

## Salford Priors Parish Council

### Statement:

Salford Priors Parish Council formally registers its strong objections to the proposals for the inclusion of **Site 7 Salford Priors** within the Warwickshire County Council Minerals Plan – Preferred Option and Policies 2017-2032.

It is the opinion of the Salford Priors Parish Council that the proposed Minerals core strategy introduces the single most destructive possible proposal of activity that this Parish has ever had to contend with. In terms of its long term impact on the wellbeing of parishioners, its certain and significant adverse effect upon the physical and visual environment and ecology of the area, the proposal to include this site on the gateway to the village is unprecedented.

### 1. Viability

**Site 7** is described as having potential to release 0.8 million tonnes of sand and gravel from a targeted 62ha area during the plan period.

With the exception of a small satellite site, compared to the remaining proposed sand and gravel site locations listed in the County Minerals Plan Preferred Options document, Site 7 shows considerably lower anticipated yield of tonnage for extraction.

There are several additional key factors mitigating against optimal extraction of minerals and give rise to serious doubt about the viability of mineral extraction at Site 7.

- Proposals indicate two crossing points for site vehicles to cross School Road to allow the excavated material to be transported from the South West sites (Sites 2, 5 and 6) across to screening and washing facilities on the North East side (Sites 1, 3 and 4).
- This is relevant in that these crossing points are vital to the viability of the entire scheme being the only way to remove the material from the South West site which makes up 40% of the sand and gravel thought to be available.
- The existing Western Power 33KV electricity mains and a network of other overhead cables, serving the area run through the sites creating restrictions to the extraction area of the proposed site. There will be requirement for safe working zones around the area of line which will effectively restrict the quantity of excavation possible.
- A substantial proportion of the targeted area will not be available for extraction due to a 100m buffer zone around properties lying immediately within or adjacent to Site 7.
- The high cost implications of practical arrangements associated with inter-site access, clearance to avoid electricity trunk mains and extended buffer zones intensify uncertainty about the amount of mineral extraction possible and therefore the viability of Site 7.
- The retention of existing field boundary hedgerows as indicated in the plan will also further reduce the site yield adding to its diminishing viability

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		<b>Deposit</b>	<b>Site</b>	<b>Tons * M</b>
	Site	Tons * M	Ha	per Ha
Ryton	6	0.4	47	0.009
<b>Salford</b>	<b>7</b>	<b>0.8</b>	<b>62</b>	<b>0.013</b>
	1	2.25	110	0.020
	5	0.3	14	0.021
	2	2.47	113	0.022
	9	1.06	48	0.022
	8	1.65	69	0.024
	3	0.87	33	0.026
	4	1.8	60	0.030

The viability of Site 7 for mineral extraction as the yield per Ha is very low and judging this against the loss of prime horticultural land the economics of this site are untenable

The site at Ryton is not a comparable site by any means as it's a satellite site to a larger site at Bubbenhall Quarry.

Of the 9 sites shown, eight are considered to be little more than agricultural mixed farming or woodland

In contrast, the Salford Priors site is listed Agriculture land, all under intensive horticultural use and is a major employment site for the area growing many specialist horticulture crops requiring intensive manual input both on and off the site for harvest and processing.

**NPPF Parra 112** states that Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land. The loss of horticultural production on this land would not be returned following restoration for many years. Therefore, mineral development proposals for Site 7 Salford Priors is in conflict with the NPPF.

**Draft Policy SP15:** Protecting The Best and Most Versatile Agricultural Land of the Salford Priors Neighbourhood Development Plan states that the best and most versatile agricultural land (Agricultural Classification Grades 1, 2 and 3a) will be protected. Development that would lead to the permanent loss of such land will not be permitted. The land within the Parish of Salford Priors is primarily agricultural land and the parish has a long history of farming and horticulture. This must be preserved. The best and most important land should be protected.

It is crucial to avoid the loss of good agricultural land which is most unlikely to be returned to its original use. Central Government has repeatedly said that farming is a very important asset to the overall economy, in that it reduces the need for the importation of foodstuffs.

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**2. Highway Network.** Salford Priors Parish comprises seven main settlements. Centrally located, the largest of these is Salford Priors.

The area of proposed Site 7 of the Minerals Plan spans the area of School Road which provides a crucial road link between the central village and outlying settlements via an uninterrupted route between the B4088 at its northern end and the B439 and its southern end.

It is a busy road in constant use by a variety of vehicles for business, work, personal, school bus and public transport purposes as well as by pedestrians, horses and cyclists. Long term disruption to the accustomed flow of traffic on this route imposed by traffic-light or manned controls will have a profound negative impact on routine interaction within the village.

**3. Environment.** There is clear indication that operations at Site 7 will generate windblown fine silicate dust whatever system of extraction and transport is used; this fact was very evident on the Marsh Farm Dunnington site on many past occasions.

The topsoil in this area is silty, as evidenced by particle size analysis and by its propensity to capping. Heavy wheeled transport on non-vegetated tracks through this material produces dust, and dust will also arise during moderate and strong winds across the site as a whole and through crushing of particles on surfaced roads.

Fine silicate dust is a human health hazard, giving rise to serious respiratory problems and exacerbating other complaints. Thus, there is prospect that noise, dust, vibration and potential pollution for local inhabitants will be a real and ongoing problem for many years.

