

**FOI DOF/2025-0420**

**Request**

Information regulations regarding the decision to grant Industrial Derating relief to Dalradian Gold Limited, as referenced in a recent FOI release by Act Now and widely circulated in public media.

Specifically, I am seeking the following information:

1. The rationale and decision-making process by which Dalradian Gold Limited was deemed eligible for Industrial Derating in the 2024/25 rates year, resulting in a recorded relief of £14,788.43.
2. The nature of the operations or premises that qualified under the definition of “industrial hereditament” per Article 39 of the Rates (Northern Ireland) Order 1977.
3. Any assessments, site inspections, or correspondence between Dalradian Gold and government departments or Land and Property Services (LPS) relating to this rating exemption.
4. A breakdown of which property/properties were derated, including their addresses and functions.
5. Whether this derating decision was based on active processing or manufacturing operations, or whether the exemption was granted based on preparatory or speculative activities related to mineral development.
6. Copies of any internal guidance or policy documents used to determine eligibility for Industrial Derating in the context of mineral exploration, development, or mining operations.

**DoF response**

I can confirm the department holds the information requested.

The information is provided in Annex B-E and below.

1. The Dalradian Gold Limited mine was entered into the Valuation List with a liability for rates from 22 January 2021. The Rates (NI) Order 1977 Schedule 2(1) provides that “mine” has the meaning assigned to it by section 156 of the Mines Act (Northern Ireland) 1969 and includes anything

which by virtue of that section is deemed to form part of a mine. Land & Property Services (LPS) considered that the operations on site met the definition of a mine under section 156 of the Mines Act (Northern Ireland) 1969. As the property was a “mine” it was distinguished as an industrial hereditament as per schedule 2 of the Rates Order and valued on the basis of Contractors Valuation. Details of the valuation is provided in **Appendix B & C**. Premises assessed as wholly industrial benefit from 70% relief on the amount of rates payable.

2. LPS applied Section 156 of the Mines Act (NI) 1969 subsection (3) which states - *A mine is deemed to include so much of the surface (including buildings, structures or works on it) surrounding or adjacent to the shafts or outlets of the mine as is occupied with the mine for the purpose of, or in connection with—*
  - (a) working the mine,*
  - (b) the storage, treatment or preparation for sale, consumption or use of minerals or mineral products extracted from the mine, or*
  - (c) the removal from the mine of minerals or mineral products extracted from it or of refuse from it.*

Schedule 2 of The Rate Order defines industrial hereditament.

Article 39 of The Rates Order provides the basis of valuation and in this case the property has been valued on an estimate of net annual value.

The property at Camcosy Road has been distinguished as Industrial. Other properties are occupied by the Company but they are not designated as Industrial.

3. The property was inspected by a member of LPS staff on 12<sup>th</sup> May 2021. Photographs taken during the property inspection are included in **Appendix D**.

Correspondence between Dalradian Gold and government departments or Land and Property Services (LPS) are included in **Appendix E**.

4. The property at Camcosy Road, Omagh, Property ID 1087893, is described in the Valuation List as a mine and is distinguished as Industrial. It has a Net Annual Value (NAV) of £38,700.
5. Schedule 11 Entry No. 5 (a) of The Rates (Northern Ireland) Order states that mines which have been opened for less than 7 years are not to be treated as hereditaments (ie rateable property). Planning permission for the subject property was granted on 22/01/2014; Planning Ref: K/2013/0072/F. The mine has been considered “opened” from this date therefore rates were applied from 22/01/2021. The District Valuer considered that the operations on site met the definition of a mine under section 156 of the Mines Act (Northern Ireland) 1969. As the property is a “mine” it will be distinguished as an industrial hereditament as per Schedule 2 of the Rates Order.
6. LPS does not have internal guidance or policy documents used to determine eligibility for Industrial Derating in the context of mineral exploration, development, or mining operations. The provisions of the legislation outlined in 1 and 2 above against the facts at inspection were used to determine eligibility.  
  
Legal advice was sought from the Departmental Solicitor’s Office, this information is withheld under Section 42 (legal professional privilege) of the Freedom of Information Act 2000.

