

Dalradian Gold 3 Killybrack Road Killybrack Business Park Omagh, BT79 7DG

28th January 2022

Dear

Re: archaeological impact of potential peat dewatering.

Thank you for sending through the HED consultation response dated 25 November 2021 and additional information in relation to the potential peat dewatering as a result of the abstractions. Having reviewed the information contained within the Abstraction Licence Application; the 2020 Groundwater Impact Assessment, submitted as Appendix C6 to the second Addendum to the Environmental Statement (ES) for the planning application; and the Golder Associates' review of same dated August 2021, it is clear that the proposed abstractions will not result in dewatering of the peatland. The key conclusions are set out below:

- Page 15 of the submitted Abstraction Licence Application for mine water states that 'At the end of operations when mine dewatering will be at its peak, no phreatic drawdown is predicted in Layer 1 of the groundwater model for peat and river alluvium above the underground mine. As much of the peatland comprises blanket bog habitat which is supported by high rainfall as opposed to groundwater flow, no impacts are expected on peatland from mine dewatering'
- Section 7.3.3 of the 2020 Groundwater Impact Assessment notes in regard to forecast changes to groundwater levels resulting from the project, 'No phreatic drawdown is predicted in the area of the underground mine, which is overlain by blanket bog peatland. No drawdown is predicted any area of peatland or alluvium', and 'Therefore, the weathered bedrock unit is predicted to dewater in parts whilst the phreatic groundwater level is maintained (perched) in the overlying peat Layer 1'
- Page 125 of the Golder Associates report ,commented on peatland water levels stating that 'A reduction in groundwater levels in the peatland is not seen in the model results as the increased seepage is balanced, at least on a monthly basis, by the 'surplus water mechanism'.







As such the proposed abstraction cannot therefore have any impact upon potential archaeological deposits within or beneath the peat.

You should note that there is potential for sub-surface archaeological deposits to survive within the area of the infrastructure site. This potential is identified within the Cultural Heritage Impact Assessment appended at Appendix C15 to the original ES for the development. This sets out an appropriate preliminary mitigation strategy to minimise any potential impact upon such deposits. Key to this strategy will be the production of an archaeological programme of works, as confirmed by HED in their consultation response of 20<sup>th</sup> November 2019. Gahan and Long have been appointed to produce the programme of works.

I trust everything is to your satisfaction however if you have any queries or require further information, please do not hesitate to contact me.

Yours sincerely





