance for road surfacing. A substantial proportion of the extracted material is transported through Belfast Docks, supplying construction and infrastructure projects across Northern Ireland and the wider UK.

The annual rate of extraction at Craigantlet Quarry is c.600kt tonnes per annum. The quarry has a £7.4 million turnover and employs 55 people.

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## 2.3 Carrowdore Quarry



**Figure 3- Carrowdore Quarry**

Carrowdore Quarry is a Gritstone Quarry, located directly to the East of the Village of Carrowdore, Co. Down. As shown in the figure below. The current quarry void is c.15ha in size, situated within Northstone's landholding which amounts to c. 27ha. Quarry benches are located within the Eastern part of the Site with the Plant Site and aggregate storage area, including concrete hardstanding and storage sheds located in the Western Part of the Site. The Site is accessed from the West via Manse Road.

Planning permission was granted by DOE on 1<sup>st</sup> August 2002 under Planning Permission Reference X/2000/0451/F for "Extension to Existing Quarry". This is the extant planning permission for the winning and working of minerals at the quarry. The quarry is currently dormant.

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## 2.4 Cairnhill Quarry



**Figure 4- Cairnhill Quarry**

Cairnhill Quarry is a gritstone/ greywacke quarry located c.200m southeast of Craigantlet Quarry. The Site benefits from permission for mineral extraction under Permission Reference X/170/86. The current quarry void is c.5ha in size. The Site is currently dormant.

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### **3.0 MINERAL DEVELOPMENT**

#### **3.1 Mineral Development Strategy**

Section 13 of the DPS concentrates on minerals development. Paragraphs 13.1 to 13.5 provide context on the minerals industry in Northern Ireland, in particular the essential role of minerals and the role of the DLP in balancing the need for development against the need to protect and conserve the environment.

It is particularly pleasing that reference is drawn to the export market for the Sandstone mineral extracted in the Borough.

The Mineral Development Strategy stated in the DPS is as follows:

*“The strategy for mineral development is to balance the need for exploiting reserves where they exist, with the need to protect and conserve the environment from the potential adverse impacts that may arise as a consequence. This is through identifying areas which should be protected from minerals development, safeguarding mineral resources which are of economic or conservation value, and providing for the full assessment of mineral proposals including the sustainable and safe restoration and reuse of mineral sites”.*

This strategy is largely supported however it should be noted that any development may result in adverse impacts in some form or another, however it is for the Planning Authority to determine the degree to which such impacts are acceptable. As such it is recommended that the word “adverse” be replaced with the word “unacceptable”. It is noted that this has been the approach for Draft Policy MIN8 and should be replicated throughout the other draft mineral policies in order that a coherent strategy between the minerals development strategy and the operational policies in accordance with Test CE1 is being adopted by the Plan Strategy.

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Paragraph 13.6 lists a number of ways in which the strategy will be achieved. The first 3 bullet points are considered acceptable, however the final bullet point states:

*“Identifying Mineral Safeguarding Areas (MSA) at LPP stage to prevent the sterilisation of mineral resources by surface development”.*

It is considered that sufficient information is available now that would allow Mineral Safeguarding Areas (MSA's) to be identified at the Plan Strategy stage. Technical Supplementary Paper 8 which forms part of the evidence base for the DPS describes how there are 7 sandstone quarries in the ANDBC Area. Information has been supplied via this and representations by other quarry operators for at least 5 of the 7 quarries. It is considered that information for the additional quarries could be readily obtained.

Given the passage of time between the coming in to force of the development plan provisions for the Planning Act 2011 in 2015 and the current stage in the preparation of this ANDBC, it is considered likely that a number of years is likely to pass before such areas are identified at the LPP stage. Given that information to allow the areas to be identified is readily available therefore is no reason why this matter needs to be delayed or deferred to the LPP stage. Indeed, it is noted that several specific areas are identified at this stage of the LDP process including a number of landscape designations as shown on the published DPS draft mapping.

Given the importance of the minerals industry in ANDBC and the availability of information, it is considered that this MSA can now be advanced at this stage of the LDP process. The matter is discussed further later in this representation.

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## 3.2 Policy MIN 1 Environmental Impact

Policy MIN1 relates to the environmental impacts of minerals development and states that planning permission will be granted for mineral exploration and working where a number of criteria are met.