Individuals and staff names/details are withheld (redacted) as this information is exempt under Section 40(2) of the Freedom of Information Act because such disclosure would contravene the first principle of the Data Protection Act 2018, which requires that personal data must be processed lawfully, fairly and in a transparent manner. Disclosure would be unfair, because the sole trader would not expect that this information would be made available to others.

Section 40(2) exempts personal information from disclosure if that information relates to someone other than the applicant and if disclosure of that information would contravene one of the data protection principles in the General Data Protection Regulations (GDPR) (or certain other provisions of the Data Protection

Act 2018).

Having considered all the information contained within the Lawfulness, Fairness and Transparency Test (which we are providing as a separate attachment – Appendix F), the department has established that, on balance, there is no lawful basis for the disclosure of third-party personal data falling within the scope of the request of which the requester is not the data subject.

# MINE BUILDINGS Camcosy Road

## NDR 2023

Buildings ERC £	1,003,554	
External Works Rate %	0.00	
External Works Value £	0	
Sub Total £	1,003,554	
Contract Size Adjustment Value %	3.993	
Contract Size Adjustment £	40,071	
Sub Total £	1,043,624	
Professional Fees Value %	11.50	
Professional Fees £	120,017	Stage 1
Sub Total £	1,163,641	
Age Absol Adj Value %	94.83	
Sub Total £	1,103,432	Stage 2
Developed Land Value £	38,750	
Age Absol Adj Value %	94.83	
Adjusted Developed Land Value £	36,745	
Undeveloped Land Value £	0	
Sub Total £	1,140,177	Stage 3
Decap Rate %	3.40	
Decap Value £	38,766	Stage 4
End Adjustment %	0%	Stage 5
NAV (Unrounded) £	38,766	
Round down to nearest £	100	
<b>NAV (Rounded)</b>	<b>£38,700</b>	



## Industrial Derating

<b>Property ID</b>	1087893
<b>Case Registration Number</b>	7064880
<b>Case Type</b>	A2 – Industrial Derating
<b>Applicant</b>	N/A
<b>Occupier</b>	Dalradian Gold
<b>Pointer Address</b>	Mine Buildings Camcosy Road Omagh
<b>List Description</b>	621 - Mine
<b>8<sup>h</sup> List NAV</b>	£38,800 (IN)
<b>8<sup>TH</sup> List NAV revised to</b>	N/A New Hereditament
<b>Date property inspected</b>	12/05/2021
<b>Person Interviewed</b>	[REDACTED]
<b>Tenure</b>	Freehold
<b>Lease Details</b>	N/A
<b>Survey correct/amended/prepared</b>	New Survey attached to AO

## Property Description

Subject property comprises Mine @ Camcosy Road, Rousky. It is a high profile site under much scrutiny and opposition in the local area with residents against mining activities and potential impact on the surrounding environment. In terms of extraction there is no active mining on site at present due to planning issues however Dalradian are in occupation of the Mine. There is ongoing environmental sampling, enabling and maintenance work associated with the mine and occupation of the stores and workshop buildings. To date the only excavation which has taken place has been for exploration purposes confirming that the subject has rich deposits of gold as well as silver and copper. In summer 2016 circa 15,000 tonnes of ore was extracted and shipped to North America to progress geological, engineering and grade studies. Areas to be valued are in three distinct portions;

- 1: Maintenance workshops, yard and entrance to the mine fronting onto Camcosy Road
- 2: Water Treatment Works circa 200m to the rear / North of the workshops
- 3: Evac site circa 400m South of the workshop

### 7 Year Rule

Schedule 11 Entry No. 5 (a) of The Rates (Northern Ireland) Order states that mines which have been opened for less than 7 years are not to be treated as hereditaments. Planning permission for subject site was granted on 22/01/2014; Planning Ref: K/2013/0072/F. The mine has been considered "opened" from this date therefore rates will apply from 22/01/2021. Emails from DSO and between SV & Dalradian relating to rates liability attached to case viewer.

Schedule 2(1) of the Rates Order provides that "*mine*" has the meaning assigned to it by section 156 of the Mines Act (Northern Ireland) 1969 and includes anything which by virtue of that section is deemed to form part of a mine. In my opinion operations on site meets the definition of a mine under section 156 of the Mines Act (Northern Ireland) 1969. As the property is a "mine" it will be distinguished as an industrial hereditament as per schedule 2 of the Rates Order.

