

Proposed Extension to Linhay Hill Quarry

Environmental Statement - Regulation 22
Response #3 Further Information Water
Resources and Land Stability
E&JW Glendinning Ltd

February 2019

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1. Introduction

- 1.1. This document has been prepared in response to a Request for Further Information under Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (The EIA Regulations) issued by the Dartmoor National Park Authority's on 22 December 2016 (Referred to as the Reg 22 Request 2016 #3).
- 1.2. This is the third tranche of Further Information submitted to the DNPA to supplement the Environmental Statement prepared to accompany the planning application ref 322/16 for the extension of Linhay Hill Quarry, Ashburton. This tranche of Further Information addresses points raised in the Reg 22 Request 2016 #3 relating to hydrological impacts, associated ecological effects and land stability.
- 1.3. Earlier Tranches were issued in July 2017 (#1) and February 1918 (#2 concerning Caton Junction Improvements).
- 1.4. This Reg 22 Response is referred to as Reg 22 Response #3.

The EIA Regulations

- 1.5. Regulation 22 of the EIA Regulations relates to 'Further information and evidence respecting environmental statements' and states:

—(1) A relevant planning authority, Secretary of State or inspector dealing with an application or appeal in relation to which the applicant or appellant has submitted an environmental statement, if of the opinion that the statement should contain additional information in order to be an environmental statement, shall notify the applicant or appellant in writing accordingly, and the applicant or appellant shall provide that additional information; and such information provided by the applicant or appellant is referred to in these Regulations as "further information".

- 1.6. The definition of an Environmental Statement is set out in Regulation 2(1) of the EIA Regulations 2011 which states:

*"environmental statement" means a statement—
(a) that includes such of the information referred to in Part 1 of Schedule 4 as is reasonably required to assess the environmental effects of the development and which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile, but
(b) that includes at least the information referred to in Part 2 of Schedule 4;*

A copy of Schedule 4 of the EIA Regulations 2011 is provided in Appendix 1.1.

National Guidance

- 1.7. The National Planning Policy Guidance (NPPG) provides direction on how a Local Planning Authority should ask for Further Information in respect of planning applications that are submitted with an Environmental Statement¹. At Paragraph: 047 Reference ID: 4-047-20140306, the NPPG states:

"The local planning authority should check that the submitted Environmental Statement contains all the information specified in Part II of Schedule 4 to the Regulations and the relevant information set out in Part I of that Schedule.

If the local planning authority considers that further information is required, they should ask the applicant to provide it (regulation 22). All information provided must be publicised, and consulted on. Requests for further information should be limited to

¹ Although the NPPF was revised in July 2018, to date National Planning Guidance has not yet been updated to reflect the changes. However, the Revised NPPF did not propose changes to the way that the EIA Regulations are interpreted.

the “main” or “significant” environmental effects to which a development is likely to give rise and must be on relevant matters set out in Schedule 4. The local planning authority, the Secretary of State or an Inspector may also require an applicant or appellant to produce evidence to verify and/or clarify any information in the Environmental Statement.

Additional information of a substantive nature submitted voluntarily by an applicant must be treated in the same way as information required by the local planning authority (see the definition of “any other information” in regulation 2(1)).

The 16 weeks’ time limit for determination of the Environmental Impact Assessment application continues to run while any correspondence about the adequacy of the information in an Environmental Statement is taking place.”

- 1.8. In preparing and considering the ES and this Regulation 22 Response, it is important to understand that there are limitations in the EIA Regulations and associated guidance on the level of detail required. Planning Practice Guidance advises:-

‘Whilst every Environmental Statement should provide a full factual description of the development, the emphasis is on the “main” or “significant” environmental effects to which a development is likely to give rise. The Environmental Statement should be proportionate and not be any longer than is necessary to assess properly those effects. Where, for example, only one environmental factor is likely to be significantly affected, the assessment should focus on that issue only. Impacts which have little or no significance for the particular development in question will need only very brief treatment to indicate that their possible relevance has been considered’²

