

**APPENDIX D5:  
RESPONSES TO THE DEPARTMENT FOR INFRASTRUCTURE (ECONOMICS  
BRANCH) REQUEST FOR FURTHER ENVIRONMENTAL INFORMATION  
MACRO-ECONOMIC AND FARMING ECONOMY EFFECTS**

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## 1. Introduction

- 1.1. This Appendix addresses questions raised by the Department for Infrastructure (DfI) (Economics Branch) about the macro economic benefits for Northern Ireland. These concern:
  - The “leakage” of benefits out of Northern Ireland (FEI Submission Questions 10.0; 10.1; 10.2; 10.3, 10.4 and 10.7);
  - How the project multipliers compare to industry benchmarks (Question 10.5); and
  - The potential for effects on displacement of farming and agricultural economic activity (Question 10.6).
- 1.2. The full text of each of the questions is included as an annex to this document.
- 1.3. For clarity, Quod confirms that none of the calculations submitted with the Application specifically assessed capital or operational expenditure spent outside Northern Ireland (NI). This is stated in the Statement of Economic Impacts (Document C13, footnote 57) and acknowledged in the response from the Economics Branch.
- 1.4. The methodology that follows is based on the principles set out in HM Treasury (HMT) Green Book Appraisal guidance (2019). However, the full HMT approach to appraisal does not need to be used (and has not been) as this is a private sector project that is not seeking recourse to public funds.

## 2. Potential for leakage of benefits outside Northern Ireland

- 2.1. Leakage describes the leakage of benefits intended for a recipient group or area into another group or area. In the case of the Project, some of the economic benefits of the project may “leak” outside of the NI economy where capital or operational expenditure is spent outside of NI (i.e. on imports).
- 2.2. This section sets out estimates of the proportions of construction and operational expenditure that are currently projected to be spent outside Northern Ireland (NI) and outside the UK – and the potential impact that could have on the assessment of the local benefits of the Project.
- 2.3. The estimates of non-NI spending are based on the current availability of components and services in NI. DGL will buy goods and services locally wherever possible and will support local companies to build their capacity so they can access tenders and supply chain opportunities – so these numbers may represent an under estimate of the local spending (if, for example, local firms respond to the new demand and provide relevant goods and services locally).
- 2.4. These estimates are based on the Addendum Project. Full details of the differences in estimates between the submitted assessment (“Submitted Project”) and the revised proposals (“Addendum Project”) are presented in the *Addendum to the Socio-Economic Impact Assessment and The Statement of Economic Impacts*. While the detail of the estimates has changed (i.e. projected cost inputs and macro-economic outputs have gone slightly up or down) the conclusions of the Submitted Project Assessment have not changed and remain valid.

## Potential for leakage of benefits during construction

2.5. The following table estimates the proportion of construction expenditure (CAPEX) that could be outside NI or outside the UK<sup>1</sup>.

Table A#.1: Projected proportion of CAPEX spent within NI, UK and outside the UK.

Effect	Total	Within NI	Within UK (outside NI)	Outside UK
Total CAPEX Investment*	£159m	58%	17%	25%

*Figures have been rounded*

*\*including contingency*

2.5. The potential for capital expenditure to be spent outside NI and outside the UK gives rise to the potential for some of the benefits of the Project, such as a portion of the Gross Value Added (GVA) and a proportion of the indirect and induced employment, to be generated outside NI or UK.

2.6. Based on these proportions, the NI benefits of the development would be as follows:

Table A#.2: Projected proportion of economic benefits captured within NI

Effect	Total	Within NI
Total CAPEX Investment*	£159m	58%
Indirect Employment	730	470
Induced Employment	170	170
Direct GVA	£63m	£45m
Indirect GVA	£40m	£26m
Induced GVA	£8m	£7m

*Figures have been rounded*

*\*including contingency*

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<sup>1</sup> All estimates of expenditure in/outside of NI are based on the current availability of goods and services with NI. If local suppliers become available, the proportion of expenditure within NI could increase.