### Valuation Approach

Buildings, Plant & Machinery will be valued under contractors basis of valuation relative to cost guide in keeping with approach applied to mines and quarries. With regard to the mineral element, Schedule 12 Part 4 of the Rates order states that we must have regard to the quantity of minerals extracted, quantity shall be the probable quantity for the first year to which the valuation will be in force. As the effective date is 22/01/2021 the relevant year is 2021/2022. There has been no

extraction from 2016 and no active mining is taking place or planned due to planning constraints therefore NAV attributable to quantity of minerals is Nil.

Valuation (See attached Spreadsheet)

Buildings Plant & Machinery NAV £38,800 (IN)

### Recommendation

1. Enter NAV £38,800 (IN)
2. Occupier: Dalradian Gold
3. Effective date: 22/01/2021

### Certificate Comment

"Property considered industrial for rating purposes."

### Valuer name and grade

██████████ Valuer I  
I confirm that I have no conflict of interest in dealing with this revision of the Valuation List

### Date

21/06/2021

Workshop, open fronted store & temp offices



Tunnel under road leading to mine



Water Treatment Works

Reinforced concrete framed "Reservoir". Contains inlet whereby the Wastewater enters pre-treatment and it is then separated and pumped through various clarifiers etc. then discharged into watercourse





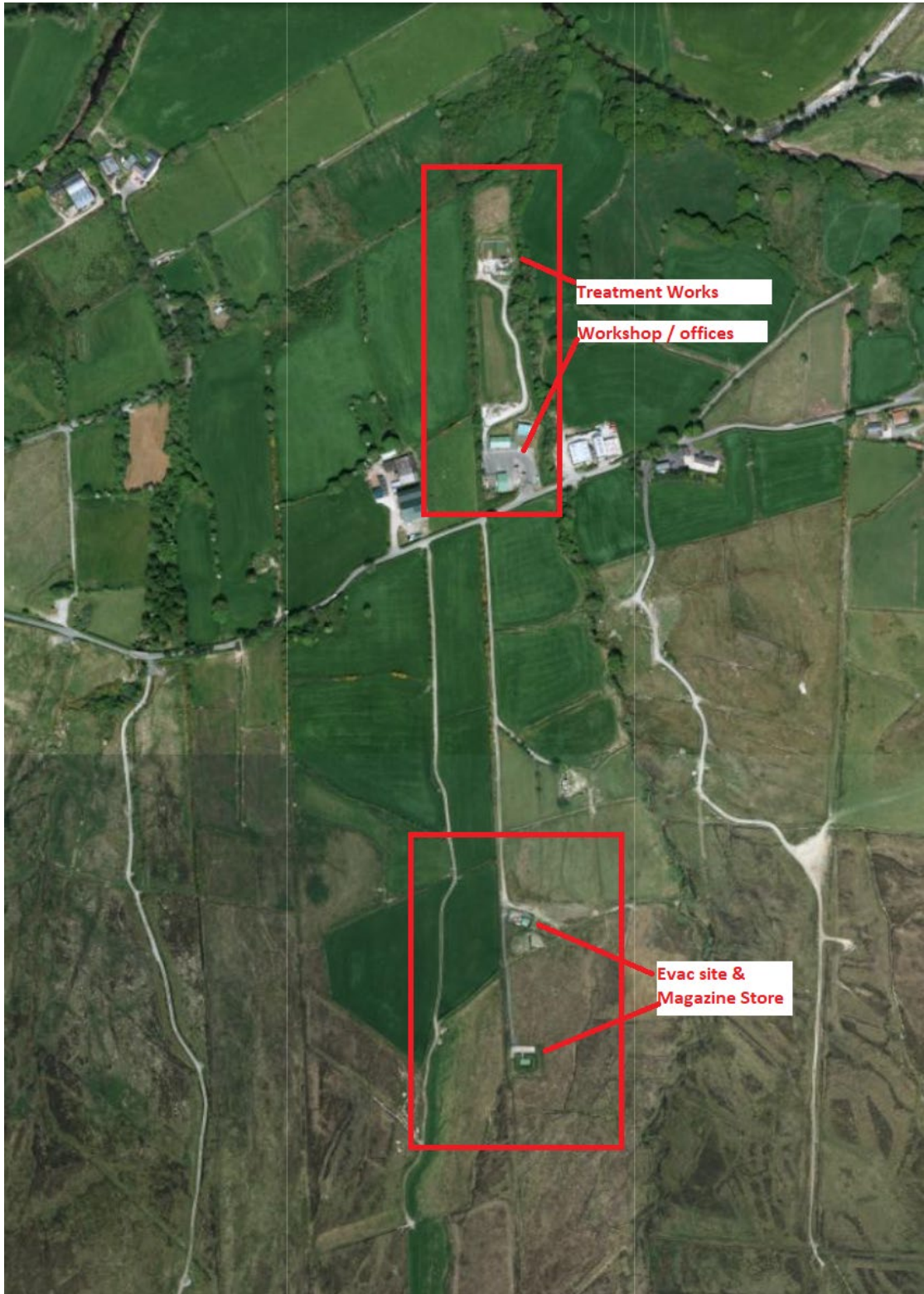
Evac area, ventilation unit and generators @ Evac site



