

### **Main issues arising from the Minerals Sites DPD consultation**

Following an assessment of the comments received through the pre-submission consultation process, a number of issues for discussion and further consideration were raised by consultees. It is likely that these issues will be discussed during the independent examination of the plan and a decision will be made on the merits of each issue where a change in the plan is proposed or requested.

#### **Wiltshire and Swindon's Sand and Gravel Apportionment figure**

Concerns were raised from some sections of the minerals industry that Wiltshire and Swindon are not seeking to allocate sufficient sites to fulfil long-standing and agreed aggregate provision obligations. Of particular concern was the approach that the councils have taken regarding the implementation of a locally derived forecast figure of 1.2 million tonnes of sand and gravel per annum. A number of comments were made covering this approach and potential implications such as:

- The need to ensure an adequate and steady supply of aggregates for use within the plan area. Wiltshire must consider a more robust method of local forecasting.
- The proposed reduction in provision rates is an abrogation of responsibility and places pressure on surrounding counties who may have to make a larger provision to cover Wiltshire's shortfall.
- In-direct encouragement of mineral importation by road runs contrary to the policies set out in MPS1.
- The proposals may lead to a downward spiral of unrealistically low assumptions of the levels of mineral needed [*to serve local markets*], leading to a reduction in the number of submitted planning applications against a backdrop of continual decline for construction minerals.
- The proposed provision rate does not offer flexibility or workable prospects for landbank maintenance for the industry, nor does it have an in-built contingency should demand increase significantly during the plan period.
- The Draft Regional Spatial Strategy (RSS) provision levels should be perpetuated (i.e. at a rate of 1.85 mtpa). The councils' revised figure for sand and gravel provision requirements might require an amendment of the adopted Minerals Core Strategy.

It was also felt that the proposals do not support the provision of adequate supplies of aggregate minerals from local quarries to support local development.

#### **Previously dropped sites**

Landowners of previously considered, but dropped sites<sup>1</sup> U15, U17 and C16 asked for the councils to revisit the assessment approach; and the information used to drop these sites with the view of reconsidering their inclusion in the Minerals Sites DPD. In the case of

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<sup>1</sup>See 'Initial Site Options Report for the Wiltshire and Swindon Aggregate Minerals Site Allocations DPD' (August 2010) and 'A report of the results of consultation on initial site options for sand and gravel extraction' (August – October 2010).

dropped sites U15 and U17 the landowner provided evidence of survey work and investigations into the quality and depth and resource at these locations. It was argued that the generic estimates used from British Geological Survey data was unreliable and that the councils should carry out a robust review of these two dropped sites as they could be suitable options to help meet Wiltshire and Swindon's minerals apportionment figure. With regards to dropped site C16, the landowner and mineral operator put forward an argument that the site should be reconsidered and developed sensitively to provide a sustainable source of local building materials.

## **Human health and amenity**

A general comment made about all sites suggested that any noise and dust assessments should address the cumulative impacts at relatively remote roadside properties where HGV traffic would pass when transporting mineral from the proposed sites. To mitigate these impacts, planning permissions for mineral workings should be conditioned to control operating hours and vehicle movements associated with the operation of sites. Furthermore, MPS2 should be the minimum standard of noise control that is applied and site specific noise considerations should be developed.

## **Cumulative effects**

Concern was expressed that cumulative effects *[associated with proposed minerals development]* had not been adequately addressed for all sites. Of particular note, the MOD raised concern about the potential cumulative effects from development of sites identified in proximity to RAF Fairford on aviation safety grounds. Sites close to the Gloucestershire County boundary could have 'in-combination' environmental, amenity and supporting infrastructure effects which should be considered. The cumulative impact of increased HGV traffic was cited as being of particular concern for those sites located in the Upper Thames Valley but also at the site located on land near Compton Bassett, in part due to current HGV traffic associated with waste operations in the area and the movement of this traffic through the centre of Calne and surrounding villages. Hampshire County Council expressed concern that potential HGV traffic associated with workings at the proposed extensions to Brickworth Quarry site be restricted to only using the A36 and thereby avoid using the A27.