- 1.9. The nature of the limitations has been clarified in the courts. Extracts from the judgements in some of the key cases are reproduced below:-

*41 ... In an imperfect world it is an unrealistic counsel of perfection to expect that an applicant’s environmental statement will always contain the ‘full information’ about the environmental impact of a project. The Regulations are not based upon such an unrealistic expectation. They recognise that an environmental statement may well be deficient, and make provision through the publicity and consultation processes for any deficiencies to be identified so that the resulting ‘environmental information’ provides the local planning authority with as full a picture as possible. **R. (Blewett) v Derbyshire CC** [2004] Env. L.R. 29 per Sullivan J.*

An ES does not need to include “every conceivable scrap of environmental information about a particular project” per Harrison J. in **R v Cornwall County Council ex p Hardy** [2001] Env LR 26;

If the ES did contain everything it would be voluminous and there would be a real danger of the public/local planning authority “losing the wood for the trees”: Sullivan J in **R v. Rochdale Metropolitan Borough Council, ex p. Milne** (2000) 81 P & CR 365;

See also **Davies v Secretary of State for Communities and Local Government** [2008] EWHC 2223 (Admin) per Sullivan J. again “ ... *In an ideal world the applicant’s Environmental Statement would be the last word on the environmental impact of a proposal because it would contain the ‘full information’ ... However, the Regulations are not premised upon such a counsel of perfection ...*” (Emphasis added).

- 1.10. Nevertheless, the applicant has striven to provide as full a coverage as is considered reasonable and proportionate, bearing in mind the position that the proposal is for additional mineral working in a National Park. It is relevant and important to remember the wording of

² Paragraph: 035 Reference ID: 4-035-20170728

Policy COR22, particularly its references to ‘*rigorous examination*’ and with regard to need which ‘*cannot reasonably be met in any other way*’.

- 1.11. The wording of Policy COR22 is set out below, with emphasis added.

Core Strategy Policy COR22

*Major mineral development will not be allowed unless, after **rigorous examination**, it can be demonstrated that there is a national need which **cannot reasonably be met in any other way**, and which is sufficient to override the potential damage to the natural beauty, wildlife, cultural heritage or quiet enjoyment of the National Park.*

Layout of Regulation 22 Response

- 1.12. The applicant has commissioned a programme of monitoring and investigation to inform this Reg 22 Response, the outcome is presented in

- a Revised Chapter 12 on Water Resources, presented in Appendix 8.1 of this Reg 22 Response
- a revised and updated HIA, presented as Appendix 12B of the ES.
- a revised chapter 17 on Land Stability, presented in Appendix 11.1 of this Reg 22 Response, and
- a revised and updated Land Stability Risk Assessment, presented as Appendix 17.1 of the ES.

- 1.13. The layout of the Regulation 22 Response has been set out using the structure of the Regulation 22 Request #1, with a chapter for each topic consisting of the relevant extract from the Regulation 22 Request followed by the Response. Where there are no relevant questions relating to hydrological impacts, associated ecological effects and land stability, this is stated in the respective chapters. This means that additional information is only presented or referred to in the chapters in bold in the list below.

- 2. Project Description**
3. Alternatives
- 4. Approach to Assessment of Impacts and Effects**
5. Landscape and Visual Effects
- 6. Ecology**
7. Traffic and Access
- 8. Flood Risk and Effects on Water Resources**
9. Heritage Assessment
10. Effects on Agricultural Land
- 11. Land Stability**
- 12. Other Impacts**
13. Clarifications
14. Improvements to Caton Cross
15. Planning Questions and Clarifications
16. Consultee and third party responses and representations
- 17 Other information provided by the applicant
- 18 Other changes to the ES.

Proposed alterations to June 2016 ES

- 1.14. In this Regulation 22 Response, some changes to the wording of the original ES are made. In order to clarify the effect of these changes, the ES dated June 2016 is referred to as the ‘original ES’ where necessary to distinguish it from the ES that would result from the revised wording introduced in this Regulation 22 Response.
- 1.15. Where further alterations are made to the ES text as amended in previous Reg 22 Responses, the relevant text is referred to according to the corresponding Reg 22 Response tranche.