Magazine Store for explosives



**Aerial overview of property**







[www.mwhire.com](http://www.mwhire.com)



98





TA 817



TA 819



TA 809



TA 816

TA 820



TA 810



TA 823



TA 811

Tag out ....!

VISITOR

VISITOR





GRIP-SALT

Kunaghraill Project

WORK SAFE BE SAFE

CHECK YOUR WHEELS

CAT





CHECK YOUR WHEELS

Tag out

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: RE: Dalradian Rates Valuation; Site @ Camcosy Road  
**Date:** 24 June 2021 10:33:00

---

[REDACTED]

I can confirm that the rates assessments for the Mine site and sheds to the East of the site have been completed as follows;

PID: 1087893  
Address: MINE BUILDINGS Camcosy Road  
NAV: £38,800 (IN)  
Effective Date: 22/01/2021

PID: 1087976  
Address: STORE N42 Camcosy Road  
NAV: £3,450 (OT)  
Effective Date:

Mine site is distinguished in the valuation list as Industrial. It is my understanding that there is currently a 12 month rating holiday for period April 2021 – March 2022 for properties in receipt of Industrial Derating. See attached link for more information regards potential rates holiday.  
[Rates holiday | nibusinessinfo.co.uk](https://www.nibusinessinfo.co.uk)

Should you wish to discuss any of the above please give me a call on [REDACTED]

Kind Regards,

[REDACTED]

[REDACTED]  
Rating & Client Services Delivery-Val Omagh  
Valuation Services Directorate  
Land & Property Services  
Department of Finance  
Boaz House  
19 Scarffe's Entry  
Omagh, BT78 1JG

Tel: [REDACTED]  
[REDACTED]

Web: [www.finance-ni.gov.uk/lps](http://www.finance-ni.gov.uk/lps)

---

**From:** [REDACTED]@dalradian.com]  
**Sent:** 10 June 2021 10:13  
**To:** [REDACTED]@finance-ni.gov.uk>  
**Cc:** [REDACTED]@dalradian.com>; [REDACTED]@dalradian.com>  
**Subject:** CM: RE: Dalradian Rates Valuation; Site @ Camcosy Road

Good morning [REDACTED]

The bulk sample of ~ 15,000 tonnes compromised 3 stopes (primarily) which were extracted in the summer of 2016.

Kind regards,

[REDACTED]

---

**From:** [REDACTED]@finance-ni.gov.uk>  
**Sent:** 08 June 2021 16:04  
**To:** [REDACTED]@dalradian.com>  
**Subject:** RE: Dalradian Rates Valuation; Site @ Camcosy Road

Thanks [REDACTED]

Can you please confirm the approximate dates extraction commenced / ceased.

Thanks,

[REDACTED]

---

**From:** [REDACTED]@dalradian.com]  
**Sent:** 08 June 2021 16:00  
**To:** [REDACTED]@finance-ni.gov.uk>  
**Subject:** RE: Dalradian Rates Valuation; Site @ Camcosy Road

Good afternoon [REDACTED]

We would have extracted ~ 15,000 tonnes of ore which was shipped to North America for processing. This work allowed us to progress geological, engineering and grade studies. It is not how the proposed project/underground mine will be operating.