- 2.7. Although 42% of the total capital expenditure is spent outside NI, the activities that generate the highest local impacts in terms of indirect employment and GVA per pound spent are highly concentrated in NI.
- 2.8. The strongest multipliers are in the construction industry and a high proportion of construction industry expenditure is captured within NI e.g. site development, construction of on and off-site infrastructure, construction of the dry stack facility. At least 75% of CAPEX on construction activity is expected to be spent within NI.
- 2.9. Weaker multipliers exist in manufacturing sectors, and a higher proportion of that expenditure is spent outside NI. Purchasing of specialist equipment and engineering services is generally outside the UK. These activities currently contribute a relatively low proportion of the indirect employment.
- 2.10. Therefore applying a 42% leakage rate is across all of the CAPEX (as has been done in Table A#.2) is likely to overestimate the leakage effects – but it is not possible at this stage of the project to quantify leakage on a sector by sector basis.

### Potential for leakage of benefits during operation

- 2.11. The following table estimates the proportion of operational expenditure (OPEX) that could be outside NI or outside the UK<sup>2</sup>.

Table A#.3: Projected proportion of OPEX spent within NI, UK and outside the UK.

Effect	Annual average	Within NI	Within UK (outside NI)	Outside UK
Total OPEX Investment*	£60m	75%	14%	11%

*Figures have been rounded*

- 2.12. As with construction, the potential for operational expenditure to be spent outside NI and outside the UK gives rise to the potential for some of the benefits of the project to “leak” outside NI.
- 2.13. During operation, expenditure outside NI reduces the supply chain (indirect) GVA benefits and imported components could reduce the scale of the benefits against trade deficit.
- 2.14. GVA generated directly by operational activity is not reduced by “leakage” as all value added to the economy by the project will be generated on-site as a result of the Project’s activities.
- 2.15. The estimated benefits of the development, taking into account potential leakage, would be as follows:

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<sup>2</sup> All estimates of expenditure in/outside of NI are based on the current availability of goods and services with NI. If local suppliers become available, the proportion of expenditure within NI could increase.

Table A#.4: Projected proportion of OPEX spent within NI, UK and outside the UK.

Effect	Total	Within NI
Annual average OPEX	£60m	75%
Indirect Employment	400	360
Induced Employment	80	77
Direct GVA	£60m	£60m
Indirect GVA	£22m	£16m
Induced GVA	£4m	£4m

2.14. The total expenditure outside NI on goods and services is projected to average at £14.5m per year. Netted off the expected annual export revenue of £118m, the Project will still be a substantial net exporter during operation with exports equating to 3.4% of the NI trade deficit.

### 3. Comparison of Multipliers

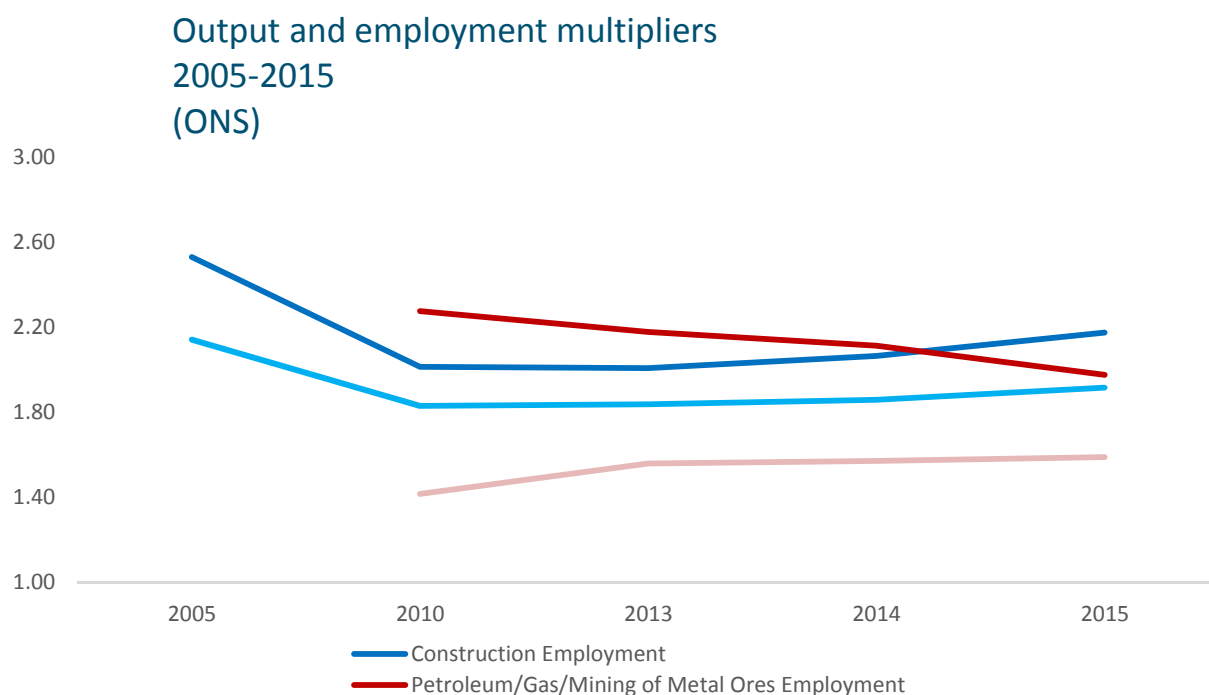
- 3.1. The table below addresses the Department for Infrastructure (Economics Branch) request for a comparison of the projected employment and GVA multipliers of the project and the most recent ONS multipliers which are from 2015.
- 3.2. The relevant sectors considered from the ONS tables are “Construction” and “Other mining and quarrying products.” Where there is a possibility that the multipliers could be reduced due to leakage outside NI, this has been highlighted in bold in the table below.
- 3.3. Operational effects are benchmarked against “Extraction of Crude Petroleum and Natural Gas & Mining of Metal Ores”.