- 1.16. The Non-Technical Summary (NTS) to the ES was updated in tranche 4 of the Reg 22 Response. That updating addresses the content of this and the other Reg 22 Responses.

2. Project Description

Extract from the Reg 22 Request 2016

- *Ensure the potential effects of deepening the quarry and the restoration phase are addressed through all topic chapters, even if it is to scope out potential effects.*
- *Provide missing information / data to complete the baseline for land stability and transport. Amend the assessments to address the additional information where necessary.*
- *Provide further details on what assumptions have been used to establish the potential operational effects of the development – such as (but not limited to) traffic movements that could be generated.*

Regulation 22 Response

Potential effects of deepening the quarry

- 2.1. The potential effects of deepening the quarry with respect to Water Resources, Drainage and Flood Risk are addressed in the revised chapter 12 in Appendix 8.1 of this Reg 22 Response and the HIA 2018 in new ES Appendix 12B.
- 2.2. The potential effects of deepening the quarry with respect to Land Stability Risk are addressed in the Revised chapter 17 in Appendix 8.2 of this Reg 22 response and the Land Stability Risk Assessment 2018 in the new ES Appendix 17.1.

Baseline for land stability

- 2.3. The additional information to complete the baseline for Land Stability is provided in the revised chapter 17 in Appendix 8.2 of this Reg 22 response and the Land Stability Risk Assessment 2018 in the new ES Appendix 17.1. In addition, other relevant information is presented in the Revised HIA in new ES Appendix 12B.

Assumptions used to establish the potential operational effects of the development

- 2.4. This question was substantially answered in the Reg 22 Response #1. The answer included a possible difference in the duration of the proposal's stages if future production at the quarry increased in line with ONS Devon's population forecast and then presented a table showing the potential implications for each ES effect of this potential change.
- 2.5. The potential implications for Land Stability were to be reported separately and can now be confirmed as no significant adverse difference, because there would be no change to the depth of extraction or to the extent of changes to surface water drainage. The Land Stability row of Table 2-2 can therefore be updated as follows:

Update to Land Stability row in Table 2-2 of Reg 22 Response #1

Effect	Implications of potential change	Result
Land Stability	No change in depth of extraction or extent of changes to surface water drainage, so no significant difference in effects on land stability.	No significant adverse difference

3. Alternatives

- 3.1. Questions concerning Alternatives have been addressed in the Reg 22 Response #1.

4. Approach to Assessment of Impacts and Effects

Extract from Regulation 22 Request

- *Include consideration of the future baseline in the assessments in all topic chapters.*
- *Provide an assessment of effects for land stability.*

Regulation 22 Response

Future Baseline

Flood Risk and Effect on Water Resources

- 4.1. The Future Baseline/Do Nothing Scenario with respect to Water Resources, Drainage and Flood Risk is provided in the revised chapter 12 in Appendix 8.1 of this Reg 22 Response and the HIA 2018 in new ES Appendix 12B.

Land Stability

- 4.2. The Future Baseline/Do Nothing Scenario with respect to Land Stability Risk is addressed in the Revised chapter 17 in Appendix 8.2 of this Reg 22 response and the Land Stability Risk Assessment 2018 in the new ES Appendix 17.1.

Assessment of effects for Land stability

- 4.3. The Assessment of effects for Land Stability is addressed in the Revised chapter 17 in Appendix 8.2 of this Reg 22 response and the Land Stability Risk Assessment 2018 in the new ES Appendix 17.1.

5. Landscape and Visual Effects

- 5.1. Questions concerning Landscape and Visual effects have been addressed in the Reg 22 Responses #1 and #4.

6. Ecology

Introduction - Extract from Regulation 22 Request

- *Provide additional ecological and hydrological assessment on subterranean water bodies and associated ecology.*
- *Provide an updated assessment of the likely effects on South Hams SAC and Dartmoor Woods and Dartmoor Special Areas of Conservation (SACs) to assess the effects and consequences ... of the further assessment of hydrogeological, land stability and surface water referred to in paragraph 2.6 of this document, ... and any other relevant changes in baseline and assessment.*

Response

Additional ecological and hydrological assessment on subterranean water bodies and associated ecology.