Our operation will produce a concentrate (a sort of metallic sand) which will be similar to the operation at Galantas/Omagh Minerals and that of Scotgold in Cononish in Scotland. Have you been able to find out how these two operations are rated ?

In terms of our proposed operation, there will also be materials produced as by-products of the process. Some of these will be returned underground, in line with the EU Mine Waste Directive but the balance will be stored in engineered facilities know as "dry stack" tailings.

Kind regards,

██████████

---

**From:** ██████████@finance-ni.gov.uk>  
**Sent:** 08 June 2021 15:30  
**To:** ██████████@dalradian.com>  
**Subject:** FW: Dalradian Rates Valuation; Site @ Camcosy Road

██████████

The current assessment for rates purposes will not have any assessment for royalties applied as it is my understanding there is no extraction taking place.

Furthermore there has only been one extraction at the site a number of years ago. As per previous requests can you please confirm details of the excavation activities to date?

Should planning be forthcoming and operations commence then this will then be reviewed. I know you are understandably keen to obtain more information on how royalties would be calculated if operational however this is not pertinent to the current ongoing valuation. If things get up and going it is something which will require due consideration.

Kind Regards,

██████████

---

**From:** ██████████  
**Sent:** 27 May 2021 13:37  
**To:** ██████████@dalradian.com>  
**Subject:** RE: Dalradian Rates Valuation; Site @ Camcosy Road

██████████

I have been in touch with Valuation Office Agency in England regards their approach and await their reply.

As advised please send requested information in the interim.

Kind Regards,

██████████

---

**From:** ██████████@dalradian.com]  
**Sent:** 27 May 2021 13:01  
**To:** ██████████@finance-ni.gov.uk>  
**Subject:** RE: Dalradian Rates Valuation; Site @ Camcosy Road

Good afternoon ██████████

I think that it would be helpful to understand what is reported by way of extracted volumes and how it is valued.



mine nor has there been for some time.

Can you please confirm details of what extraction has been carried out to date including amount of materials extracted and approximate dates over which extraction took place.

Should you wish to discuss please feel free to give me a call in [REDACTED]

Kind Regards,

[REDACTED]

[REDACTED]

Rating & Client Services Delivery-Val Omagh  
Valuation Services Directorate  
Land & Property Services  
Department of Finance  
Boaz House  
19 Scarffe's Entry  
Omagh, BT78 1JG

Tel: [REDACTED]  
[REDACTED]

Web: [www.finance-ni.gov.uk/lps](http://www.finance-ni.gov.uk/lps)  
[IPS Privacy Notice \(financen.gov.uk\)](#)

---

**From:** [REDACTED]@dalradian.com]  
**Sent:** 12 May 2021 17:01  
**To:** [REDACTED]@finance-ni.gov.uk>; [REDACTED]@dalradian.com>  
**Cc:** [REDACTED]@dalradian.com>; [REDACTED]@dalradian.com>  
**Subject:** RE: Dalradian Rates Valuation; Site @ Camcosy Road

Good afternoon [REDACTED]

It was good to meet up with you earlier today.

As discussed on-site, the sheds to the east of the site are those that we have a degree of occupation over. That is not the case for the sheds to the west of the site (approach from Rouskey village).

Kind regards,

[REDACTED]

---

**From:** [REDACTED]@finance-ni.gov.uk>  
**Sent:** 16 April 2021 13:23  
**To:** [REDACTED]@dalradian.com>; [REDACTED]@dalradian.com>  
**Cc:** [REDACTED]@dalradian.com>; [REDACTED]@dalradian.com>  
**Subject:** Dalradian Rates Valuation; Site @ Camcosy Road

██████████

Wednesday 12<sup>th</sup> May @ 10AM suits.

With regard to the sheds to the East and West of the Site. Any rates levied will be the responsibility of the Occupier / Tenant therefore if there is occupation by Dalradian this matter will be dealt with between LPS and Dalradian.