In order for the policy to be consistent with planning legislation and the reference to the “*winning and working of minerals*” within the same, it is recommended that the first sentence of the draft policy be amended to state:

*“Planning permission will be granted for mineral exploration and the winning and working of minerals only where...”.*

*Criterion b states:*

*“Such exploration and working delivers a high standard of environmental protection and enhancement to ensure that there are no unacceptable impacts on the natural and historic environment”*

This criterion implies that enhancements are required in order for there to be no unacceptable impacts on the natural and historic environment. Enhancements are not always necessary to achieve the same and therefore the wording proposed is not coherent. It is recommended that the reference to enhancement be removed from the criterion so that it states:

*“it delivers a high standard of environmental protection to ensure that there are no unacceptable impacts on the natural and historic environment”.*

The remainder of the criteria are considered broadly acceptable.

The policy goes on to state that:

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*“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”.*

Unless a specific distance is prescribed, it is considered that the reference to “close proximity” in the draft policy wording creates a degree of ambiguity within the policy. It also fails to reflect impacts which may occur at a greater distance but may have greater impacts due to direct connectivity (e.g. hydrological connectivity). The draft wording this therefore not considered logical or coherent with regards to sufficiently protecting designated sites.

At paragraph 13.17 the word “Impact” should be inserted.

Paragraph 13.18 states that:

*“Any minerals development that could impact directly or indirectly on a European Designated Site must demonstrate compliance with the requirements of Regulation 43 (1) of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended), commonly referred to as Habitats Regulation Assessment (HRA)”.*

The approach described above is not consistent with legislation, policy and guidance on the matter. The applicant may provide sufficient information to inform the competent authority's assessment which may include information on likely significant effects, mitigation solutions, reasonable alternatives, and potential compensatory measures however it is the decision maker i.e. the competent authority, who undertakes the HRA screening assessment for the plan or project, not the Applicant.

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### **3.3 Policy MIN2 Areas of Constraint on Mineral Developments**

Policy MIN2 relates to Areas of Constraint on Mineral Developments (ACMD's). The policy states that:

*“Planning permission will not be granted for mineral extraction and/or processing of minerals within an area designated as an (ACMD).*

*Exceptions to this policy may be made where the proposed operations are:*

- *Short term; and*
- *The environmental and/or amenity impacts are not significant.*

*In such cases on-site processing of the excavated material is unlikely to be permitted”.*

The wording above is considered incoherent as it states that mineral processing will not be permitted in ACMD's, with the next sentence of the draft policy confirming that exceptions exist where it would be acceptable, followed by the next sentence which states that it is unlikely to be permitted.

Paragraph 13.31 states that the reference to 'short term' in the policy is a matter of planning judgement. It is considered that in order for the policy to be effective that guidance either in the policy or justification and amplification text should be provided. It is noted that in other Planning Authority areas in Northern Ireland, adopted Plan Strategies state a specific time period.

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### **3.4 Policy MIN4 Mineral Safeguarding Areas**

Policy MIN4 relates to Mineral Safeguarding Areas (MSA's) and states that:

*“Planning permission will not be granted where surface development would prejudice the future exploitation of valuable mineral reserves”.*

It is unclear if the use of the description “valuable mineral reserves” relates to the that used for Draft Policy MIN3 and for which footnote 31 states *“valuable Minerals are defined as metalliferous or non-metalliferous minerals licensed by the Department for the Economy (DfE) or Crown Estate which are particularly valuable to the economy”.*

If this is the case, it is considered that by restricting MSA's to ‘valuable’ minerals only, that it would fail to adequately safeguard the important sandstone deposits found in the borough which are referenced earlier in the draft plan and would conflict with the mineral development strategy stated in the DPS, as discussed earlier in this representation. If this is the case the proposed approach would not follow a coherent strategy and would fail to comply with Coherence and Effectiveness tests CE1 and C E2.

Should this not be the case, and that the draft policy is intended to refer to all minerals, this should be clarified within the policy wording.

