

12 Royal Scot Road,
Pride Park,
Derby,
DE24 8AJ

Dear Richard,

Town and Country Planning Act 1990

The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) – Regulation 14 Scoping Opinion

CAIS /	15/2025/0142/SCO
APPLICATION:	
CYNNIG /	Barn Gwmpasu Cais am echdynnu tywod silica ac adfer cynyddol / Scoping Opinion
PROPOSAL:	Request for silica sand extraction and progressive restoration
LLEOLIAD /	Maes Y Droell Quarry, Graianrhyd, Mold, Denbighshire
LOCATION:	

I refer to your correspondence dated 31.03.2025 in relation to a request for a Scoping Opinion in relation to the above proposed development.

The Authority are satisfied that the request meets the requirements of the regulation 14 (2) of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ('the 2017 Regulations'). Please find the Authority's Scoping Opinion as follows.

In adopting this Scoping Opinion, the Planning Authority has considered the requirements of the 2017 regulations, Welsh Office Circular 11/99: Environmental Impact Assessment, as well as current best practice towards preparation of an ES. In accordance with regulation 14 (4) of the 2017 regulations, the Authority has consulted on the report and the responses received from the consultation bodies have been taken into account in adopting this Opinion. The authority has also considered the specific characteristics of the proposal, the type of development and the environmental features likely to be affected by the development in accordance with regulation 14 (6) of the 2017 regulations. The application should be assessed and referred to within the Environmental Statement when the planning application is submitted.

This Scoping Opinion seeks to ensure that any Environmental Statement submitted with respect to a planning application for the development proposal described in the scoping request includes information that are reasonably required to assess the environmental effects and allow a determination to take place. The statement must address the baseline conditions, likely significant impacts, the probability of effects and the proposed mitigation measures. The information provided should be that which is necessary to demonstrate the risks, likelihood of occurrence, likelihood of any significant impact and an outline of the main alternatives studied by the applicant.

The following will consider the content of the Scoping Report as submitted and will outline the matters which require modification, augmentation or clarification as part of any subsequent planning application and environmental statement.

Background

Quarrying has taken place within the Maes y Droell Quarry site for over a hundred years. Previously, in the past, the site was also known as Pen y Foel Quarry. Now known as Maes y Droell Quarry, the site has a complex planning history.

The proposed development subject of this scoping opinion would cover land which is currently subject to mineral planning permissions as well as areas which have never been worked previously.

The proposal is for the extraction, processing and export of silica sand and fine clay principally for glass and porcelain manufacture. It would include progressive restoration from south to north utilising site derived soils /restoration materials.

Proposed Development

As set out above, the proposal is for the extraction, processing and export of silica sand and fine clay principally for glass and porcelain manufacture. It would include progressive restoration from south to north utilising site derived soils /restoration materials.

The applicant provides the following setting out operating hours:

Operation	Mon to Friday	Saturday	Sunday, Bank and Public Holidays	Comment
Mineral extraction	0700 to 1900	0700 to 1400	Nil	Potentially on a 'campaign' basis
Processing	0700 to 1900	0700 to 1400	0700 to 1400	
Export/Import	0700 to 1900	0700 to 1400	Nil	
Maintenance	0700 to 1900	0700 to 1900	0700 to 1900	

The access into the site would be via a bellmouth opening on the west of the site taking access onto USRN: 46702276. The applicant indicates that a maximum of 60 HGV deliveries from the site would occur over a full working day. It is anticipated the exports would be carried out in 20 tonne loads. It is estimated the annual throughput would be 360,000 tonnes per annum.

The site would be worked using a front loading shovel before being loaded onto dump trucks for transportation to the processing area. No blasting is required.

Water supply would be taken via a borehole (i.e. abstraction). It is estimated that the plant would be capable of processing 120tph requiring 30 cubic metres per hour of water.

The site would have wheel cleaning facilities, a weighbridge office and welfare facilities for workers. No details of these have been provided at this time.

The proposals would demolish the existing buildings on the site.

Limited details have been provided regarding the restoration of the site but it is indicated that restoration would deliver the site to either 'its original condition or an approved alternative'. It is understood this is effectively agriculture and/or biodiversity enhancement. It is not indicated that any import would be required for restoration.

