

## Wiltshire Council

### Strategic Planning Committee

13 May 2020

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#### **Item 6 – 19/07824/WCM - Land to the north of the Rudloe Water Treatment Works, Bath Road, Rudloe Firs, Corsham, Wiltshire, SN13 0PG**

*Construction of a new inclined mine entrance from the surface into the existing permitted mine workings, and the construction of ancillary surface facilities including new cutting shed/workshop, block storage area, alterations to existing vehicular access and landscaping*

#### **Public Statement – OBJECTION – Dr David W Lynn and Mr Philip E Green, Local residents, users of the A4 and local footpaths**

- there is little support for this application. More than 490 individuals have signed an online petition opposing it
- the proposals offer no public benefit
- there are no economic benefits. Employment gains are neutral. The 10 staff posts planned for the Bradford Road new mine entrance will become the 10 posts at Rudloe Firs. Rescinding the Bradford Road permissions will mean there is no increase in production. The applicants say historic extraction rates will be maintained - 100 cubic metres per week
- this is not just a new mine entrance
- it is also a heavy industrial facility (factory) for cutting, processing and crushing stone at the surface. These activities were specifically prohibited when planning permission was granted for the new mine entrance at Bradford Road in January 2016
- the current proposals are not for a small development
- it is the size of three and a half Premier League football pitches
- this is not a sustainable development
- noisy, polluting, diesel fuelled HGVs, up to 15.5 metres long, will be used to transport the stone; heavy industrial cutting saws and crushers will be used at the surface. No carbon budget plans have been provided for the development's 25 year life cycle (construction, operations, decommissioning and restoration)
- this is clearly not an activity that sits comfortably on the proposed rural site which is currently farmed
- immediately adjacent to the Cotswolds AONB boundary, this heavy industrial activity will undoubtedly adversely affect the ambience (noise, artificial light, dust, traffic, pollution etc) within this part of the AONB
- little serious consideration is given to the resident and commuter bat population on the site, even though the applicant's documents recognise that it is of "Regional to National value" because of the proximity to important roosts in Special Areas of Conservation and Sites of Special Scientific Interest close by
- no mention is made of the Red Kites - a protected species - which have been sighted over the woodland at Rudloe Firs, with local reports of nesting sites within the woodland
- no vibration impact analysis has been carried out with regard to the heritage assets adjacent to the site, specifically Grade II listed buildings: Foxfire Lodge, Rudloe Cottage and Rudloe Manor
- the proposed site junction with the A4 Bath Road is not safe

- this a 50 mile per hour zone, on the brow of Box Hill, on a bend in the road and close to a dog-leg junction which crosses the A4 with a turning point in the middle of the road. Large (10 to 15 metres long), heavy, slow moving HGVs turning on to, and off of the busy and fast A4 will exacerbate what is already an unsafe stretch of road
- for these reasons this planning application must be turned down. Your decision, today, will impact both the lives of all of those who have expressed their opposition and the next generation of residents, users of the countryside and those who travel the A4.

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**Public Statement – OBJECTION – Robert and Jo Pegg**

Dear Committee Members

We seek your support in rejecting this planning application. 83 have objected with 60 supporting it.

Most of the supporters are mine employees and their relatives.

More than 490 have supported an online petition against the application.

The application is for a new mine entrance and heavy industrial works at Rudloe Firs, which adjoins an AONB.

My wife and I reside at Foxfire Lodge, a Grade 11 listed building, situated 80 metres from the proposed factory.

Despite assurances from the applicants team, we believe the affect on the ambience and Heritage afforded to our home will be catastrophic.

Unlike the approved site at Bradford Road where the cutting of stone was to be underground, it is proposed that the Rudloe Firs site would have a factory where the stone would be processed above ground.

There would be a noticeable increase in noise, dust, CO2, light and vibrations.

The flora and fauna will be badly affected, recently bats and kites have been flying over our garden believed to be nesting in the woods adjacent to the factory site.

Throughout the application they seek to assure that everything would be monitored and all would be kept within strict limits.

The concern would be - who would monitor these limits and what are the procedures if they are exceeded? Would there be external audits ?

Confusion exists over the traffic using the factory. The access design is based on 10.5 mtr vehicles and the site plan is for 15.5 mtr vehicles.

This needs to be clarified along with the number of vehicles, including customers vehicles, of which there is no mention, that would use the factory site on a daily basis.

The access to the site is positioned on a bend at the top of Box Hill onto the A4.

In the past, Planning for bungalows opposite the access was refused, because the traffic was too dangerous for vehicles from the bungalows to access the A4 at that point.

Also a road opposite the access was closed to through traffic for the same reason.