The third sentence in the draft policy states:

*“Mineral Safeguarding Area (MSA)’s will, where appropriate, be designated in the LPP using evidence to determine and support their extent”.*

Technical Supplement Paper 8 identifies how there are 7 quarries located within the Borough. Four of the quarries are identified as active and 3 are identified as temporarily closed. Information is available for at least 5 of the 7

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quarries in the Borough. Specific information with regards to the economic importance of Northstone operations at is provided at Section 2 of this representation.

Given the small number of quarries, the level of information previously supplied to the Planning Authority and responses to this consultation, it is considered that sufficient information is available that would allow the Planning Authority to identify MSA's at this stage of the LDP process. It is not logical for the Planning Authority to defer this to matter to the LPP stage when sufficient information is available now.

Accordingly, please find enclosed at Appendix 1, a map of lands which are proposed to be safeguarded at Northstone's 4 quarries in the ANDBC area. This includes lands which would potentially be worked in the future, with a minimum 100m buffer which is the minimum standoff distance stated in guidance.

Paragraph 13.39 list the types of developments which will be exempt from the policy. The list includes the following development types:

- Applications for alterations and extensions to existing non-residential buildings and for change of use of existing development, unless intensifying activity on the site; and
- Applications for temporary planning permission.

It is considered that these development types should be removed from the last as the potential exists that the development types listed would provide an opportunity for residential development which is particularly sensitive to minerals development and which, if granted permission, would prejudice exploitation of minerals in the proposed MSA's.

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### **3.5 Policy MIN5 Amenity**

Draft Policy MIN5 relates to safety and amenity. The draft policy states that:

*“Planning permission will be granted for mineral development where it can be demonstrated that it will not... cause adverse impact due to noise, dust and vibration arising from extraction, processing or transportation of materials/minerals”.*

As per the earlier discussion, it should be noted that development may result in adverse impacts, however it is for the Planning Authority to determine the degree to which such impacts are acceptable, considering the planning balance and determining each planning application on its own merits. As such it is recommended that the word “adverse” be replaced with the word “unacceptable”.

The subsequent sentence in the draft policy appears to allude to this, stating that:

*“Where such impacts are judged to be incompatible with standards of amenity acceptable to the Council, planning permission shall be refused, unless the applicant can demonstrate adequate and acceptable means of mitigation”.*

In order to for the policy to be coherent and comply with Test CE1, it is considered that the text be revised to clarify the above. It is noted that this has been the approach for Draft Policy MIN8 and should be replicated throughout the other draft mineral policies.

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### 3.6 Policy MIN7 Restoration

Draft Policy MIN7 relates to restoration and states that planning permission will only be granted for proposals for the extraction of minerals which include satisfactory restoration proposals. The draft policy goes on to specify what restoration plans must include. Criterion (a) of the Policy states that:

*“An overall concept plan with sufficient detail to demonstrate that the scheme is feasible in both technical and economic terms”*

It is unclear as to what this statement means and the justification and amplification text provides no further guidance. Without further explanation, the requirement of this part of the policy is not clear and therefore the policy is incoherent.

Criterion (c) of the draft policy states that:

*“A statement demonstrating benefit to the locality, such as for biodiversity, tourism”.*

There is no full stop at the end of this criterion and it is unclear if the sentence is intended to continue. Confirmation is required in order to make this part of the policy coherent.

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### 3.7 Other Relevant Matters

A number of other policies and sections within the DPS are considered relevant to the minerals industry in the ANDBC area.

The LDP vision states:

*“Ards and North Down is a vibrant, connected, healthy, safe and prosperous place to live”.*

The DPS Identifies a number of strategic objectives which includes *inter alia*:

- Promote sustainable growth
- Create sustainable places
- Support sustainably located and designed development

Policy SGS3 seeks to allocate a minimum of 25 hectares of land for economic development purposes. Policy SGS4 seeks to allocate 15,608 new homes to meet housing need and support job creation over the Plan period.