Environmental Impact Assessment Methodology

The ES should include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. Where professional judgement has been applied this should be clearly stated.

The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking of environmental effects as set out in section 3.3 of the scoping report.

The applicants should satisfy themselves that the ES includes all the information outlined in Schedule 4 of the 2017 Regulations. In addition, the Applicant should ensure that the Non-Technical Summary includes a summary of all the information included in Schedule 4. The applicant should consider a structure that allows the author of the ES and the Authority to readily satisfy themselves that the ES contains all the information specified under Regulation 17 and Schedule 4 of the 2017 Regulations (Information for inclusion in Environmental Statements), cross refers to the requirements in the relevant sections of the ES, and include a summary after the Contents page that lays out all the requirements from the Regulations and what sections of the ES they are fulfilled by.

A key aspect of the consideration of the environmental impacts of this proposal relates to the baseline taken when carrying out assessments.

With regards to the planning baseline, there are three main consents relating to mineral working.

- The IDO permission 'Silica sand quarry workings' (ref P11/107) and the subsequent determination of new conditions in respect of the IDO Permission (ref 15/384/96);
- The 1950 permission for the 'Winning and Working of Minerals and provision of three vehicular accesses' (ref 11/290) and subsequent application for the review for the approval of conditions referring to the application sites as 'North Land' and 'South Land';

- The 1951 permission for 'Mining Operations' (ref 11/355).

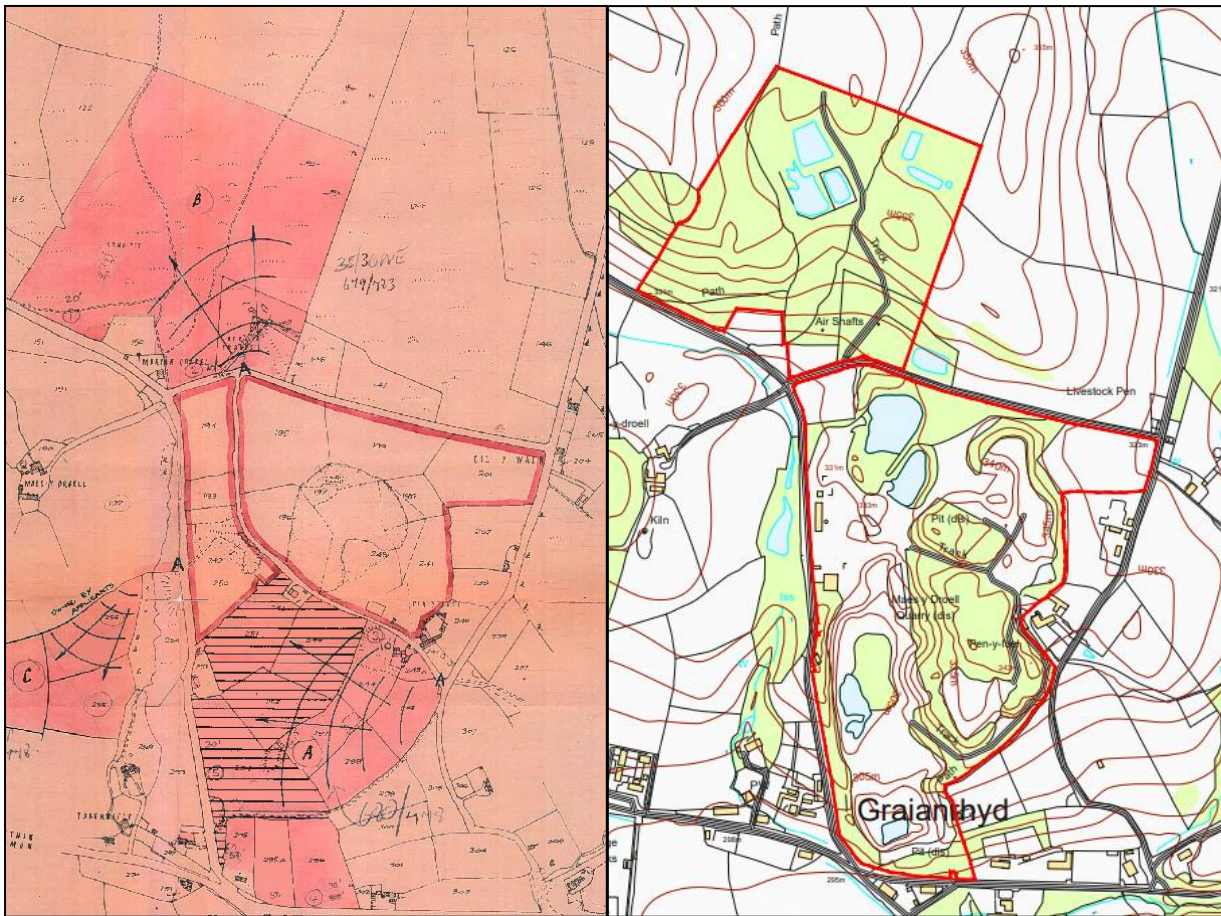
With regards to 'the IDO permission', it is considered that by virtue of the fact that in excess of 10 years have passed since the end date for operations (including restoration) under the permission set by condition 2 (31st December 2010), the permission itself has lapsed. It is therefore held that this permission is irrelevant both when assessing the planning baseline and the baseline for environmental assessment.