Is the production of the mine to remain at circa 100cmtr per week for the duration of the mine or is it expected to increase?

To date there is no:

- Carbon footprint for the 25yr life of the mine
- Environmental impact report.
- Tunnelling map
- Route maps for vehicles arriving and leaving the site
- Assessment on the affect that stone dust has on those in the
- local community who have serious health issues

This Application is not about meeting the National requirement for stone and providing increased opportunities for employment. These are met at the approved site at Bradford Road.

This is being driven purely for financial greed, with no consideration on the impact to wildlife, the community or ambience of the entire area.

Working above ground makes for a more efficient operation allowing the owners to achieve a better return on their investment.

The Applicant has a large organisation behind them costing hundreds of thousands of pounds, where we have only the Councillors to protect us.

We strongly oppose this application and implore you to reject the proposal for the sake of the beauty of the area and for future generations.

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**Public Statement – OBJECTION – Sue and Mark Maidment**

We strongly object to the above planning application the reasons being

**1. Safety of the proposed tunnel**

We own the land above where the mine tunnel will go. Yes we are fully aware that the applicant owns from 10 meters down but this doesn't stop our land from sinking into their mine, there has been NO Survey done on our land, seeing as we already have a place that has subsided down into the applicants mining area. The core samples that are included with this planning application has been copied and pasted from the previous application on another site.

**2. The size/noise produced by the proposed works**

The size of the proposed associated works is on the industrial level. And will change the outlook of the area as well as having a stone cutting area above ground and thus radiating noise all round. Even with insulation the noise from the cutting shed will still travel as will the reversing beepers of the trucks and mine working machinery.

**3. The Entrance**

The proposed entry/exit to the site is an accident waiting to happen, as its will be coming out/in from the fast busy A4 on the brow of the hill/blind corner. Seeing as the private road oboist was closed in the 1960's as through road to the Rudloe Estate it was deemed unsafe to exit/enter on to the A4 back then, And when 90% of all the letters of objection raises the concerns of the road safety this should raise real concerns.

**4. Loss of peaceful wood**

This wood will never be the same again. It is used by the locals for walks exploring and watching wildlife and has a drinking water pumping station located in it as well. If planning goes ahead this walking area will be lost for ever as the road through to the site cuts the wood in half and with Lorries and traffic using it will not be the peaceful wood land it is.

**5. Points to take in to account**

Remember that both Box and Corsham Councils have objected to this application. That the applicant has already got planning passed for a mine entrance into this mine already on a much safe site with far less concerns for the site and letters of objections and is situated off a much quieter B road.

### **Summing up**

We ask the councillors to think very hard before allowing this industrial stone mining operation to go ahead, ask them to remember that it is situated on the boundary of the area of outstanding natural beauty, in what is now a peaceful area where you can sit with your door open and just hear birds singing. It will be built on what is now a crop growing field (green site), the access/exit entrance is through a peaceful wood as well as on to a very busy A4 road on the brow of a hill/blind corner in a 50mph zone no matter what signage won't cure that, 90% of the letter of objection site or say road safety is a real concern

It's a real shame that with the corona virus that this meeting is going to be held via links as it doesn't allow the councillor to actual see the members of the public, to be able to sense their feelings and hear from them the real concerns that they have over this application.

So please think carefully about the decisions you make that will affect so many people on all different levels and that you will create an entrance on to a very busy A road which will be an accident waiting to happen.

Thank you

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**Public Statement – OBJECTION – Derrick Elliott**

CONCENTRATING ON HEALTH AND SAFETY ISSUES.....

Rule 166 of the HIGHWAY CODE, which motorists should abide by, clearly states 'not to overtake on a bend, nor on the brow of a hill'.

The proposed location of the site includes both criteria, on entrance and exit. Myself and others have often witnessed motorbikes and cars overtaking on this stretch of the road. So, why would any Council consider an application which could EASILY IMPACT (I REPEAT IMPACT) a hazard?

May I respectfully remind the Council that 15 or 20 years ago, a planning application for three houses opposite, in the field owned by the owners of the B & B HAWKSTONE, was rejected for that very reason. An entrance off from the A4 would be considered a ROAD HAZARD!

SO, What is the difference now?

The road hasn't changed; the Private Road opposite was blocked off from the estate at Rudloe for safety reasons. WHAT HAS CHANGED is the increased volume of traffic that uses the A4 and that would accordingly pass by the proposed point.....

In the same degree, dozens of local residents are clearly saying, that in addition to noise, dust, wildlife issues, it would be extremely dangerous, and could have serious consequences to have Industrial Turning vehicles (HGC's) operating, on and off the A4 from the proposed point.