The Economic Development Strategy seeks to:

*“To ensure there is a generous supply of suitable land to meet the economic development needs of the Borough over the Plan period, to allocate appropriate economic development land in the key settlements of Bangor and Newtownards and to provide a spatial framework for the application of economic development policies intended to deliver sustainable and environmentally sensitive economic growth across the Borough, including rural areas”.*

Paragraph 10.7 of the DPS states that this will be achieved by *inter alia*:

- 
- *A presumption in favour of employment-related development, provided it meets the requirements of the operational economic development policies and other relevant policies in the LDP; and*
  - *Supporting sustainable economic growth in the countryside where this accords with the relevant operational policy;*

The minerals industry is fundamental to achieving all the above. A steady and adequate supply of locally sourced aggregates is essential to support the construction and infrastructure delivery envisaged for the Borough. To ensure sustainable and timely growth, as discussed above, the Plan should recognise the strategic importance of safeguarding mineral resources and enabling their extraction where viable. Without this, the delivery of economic development land and associated infrastructure will be constrained.

Our client supports the presumption in favour of employment-related development, as this approach recognises the importance of sustaining and growing key economic sectors, including minerals. Quarrying provides significant rural employment and underpins a wide range of construction and infrastructure projects across the Borough, the Northern Ireland region and the export market to Great Britain.

Recent research by the University of Ulster<sup>1</sup> identified that the Geoscience Industry in Northern Ireland—including mineral extraction and mineral-based manufacturing—directly supports 34,000 jobs (4.6% of total employment), generates £2.1 billion in GVA (5.8% of NI's total), and comprises over 6,000 businesses (8.6% of total). Employment levels in the sector are comparable to those in agriculture and the knowledge economy, demonstrating that mineral extraction is a cornerstone of regional economic activity, including within Ards and North Down.

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<sup>1</sup> Ulster University Economic Policy Centre (UUEPC), "Economic Impact of the Geoscience Industry on the Northern Ireland Economy" (2019)

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Recognising mineral extraction as an employment-generating activity within the Plan will help maintain local and rural jobs, sustain supply chains, and strengthen economic resilience, aligning with the objectives of the DPS.

Our client supports the vision and growth strategy for the Borough. It is recognised that the extractive industry is distinctive due to its operational characteristics and incompatibility with certain sensitive land uses such as residential development. Preventing encroachment on mineral extraction sites will help protect vital resources, which is essential in enabling the Council to deliver its economic, social, and environmental vision.

To deliver the planned 15,608 new homes, it is essential that quarry operations are not unduly constrained, as a consistent supply of aggregates is fundamental to housing delivery. The British Geological Survey (BGS) calculates each new house built in England requires around 60 tonnes of aggregates. If all roads and utilities associated with housebuilding are included, the requirement can increase to as much as 400 tonnes of aggregates. Whilst no figure is published for Northern Ireland, the requirement is considered to be similar, it is therefore deduced that undue restrictions on quarry activity may prevent the Borough's ability to meet its housing targets.

## **4.0 CONCLUSION**

This representation is submitted on behalf of Northstone Materials Ltd, a major minerals operator within the ANDBC area. Northstone operates several long-established quarry sites—including North Down, Carrowdore, Craigantlet, and Cairnhill—which collectively play a vital role in supplying construction aggregates and mineral products across the Borough and the wider Northern Ireland region.