With regards to the 1950 permission, a review of the consent is due under the Environment Act 1995. Only the 'north land' is considered to have a valid planning permission for the winning and working of mineral. To be able to work this permission a review has to have been carried out. At this time an EIA and detailed phased working and restoration plan are absent from the submission for the review.

The 1951 permission was also not registered or listed as a Phase I Active Site under the Environment Act 1995. As no application was made to add that consent to the statutory list, it is considered that this application has now expired and ceased to have effect.

Summary

Mindful of the above, the only extant planning permission relates to the 'north land' or area 'B' indicated on the below (left) drawing (notwithstanding the requirement for a review). The application area covered by the scoping opinion (below right) includes the 'north land' and also the areas subject of historic working. For the purpose of deciding a baseline for the ES, the council consider the baseline for assessment should be taken as the situation on the ground at present. Aside from the 'north land' there is no planning permission for mineral working. It is considered beneficial for simplicity and ease of understanding that this baseline is selected. Of course reference to the extant permission can be made when assessing any impacts.



Site Location

The site is known as Maes y Droell Quarry located on Graianrhyd Road, Llanarmon-yn-Iâl, Mold. Maes y Droell Quarry is situated approximately 400 metres north of the village of Graianrhyd, off the Graianrhyd-Eryrys Road. Graianrhyd is located 11 km east of Ruthin, 8 km south of Mold, and 14 km north east of Wrexham, in the County of Denbighshire, and is approximately 1 km to the west of the boundary with the County of Flintshire. The B5430 Ruthin-Minera road passes through Graianrhyd and links up with the A5104 Ruthin-Chester Road, about 2 km east of the village.