## **Site Specific Issues**

### Cox's Farm

- The MOD commented that the proposed site is situated within the explosive, height and technical safeguarding consultation zone which surrounds RAF Fairford and subsequently presented a line within the site boundary where they cannot accept mineral working (in line with requirements of explosives safeguarding).
- The MOD also commented on the need to reduce the risks associated with birdstrike, the requirement to not work within the Inhabited Building Distance (IBD<sup>2</sup>), that restoration should not feature wetland habitat and that all phased workings are approved by DIO<sup>3</sup> safeguarding.

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<sup>2</sup> Inhabited Building Distance (IBD) - Within this safeguarding zone the MOD monitors the management and use of developments to maintain public safety and tends to object to any persons living, working or congregating for long periods of time. Allowing mineral workings within this zone will introduce a significant risk to operations at RAF Fairford by severely reducing the licensed storage capacity at several ammunitions storage facilities located at the aerodrome.

<sup>3</sup> Defence Infrastructure Organisation – Manages the military estate, including accommodation for Service personnel and their families, on behalf of the MoD. The DIO was formed on 1 April 2011. The DIO should be consulted when a planning application for the site is received.

- Comments received from residents of Marston Meysey sought an increased buffer zone or designated 'Zone of Sensitivity' (over 100m) to the west of the site to protect the historic setting of the village, limit noise and dust impacts and reduce landscape impacts.
- The archaeological value of the site and surrounding areas was highlighted as being of particular importance requiring suitable mitigation in line with policy and guidance notes.
- Numerous comments were received pointing to the need for improvements to the local C class roads in the area, the introduction of a 30/40 mph speed limit and that traffic issues in the area are looked at in a co-ordinated manner.
- There were calls for more assessments to be undertaken into the impact of quarrying on water courses and water flow and questions were raised over the credibility and robustness of the evidence used by the councils whilst the Environment Agency is carrying out re-modelling work in the area.

### Blackburr Farm

- The MOD expressed a preference for restoration to dry land on the site whilst the Cotswold Canal trust felt that restoration of the canal and creation of a marina in the area was of great importance to the Cotswold Canal restoration project as a whole.
- Concerns around the issues of noise, dust and disruption to village life in Castle Eaton and the nearby Second Chance Touring Park were of particular prominence. Recommendations were proposed whereby any permission at the site should include a comprehensive noise condition derived from a combination of good practice, existing guidance and the current World Health Organisation advice on the impacts of noise on health - with enforceable target noise levels.
- Due to the relatively elevated position of Castle Eaton, quarrying at this location would have a significant detrimental impact on the historical/landscape character of the area – in particular with impacts to the setting of Castle Eaton conservation area and St Marys Parish Church (Grade 1 listed).
- The archaeological value of the site and surrounding areas was highlighted, with evidence of a prehistoric/roman settlement in the vicinity requiring suitable mitigation in line with policy and guidance notes.
- It was felt that the local C-class roads in the area would require major improvements to service new quarries (similar to points raised against Cox's Farm) and the safety of the A419 was questioned.
- There were calls for more assessments to be undertaken on the potential impact of quarrying on water courses and the pattern of water flow. Questions were raised over the credibility and robustness of the evidence used by the councils whilst the Environment Agency is carrying out re-modelling work in the area.

### North Farm

- Part of the site is said to be owned by one of the consultees who objects to the inclusion of the land in the Minerals Sites DPD. They were also of the opinion that the inclusion of the site was an economically unsound proposition as the site had the smallest potential yield of all sites in the DPD, with the greatest potential difficulty and associated developer costs.
- There was support for the proposed restoration objective, however the MOD would prefer the site was restored to dry land, there were also concerns that restored land will reduce landscape value.