The residents know the area thoroughly as it is used on a daily basis by many, and by many over years; unlike many of the supporters to this development, who do not live in the area, but have a vested interest, but no knowledge, of the implications that could arise.....ACCIDENTS JUST WAITING TO HAPPEN!

May I remind us all here that all BLUE LIGHT EMERGENCY VEHICLES operate along the A4 24/7 in both directions. These vehicles do not slow down for any sign erected saying ' Caution, SLOW VEHICLES TURNING'. They rely on the motorist to pull over so they may proceed to save lives or respond to incidents in the fastest lane possible; they overtake in either direction, in the safest manner, in order to 'do

their job'. To come face to face with a stone laden lorry pulling out of or entering, or in the middle of the road.....the outcome is unthinkable!

I finish my objection to this proposal by saying to all Councillors, that some times in life we have to think and make decisions on matters WITH OUR HEART as well as OUR HEAD!!

I strongly urge Councillors to not be swayed by others, or by the reams of facts and figures portrayed and deemed acceptable.....

This is not a Corner Shop Development. IT IS A MAJOR PLANNING APPLICATION IN ALL ASPECTS that has far too many foreseeable dire consequences for the road users and the area.

In raising my objections to his planning application, may I say, although WARDELL-ARMSTRONG consider they have covered all the necessary details in the realms of the submitted literature, there appears to e some ambiguities which I am sure will be further discussed.

My Observation: is that they often use the term ADVERSE in reference to magnitude of impact or significance of impact.....e.g MAIN ENTRANCE ROAD: SLIGHT/MODERATE 'ADVERSE' and PUBLIC RIGHT OF WAY: MODERATE 'ADVERSE.

IN MY OPINION and the dictionary indicates, the definition of ADVERSE IS, HARMFUL, UNFAVOURABLE, PREVENTING SUCCESS OR DEVELOPMENT.....(Considering the location, it might be suggested that the 'word' MODERATE to be very much an understatement!)

Thank you

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**Public Statement – SUPPORT – Matthew Hawker, Director Bath Stone Group and Mine Manager**

Dear Chairman, Vice-Chairman and Members of the Committee

I am the Mining Director for the Bath Stone Group Ltd and the Mine Manager for Stoke Hill Mine at Limpley Stoke, Nr Bath.

I have been mining Bath stone seams for approximately 22 years and started working underground as a trainee miner. I learned how to cut the faces, support the roof, ventilate the roadways and plan the careful extraction of mineral in a pillar and stall mine. Over the years I was promoted to a Command Supervisor, Deputy Manager and then Mine Manager. A role I have continued to undertake whilst being made a Company Director in 2008. For many years I was a member of the local mines rescue response team so I have a full and rounded understanding of the roles and responsibilities required for the proper running of a mine.

The Bath Stone Group is made up of a team of skilled men and women who understand that to be safe and successful all that we do has to be undertaken to the highest possible standard. It's a very easy statement to write and an extremely challenging one to implement on a consistent basis. However, I genuinely believe that our shared ethic is one of trying to do our best each and every day. Shortcuts are not considered let alone taken, it is not the way we work.

The mine at Stoke Hill has been in operation for centuries and our business started there in 1982. Our neighbours are immediate, much closer than at the application site. The boundary garden wall of my closest neighbour at Limpley Stoke is approximately 6.5 meters from the car park entrance of the mine. I and we work closely with those that share our workspace so that any perceived issue no matter how small can be addressed promptly and effectively. We are not in the business of upsetting our neighbours in a quiet village. Conflict is time consuming, expensive and detracts from what we set out to do, namely to mine in a careful, controlled and planned manner with due regard to residents and our colleagues.

The operation at the proposed new entrance will be undertaken in exactly the same way as we currently work. Vehicle movements will be low and the work undertaken in a normal working shift. Noise and dust will be minimised to as low as is possible and in any case will not affect residents due to the sheltered and removed nature of the site.

The forming of the inclined tunnel will utilise equipment we already use successfully to slowly cut our way into the existing mine workings. The tunnel will be supported to a qualified and proven design with steel bolts, straps and mesh each 1.2m of advance, the long-term stability of this tunnel is of paramount importance and so will be undertaken to a high standard.

Once we meet with the current workings, we will then set out the planned design of extraction again to qualified design. Auditing and checks by our team, external consultants and Her Majesties Inspectorate of Mines will be regular and ongoing.

At all times my team and I will be available to anyone who requires help, assistance or just to answer questions. We are not a distant corporate entity but a local organisation that will work with people to a common aim. My contact details will be made available to all residents and I can promise that any query that anyone may have will be investigated and answered without delay.