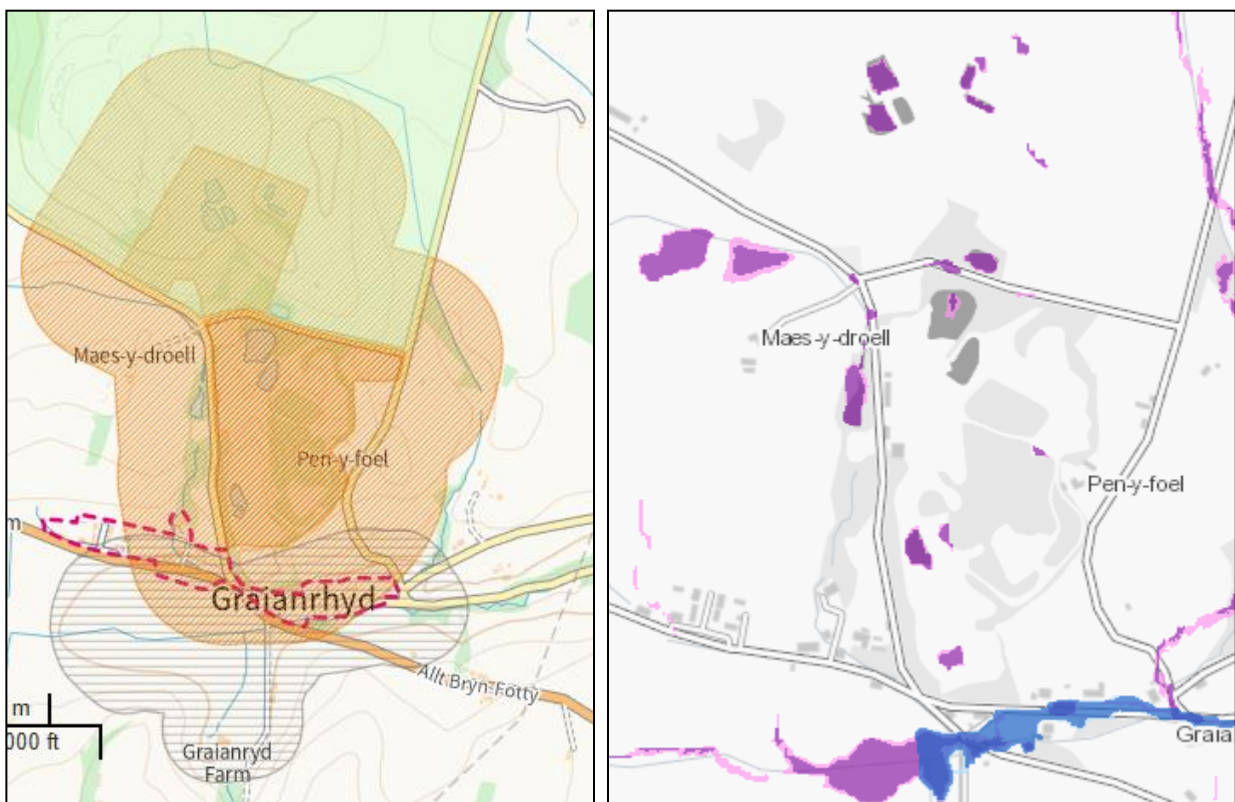
Residential properties and businesses (some combined) lie to the east, south and west of the site. To the east is the Woolly Experiences therapy farm and a tree surgeon. The Rose and Crown public house is to the south of the site. Small farmsteads are on all sides. The majority of surrounding land is farmland or moorland.

Bridleway No17 bisects the proposal area running east to west. There are a number of footpaths in the surrounding area. Footpath No.17 runs north to south through the northern section of the proposals. Footpath No.15 runs along the southern boundary of the site.

Part of the site lies within the Clwydian and Dee Valley Area of Outstanding Natural Beauty (AONB) now known as National Landscapes, and a number of public rights of way are affected by the site.

The overall redline boundary for the development measures circa 22ha. The southern section of the proposals cover circa 14ha. The northern section of the proposals cover circa 8ha.

With regards to local policy designations, (Denbighshire Local Development Plan (2013)), a quarry buffer zone is drawn around the former quarry workings and a sand and gravel mineral safeguarding area lies to the south. A policy relating to affordable housing in hamlets allocates land within Graianrhyd (see below left).



With regards to flood risk, TAN 15 (2004) was revised on 31st March 2025 with revised guidance and mapping (above right) being relevant for new proposals. The site doesn't appear to be at risk of flooding from rivers and sea. The site does have areas which are in flood zone 2 and 3 for surface water and small watercourses.

There are no designated historic assets within the proposal site. Mine Chimney at Castell (Grade II) lies circa 210m west of the proposal site at the nearest point. A cluster of three Grade II listed buildings lie circa 675m west of the site at Bryn Ffynnon.

The proposed site is not covered by any national or international nature conservation or ecological designations. The nearest designated sites are Berwyn and South Clwyd Mountains Special Area of

Conservation (SAC) and Llandegla Moor Site of Special Scientific Interest (SSSI) which lie circa 1km south of the site at the nearest point. Graid, Llanarmon-yn-Iâl (SSSI) lies circa 1.25km west of the site. Eryrys Grasslands (SSSI) lie circa 1.25km northwest of the site.

There are sections of ancient woodlands within 1km of the site.

The predictive mapping produced by Welsh Government indicates the site is predominantly Grade 3b agricultural land with some Grade 4.