- 6.1. The Reg 22 Response #1 provided the results of a survey of subterranean fauna, together with an assessment of associated ecological and hydrological effects and proposed mitigation measures.
- 6.2. A separate eco-hydrological assessment of the quarry extension proposals, drawing on information provided in the Linhay Hill Quarry: Hydrogeological Impact Assessment (HIA) 2018 (Atkins, 2018) and the updated water resources chapter of the ES is provided in Appendix 6.1 of this Reg 22 Response.

Updated Assessment of potential effects on European Sites

- 6.3. An updated assessment of potential effects on South Hams SAC, Dartmoor Woods SAC and Dartmoor SACs, taking account of the information and assessment of effects on hydrogeology, surface water, land stability and other relevant factors is provided in Appendix 6.2 of this Reg 22 Response.

7. Traffic and Access

- 7.1. Questions concerning Traffic and Access have been addressed in the Reg 22 Responses #1 and #4.

8. Flood Risk and Effects on Water Resources

Extract from Regulation 22 Request

1. *Assess the hydrogeological effects of deepening the quarry including groundwater flow and local hydrogeological conditions and the potential need for increased dewatering.*
2. *Provide further investigation to confirm the existing groundwater regime as well as to allow future monitoring of groundwater levels as quarrying in the extension proceeds.*
3. *Provide details of the water pollution measures within the CEMP that are proposed as mitigation for likely ecological effects.*
4. *Provide an analysis of the hydrological effects of climate change.*
5. *Consider the future baseline, taking into account changes in water levels resulting from climate change or restoration of the currently permitted scheme.*

Response

- 8.1. In general terms the additional information with respect to items 1,2,4 and 5 is provided in the Environmental Statement revised chapter 12 and its Appendix 12B, the Hydrological Impact Assessment 2018 (HIA 2018), whereas item 3 was answered in the Reg 22 Response 22 Response #1 in chapter 13 at para 13.25.
- 8.2. Further details to direct the reader are provided in the following responses.

Question 1

Assess the hydrogeological effects of deepening the quarry including groundwater flow and local hydrogeological conditions and the potential need for increased dewatering.

Response

- 8.3. The additional information is provided in the Environmental Statement revised chapter 12 and specifically its Appendix 12B, the Hydrogeological Impact Assessment 2018 (HIA 2018).
- 8.4. Based on assessment of the site specific data acquired from initial monitoring of watercourses and groundwater at the quarry and boreholes drilled since the application submission, and the water balance of that data provide in the HIA 2018 Section 3.6, the potential need for increased dewatering is detailed in the HIA 2018 Section 3.7.1 'Potential effects from deepening the existing quarry' and Section 3.7.2.1 'Potential effects on water resources'.

Question 2

Provide further investigation to confirm the existing groundwater regime as well as to allow future monitoring of groundwater levels as quarrying in the extension proceeds.

Response

- 8.5. The additional information is provided in the Environmental Statement revised chapter 12 in Appendix 8.1 of this Reg 22 Response and in Appendix 12B, the Hydrogeological Impact Assessment 2018 (HIA 2018). The HIA 2018 provides an updated conceptual model as its Section 3 'Conceptual Model' which is based on desk study (within Sections 3.1 and 3.2),

walkover survey (Section 3.1.7) and ground investigation (Section 3.1.6), water quality monitoring (Section 3.4) and water resource monitoring (Section 3.5). The water resource monitoring includes the initial monitoring of rainfall, watercourses and groundwater levels in boreholes including during a defined 'signal test' (Section 3.5.6) period when pumping from the quarry sump was intentionally stopped for a prolonged period.

- 8.6. Proposals for continued monitoring are provided in the HIA 2018 Section 4.2 'Locations and scope of baseline monitoring'.

Question 3

Provide details of the water pollution measures within the CEMP that are proposed as mitigation for likely ecological effects.