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**Public Statement – SUPPORT – Nicholas Johnston, Director Bath Stone Group**

Dear Chairman and Members of the Committee,

I write to you, as a director of and the principal shareholder in Bath Stone Group, in support of the above application, heard in Committee today in an unprecedented manner and at an unprecedented time. The effects and aftermath of COVID-19 will leave many different trails of devastation but it is undeniable that one of the greatest consequences will be felt by small companies and the employees of those companies, many of which are already bruised and battered by the gnawing uncertainty of (now) four years of Brexit deliberation.

The Bath Stone Group, with our mines at Stoke Hill and Hartham, are no different from many of these companies based in your County. Whilst Matthew Hawker leads the business and its skilled team of mine workers to the very best of his considerable ability and expertise, the last few years have not been easy. If this application was being heard in the conventional way, there may have been a dozen mineworkers sat in the Committee Room, hoping for your support to this application so that it raised the prospect of additional work for them and additional security for their nervous families. Indeed, for the extensive local and national network of stone masons and dedicated heritage building firms, ensuring the continued availability of our famed Hartham Park Bath stone also gives them some additional security too. There are many positive, lasting trickle down effects into the high quality construction and restoration industry, from your decision on Wednesday.

As your Case Officer has already noted in his report, this is not a wholly new application as such. The mineral below the surface already has a long standing planning permission for extraction. The previous owner of the Hartham reserve, Hanson PLC, gained a planning permission in 2016 for a new adit to access the reserve in a site off the Bradford upon Avon Road. This application merely seeks to re-locate that same adit to a more discrete and appropriate site, further away from neighbouring residential properties, on the A4 Bath road (and thus transferring the proposed HGV movements to a more suitable A road).

This application has been meticulously scrutinised by your minerals team and many small but important details have been considered, and re-considered, to ensure that the application presented to you today minimises all the disbenefits of such a mineral activity and maximises the benefits. Having taken the time to consider this

application so carefully through the consultation process, we hope you will be able to follow your Case Officers carefully considered recommendation to approve this application in your first virtual Committee meeting, and thereby give continuity to a historic and valuable Wiltshire mineral reserve whilst also giving a terrific team of local employees the support and encouragement to keep working safely and with enthusiasm as we all seek to adapt and recover to this awful pandemic. Your support on Wednesday will show that Wiltshire County Council supports its local business and its local employees when they need it most.

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**Public Statement – SUPPORT – Chris Bean, Planning Consultant, Wardell Armstrong**

Dear Chairman and Members of the Committee

My name is Christopher Bean, Planning consultant at Wardell Armstrong, a full-service British technical mining, planning and environmental consultancy with global expertise in the whole mine life cycle

We act on behalf of The Bath Stone Company in respect of the above application and appreciate the time and assistance that your officers have given in working closely with us to refine the proposal and address concerns raised by local residents.

Hartham Park Quarry has a long-established underground mine for Bath stone and benefits from a full planning permission. Granting this permission would provide a new mine entrance sitting right at the heart of the mineral area. This will be much more efficient location for the entrance as less movements will be required to raise the block stone to the surface. It will allow the existing permission for a mine entrance off Bradford Road to be rescinded.

In terms of traffic numbers, we have confirmed that the proposal would result in only 12 HGV movements per day as a maximum (6 'in' and 6 'out').

Non-HGV's would be limited to around 14 per day.

The proposal is for direct access from the site on to the A4 – which is a designated strategic lorry route, designed and intended for HGVs. Unlike the Bradford Road site, this route has the capacity to accommodate the traffic the development would generate.

We have clarified how we would manage and control HGV movements, a system which Bath Stone Company already operates at other sites.

Our application includes a full survey of trees and includes methods to ensure their retention, maintaining the character of the area, whilst also providing additional hedge and tree planting to the site boundaries.

The site would operate between 07:00 – 17:30 Monday to Friday and 07:00 – 13:00 Saturday. Our noise assessment has demonstrated that the operations proposed at the site would not have a harmful impact on residents. We have worked with your

officers to include additional measures to ensure noise is controlled including noise attenuation to the stone processing building and fencing to the boundaries to provide additional protection.

The development will help to sustain jobs on the site for the duration of the operations and wider economic benefits associated with the mine, including local network of masonry works in the local area, which may receive a proportion of the stone produced at Hartham Park Mine.

A continuing supply of Bath stone for new building and renovation purposes is important nationally and locally. Mining of Bath Stone is important in the supply of refurbishment materials to sites of national and world heritage and the approval of this planning application would enable these important uses to continue.

These proposals are supported by policies within the National Planning Policy framework, Wiltshire Core Strategy and the Corsham Neighbourhood Plan and we therefore hope that you will be able to support the application today in line with your officers recommendation.