Therefore I request that you please confirm the following;

**Sheds to the West of the Goldmine**

Please confirm if Dalradian occupy this property?

If so please provide plans detailing areas occupied or alternatively arrange access to permit an inspection and survey of the areas occupied by Dalradian.

**Sheds to the East of the Goldmine**

Please confirm if Dalradian occupy this property?

If so please provide plans detailing portion occupied or alternatively arrange access to permit an inspection and survey of the areas occupied by Dalradian.

Thank you for your co-operation.

Kind Regards,

██████████

---

**From:** ██████████@dalradian.com]  
**Sent:** 16 April 2021 09:17  
**To:** ██████████@finance-ni.gov.uk>; ██████████@dalradian.com>  
**Cc:** ██████████@dalradian.com>; ██████████@dalradian.com>  
**Subject:** RE: Drawings and Aerial photo request

Good morning ██████████

We should be able to facilitate your visit on either week. Can you please advise as to a preferred date and time and we will arrange for a member of staff to meet you on site and to provide a H&S induction.

As per previous correspondence, the sheds that you refer to are not the property of the company and we would respectfully request that you make whatever arrangements are necessary with the relevant landowner.

Kind regards,

██████████

---

**From:** ██████████@finance-ni.gov.uk>  
**Sent:** 15 April 2021 15:12

**To:** [REDACTED]@dalradian.com>; [REDACTED]@dalradian.com>

**Subject:** FW: Drawings and Aerial photo request

[REDACTED],

I refer to below emails regarding rating assessment for the site @ Camcosy Road. This case has been allocated to me to take forward and complete the rating assessment of the site.

To undertake the valuation access to the site is required to undertake an inspection. Whilst undertaking this valuation it is also my intention to conclude investigations into the sheds to the East and West of the site.

I am free the weeks beginning 10<sup>th</sup> & 17<sup>th</sup> May 2021 and would appreciate if a meeting / access could be arranged for a nominated date on either of those weeks.

Kind Regards,

[REDACTED]

[REDACTED]

Rating & Client Services Delivery-Val Omagh  
Valuation Services Directorate  
Land & Property Services  
Department of Finance  
Boaz House  
19 Scarffe's Entry  
Omagh, BT78 1JG

Tel: [REDACTED]

[REDACTED]

Web: [www.finance-ni.gov.uk/lps](http://www.finance-ni.gov.uk/lps)

[LPS Privacy Notice \(finance-ni.gov.uk\)](#)

---

**From:** Kelso, Crawford

**Sent:** 06 January 2020 11:42

**To:** [REDACTED]@dalradian.com>

**Cc:** [REDACTED]@dalradian.com>

**Subject:** RE: Drawings and Aerial photo request

[REDACTED] – thank you for your email below.

- (i) With regards to the commencement of the 7 year period to value the mine at Camcosy Road, the date adopted by LPS is 22 January 2014 as representing the grant of planning permission for the site. This was discussed with Dalradian at that time. The case reference is 7064880-0.

- (ii) If the proposed Greencastle mine is an independent property unit in its own right, then it should have a separate rating assessment and be valued accordingly. The current rating provisions apply.
- (iii) All of the above assumes that the current legislative rating framework remains unchanged. You are aware that a review of non-domestic rating, undertaken by the Department in 2016, proposed that the “7 year rule” be abolished. A further Departmental review of the rating system is being undertaken, although the initial findings and proposals have not yet been released. The public and stakeholders were consulted for a 6 week period up until mid-November.

Trust that this is of assistance to you.

Kind regards,

Crawford

---

**From:** [REDACTED]@dalradian.com]  
**Sent:** 03 January 2020 16:02  
**To:** [REDACTED]@finance-ni.gov.uk>  
**Cc:** [REDACTED]@dalradian.com>  
**Subject:** FW: Drawings and Aerial photo request

Crawford,

Thank you for your email below and clarifying the position with regard to the site at Camcosy Road. In terms of when the 7 year period commences I would suggest the date the underground ventilation system was installed and operational could be used and this is October 2015.

I also appreciate the clarification concerning the proposed mine site at Greencastle which will be assessed 7 years after it is opened as per the terms of Schedule 11 of the Rates (NI) Order 1977.