Table A#.5: Comparison of Multipliers for the Project against industry and ONS benchmarks

Multiplier	Total Impact, Type 2 (not including leakage)	Industry benchmarks (Type 2)	2015 ONS Input-Output Analytical Tables Multipliers and effects (product) (assumed not to include induced)	Suggested reason for difference
Construction Employment multiplier (TYPE 2)	2.47	2.0	2.174	Capital intensive cost profile = relatively high spend in the supply chain compared to labour cost – especially in construction related supply chain, which supports a higher level of indirect employment for every £ spent. <b>Some leakage outside NI likely.</b> ONS 2015 benchmarks do not include induced effects.
Construction GVA Multiplier	1.75	1.9	2.041	Expenditure on manufactured goods and energy offering relatively low indirect GVA. <b>Some leakage outside NI likely.</b> ONS 2015 benchmarks do not include induced effects.
Operational Employment multiplier (TYPE 2)	2.45	2.17	1.974	Significantly higher expenditure on supply chain relative to on-site labour costs, which supports a higher level of indirect employment. <b>Some leakage outside NI likely.</b> ONS 2015 benchmarks do not include induced effects.
Operational Output Multiplier	1.44	1.46	1.521	Expenditure on manufactured goods and energy offering relatively low indirect GVA. ONS 2015 benchmarks do not include induced effects.

- 3.4. The Economics Branch has expressed interest in understanding the potential effects of the economic cycle on the multipliers. The chart that follows (Chart A2.6) shows the changes in ONS (Blue Book) Type I multipliers between 2005 and 2015. This shows a decline in construction output and employment multipliers between 2005 and 2010, followed by an increase (although not up to pre-recession levels by 2015).
- 3.5. Data for petroleum and mining (ores) sectors combined was not presented in the 2005 ONS outputs, so it has been omitted from this chart. In these sectors employment multipliers have declined and GVA multipliers have increased over the time period, likely indicating an increase in capital intensity in the sector and its supply chain.
- 3.6. These trends do not affect the conclusions of the assessment. The assessment is based on a Project Specific economic model which only provides the industry benchmarks for the purposes of comparison and does not use them in the projections.

Figure A#:1 Output and employment multipliers, 2005-2015 (ONS)