A cemetery lies immediately adjacent to the northern section of the proposals.

The proposal crosses or is proximal to a number of receptors and planning constraints. Where relevant any receptors or constraints will be raised in discussion of the scoping of individual chapters.

Scoping Opinion

A Scoping Opinion seeks to ensure that any Environmental Statement submitted with respect to a planning application for the development proposals described in the scoping request includes information that is reasonably required to assess the environmental effects, and allow a determination to take place. The below commentary on the scope of the EIA, and the proposed methodologies should not unduly preclude any further information which may be required once the Environmental Statement has been submitted.

General

In accordance with Regulation 17 of the EIA Regulations, in order to ensure the completeness and quality of the environmental statement—

- a) the developer must ensure that the environmental statement is prepared by competent experts; and
- b) the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts.

Mitigation measures should be described for identified significant impacts. An assessment of the effectiveness of the mitigation measures should also be included. Other impacts that are not considered to be significant will not need to be assessed to the same level of detail as significant impacts identified. However, some detail will be required to indicate that they have been considered and why they are not considered to be significant.

The EIA should identify sensitive receptors, including residential properties within close proximity of the site and consider the impacts on these. The ES should cover the whole site, including all ancillary development and all the phases of the development (demolition of existing buildings, construction of proposed, operation and restoration/aftercare).

Regulation 17 of the EIA regulations sets out that reasonable alternatives should be included. It should be noted that the regulations do not require an applicant to consider alternatives. The approach to alternatives set out within the scoping request is supported.

Denbighshire County Council recommends that the details requested by the consultees, as summarised in Annex 1, are incorporated into the Environmental Impact Assessment (EIA).

Topics

The following outlines matters which require modification, augmentation or clarification as part of any subsequent planning application and Environmental Statement. For ease of reference these are raised in the order they are raised in the scoping request.

Climate Change

Climate change is proposed to be scoped out of the EIA. This decision by the applicant was taken with reference to the Supreme Court decision made on the Finch v Surrey County Council Case. The council support this decision to scope climate change out.

Agricultural Land

The applicant advises a quantitative soil survey will be undertaken to inform the design of restoration proposals. The predictive mapping doesn't indicate the site consists of best most versatile agricultural land. The applicant proposed to scope soils out of the EIA process. This is supported but this matter needs consideration as part of the planning application.

Air Quality

The scoping opinion request and appended scoping report focussing on Air Quality (Appendix 3) propose to scope air quality into the ES. The chapter would look at the impacts of emissions from operational road traffic generated by the quarry on concentrations of NO₂, PM₁₀ and PM_{2.5} at sensitive locations along the road network. The chapter would also look at impacts of the operation of the quarry on concentrations of dust, PM₁₀ and PM_{2.5} from the extraction operations; and whether any additional mitigation measures will be required to address any significant air quality or dust effects.

This approach is broadly supported but it is requested that all operations which are likely to herald dust impacts (i.e. Soil Movement and Restoration Works) are included in the assessment. It is also recommended that impacts upon nearby ancient woodlands are considered.

It is also suggested that cumulative effects upon air quality from operations at the Graig Quarry west of the site are examined.

A dust management scheme should also be produced in support of the application.

The council's environmental health officer was consulted and has not responded at the time of writing.

Natural Resources Wales with relevance to air quality comment that the site is more than 250m from any designated nature conservation site. Therefore, they have no further comments on this topic.

Noise

The scoping opinion request and appended scoping report focussing on Noise (Appendix 4) propose to scope noise into the ES. The report considers the stages of the development (construction, operation and restoration) and examines traffic noise and vibration as well as operational noise and vibration.

For the construction phase (which is assumed to relate to demolition of old buildings, siting of new plant and making of soil perimeter bunds) the applicant suggests scoping out everything aside from onsite construction noise. Limited information regarding the likely traffic movements is provided but it is assumed to be well below 100 two-way HGV movements per day. It is agreed that construction traffic noise and vibration can be scoped out on that assumption. No detail is provided regarding any new buildings to be erected but it suggested that no piling would be required. On this assumption it is agreed construction vibration can be scoped out.