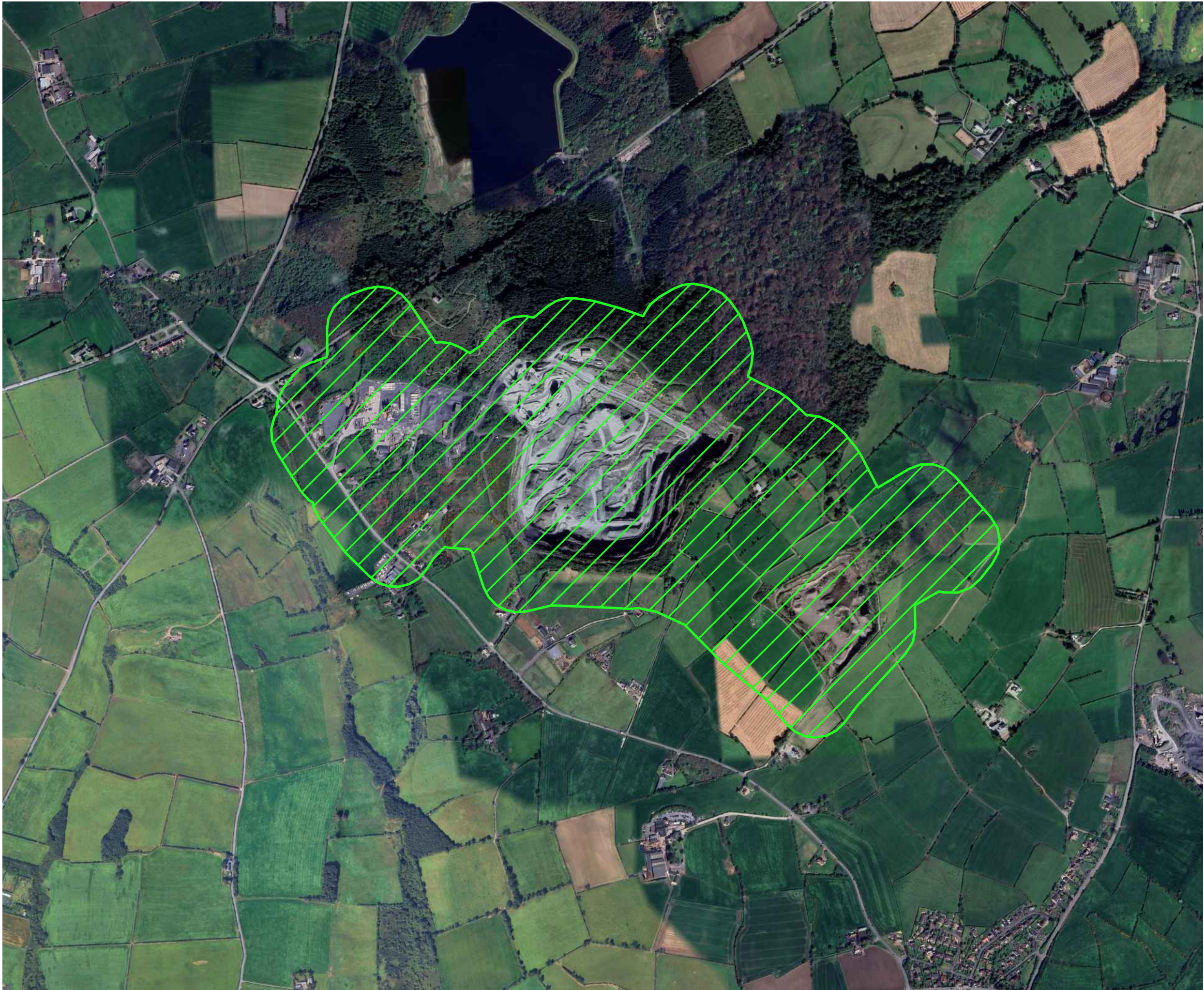
Northstone welcomes the recognition within the DPS of the minerals industry's strategic importance but considers that several policy areas require clarification and amendment to ensure consistency, soundness, and effective implementation over the plan period.

Given the availability of robust evidence on mineral resources and existing operational sites as outlined above, it is the view of Northstone that Mineral Safeguarding Areas (MSA's) should be defined at the Plan Strategy stage. Deferral to the LPP stage, as proposed under Draft Policy MIN3, is neither necessary nor justified. Early designation will provide certainty for operators, the Council, and future land-use decision-making. Details of the proposed MSA's for the 4 quarries is enclosed.

Northstone remains committed to constructive engagement with ANDBC and seeks appropriate modifications to ensure the LDP fully supports sustainable, economically essential mineral development across the Borough.


## **APPENDIX 1**

### **Proposed Mineral Safeguarding Area Maps**



Notes: Contains Google Satellite Imagery

### Legend

-  Proposed Mineral Safeguarding Area at Craigantlet and Cairn Hill Quarries



Contains OS Data © Crown copyright and database right 2011.

Title: Proposed Mineral Safeguarding Area

Scale: 1:10,000@A3

Dwg. No.: 001


Drawn By:  
CST

Date:  
20/11/2025



Notes: Contains Google Satellite Imagery

### Legend

-  Proposed Mineral Safeguarding Area at North Down Quarry



Contains OS Data © Crown copyright and database right 2011.