## 4. Potential for effects on the farm economy and agriculture

### Overview

- 4.1. The scope of the submission documents and Environmental Impact Assessment was established through a formal request for scoping (Document A2). Statutory consultees responded to this request in the Scoping Report (Document A1). Through this process, a specific assessment on the impact on agricultural/farmland was scoped out of the Environmental Impact Assessment as no statutory consultees requested this (see summary of relevant responses below).
- 4.2. Although a formal assessment was scoped out of the EIA, the Applicant acknowledges that potential impacts on agriculture and farm output are a key concern in a rural economy. 8.1% of working residents of Owenkillew Super Output Area work in agriculture – an estimated 930 residents. The dominant activity is raising livestock (rather than growing crops).
- 4.3. There was a large amount of relevant material submitted in support of the application and it may be helpful for both the public and the decision-making bodies if these key matters were summarised in one place, with signposting to details in the submission documents.
- 4.4. There are pathways through which environmental effects have the potential to impact on agricultural output. Relevant topics which cover these pathways and which were scoped into the Environmental Statement include:
  - Animal health (e.g. risks to the health of livestock).
  - Surface water and ground water (e.g. quality and quantity of available water and potential risks of contamination)
  - Ecology (e.g. potential impacts on ecosystems)
  - Air quality (including dust) (e.g. potential for dust and particulates to affect plant growth or animal health).
  - Human health (e.g. any likely effect on human health from the Project, including contamination of food sources).
  - Radio-active material (e.g. any likely risk to plant or animal health from exposure to radio-active materials associated with the Project).
  - Risk perception. (e.g. likelihood of negative perception of risks affecting the market for farm output).
- 4.5. This Appendix summarises/signposts to the relevant information and likely significant impacts of the Project with respect to these topics.
- 4.5. The “2019 update” changes to the scheme have also been considered.

### Relevant matters in the Scoping Report

- 4.6. The Scoping Report (Document A1) sets out the responses from all statutory consultees on the scope and content of the Environmental Statement (ES). The Northern Ireland Department of Agriculture and Rural Development responded to the scoping request. There were two responses from this department – one from the Veterinary Service and one from the Countryside Management Delivery Branch. Neither requested an assessment of the impact on agriculture be undertaken.

- 4.7. The Countryside Management Delivery Branch at the Department stated that there were ecology matters of relevance to the site, including scrub, hedge and tree removal, field boundaries and scrubland, grassland, heather moorland and wetland habitats<sup>3</sup>. These matters relate to the farm environment but not directly to agricultural output or the farm economy. These matters are addressed in **ES Vol 3 - Appendix C8 - Ecological Impact Assessment**.
- 4.8. The Branch confirmed that the agricultural land under consideration is classified as grades ALC 3b and ALC 4. This means it is not “*the best and most versatile agricultural land (BMV)*”<sup>4</sup>. Therefore, the impact on or loss of this land for agriculture has not been assessed with reference to BMV.
- 4.9. In response to the Scoping Report, no further work specifically focussed on the impact on agriculture and the farm economy was undertaken. However, across the ES, there is relevant information and assessments on matters that could be relevant to agriculture (as listed above in Paragraph 1.6) and a summary of where to find this information and the conclusions of the assessments is set out below.

#### Animal health

- 4.10. The Health Impact Assessment considered the potential effects on the health of animals from the Development.
- 4.11. Relevant assessments can be found at:
- ES Vol 2 – Environmental and Social Impact Assessment, Section 8.14
  - ES Vol 2 – Environmental and Social Impact Assessment (Section 8.14.10)
  - ES Vol 3 – Appendix C14 – Health Impact Assessment
  - Addenda to the above submitted to reflect the proposed changes to the Development.
- 4.12. Based on the information presented in the **Health Impact Assessment**, there are no likely significant impacts on the environment that are likely to trigger indirect impacts on agriculture including animal health.

#### Surface water and ground water

- 4.13. Surface water and ground water quality may affect the health of animals, the productivity of agriculture and the safety of eating produce grown or reared in an area.
- 4.14. Relevant assessments can be found at:
- ES Vol 2 – Environmental and Social Impact Assessment, Section 8.3 - 8.4
  - ES Vol 3 - Appendix C6 - Groundwater Impact Assessment
  - ES Vol 3 - Appendix C4 - Surface Water Impact Assessment
  - ES Vol 1 - Non-technical summary, Section 4.3

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<sup>3</sup> DGL, 2017 Curraghinalt Project, County Tyrone, Environmental Statement - Volume 3 A2 Response to request for formal scoping opinion p.13-14

<sup>4</sup> DGL, 2017 Curraghinalt Project, County Tyrone, Environmental Statement - Volume 3 A2 Response to request for formal scoping opinion p.13-14

- ES Vol 3 - Appendix C14 – Health Impact Assessment
- Addenda to the above submitted to reflect the proposed changes to the Development.

4.13. Based on the information presented in the above documents, there are no likely significant impacts on the environment that are likely to trigger indirect impacts on agriculture. This includes the assessment of risks of hazardous leakage into water sources impacting on the quality of water indirectly affecting livestock.