For the operational phase it is proposed to scope in traffic noise and onsite operational noise (plant and equipment). This is agreed. For the operational phase traffic vibration and operational vibration is proposed to be scoped out. The proposals would not include blasting and would utilise existing roads. This is agreed.

With regards to restoration, traffic noise and vibration is proposed to be scoped out. This is agreed on the basis that no import of restoration material is proposed. Onsite restoration noise is proposed to be scoped in. This is agreed.

The council's environmental health officer was consulted and has not responded at the time of writing.

Heritage and Archaeology

The applicant proposed to scope out Heritage and Archaeology from the ES.

CADW and the Council's Heritage Officer were consulted and have not responded at the time of writing.

With regards to built heritage, it is agreed that this can be scoped out of the ES. However, it is recommended an impact assessment is included with the planning application.

Heneb – Clwyd-Powys Archaeological Trust were consulted on the scoping opinion. They disagree with the applicant and would not agree that Heritage and Archaeology can be scoped out of the EIA. They consider there are areas in Phase 1B, Phase 3, the proposed BNG area and the whole of Phase 4 which have not been previously assessed for archaeological potential through systematic survey and therefore the level of impact is unknown.

They consider Phase 4 in particular may have a high potential for previously unrecorded archaeology. This may span all periods and be present as surface or sub-surface features. They advise Heritage and Archaeology is scoped in for the above reasons.

The council are not convinced that sufficient evidence to scope out archaeology has been provided and potential significant effects cannot be ruled out at this time. The council request archaeology is scoped in.

Landscape and Visual Effects

It is not apparent from submissions whether or not Landscape and Visual Effects are proposed to be scoped into the Environmental Impact Assessment Process and Environmental Statement. It is indicated that a LVIA would be completed and some details of the scope for that is provided. The council consider that Landscape and Visual Effects should be scoped in and form a chapter in the ES.

The LVIA scoping document (Appendix 5) advise that the following will form part of the LVIA:

- Landscape Character Impacts
- Impacts upon the Clwydian Range and Dee Valley National Landscape AONB, including visual/landscape impacts on the setting of the Clwydian Range and Dee Valley National Landscape AONB
- Visual Impact Receptors
- Cumulative effects in combination with Graig Quarry
- Lighting impacts (with reference to Dark Sky SPG)

With regards to the suggested viewpoints, there is inconsistency between section 6.2 of the LVIA scoping document, the LVIA Designations Plan and the ZTV as to where viewpoints would be taken and how many there are.

It is suggested additional viewpoints are taken from highpoints within the national landscape to ascertain the levels of impact on the national landscape and its setting.

There is a lack of information regarding any landscaping work which forms part of the proposals or the restoration scheme.

National Resources Wales were consulted and agree landscape should be scoped in. They consider there is potential for significant effects in the character and special qualities of the Clwydian Range and Dee Valley National Landscape and its setting. They consider the LVIA should consider the National Landscape, its users and wider setting should be scoped in. They also advise that the LVIA should include assessment of each phase of the proposed development. The council support these comments and recommend the advice is incorporated into the forthcoming submissions.

Transport

Transport is proposed to be scoped into the Environmental Impact Assessment Process and Environmental Statement. This is supported.

The Highway Authority have been consulted but has not returned a response at the time of writing.

The scope is understood to include the access onto the access road on the western site boundary, B5430 and Ffordd LLanarmon. This would follow HGV routing up until they meet the main A5104. It is considered appropriate to evaluate the capability for the A road to accept this additional traffic. It is also considered that the above scope would only be acceptable should routing of HGVs be secured via an obligation along that route.

Mitigation measures are to be identified through the production of this chapter.

Ecology / Biodiversity

Ecology / Biodiversity is proposed to be scoped into the Environmental Impact Assessment Process and Environmental Statement. This is supported. The Council's Ecologist have been consulted but has not returned a response at the time of writing.

Notwithstanding this, the council broadly agree with the conclusions of section 5.9 of the scoping report. The council do note a lack of information regarding the proposed landscaping and any biodiversity enhancement.

National Resources Wales agree biodiversity should be scoped in (in respect of protected sites and species) and they provide comments, appended to this Opinion, which the council support.

