

Ards and North Down Borough Council

Local Development Plan 2032

**Representation made on behalf of:
Breedon**

December 2025

By Quarryplan Ltd



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1.0 INTRODUCTION

The representation hereby submitted has been made by Quarryplan Limited (Quarryplan) on the Instruction of its Client Whitemountain Quarries Ltd trading as Breedon Ireland ('Breedon').

Breedon is a leading producer and supplier of raw earth products and materials across the UK and Ireland with a well-established quarry located on 63 Ballystockart Rd, Newtownards BT23 5QY.

Breedon's Ballystockart Quarry site benefits from several extant mineral extraction consents, along with multiple permissions for associated plant and machinery. These include facilities for asphalt production, concrete batching, and mineral washing. The quarry is notable for its high-PSV (65+) greywacke reserves, a material of significant value and importance for road surfacing in Ards and North Down and the wider region. A substantial proportion of the extracted material is transported through Belfast Docks, supplying construction and infrastructure projects across Northern Ireland and the wider UK.

A planning application is currently pending (Application Reference LA06/2022/0310/F) at the quarry for a north westerly lateral extension, with associated deepening of the existing northern operational area.

This representation provides comments on the draft policies of the Ards and Ards and North Down Borough Council (ANDBC) Local Development Plan (LDP) 2032 Draft Plan Strategy (DPS). Whilst Breedon is largely supportive of the DPS, a number of revisions are proposed in order to allow for coherence, consistency and accuracy in the minerals development policies over the plan period.

Comments are provided in relation to a number of the draft policies with reference to the LDP test of soundness as detailed in Development Plan

Practice Note 6 published by the Department for Infrastructure in May 2017.

2.0 BALLYSTOCKART QUARRY

Ballystockart Quarry is located some 3km to the north and west of the centre of the town of Comber, and approximately 1km to the south and west of the A22 arterial route into Belfast, on a previously widened and improved section of public highway.

The figure overleaf illustrates the extent of the planning application area with respect to the existing operations.

The planning application area (outlined in red) extends to an area of some 51.4ha and comprises the existing operational site to include the mineral extraction area in the Northern Quarry, the historical operations, processing, stockpiling and added value activities in the Southern quarry and the lateral extents and direction of the proposed future extended area of working.

The existing Northern quarry forms the active extraction area (c. 7ha) with the blast rock won passing through the connecting tunnel for processing. The larger southern void some 24ha reflects the historical working and commenced over 50 years ago, but now primarily provides the location for the processing plant and stockpiling for the processed material in the extended c. 30ha footprint.

The southern site provides for downstream processing activities:

- Concrete Batching Plant;
- Aggregate Recycling Washing plant and;
- the placement in the void of excess overburden and out of specification material which is an essential part of any quarry operation

Ballystockart quarry currently has a footprint of some 42.4ha and the proposed extension lands, shaded red, would increase this by a further c. 9ha



Figure 1 Ballystockart Quarry

Further Information (FI) submitted to the Planning Authority under Regulation 21 of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 confirms that the annual rate of extraction at the quarry is c. 500,000 tonnes per annum. The quarry has a £7.5 million turnover and employs 27 people. The FI also confirms that in the 12 months prior to August 2025, that salaries attributable to the 27 people employed at the Site have been split as follows:

- Full-time Equivalent Employees connected to Ballystockart (13) £760,284
- Dedicated Haulier employment costs (14) £504,000
- **Total £1,264,284**

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.

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 a number of 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 considered that this MSA can now be advanced at this stage of the LDP process. The matter is discussed further later in this representation.

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 in order 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:

“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.

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.

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 CE2.

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 quarries in the Borough. Specific information with regards to the economic importance of operations at Ballystockart Quarry 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 Ballystockart Quarry. 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.

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.

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.

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 of 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 Ulster¹ 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.

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.

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

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 made on behalf of Breedon, which operates a Greywacke Quarry at Ballystockart Quarry. The quarry is 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.