Response

- 8.7. Regarding water pollution measures within the CEMP, this question was answered in the Reg 22 Response #1 in chapter 13 at para 13.25, in response to the same question that was repeated later in the Reg 22 Request 2016 as follows.

"Details of the proposed water pollution control measures that will be adopted during construction will be contained in a CEMP to be produced in response to a condition in the event that planning permission is granted. This is standard practice in relation to details of this sort. The applicant has experience of similar requirements and is happy to confirm that such a condition was anticipated and sees no difficulty in meeting its requirements."

- 8.8. The CEMP will be in accordance with environmental good practice, following Government, regulator or industry guidance. Typical measures might include the following:

1. Carrying out works under a Land Drainage Consent or Flood Risk Activity permit.
2. Scheduling construction works when there is no or negligible flow in a watercourse.
3. Temporary diversion of flow in a watercourse e.g. around the area of works, such as Way Pond, or new attenuation areas to be formed.
4. For works near water, no discharge to a watercourse without mitigation for suspended solids and that may be by settlement, filtration, or chemical methods dependent on the character of the suspended solids. The latter option will only be necessary if it is found that the characteristic of the ground being disturbed is such that suspended solids will not settle in a suitable timescale for implementation of construction works. In any case discharge of surface water runoff during construction of overburden bunds will be regulated by a water discharge activity permit.

Question 4

Provide an analysis of the hydrological effects of climate change.

Response

- 8.9. The Flood Risk Assessment, May 2016, submitted with the planning application for the quarry extension in 2016, includes consideration of the potential for climate change in accordance with Government guidance at that time, and incorporates the prescribed allowances for increased peak rainfall intensity into the drainage design for severe rainfall events for Stages 1 to 5, and for the restored quarry Stage 6.
- 8.10. The updated Environmental Statement Chapter 12 within the section 'Future Baseline' provides further consideration of potential climate change from paragraphs 12.98 to 12.103, with reference to the latest guidance, namely the UKCP18 projections whose publication postdates the application submission date.

- 8.11. As detailed in the updated Environmental Statement Chapter 12 those projections indicate a potential for wetter winters and drier summers, but annual rainfall on average is likely to remain similar to 1981-2000 i.e. effectively the same as currently. Therefore it is considered that no further appraisal of potential climate change on water resources or hydrology is required.
- 8.12. Nevertheless prior to the UKCP18 projections a Future Flows and Groundwater Levels project ran between March 2010 and Spring 2012 and used the latest projects from the UK Climate Impact Programme, including the UKCP09 probabilistic climate change projections from the Met Office Hadley Centre. The project was cofunded by the Environment Agency of England and Wales, Defra, UK Water Industry Research, the Centre for Ecology & Hydrology (CEH), the British Geology Survey and Wallingford Hydrosolutions. As states on the CEH website (<https://www.ceh.ac.uk/our-science/projects/future-flows-and-groundwater-levels>) the project developed two unique datasets for Great Britain:
- Future Flows Climate (FF-HadRM3-PPE), an 11-member ensemble 1km gridded projection time series (1950-2098) of precipitation and potential evapotranspiration for Great Britain, developed for hydrological and hydrogeological application based on HadRM3-PPE run under the Medium emission scenario SRES A1B.
 - Future Flows Hydrology (FF-HydMod-PPE), an 11-member ensemble projection of daily river flow and monthly groundwater levels time series (1951-2098) for 282 rivers and 24 boreholes in Great Britain.
- 8.13. The CEH website states “They represented a nationally consistent ensemble of 11 plausible realisations (all equally likely) of almost 150 years of climate, river flow and groundwater regime, and enable us to investigate the role of climate variability on river flow and groundwater levels nationally and how this may change in the future. Considering all ensemble members together accounts for some climate change uncertainty”. The projections are only for one emission scenario and although the UKCPO9 climate change projections have been superseded by the UKCP18 projections, Atkins’ initial appraisal of the Future Flows and Groundwater Levels project ‘snapshot maps’ of river flows has assessed that for rivers in south Devon the maps generally reflect a forecast of average flows being similar to current.
- 8.14. The projections do not include groundwater levels for a borehole near south Devon, but do include the River Dart at Austins Bridge for which flow projections were made to the end of 2098. Linhay Hill Quarry currently transfers water back to the Balland Stream which joins the River Ashburn which flows into the River Dart, though the quarry catchment represents a very small proportion of the River Dart catchment. Examination of the projections for the River Dart at Austins Bridge suggest that for the emission scenario average flows in the River Dart at Austins Bridge by 2098 would be similar to current but with a potential for a lower 95% and 70% exceedance (Q95 and Q70) and higher 10% and 5% exceedance (Q10 and Q5). The potential for future variance in watercourse flow and water resources is a known factor to be considered when appraising the site monitoring data as discussed in the Hydrogeological Impact Assessment 2018 Section 6.