Hydrology / Hydrogeology

It is not clear if Hydrology / Hydrogeology is proposed to be scoped out of the Environmental Impact Assessment Process and Environmental Statement.

The Lead local Flood Authority (LLFA) and National Resources Wales were consulted. The LLFA note that a Flood Consequence Assessment will be drafted in support of any forthcoming planning application. The LLFA request that in support of the application a Surface Water Drainage Strategy

and Water Framework Directive Assessment is provided. They also advise that SAB Approval would be required for the proposed development.

National Resources Wales consider the report identifies this topic area as scoped in. The council cannot identify where within the submissions this has been made apparent by the applicant. It is therefore suggested this comment is taken as meaning the topic should be scoped in which the council would support.

They advise that the presence of existing workings and the operations at the quarry add to complexity of a Hydrogeologic Impact Assessment. The interaction between these factors and groundwater conditions is required to be assessed as part of the EIA.

Given the site conditions, they recommend that the EIA should take into consideration what existing groundwater level and hydrodynamic information exists for the local area, groundwater level trends, borehole information including stratigraphy etc.

They advise that details are provided showing the spatial extent of the proposed workings and reworkings to illustrate how the phasing of the works will be carried out and the expected durations. Additionally, they advise that cross-sections of the proposed phases, along with estimated groundwater levels, are provided together with clarification whether all workings will take place within the unsaturated zone or if some will occur within groundwater.

They advise that a water demand assessment is completed for the EIA, with an assessment of the feasibility of using boreholes to provide water supply required for the proposed operations on site, and that assessment is also completed for the EIA and included in any submission

They advise that further assessment work is required to estimate the spatial extent that the water supply boreholes drawdown may have on the local environment. This estimation would then be validated via an application for Groundwater Impact Consent.

The council endorse this advice and recommend it is produced in the EIA.

Ground Conditions and Contaminated land

It is noted that Ground Conditions and Contaminated Land have not been mentioned within the submissions. The council consider insufficient evidence to scope out this topic has been provided and potential significant effects cannot be ruled out at this time.

Waste

It is noted that Waste is not proposed to be scoped into the Environmental Impact Assessment Process and Environmental Statement. This is accepted as it is understood no importation of waste is proposed.

Major Accidents and Disasters

It is noted that Major Accidents and Disasters are not proposed to be scoped into the Environmental Impact Assessment Process and Environmental Statement. This is agreed.

Socio-Economic

There is no specific guidance available which establishes a methodology for undertaking an Environmental Impact Assessment (EIA) of the socio-economic effects of a proposed development.

At this time limited information regarding the likely impacts of the scheme (i.e. job creation, impacts on nearby facilities and business) has been provided. It is recommended this matter is scoped in.

Representations made from the Local Community

No individuals have responded to the Scoping Report, any representations made after the drafting of this report are publicly available on the Denbighshire County Council Planning Portal and can be viewed:- <https://planning.denbighshire.gov.uk/planning/search-applications?civica.query.FullTextSearch=21%2F2021%2F0052#VIEW?RefType=PBDC&KeyNo=31102>

Conclusion

Provided that the above information is included and the detailed requirements of the consultees (Annex 1) are taken into account, Denbighshire County Council considers that the Environmental Impact Assessment would sufficiently cover the necessary information for inclusion in an Environmental Statement. However, EIA is an iterative process that allows the development proposal to be continually refined. Further information may therefore be required at a later stage.

Any further responses received by the council from consultees after the submission of this letter will be available on public access.

ANNEX 1: Summary of Consultation Responses (Full Responses Available on Public Access)

Consultees

Heneb: Clwyd-Powys Archaeology –

Note the limited detail within the scoping request and attach a copy of their normal requirements for a DBA and walkover assessment. They disagree with the applicant and would not agree that Heritage and Archaeology can be scoped out of the EIA. They disagree with the assertion in 5.6.9 of the scoping request which states that there is a 'lack of likely impacts'. They consider there are areas in Phase 1B, Phase 3, the proposed BNG area and the whole of Phase 4 which have not been previously assessed for archaeological potential through systematic survey and therefore the level of impact is unknown.