#### Air quality

4.14. Air quality (including dust) may affect the health of animals and the productivity of agriculture.

4.15. Relevant assessments can be found at:

- ES Vol 2 – Environmental and Social Impact Assessment, Section 8.6
- ES Vol 3 – Air Quality Impact Assessment and Baseline Report
- ES Vol 1 - Non-technical summary, Section 4.3
- ES Vol 3 - Appendix C14 – Health Impact Assessment
- Addenda to the above submitted to reflect the proposed changes to the Development.

4.23. Based on the information presented in the documents stated above, there are no likely significant impacts on the environment that are likely to trigger indirect impacts on agriculture. This includes risks from changes to air quality that could impact animal health or risks of increased dust that could affect plant growth or habitats.

#### Soils

4.24. Soil quality and contamination may similarly affect agricultural output and safety for consumers.

4.25. Relevant assessments can be found at:

- ES Vol 3 - Appendix C1 – Soils and Geology Baseline Report
- ES Vol 3 - Appendix C6 - Groundwater Impact Assessment
- ES Vol 3 - Appendix C4 - Surface Water Impact Assessment
- ES Vol 3 - Appendix C7 – Radon and NORM Emissions Impact Assessment
- ES Vol 1 - Non-technical summary, Section 4.3
- Addenda to the above submitted to reflect the proposed changes to the Development.

4.30. Based on the information presented in the documents stated above and throughout this document, there are no likely significant impacts on soil quality that are likely to trigger impacts on agriculture. This includes disturbance caused by clearing of vegetation, disturbance of the natural ground surface and potential pollution of soil.

#### Ecology

4.31. Relevant assessments can be found at:

- ES Vol 2 – Environmental and Social Impact Assessment, Section 8.11
- ES Vol 3 – Appendix C8 – Ecological Impact Assessment and Baseline Reports

- ES Vol 1 - Non-technical summary, Section 4.3
- ES Vol 3 - Appendix C14 – Health Impact Assessment
- Addenda to the above submitted to reflect the proposed changes to the Development.

4.34. Based on a summary of information presented in the documents stated above and throughout this document, there are no likely significant impacts on ecology that are likely to trigger impacts on agriculture. This includes disturbance caused by construction and operation or indirect effects on ecosystems.

#### **Human health**

4.35. Relevant assessments can be found at:

- ES Vol 2 – Environmental and Social Impact Assessment, Section 8.14
- ES Vol 1 - Non-technical summary, Section 4.3
- ES Vol 3 - Appendix C14 – Health Impact Assessment
- Addenda to the above submitted to reflect the proposed changes to the Development.

4.36. There are no likely significant impacts identified in the Health Impact Assessment that are likely to trigger impacts on agriculture.

#### **Naturally occurring radio-active material (NORM)**

4.37. Exposure to NORM may cause lung cancer from prolonged exposure but is not typically associated with any risk to agricultural output or the safety of consuming produce.

4.38. Relevant assessments can be found at:

- ES Vol 2 – Environmental and Social Impact Assessment, Section 8.10
- ES Vol 3 – Appendix C7 – Radon and NORM Emissions Impact Assessment
- ES Vol 1 – Non-technical summary, Section 4.3
- ES Vol 3 – Appendix C14 – Health Impact Assessment
- Addenda to the above submitted to reflect the proposed changes to the Development.

4.45. Based on a summary of information presented in the documents stated above, there are no likely significant impacts on the environment that are likely to trigger indirect impacts on agriculture.

#### **Risk perception**

4.46. While the environmental impact assessments do not identify any likely significant effects relevant to agriculture or the farm economy, public representations to the Application highlight that negative perceptions (e.g. of contaminated water) could affect the market for produce from this area. The Health Impact Assessment included an assessment of “risk perception”.

4.47. Relevant assessments can be found at:

- ES Vol 2 – Environmental and Social Impact Assessment, Section 8.14
- ES Vol 1 – Non-technical summary, Section 4.3
- ES Vol 3 – Appendix C14 – Health Impact Assessment

- Addenda to the above submitted to reflect the proposed changes to the Development.
- 4.48. The proposed changes to the Development mean that the risk (and risk perception) associated with cyanide has been completely removed through the removal of any onsite processing.

