

15 December 2021
Our ref: BRE/BO/TJC/1744/01

S Greenland
Wrexham County Borough Council
Planning Service
16 Lord Street
Wrexham
LL11 1LG

BY EMAIL ONLY

Dear Simon

Borras Quarry – Planning application reference P/2021/0991

Further to your email dated 24 November 2021 please find at Schedule 1 to this letter a response to the comments raised by the local residents in response to the consultation on planning application reference P/2021/0991.

A number of the comments raised are similar or the same as the comments made during the pre-application consultation period and were addressed in Appendix H of the pre-application consultation (PAC) report submitted to Wrexham County Borough Council (WCBC) on 15 October 2021. For clarity in Schedule 1 we have reproduced the text from Appendix H of the PAC report where relevant and addressed the additional comments raised in response to planning application reference P/2021/0991.

Further to our discussion on 23 November 2021 and as stated in our letter dated 21 April 2021 the proposal the subject of planning application reference P/2021/0991 (the proposed development) is located within the boundary of an existing well operated quarry. The operations proposed are commonly associated with mineral extraction sites such as operations at Sandside Quarry in Cumbria (planning permission reference 5/20/9002) and Ham Hill Quarry in Kent (planning permission reference TM/12/183). As you are aware the importation and recycling of road planings has been previously undertaken at Borras Quarry and was deemed acceptable by the grant of two previous planning permissions references P/2007/1130 and P/2010/0043. The proposed operations at Borras Quarry will provide a service to Wrexham Highways Authority and other local Highways Authorities by allowing the use of recycled road surface materials in the construction and resurfacing of roads locally.

It is considered that the proposed development is generally in accordance with emerging policy in the WLDP with regards to waste management. Policy MW12 of the emerging Wrexham Local Development Plan (WLDP) 2013-2028¹ states that:

“Waste management facilities will be located having regard to:- a) the best practicable environmental option; b) the waste hierarchy; c) the proximity principle. d) regional self-sufficiency. With the exception of landfilling,

¹ Wrexham Local Development Plan (WLDP)



windrow composting or small-scale collection and recycling points, facilities for sorting, transferring and processing of waste will be permitted within sites on general industrial estates."

The proposed development is appropriately located in a suitable location in policy and environmental terms. The proposed development will contribute to the sustainable use of materials by recycling and reuse and will not result in changes to the life of the quarry, the quarry restoration or the phasing.

Should you have any queries or need any further information please do not hesitate to contact us.

Yours sincerely



Laura Cherry

cc M Cotton, Breedon Trading Limited
 C Burgess, Breedon Trading Limited



FS 23915

Schedule 1 to the letter to Simon Greenland, Wrexham County Borough Council dated 15 December 2021

Comments made by the local residents in response to the consultation on planning application reference P/2021/0991

Comment	Where the comment is addressed in the planning application, response to the comment
<i>1) Having resided next to Borrás Quarry for almost 15 years now and been subjected to regular dust and noise pollution, I would argue that the location of the proposed activity could have an impact beyond the local area and therefore an Environmental Impact Assessment may be required.</i>	<u>Planning application reference P/2021/0991 – Introduction, Page 2</u> A screening opinion was issued by Wrexham County Borough Council (WCBC) dated 10 March 2020 for planning application reference P/2020/0153 which was for the same development as planning application P/2021/0991. The WCBC screening opinion determined that the proposal is likely to give rise to only localised impacts and are not considered to be of a scale that would result in significant effects hence an Environmental Impact Assessment (EIA) is not required. As the proposed development the subject of this application is the same as the development the subject of planning application reference P/2020/0153 it is considered an EIA is not required.
<i>2) I would be interested to understand why this particular location within the Borrás Quarry boundary has been chosen for this development and activity. The proposed location probably has the highest concentration of residential homes in close proximity to the quarry and will therefore potentially have the greatest impact. I am sure alternative locations could be progressed that would have less of an impact. As stated in the documentation the properties at Borrás Hall Court are some of the closest to</i>	<u>Planning application reference P/2021/0991 – Landscape character and visibility, Pages 7&8</u> The proposed development is located within the site boundary of an active sand and gravel quarry. The proposed development area was formally a concrete block making facility. The addition of further processing equipment within the existing quarry boundary will not detrimentally affect the landscape character of the site.

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<i>the proposed development area at 75m. Interestingly we did not receive an initial consultation letter and have only been alerted to the proposed development by the Occupier of Borrás Hall.</i>	The small scale features proposed within the proposed development area including the imported road planings stockpile, the processing plant, the RAP storage shed and the pre-coated chippings storage bays are all generally consistent with the character of the existing site and quarry. The individuals and organisations consulted as part of the pre-application consultation for planning application reference P/2021/0991 were identified using the guidance provided in The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended) and the Welsh Government Development Management Manual (DMM) (2017).
3) <i>The proposal will, as far as I am aware, significantly increase the flow of HGV traffic into the Quarry. I am concerned about the increase in dust and noise pollution as a result of this increased activity and would like some assurance about the measures being taken to mitigate and minimise this impact and also the proposed mitigating actions that will be taken should the impact exceed acceptable levels (should the proposed development proceed).</i>	<u>Planning application reference P/2021/0991 – Proposed development section, Pages 4-6</u> The extant planning permission for Borrás Quarry does not include a condition which limits the output rates from the quarry or the vehicle movements. HGVs will continue to access and exit the site using the site access on Holt Road. In the transport assessment which formed part of the 2005 Environmental Statement it was anticipated that the extraction rate at Borrás Quarry could be 820,000 tonnes per annum over a 5.5 day working week for 46 weeks of the year. This would equate to 332 HGV movements per day (158 HGVs in and 174 HGVs out) associated with the exportation of sand and gravel. <i>“The current sand and gravel exportation rate from Borrás Quarry ... generate approximately 164 HGV movements per day...”</i>

