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**Dawn Paton**

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**From:** Ash, Merlin (NE)  
**Sent:** 06 June 2017 15:49  
**To:** Planning; Mark Hill  
**Cc:** Robertson, Christine (NE); Clayden, David (NE); Burnett, Robert (NE); Wetherell, Anna (NE)  
**Subject:** RE: Woodsmith Mine (Formally Dove's Nest Farm & Haxby Plantation), Sneatonthorpe - NYM/2017/0258/CVC  
**Attachments:** 217364 Natural England Response.pdf

Dear Mark,

Further to our email dated 26 May 2017. Natural England has previously provided comments on the discharge of conditions in relation to this application for the verification check of conditions in our letter dated 26 May 2017 (our ref 214808). Please find attached our letter concerning our response to conditions NYMNPA-46, 47, 60 and 79 with regards to hydrology, hydrogeology and water quality which we were unable to comment on previously.

Yours sincerely,

Merlin

Merlin Ash  
Lead Adviser  
Sustainable Development and Marine  
Yorkshire and Northern Lincolnshire  
Natural England  
Foss House, 1-2 Peasholme Green, York, YO1 7PX



**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

Natural England offers two chargeable services – The Discretionary Advice Service (DAS) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service (PSS) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Date: 06 June 2017  
Our ref: 217364  
Your ref: NYM/2017/0258/CVC



Mark Hill  
North York Moors National Park Authority

4<sup>th</sup> Floor Foss House  
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1-2 Peasholme Green  
York  
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YO1 7PX

BY EMAIL ONLY



Dear Mark Hill

**Planning consultation:** Application for verification check of conditions 4, 18, 34, 46, 47, 49, 52, 57, 59, 60, 64, 68, 70, 73, 76, 79, 91, 92, 93, 94, 95 of planning approval NYM/2014/0676/MEIA

**Location:** At Woodsmith Mine (Formally Dove's Nest Farm & Haxby Plantation), Sneatonthorpe Grid Reference 489495 505142

Thank you for your consultation dated 28 April 2017, which we received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have previously provided comments on the discharge of conditions in relation to this application for the verification check of conditions in our letter dated 26 May 2017 (our ref 214808). This letter represents our response to conditions NYMNP-46, 47, 60 and 79 with regards to hydrology, hydrogeology and water quality which we were unable to comment on previously.

**Discharge planning conditions NYMNP-46, 47, 60 and 79 with regards to hydrology, hydrogeology and water quality**

Natural England has now assessed the reports relating to hydrology and hydrogeology (in particular the hydrogeological risk assessment, ground and surface water monitoring scheme and remedial action plan). We have the following concerns:

- The platforms and associated development at Woodsmith Mine have been identified as having a potential impact on the local hydrological regime, in particular through preventing or limiting recharge over a significant area. They have been modelled as being no recharge zones. However, the impact has only been modelled over a 12 month period. While the Phase 3 dewatering is only in place for a short period of time and is relatively 'minor' (noting we have yet to see the detail of what will be needed in Phase 4 for shaft construction), the platforms and other development will be in place for much longer than 12 months. The modelling indicates that there will be an overall and progressive decline in groundwater levels over the initial 12 months. What is unknown is what the cumulative impact over the lifetime of the operation, or for the period that the platforms will be in place, could be. Even with some recharge included in the model during the summer (which could be expected to be zero in reality), the water levels drop overall during the 12 month period. Natural England is of the opinion that this is a significant concern, as impacts on recharge may affect water dependant features within the SAC. It is important that the long term impacts of infrastructure being implemented in Phase 3 (or future phases), that will be in place beyond that phase (and potentially for the lifetime of the development), are adequately assessed and impacts accounted for as early as possible.
- The monitoring scheme sets trigger values which flag when there may be impacts on the



groundwater system (for further assessment and potential remedial action). The calculation of these now includes taking account of the modelled impact at each location (see section 3.5.5 of the monitoring plan). Natural England is of the opinion that this approach increases the risk of actual impact, and that the method assumes that the modelled impact is acceptable. We recommend that the modelled impact is not included in the calculation of trigger values.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Yours sincerely

Christine Robertson, Team Leader, North York Moors  
Yorkshire and Northern Lincolnshire