## Conclusions

- 4.49. Agriculture and farming is an important source of employment in the local economy – although it is relatively low paid and seasonal in this area. Diversifying the rural economy is a policy aspiration at a national and local level in NI<sup>5</sup>.
- 4.50. A specific assessment of the effects of the Development on agriculture and the farm economy was not scoped in the EIA, as the relevant Statutory Consultees did not consider this was necessary and there were no likely significant effects projected. No agricultural jobs will be directly lost by the Project<sup>6</sup>. Based on the summary of information presented above, there are no likely significant impacts on the environment that are likely to trigger indirect loss of agricultural jobs or reduction in farming output.
- 4.51. The proposed changes to the Development remove the processing element of the Project which will remove cyanide (and its associated risks and perception of risk) from the site.

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<sup>5</sup> Fermanagh and Omagh, Local Plan Preferred Options 2016, para 7.8

<sup>6</sup> Relevant assessments can be found at:

- ES Vol 2 – Environmental and Social Impact Assessment, Section 8.13
- ES Vol 1 - Non-technical summary, Section 4.3
- ES Vol 3 - Appendix C12 – Socio-economic Impact Assessment
- Addenda to the above submitted to reflect the proposed changes to the Development.

## Annex 1 Table of DfI Questions and responses

Question Reference	Question summary	Response summary
10.0	<p>Note that these points refer to the document C13 Statement of Economic Impacts unless otherwise stated. The total construction (pre-production) investment is estimated to be £160m, consisting of £121.6m Supply Chain spending and £38.5m Staff Costs (figures may not add due to rounding). This is then used to estimate the economic impacts (employment, GVA, Tax etc). Figure 3.2 highlights that £117m of the £160m is assumed to be invested within NI (approximately 73%). That being the case, it would have been useful if a breakdown of investment was provided at the NI level.</p> <p>Nevertheless, it isn't clear if the supply chain and induced employment impacts have been estimated using the total investment or the investment within NI. For instance, if a portion of the investment is spent in the ROI or rest of the UK then at least some of the benefits linked to this are likely to accrue outside of NI. Planning should seek clarification of how this has been accounted for and what the key benefits are for the NI economy (as opposed to total benefits, some of which could accrue elsewhere).</p>	<p>For clarity, Quod confirms that none of the calculations as submitted with the Application specifically assessed capital or operational expenditure spent outside Northern Ireland (NI). This is stated in the Statement of Economic Impacts (Document C13, footnote 57) and acknowledged in the response from the Economics Branch.</p> <p>Both the supply chain and induced employment effects have the potential to be reduced when expenditure outside NI is factored into the assessment.</p> <p>An assessment of “leakage” effects is presented in Appendix #.</p> <p>This further level of detail does not change the conclusions of the Submission Assessments with respect to the potential for major economic benefits.</p>