Comment	Where the comment is addressed in the planning application, response to the comment
	<i>“...the importation of asphalt plantings and subsequent exportation of processed RAP will generate approximately 28 HGV movements per day... It is anticipated that the pre-coated chippings will be imported on a backhaul basis. If the pre-coated chippings could not be imported on a backhaul basis it would generate 2 HGV movements per day... The traffic movements are well within the historic traffic movements associated with the site. During the determination of planning application reference P/2020/0153 the Chief Officer of Environment and Technical made no recommendations on highway grounds.”</i> During the pre-application consultation period for the draft application the Chief Officer of Environmental and Technical at WCBC raised no objections to the proposed development on highway grounds.
<i>4) I am equally concerned about the increase in noise pollution and air / dust from the proposed processing plant, and any smells that may be created by the processing and storage of bitumen coated products. The document states that the crushing operation may create dust and that water spray will be used if the dust suppression measures are not sufficient. I would ask that the dust suppression measures installed be of a sufficient standard to fully mitigate the possibility of any dust pollution. If this is not possible how will the monitoring of dust pollution and application of water spray be monitored and managed. In the past this responsibility had inadvertently fallen to local</i>	<u>Planning application reference P/2021/0991 – Noise section, Pages 8&9</u> A noise assessment is presented at Appendix A [of planning application reference P/2021/0991]. It is concluded in the report at Appendix A that noise associated with the proposed development will not exceed the noise level limits stipulated on the current planning permission. Based on the operations at Borrás Quarry including the proposed development resulting in noise levels within the limits specified in Condition 28 [of planning permission reference P/2003/0579] it is concluded that the proposed development will not result in an adverse impact on residential amenity by virtue of noise.

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<i>residents to notify the quarry of dust pollution. The documents also state that crushing will not take place in windy conditions. I would be interested to understand how this will be monitored and managed. The document states that '..... it is unlikely that significant odour would be generated...' This statement, presumably based on the technical aspects of the proposed development, does not assure me that we will not be significantly and adversely affected by the smells from the proposed development. I would like some assurance about the measures being taken to mitigate and minimise these impacts and the proposed mitigating actions that will be taken should the impact exceed acceptable levels (should the proposed development proceed).</i>	Restrictions on the working hours are proposed to 0730 to 1800 Monday to Friday and 0800 to 1300 Saturdays. <u>Planning application reference P/2021/0991 – Amenity section, Pages 11&12</u> There is the potential for the generation of dust during the crushing of the planings. The crusher has in built dust suppression measures. On completion of the crushing the RAP will be stored in the storage shed. If further mitigation is necessary once the material is crushed it will be sprayed with water as necessary. Crushing will not be undertaken in windy conditions that have the potential to generate dust. During the process of crushing the planings the crusher has an in built suppression measure that will be sufficient in preventing unacceptable impacts with respect to dust. The crushing and screening process will produce (RAP) which will be stored in an aggregate stockpile until it is transferred to a covered Nissen storage hut. During the short period of time where the RAP is stored in an aggregate stockpile adjacent to the crushing plant the stockpile will be monitored by suitably trained staff who will spray the stockpile with water if it is judged that further mitigation is required. The materials that will be imported to the site for processing comprise road surfacing materials which due to their age and/or condition need to be removed and replaced. It is consistent with the circular economy principles to where possible recycle the material. The materials will by their nature present a low risk of odour from the site.

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	During the determination period of application reference P/2020/0153 and during the pre-application consultation period for the draft application no objections or concerns were raised relating to odour.
5) <i>The documents make it clear that Borrás Hall Court is the closest residential noise receptor. They also state that the levels of noise will not exceed those stipulated in the existing planning permission. Can the methodology and testing of this statement be clearly explained?</i>	<u>Planning application reference P/2021/0991 – Noise section, Pages 8&9</u> A noise assessment is presented at Appendix A [of planning application reference P/2021/0991]. It is concluded in the report at Appendix A that noise associated with the proposed development will not exceed the noise level limits stipulated on the current planning permission The methodology of the noise modelling exercise are explained in detail in Appendix A. It is understood from Breedon that the quarry operations are not the subject of regular complaint. Restrictions on the working hours are proposed to 0730 to 1800 Monday to Friday and 0800 to 1300 Saturdays.
6) <i>I believe that the proposed development will have a significant negative impact on the surrounding environment - listed buildings adjacent to the site, surrounding natural environment and wildlife.</i>	<u>Planning application reference P/2021/0991 – Cultural heritage, Page 10</u> There are two listed buildings within 1km of the proposed development area which are Borrás Hall and Borrás Head. Borrás Hall is a Grade II* listed building located approximately 90m east north east of the site and approximately 115m east north east of the proposed development area. The proposed development is no closer to Borrás Hall than the consented mineral extraction and processing operations and the setting of the listed building will already be influenced by the operations at the

