

Our ref:

Date: 18th October 2020

Your ref:

Addendum to Wardell Armstrong's Prior Extraction Assessment of December 2018

This Addendum is a response to the points raised regarding mineral safeguarding in the Chief Planning Officer's Report to the Planning and Regulatory Committee dated 27th July 2020.

The Chief Planning Officer states that even with the 600 dwellings that would be created by the proposed development, there will still be a shortfall of 94 dwellings in the Council's housing requirements. In the Officer's opinion, the need for housing outweighs the harm arising from the loss of mineral resources in this instance.

The Officer's Report included a summary of a consultation response submitted by Breedon Quarry Group ("Breedon") which is the operator of Borrass quarry, located approximately 1 km north of the site. It appears from the submission that Breedon would be prepared to accept sand from the site as the company believes that it could be blended with coarser material brought in from more distant sources to create an acceptable aggregate.

It is apparent that there are two conflicting planning requirements in relation to this site. On the one hand, there is a demonstrable and immediate need for houses for the residents of Wrexham. On the other hand, there is a planning policy that safeguards the sand on the site, but there is no immediate need for it. In our prior extraction report, we made the point that since the safeguarded resource does not have a significant gravel content, the sand alone is of very limited use. The Breedon response states that many companies now source grits, recycled glass and other materials to add to sand to create the required specification. This would incur a significant additional cost for handling and haulage compared with using site-won gravel, so it might not be a viable commercial option for Borrass quarry at this time. Although the mineral is safeguarded for the future, there is no guarantee that it will ever be extracted.

We believe our prior extraction report is an accurate reflection of the commercial reality of the site as the proportion of gravel is so low at 2%. However, we note that the Mineral Planning Authority has agreed that the housing developers would not be expected to extract sand below a developable platform. We also note that the mineral safeguarding policy does not require the total extraction of the mineral resource, so partial extraction should be an acceptable option given the MPA's agreement that extraction should be no deeper than a developable platform.



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In circumstances such as this where there are conflicting planning policy requirements, some mineral planning authorities have used a Condition Precedent to require the developer to submit a Minerals Recovery Plan (MRP). The aim of a MRP is to balance as far as possible the mineral recovered from the operations with site construction activity which would consume aggregate i.e. road sub-bases, granular fill, bunding requirements, and mortar etc. In order to do this the MRP should assess and consider the areas of construction where minerals would be potentially recoverable, such as from groundworks, sustainable drainage systems, landscaping areas etc, and consider the extent to which the available minerals would meet the specification for on-site use or be suitable for off-site processing. We consider that this option could be a pragmatic way of resolving the conflicting priorities of the relevant planning policies and provides the potential for any material that is not needed on site to be made available to the aggregates industry.

for Wardell Armstrong LLP

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