It is understood that this assumes the 7 year rule is not abolished in future legislation.

Kind regards,

[REDACTED]

---

**From:** [REDACTED]@finance-ni.gov.uk>  
**Sent:** 05 June 2019 09:55  
**To:** [REDACTED]@dalradian.com>  
**Subject:** RE: Drawings and Aerial photo request

[REDACTED] - thank you for your email below. After due consideration of all matters that pertain to this enquiry, the District Valuer proposes to proceed as follows;

- (i) Existing Development at Camcosy Road - It is considered that a mine has been opened within the terms of Schedule 11 of the Rates (NI) Order 1977 and therefore the NAV falls to be assessed 7 years after this mine was opened by Dalradian.

(ii) Proposed mine at Greencastle - A mine has yet to be opened on this site, being subject to a current planning application. The NAV will likewise fall to be assessed 7 years after this mine has opened.

All of the above assumes that the current legislative rating framework remains unchanged. You are aware that a review of non-domestic rating, undertaken by the Department in 2016, proposed that the "7 year rule" be abolished. The absence of a NI Executive has prevented the recommendations of this review from being considered further and implemented. In the event that any such legislative changes occur before the 7 years have expired, then the contents of this email may no longer be relevant.

I trust that this is of assistance.

Kind regards,

Crawford

Sent with BlackBerry Work  
([www.blackberry.com](http://www.blackberry.com))

---

**From:** [REDACTED] <[\[REDACTED\]@dalradian.com](mailto:[REDACTED]@dalradian.com)>  
**Date:** Tuesday, 04 Jun 2019, 10:03 am  
**To:** [REDACTED] <[\[REDACTED\]@finance-ni.gov.uk](mailto:[REDACTED]@finance-ni.gov.uk)>  
**Subject:** RE: Drawings and Aerial photo request

Crawford,

Please provide an update on where things stand at the moment?

Kind regards,

[REDACTED]

---

**From:** [REDACTED] <[\[REDACTED\]@finance-ni.gov.uk](mailto:[REDACTED]@finance-ni.gov.uk)>  
**Sent:** 09 May 2019 15:34  
**To:** [REDACTED] <[\[REDACTED\]@dalradian.com](mailto:[REDACTED]@dalradian.com)>  
**Subject:** RE: Drawings and Aerial photo request

[REDACTED] – thank you for the attached, together with our recent meeting and discussions. Hope to be back to you in the near future with LPS position.

Kind regards,

Crawford

---

**From:** [REDACTED] <[\[REDACTED\]@dalradian.com](mailto:[REDACTED]@dalradian.com)>  
**Sent:** 09 May 2019 12:40

To: [REDACTED]@finance-ni.gov.uk>  
Cc: [REDACTED]@dalradian.com>  
Subject: FW: Drawings and Aerial photo request

Crawford,

Please see attachments relating to the following;

1. WWTP area - Lagoon, WWTP pad and fixed plant/ equipment, Access track from yard to WWTP.
2. Mine site operations yard, showing Site security huts, Ore store, Adit entrance, Generators, Water tanks, Work shop and Office/ welfare facility.
3. Raised bore yard, Alimac egress building, stationary plant and yard layout, with access track from Camcosy road.
4. Magazine area, building, earth bund and yard layout, with access track from start of security fence No1.

An aerial photo is also attached.

Kind regards,

[REDACTED]

[REDACTED]  
Financial Controller | Dalradian Gold Limited  
t [+44 28 8224 6289] [REDACTED]@dalradian.com  
[REDACTED]  
[www.dalradian.com](http://www.dalradian.com)

#### Disclaimer:

This communication, including any attachments, is intended only for the use of the addressee and may contain confidential and privileged information. If you are not the intended recipient, or the person responsible for delivering this information to the intended recipient, you are notified that any dissemination, distribution, disclosure, retaining or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by telephone or reply email and permanently delete the original transmission from us, including any attachments, without making a copy. Thank you.

Visit us at: [dalradian.com](http://dalradian.com)

#### Disclaimer:

This communication, including any attachments, is intended only for the use of the addressee and may contain confidential and privileged information. If you are not the intended recipient, or the person responsible for delivering this information to the intended recipient, you are notified that any dissemination, distribution, disclosure, retaining or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by telephone or reply email and permanently delete the original transmission from us, including any attachments, without making a copy. Thank you.