Question 5

Consider the future baseline, taking into account changes in water levels resulting from climate change or restoration of the currently permitted scheme

Response

- 8.15. The updated Environmental Statement Chapter 12 in Appendix 8.1 of this Reg 22 Response within the section ‘Future Baseline’ provides the requested consideration, including by reference to the latest guidance, namely the UKCP18 projections whose publication postdates the application submission date.

9. Heritage Assessment

9.1. Questions concerning Heritage have been addressed in the Reg 22 Responses #1 and #4.

10. Effects on Agricultural Land

10.1. Questions concerning Agricultural Land have been addressed in the Reg 22 Response #1.

11. Land Stability

Extract from Regulation 22 Request

- *Provide the results of the further land investigations and the resulting assessment of effects.*
- *Explain the process for determining significance of effects for land stability including describing receptor value and sensitivity so that they are consistent with the approaches taken in Chapter 7 of the ES. Review and revise the chapter to fully demonstrate which effects are considered significant and not significant.*

Response

- 11.1. The matters are addressed in the Revised ES Chapter 17 in Appendix 8.2 of this Reg 22 Response and the Land Stability Risk Assessment 2018 in the new ES Appendix 17.1.

12. Other Impacts

Extract from Regulation 22 Request

- *Provide an assessment of climatic factors and climate change to confirm likely climatic effects from the development, with regard to effects on ground water, stability and flood risk. In relation to other topics please refer to these potential effects, assess whether applicable and if so include in your assessment; or state whether and why this issue is not applicable and has been scoped out.*

Response

- 12.1. This question was substantially answered in the ES and in Reg 22 Response #1. The remaining issue being any update to the likely effect of climate change with regard to ground water and land stability. This is now addressed in the updated chapters 12 and 17 in appendices 8.1 and 8.2 of this Reg 22 Response.

13. Clarifications

- 13.1. Questions raised under the topic 'Clarifications' have been addressed in the Reg 22 Responses #1 and #4.

14. Alternative Highways Scheme for Caton Cross

- 14.1. Questions concerning the alternative Highways Scheme for Caton Cross have been addressed in the Reg 22 Response #2.

15. Planning Questions and Clarifications

- 15.1. Questions concerning the Planning Questions and Clarifications have been addressed in the Reg 22 Response #1 and 4.

16. Consultee and Third Party Responses and Representations

- 16.1. Questions concerning the Consultee and third party responses and representations have been answered in the Reg 22 Responses #1 and #4.

17. Other Information provided by the applicants

- 17.1. The applicant does not have any other information to add re water resources and land stability.

18. Further changes to the ES and errata

- 18.1. The applicant does not have any other information to add re further changes to the ES and errata.

Appendices

(Presented in separate document)

Appendix 1.1 Schedule 4 of the EIA Regulations 2011

Appendix 6.1 Further Eco-hydrological Assessment

Appendix 6.2 updated Information to support the Habitats Regulation Assessment

Appendix 8.1 Revised ES Chapter 12 Flood Risk and Effect on Water Resources.

Appendix 8.2 Revised ES Chapter 17 Land Stability

Changes to ES Appendices

New ES Appendix 12B HIA 2018

New ES Appendix 17.1 Land Stability Risk Assessment 2028