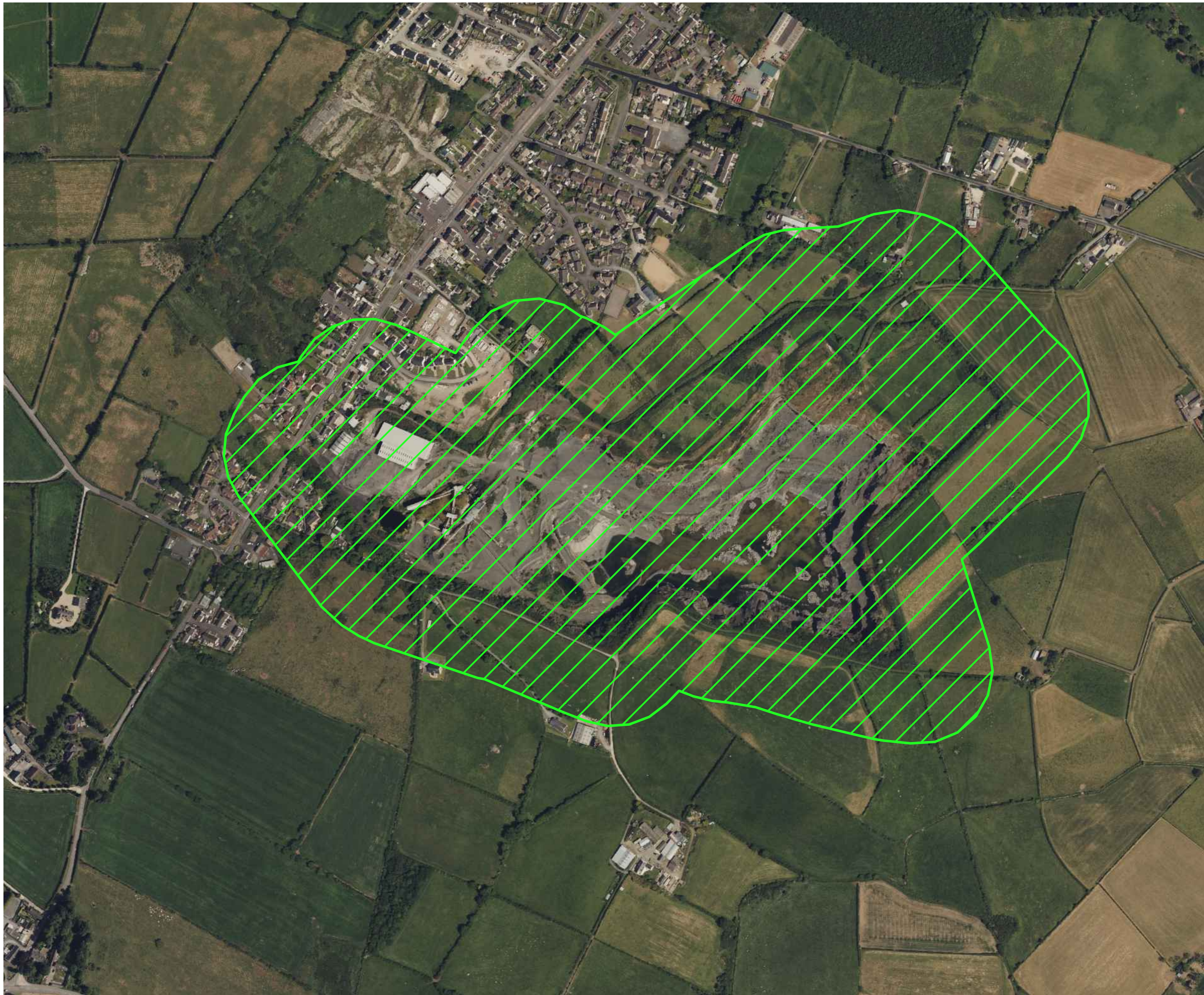
Title: Proposed Mineral Safeguarding Area

Scale: 1:5,000@A3

Dwg. No.: 002


Drawn By:  
CST

Date:  
20/11/2025



Notes: Contains Google Satellite Imagery

### Legend

-  Proposed Mineral Safeguarding Area at Carrowdore Quarry



Contains OS Data © Crown copyright and database right 2011.

Title: Proposed Mineral Safeguarding Area

Scale: 1:5,000@A3

Dwg. No.: 003

Drawn By:  
CST

Date:  
05/12/2025