Whilst speculative, there is potential for local residents and pupils at the nearby Primary School to be affected by any health and safety issues arising, particularly when individuals have identified respiratory conditions such as asthma.

From local knowledge, a significant amount of ground water will be discovered at a depth of about 2.5 metres, the proposal to restore the excavated site to a lower level instead of the original levels leaves the potential for land flooding or waterlogging after restoration rendering it unfit for agricultural/horticultural use.

Overflow or pumping out of excavations into Ban Brook alongside the northern perimeter of the northeast site has the potential for causing flooding and there are grave concerns about the effects of mineral extraction would have on water/silt levels in Ban Brook both during works and after restoration.

Ban Brook is an area of outstanding biodiversity providing a habitat for a large number of animals and is at the heart of the local natural ecosystem. Life generated from the Ban Brook feeds the local population of bats and owls.

The configuration of Site 7, requiring sequential phases of extraction in separated 'quadrants' and repeated shifts of the haul roads or conveyors, moves the source of

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environmental damage such as dust and water contamination around, making it exceptionally difficult to control effectively.

The indicative locations of the proposed haul roads, and the requirement to shift these periodically, will make this situation unmanageable in many locations close to housing.

The Parish Council is sensitive to its parishioner's long drawn out patience with the quarrying operations at Marsh Farm Dunnington and have little confidence with the proposed site being restored for many years following the end of quarrying activities.

**4. Ecology.** Having reviewed the ecological nature of the proposed site there is acute awareness of the potential long term effects of mineral extraction operations on existing flora and fauna with protected rare species present. Although at this stage The Parish Council have not been able to commission a full ecological review, this exercise is under active consideration.

Two documents have been scrutinised. Extracts of these documents are included for your attention:

- The distribution of threatened Farmland Birds in Warwickshire. April 2010
- Warwickshire local Biodiversity Action Plan. Revised 2014.

The documents identify two protected bird species within the area both included on the BoCC3 Red List which identifies Breeding Populations present and their decline within Warwickshire and also the presence of the protected species of Great Crested Newts within the area.

**Turtle Dove:** The presence of Turtle Doves actually sighted within the proposed development area by local residents and bird watchers is well established and the presence is also recognised within the area by the Warwickshire Wildlife Information Consultancy. Efforts have been made in the past to improve the habitat for these birds and in this case have proven successful.

**Yellow Wagtail:** Yellow Wagtail with a breeding population in decline has also been detected within the proposed area. It is clear that these Warwickshire farmland birds are at risk and efforts are already being made to secure their protection.

**Great Crested Newt:** The distribution of Great Crested Newts is well known within this region of Warwickshire with up to 25% of ponds containing GCN populations. This newt species can travel up to 0.5km from ponds and so it is important to consider both the aquatic and terrestrial habitats within any survey. The area surrounding the proposed site contains a number of established ponds within the potential affected radius.

The diversity of local wildlife contributes greatly the experience of living within the Parish with some residents employed in agricultural in some form or other be it farming, forestry, estates management or many other diverse rural activities.

The Parish Council are determined to preserve the ecology and rural traditions of the parish which have existed and been appreciated by the parishioners for many years.

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**5. Social and Economic Issues.** Areas of social and economic concern (not exhaustive) are highlighted below:

- Hazard of large vehicles and heavy equipment crossing School Road in two locations becomes an increased undesirable factor.
- Site 7 is listed agriculture land, is intensively farmed and is a major employment site for the area growing many specialist horticulture crops. There is crucial need to protect and enhance such a material asset. Its loss to the community presents a significant negative impact. Salford Priors is a rural village with a rural community with great knowledge and appreciation of the local countryside and the environment in which they are able to live.

### **Summary.**

There is a long history of extensive mineral extraction in the Parish of Salford Priors. It is therefore inevitable that considerations applied to the Warwickshire County Minerals Plan 2017-2032 are tempered by long exposure to such operations. Notwithstanding this background, this most recent proposal to execute new Sand and Gravel workings so close to the village centre is deemed entirely unacceptable.

There remain a number of other key issues concerning this proposed development which merit further address. Suffice at this point to express unease that Warwickshire County Council holds a monopoly in terms of ownership and marketing aspects of the proposed Site 7 in Salford Priors.

The Council are uncomfortable with the written statement it has received that Warwickshire County Council (as landowner) is driving this development primarily from an income generation perspective, with the wider County objective to facilitate aggregate delivery for local construction industry needs as a secondary consideration.

Clearly, these circumstances merit higher level independent scrutiny and transparency within the decision making process.

The Parish Council shares the unease of parishioners expressed objectively regarding the lack of specific detail in answers given in response to questions about the Minerals Plan. Moreover, there is universal disappointment for us to arrive collectively at a perspective in which income generation merits the County Council priority of consideration over adverse impact on the environment and ecology of Site 7 and the health and well-being of parishioners.

**Salford Priors Parish Council** strongly objects to the proposal for mineral extraction at Site 7 Salford Priors. The Council contend that quarrying operations on this site would be disastrous for the village with risks and disadvantage to all sections of the community and strongly urges its removal from the Warwickshire County Minerals Plan 2017-2032.

**30<sup>th</sup> November 2015**