They consider Phase 4 in particular may have a high potential for previously unrecorded archaeology and 1m lidar data shows numerous shafts, remains of late 19th Century workings, tracks, banked boundaries, ditched boundaries and perhaps earthworks or buried remains of the former 19th Century Llanarmon Lead Mine buildings and two shafts. They consider much of the upland area has not been previously quarried and archaeology spanning all periods may be present as surface or sub-surface features.

They advise Heritage and Archaeology is scoped in for the above reasons.

DCC Tree Officer –

Consider that an Arboricultural Survey and Report will be required to support the ES.

DCC LLFA / SAB –

Note that the scoping opinion request advises a Flood Consequences Assessment will be carried out in accordance with the requirements of TAN15 and will be submitted in support of the Planning Application rather than contributing to the Environmental Statement.

The LLFA Request that in support of the application the following is provided:

- Surface Water Drainage Strategy
- Water Framework Directive Assessment.

SAB consider that SAB Approval would be required for the proposed development.

Dŵr Cymru / Welsh Water –

Note no details have been provided regarding foul and surface water disposal. Make reference to the Flood and Water Management Act 2010 and how the site may require SAB approval.

With reference to asset protection they advise the site is crossed by a public mains sewer but recognise no works are proposed in the areas close to the water main route. They advise regarding asset protection zones and access requirements.

They provide advisory notes to be attached to any forthcoming planning permission.

Natural Resources Wales –

Note that the site is more than 250 meters from any designated nature conservation site and therefore have no further comments regarding the inclusion of air quality within the scope of the EIA.

Support the inclusion of Landscape and Visual within the ES. They agree that there is potential for significant effects on the character and special qualities of the CRDV NL and its setting, and advise that this may cause permanent harm to the National Landscape. They consider that the National Landscape, its users and the wider setting of the protected landscape should be in-scope.

They consider that the LVIA should include assessment of effects at each phase of the development and its conclusion together with indication of duration of phases and intended lifespan of operations.

Support the inclusion of biodiversity within the ES. With regards to protected species they consider the scope set out in section 5.9 of the scoping report are appropriate. They advise that the EIA A considers significance (both alone and in combination) and where applicable conservation status. They are in broad agreement with the suggested approach to this section.

With regards to terrestrial ornithology they note the site is 1.1km from the Llandegla Moor Site of Special Scientific Interest (SSSI) and Berwyn & South Clwyd Mountains Special Area of Conservation (SAC). They advise Curlew form part of the assemblage feature of Llandegla moor SSSI and are a National Priority in Wales. They add that the proposal falls within the important Curlew Area 5 and that Curlew are site faithful and will nest and forage within the SSSI and on the adjacent non-designated land. They therefore advise that potential impacts on curlew are considered in the EIA.

With regards to hydrology / hydrogeology they consider this should be scoped in. They advise that the presence of existing workings and the operations at the quarry add to complexity of a Hydrogeologic Impact Assessment. The interaction between these factors and groundwater conditions is required to be assessed as part of the EIA.

Given the site conditions, they recommend that the EIA should take into consideration what existing groundwater level and hydrodynamic information exists for the local area, groundwater level trends, borehole information including stratigraphy etc.

They advise that details are provided showing the spatial extent of the proposed workings and reworkings to illustrate how the phasing of the works will be carried out and the expected durations. Additionally, they advise that cross-sections of the proposed phases, along with estimated groundwater levels, are provided together with clarification whether all workings will take place within the unsaturated zone or if some will occur within groundwater.

They advise that a water demand assessment is completed for the EIA with an assessment of the feasibility of using boreholes to provide this water supply provided also for the EIA.

They advise that further assessment work is required to estimate the spatial extent that the water supply boreholes drawdown may have on the local environment. This estimation would then be validated via an application for Groundwater Impact Consent.

More extensive advice upon Landscape, Protected Species and Local Biodiversity Interests is appended to the response.

NRW provide advice on Protected Sites Foul Drainage matters which are outside the scope of EIA.

DCC Conservation – No response received.

DCC Policy – No response received.

DCC Environmental Health – No response received.

DCC Rights of Way – No response received.

DCC Highways – No response received.

DCC Ecology – No response received.

AONB Joint Advisory Committee – No response received.