Visit us at: [dalradian.com](http://dalradian.com)

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Curraghinalt Rates  
**Date:** 12 April 2018 15:36:08

---

Hi [REDACTED]

This is all correct, and I appreciate you coming back to me to confirm everything.

Thanks again

[REDACTED]

---

**From:** [REDACTED]@finance-ni.gov.uk]  
**Sent:** 10 April 2018 16:19  
**To:** [REDACTED]@dalradian.com>  
**Subject:** RE: Curraghinalt Rates

[REDACTED], further to our telephone conversation on 9/4/18 I can confirm that Schedule 11 of the Rates (NI) Order 1977 lists all properties that are 'not to be treated as hereditaments' (i.e. properties that are not included in the valuation list). In relation to mines I have attached the appropriate extract below: -

#### PROPERTIES NOT TO BE TREATED AS HEREDITAMENTS

Mines— (a) which have been opened for less than 7 years; or (b) which have been abandoned.	Mines <i>bona fide</i> reopened after they have been <i>bona fide</i> abandoned shall be deemed, for the purposes of this entry, to have been opened.
--	---

Based on our initial investigations it has been concluded that your mine at Curraghinalt is not a hereditament in that it has been opened for less than 7 years. Furthermore all buildings currently on site are considered as being 'contiguous' with the mine and as such are considered as being part of the mine.

My understanding is that planning approval for exploration was granted in January 2014 and that the application for full approval is ongoing – prior to 2014 the old mine on site was considered as being abandoned.

I would appreciate if you would confirm that the above information is correct.

Regards

[REDACTED]

Rating & Client Services Delivery-Val Omagh  
Valuation Services Directorate  
Land & Property Services  
Department of Finance  
Boaz House  
19 Scarffe's Entry  
Omagh, BT78 1JG

Tel: [REDACTED]  
[REDACTED]

Web: [www.finance-ni.gov.uk/lps](http://www.finance-ni.gov.uk/lps)

---

**From:** [REDACTED]@dalradian.com]

**Sent:** 23 March 2018 10:48

**To:** [REDACTED]@finance-ni.gov.uk>

**Subject:** Curraghinalt Rates

Hi there [REDACTED],

I got your details from [REDACTED] our Surface Manager, who had let me know you had been on site for a visit at our mine last April. I was just following up to see if you know if a rates bill had been generated as yet for this site?

Many Thanks

[REDACTED]

**Dalradian Gold Limited**

[REDACTED]

[www.dalradian.com](http://www.dalradian.com) | TSX: DNA & AIM: DALR.L

# LAWFULNESS, FAIRNESS AND TRANSPARENCY TEST

## Application of FOI exemption Section 40(2)

### DOF/2025-0420 ANNEX F

A Lawfulness, Fairness and Transparency Test must be carried out by the Department of Finance when considering disclosure of third-party personal data which falls within the scope of an FOI or EIR request.

#### FOI / EIR request

Information regulations regarding the decision to grant Industrial Derating relief to Dalradian Gold Limited, as referenced in a recent FOI release by Act Now and widely circulated in public media.

#### Consideration of the personal data falling within the scope of the request

Guidance from the Information Commissioner's office states that personal data only includes information relating to natural persons who:

- can be identified or who are identifiable, directly from the information in question; or
- who can be indirectly identified from that information in combination with other information.

#### Description of personal data/issue(s) under consideration:

LPS Staff & Third-Party names/details.

#### Lawfulness

Do either of the two lawful basis below, which allow for the disclosure of personal data, apply? **No**

- Consent:** This applies when the data subject(s) clear consent exists, allowing the department to disclose personal data falling within the scope of this request.
- Legitimate interests:** This applies when disclosure is necessary for the department's legitimate interests or the legitimate interests of a third party that overrides the data subject(s) rights and freedoms, particularly their right to privacy.

#### Conclusion

Having considered all the information contained within the Lawfulness, Fairness and Transparency Test, the department has established that, on balance, there is no lawful basis for the disclosure of third-party personal data falling within the scope of the request (of which the requester is not the data subject).