- Concerns were raised as to the potential impact of working the site on the Thames habitat corridor and associated species and the Thames National Path.
- The issue of noise, dust and disruption to village life in Castle Eaton and the nearby Second Chance Touring Park was of particular prominence in submitted representations. Recommendations were proposed whereby any permission at the site should include a comprehensive noise condition with target noise levels.
- It was felt that due to the relatively elevated position of Castle Eaton, quarrying at this location would have a significant detrimental impact on the historical/landscape character of the area – in particular with impacts to the setting of Caste Eaton conservation area and St Mary's Parish Church (Grade 1 listed).
- There was a strong feeling amongst consultees that the infrastructure in the area is not effective to take additional HGV traffic. Again, safety issues and required road improvements were cited as significant concerns. One transport solution should be sought to address problems of the four proposed sites in the area.
- The archaeological value of the site and surrounding areas was highlighted as being of considerable importance and likely to contain more finds of equal if not greater significance requiring suitable mitigation in line with policy and guidance notes.
- Concern was raised that the land is subject to winter flooding which could increase the risk of pollutants entering the surrounding land and the River Thames.

#### Land east of Calcutt

- It was pointed out that the site is in close proximity to a Sewage Treatment Works and that Thames Water have operational assets crossing the site. It was suggested that the Minerals Sites DPD be amended to reflect this fact.
- Concerns were expressed that the habitat and landscape value of the River Thames will be spoilt by the erection of bunds and screening.
- The archaeological value of the site and surrounding areas was highlighted, with the site located in proximity to Ermin Way and the site of a former Roman Villa requiring suitable mitigation in line with policy and guidance notes.
- There was a strong feeling amongst consultees that the infrastructure in the area is not effective to take additional HGV traffic. Again, safety issues and required road improvements were cited as significant concerns. One transport solution should be sought to address problems of the four proposed sites in the area.
- Concern was raised that the land is subject to winter flooding which could increase the risk of pollutants entering the surrounding land and the River Thames.

#### Land at Cotswold Community

- There was support for the inclusion of this site, however there were conflicting views regarding how issues of access should be approached within the Minerals Sites DPD. Hills Quarry Products Ltd. (an adjacent mineral operator), felt that the site should be treated as an extension to the adjoining quarrying activity located to the north of the proposed site. However the owner of the site objected to the site being treated as an extension to the adjoining quarry to the north and instead requested that the site be treated as independent with its own access arrangements (direct to the Western Spine Road) developed.
- The archaeological value of the site and surrounding areas was highlighted, whilst English Heritage commented on the likely potential change to the context and setting of the former school/farmstead and grade 2 listed buildings. However, it was also suggested that these buildings may have already been compromised by past construction and that restoration could improve these aspects.

### Land near Compton Bassett

- The proposed preferred restoration objective for the site split opinion. Natural England broadly welcomed the proposals and the potential to enhance public rights of way and cycle routes. However local residents felt that a restoration timescale was required, there was still concern that sand extraction would be followed by waste disposal (landfilling) activities. Comments were made that the inclusion of the site was to the detriment of strategic restoration and amenity proposals considered for the whole Lower Compton site.
- Concern was expressed that working of the site would impact on the well-being of Calne communities as a result of air quality impacts and associated movement of HGV traffic through the centre of Calne.
- The issue of HGV traffic and associated movements was raised by a number of consultees. It was felt that the location of the site was likely to exacerbate traffic issues in Calne whilst increases in HGV traffic along the A3102 and through Royal Wootton Bassett, Lyneham, Goatacre and Hilmarton would not be acceptable to residents in these locations. It was also highlighted that HGV routeing would have to be down Sandpit Lane where a new housing estate has recently been built and that traffic pressures would increase around Lower Compton Road and the A4 junction.
- Comments considered that the likely impact on the nearby North Wessex Downs AONB and visual impact on Morgan's Hill had not been adequately assessed and that an Environmental Impact Assessment would be required for proposed works.
- It was also considered that current workings in the area have affected underlying groundwater and aquifer dynamics and that further extraction in the area would exacerbate this issue.

### Extensions to Brickworth Quarry

- A recurring issue expressed by consultees was an objection to the footprint of the site being located in an area designated as Ancient Woodland and County Wildlife Site. Comments raised suggested that the Minerals Sites DPD does not show that the need for the site outweighs the loss of woodland habitat; that Ancient Woodland (as a system) cannot be trans-located; that the loss of Ancient Woodland would run contrary to government forestry policies and that although soil structures can be maintained and preserved, areas of Ancient Woodland that are disturbed are unlikely to survive.