<p>10.1</p>	<p>Linked to the point above, GVA has been estimated using the following assumption (p.28);          ‘The Office for National Statistics (ONS) estimates that approximately 40% of total construction investment (including staff costs) is "value added." For the £160 million of spending on construction inputs and labour for Curraghinalt, the direct GVA would be approximately £64 million’.</p> <p>Again, this appears to suggest that GVA for NI as a result of the construction phase has been estimated using the total investment and not the investment within NI, which has a knock-on effect when the indirect and induced GVA is estimated. Planning should clarify if the GVA figures presented are for NI and, if not, what this would be to show the impact for the NI economy.</p>	<p>See:          Section 2 of Appendix 2</p> <p>Addendum to the Socio-Economic Impact Assessment and The Statement of Economic Impacts</p>
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<p>10.2</p>	<p>In terms of the operational phase, indirect employment has been estimated using a breakdown of operational spending. Planning should seek clarification if this is based on expenditure within NI or total expenditure, as the increase in employment across the supply chain in NI is only likely to be connected to expenditure within NI. Note the induced employment is linked to this as well.</p>	<p>For clarity, Quod confirms that none of the calculations as submitted with the Application specifically assessed capital or operational expenditure spent outside Northern Ireland (NI). This is stated in the Statement of Economic Impacts (Document C13, footnote 57) and acknowledged in the response from the Economics Branch.</p> <p>Indirect operational employment effects have the potential to be reduced when expenditure outside NI is factored into the assessment.</p> <p>An assessment of “leakage” effects is presented in Appendix #.</p> <p>This further level of detail does not change the conclusions of the Submission Assessments with respect to the potential for major economic benefits.</p>
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<p>10.3</p>	<p>The ES does not provide an explanation as to how the GVA for the operational phase was estimated and it would be useful if this was clarified to ensure it accounted for NI-specific expenditure/ employment.</p>	<p>For clarity, Quod confirms that none of the calculations as submitted with the Application specifically assessed capital or operational expenditure spent outside Northern Ireland (NI). This is stated in the Statement of Economic Impacts (Document C13, footnote 57) and acknowledged in the response from the Economics Branch.</p> <p>Direct operational GVA is not reduced by supply chain expenditure outside NI - value generation will all be located within NI.</p> <p>Construction GVA does has the potential to be reduced when expenditure outside NI is factored into the assessment.</p> <p>An assessment of “leakage” effects is presented in Appendix #.</p> <p>This further level of detail does not change the conclusions of the Submission Assessments with respect to the potential for major economic benefits.</p>
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<p>10.4</p>	<p>Section 3.11 outlines the benefits related to exports and a reduction in the trade deficit. Planning should seek clarification that any materials/services sourced from outside of NI have been accounted for which will, of course, represent imports.</p>	<p>For clarity, Quod confirms that none of the calculations as submitted with the Application specifically assessed capital or operational expenditure spent outside Northern Ireland (NI). This is stated in the Statement of Economic Impacts (Document C13, footnote 57) and acknowledged in the response from the Economics Branch.</p> <p>The impacts on trade deficit have the potential to be reduced when expenditure outside NI (i.e. imports) is factored into the assessment.</p> <p>An assessment of “leakage” effects is presented in Appendix #.</p> <p>This further level of detail does not change the conclusions of the Submission Assessments with respect to the potential for major economic benefits.</p>
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<p>10.5</p>	<p>Quod have already compared their multipliers to industry standards and provided a brief suggested reason for difference, but I thought it would also be useful to show how these compare to the most recent UK figures from ONS. It is also worth noting the ONS estimates are 2014 figures and economic conditions are likely to have an impact, with Quod estimating future multipliers which should relate to a period of improved economic conditions (the pre-recession 2005 ONS Construction Employment Type I multiplier was 2.53 for instance). Therefore, I believe these are at the higher end for the industries in question, based on the most recent data, but not unreasonable.</p>	<p>A comparison of the projected multipliers for both employment and output – and both construction and operation phases – has been presented alongside the latest ONS multipliers. This can be found in Appendix #. These are provided for information, as requested and do not provide any evidence which calls into question the methodology of outcomes of the assessment and do no change the conclusion of the assessment.</p>
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<p>10.6</p>	<p>Displacement has been considered and dismissed, the reasoning for doing so appears to be sound. However, I am not familiar with the area/location in question and Planning should be satisfied that there is unlikely to be a notable impact on farming and agriculture; this will ensure no displacement of current economic activity linked to the sector.</p>	<p>A specific assessment of the effects of the Development on agriculture and the farm economy was not scoped in the EIA, as the relevant Statutory Consultees did not consider this was necessary and there were no likely significant effects projected. However, relevant environmental assessments were undertaken (such as on the potential effects on soil, water, ecology, health, etc.). These assessments did not find any significant environmental effects which could be linked to an impact on agriculture or the farm economy.</p> <p>Summaries of relevant assessment are presented in Appendix #.</p> <p>The proposed changes to the Development would remove the processing element of the Project which will remove cyanide (and its associated risks and perception of risk) from the site.</p>
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<p>10.7</p>	<p>In conclusion, the theme running through the comments above is leakage i.e. employment or GVA benefits occurring outside of the region (NI). Footnote 57 of the report states,          'Leakage has not been directly assessed either as DGL is not undertaking a Green Book appraisal which would be applicable in the case of public funds investment. Leakage is implicitly assessed when estimating local impacts'.          Whilst this is not an appraisal, it is important to disaggregate benefits to the NI economy and therefore leakage would be implicitly assessed at the N 1-level if this has been done. Planning should seek clarification about the points above to ensure a fair reflection of regional benefits has been considered when making a decision about the planning application.</p>	<p>An assessment of “leakage” effects is presented in Appendix #.</p> <p>This further level of detail does not change the conclusions of the Submission Assessments with respect to the potential for major economic benefits.</p>
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