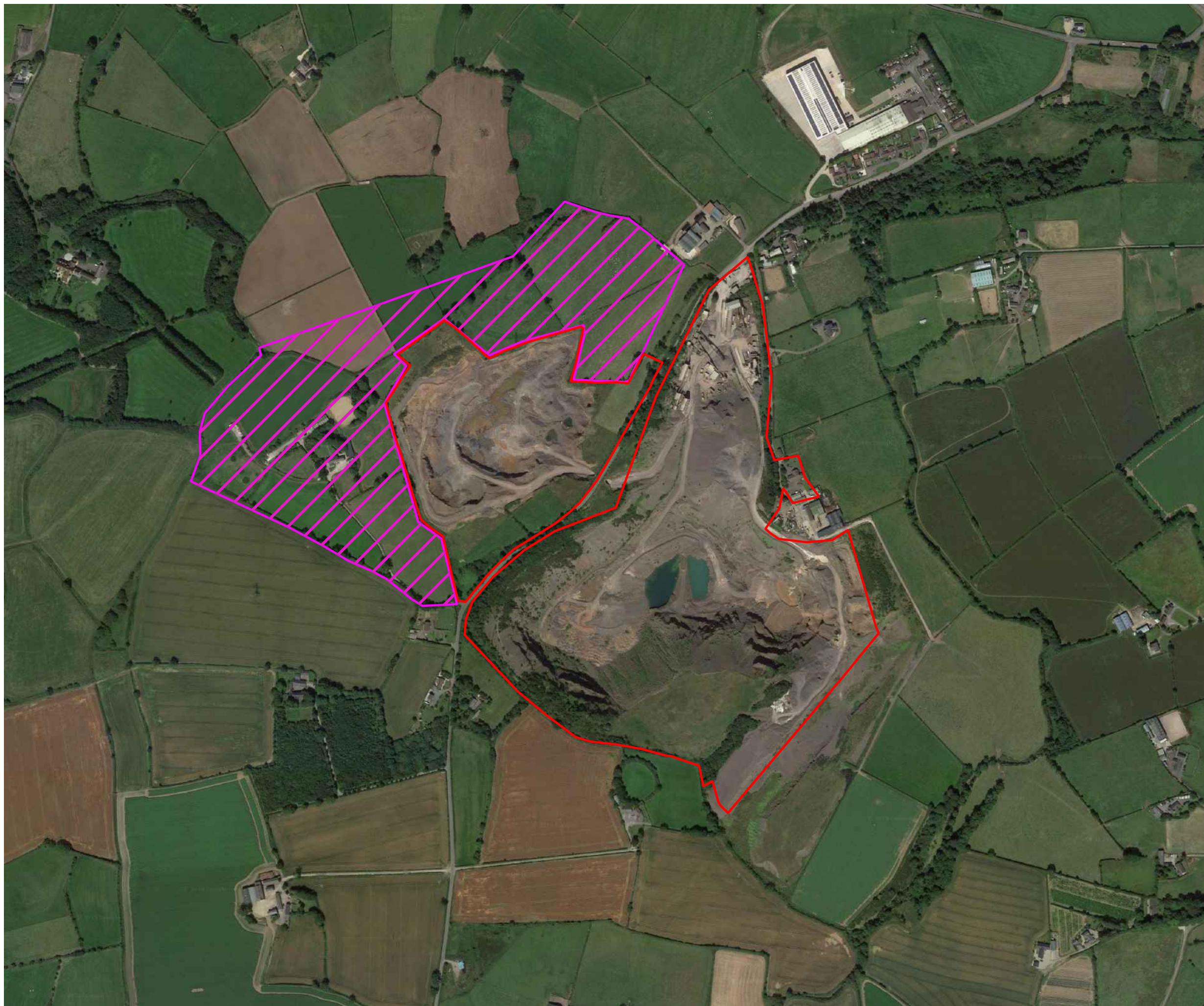
It is considered that the importance of the minerals industry to the local economy and wider regional economy is understood and the draft mineral development policies are largely welcomed, save for some further clarification and changes to the policy wording.

The overall economic importance of the minerals industry to the ANDBC Area and the wider NI region appears to be understood in the DPS. Information on Breedon's contribution via Ballystockart Quarry is provided.

Given that information is readily available it is considered that Mineral Safeguarding Areas can be defined at this stage of the LDP process and need not be deferred until the LPP stage, as is proposed via Draft Policy MIN3. Details of the proposed MSA for Ballystockart Quarry is enclosed.



APPENDIX 1

Proposed Mineral Safeguarding Area (MSA) Map



Notes: Produced using Bing Aerial Imagery

Legend

-  Consolidated Planning Boundary
-  Potential Protection Area



Contains OS Data © Crown copyright and database right 2011.

Title: Ballystockart Quarry Potential Protection Area

Scale: 1:10,000 @A3

Dwg. No.: Breedon-01

Drawn By:
CST

Date:
08/05/2019