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	site. The proposed road planings storage and processing plant are small scale and will be no taller than the current mineral processing plant. The proposed Nissen hut or similar structure for storage of material will be approximately 10m tall. There is limited intervisibility between Borrass Hall and the proposed development area as there is an established belt of trees to the north east of the proposed development area which will screen the views of the proposed operations. There may be the potential for glimpses of the roof line of the Nissen hut from Borrass Hall. The existing vegetation is shown on Figure 3 [of planning application reference P/2021/0991]. The proposed development is unlikely to further affect the setting of Borrass Hall. Borrass Head is a Grade II* listed building located approximately 240m north east of the site and approximately 695m north north west of the proposed development area. The proposed development, which has historically been undertaken on a similar scale in another area of the quarry, is an ancillary operation within the working sand and gravel quarry and any views of the proposed development from Borrass Head will be long distance views within the wider context of the existing Borrass Quarry. There is established vegetation located south east and adjacent to Borrass Head between the listed building and the proposed development area. It is considered unlikely that the proposed development will result in an impact on the setting of Borrass Head due to the distance of the listed building from the proposed operations, the existing vegetation and the context of the current mineral site.
7) <i>I understand that the surrounding area provides a habitat for a number of protected species. I am concerned that the proposed development will have a negative impact on the natural environment for these species. For the</i>	<u>Planning application reference P/2021/0991 – Ecology section, Pages 10&11</u>

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<i>above reasons I am against the proposed development progressing Case Number P/2021/0991</i>	The area the subject of the proposed development is hardstanding with limited vegetation. The tree and scrub vegetation on and adjacent to the proposed development area boundaries will not be affected by the proposals. An ecological survey of the proposed development area was undertaken on 27 May 2020... A copy of the technical note that summarises the findings of the survey is presented at Appendix B [of planning application reference P/2021/0991]. There are four ponds within 250m of the boundary of the proposed development area which were visited during the survey and it is concluded that the ponds are not suitable for breeding Great Crested Newts (GCNs). The proposal will not affect any semi natural habitats of ecological importance, including priority habitats or habitats likely to be used by protected species including GCNs. NRW confirmed during the determination of planning application reference P/2020/0153 that they concur with the observations and conclusions of the technical note presented at Appendix B. During the pre-application consultation period for the draft application NRW raised no objections to the proposed development.
<i>we already have a level of noise from the quarry which is just acceptable at present but which would be unacceptable if much higher - hence my question about precise location of the planned processing etc - eg will it be in the south east section near our property or in the north west section furthest from our property - I am sure the 5</i>	The proposed development area is located in the south eastern part of Borras Quarry adjacent to the northern boundary in the eastern part of Borras Airfield as shown on Figure 2 [of planning application reference P/2021/0991]. It is proposed that the planing processing operations will take place in the south western part of the proposed development area as shown on Figure 3 [of planning application reference P/2021/0991].

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<i>other residencies in [REDACTED] and [REDACTED] will share this concern</i>	<u>Planning application reference P/2021/0991 – Noise section, Pages 8&9</u> A noise assessment is presented at Appendix A [of planning application reference P/2021/0991]. It is concluded in the report at Appendix A that noise associated with the proposed development will not exceed the noise level limits stipulated on the current planning permission. Based on the operations at Borrass Quarry including the proposed development resulting in noise levels within the limits specified in Condition 28 [of planning permission reference P/2003/0579] it is concluded that the proposed development will not result in an adverse impact on residential amenity by virtue of noise. Restrictions on the working hours are proposed to 0730 to 1800 Monday to Friday and 0800 to 1300 Saturdays.
<i>Borrass Hall Lane already has much heavy and noisy traffic (tractors, farm vehicles, vans etc and being single lane in many parts it is very difficult to navigate at many times and represents just an acceptable level of noise at present - which we accepted when buying the house and moving in in March. Any more traffic noise would not be an acceptable level and there is also a safety factor as much traffic already travels at excessive speeds for the lane.</i>	<u>Planning application reference P/2021/0991 – Proposed development section, Pages 4-6</u> The extant planning permission for Borrass Quarry does not include a condition which limits the output rates from the quarry or the vehicle movements. HGVs will continue to access and exit the site using the site access on Holt Road. In the transport assessment which formed part of the 2005 Environmental Statement it was anticipated that the extraction rate at Borrass Quarry could be 820,000 tonnes per annum over a 5.5 day working week for 46 weeks of the year. This would equate to 332 HGV movements per day (158 HGVs in and 174 HGVs out) associated with the exportation of sand and gravel.

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