

21 April 2021
Our ref: BRE/BO/TJC/1744/01

Wrexham County Borough Council
Planning Service
Guildhall
Wrexham
LL11 1AY

BY EMAIL ONLY

For the attention of S Greenland, Planning and Enforcement Officer

Dear Sir/Madam

Borras Quarry

Further to our letter dated 18 March 2021 MJCA are commissioned by Breedon Trading Limited (Breedon) to prepare a planning application under the Town and Country Planning Act 1990 (as amended) for the importation, processing and storage of road planings at Borras Quarry and the importation and storage of bitumen coated asphalt chippings (pre-coated chippings). The application comprises the application forms, cover letter, figures, noise assessment (Appendix A) and ecological survey technical note (Appendix B).

Background to the application

An application for planning permission under Section 73 of the Town and Country Planning Act 1990 (as amended) to vary Condition 3 of planning permission reference P/2003/0579 to provide for the importation, processing and storage of road planings at Borras Quarry and the importation and storage of bitumen coated asphalt chippings (pre-coated chippings) was submitted to Wrexham County Borough Council (WCBC) on 4 March 2020 and determined by WCBC on 15 March 2021. The Section 73 application reference P/2020/0153 was refused with the reason cited that the proposed development would not keep the description of the development intact and falls outside the scope of a material minor amendment to the planning permission under Section 73 of the Town and Country Planning Act 1990 as amended. This planning application addresses the comments made on the refusal notice as it is a standalone planning application for the same proposed development at the same location in Borras Quarry as that subject of application reference P/2020/0153.

This planning application is presented in the same format as application reference P/2020/0153. During the determination period of application reference P/2020/0153 comments were made by consultees with requests for clarification provided by the conservation officer, the environmental protection officer and the ecology officer at WCBC and by Natural Resources Wales (NRW). The comments and requests for clarification were addressed during the determination period with where necessary confirmation from the relevant consultees that the information provided to address the comments was satisfactory hence the information has been included in this application.



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Introduction

Borras Quarry has been a working sand and gravel quarry since the early 1970s. Planning permission was initially granted in 1965 by the former Secretary of State for Wales. Since the grant of the original permission a number of permissions have been granted for mineral extraction and associated operations such as an asphalt plant and a concrete block plant. The extant planning permission for Borras Quarry (Planning permission reference P/2003/0579) was granted by Wrexham County Borough Council in 2007 and allows for the extraction of sand and gravel until 2042. The boundary of planning permission reference P/2003/0579 is shown on Figure 1.

A screening opinion was issued by Wrexham County Borough Council (WCBC) dated 10 March 2020 for planning application reference P/2020/0153. A response to the screening opinion on behalf of Breedon dated 15 July 2020 provided clarification on the proposed development and the site setting. 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.

Site location and description

Borras Quarry is centred at National Grid Reference SJ 36198 52728 approximately 200m north east of Wrexham at its closest point (Figure 1). Throughout this letter Borras Quarry is referred to as the site. The A534 runs in a west to east direction to the south/south east of Borras Quarry. The existing access to the site is on Holt Road which runs adjacent to the southern boundary of the site. The access road runs from Holt Road in a northerly direction under the A534 (Figure 2). Holt Road joins the A534 approximately 320m to the east of the access road at a roundabout. The A534 meets A5156 and the A534 west at a roundabout junction approximately 4km west of the site access.

The planning application boundary is shown on Figure 2 and occupies an area of approximately 2.04 hectares. The planning application boundary comprises the proposed area for the storage and processing of road planings and the storage of pre-coated chippings (referred to as the proposed development area throughout this letter) together with the section of the site access road that runs from the existing quarry entrance on Holt Road to the proposed development area. The proposed development area is shown on Figure 3 and occupies an area of approximately 1.55 hectares.

The site is bisected diagonally into two areas by Borras Road which runs in a north easterly direction from the A5156 to Borras Hall Lane. The southern part of the site encompasses Borras Airfield and covers an area of approximately 97 hectares (Figure 2). The extraction of sand and gravel has been undertaken in the western part of Borras Airfield with future extraction works to be undertaken in the south eastern area of Borras Airfield. The main structures within the Airfield are the existing sand and gravel processing plant and associated conveyors and the site weighbridge and offices. There is an aggregate bagging plant located in the southern area of Borras Airfield which is operated by Tarmac Building Products Limited. There are also a number of low level buildings in the south eastern corner of Borras Airfield which are used as offices. A Millennium Eco Centre is located to the south east of the aggregate bagging plant.

The proposed development area is centred on National Grid Reference SJ 36913 52480 (Figure 2) and is located adjacent to the northern boundary in the eastern part of Borras Airfield. The development will be located within an area formerly occupied by a concrete block



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making plant. The proposed development area comprises a concrete surface from which incident rainfall will drain to ground. The proposed development area is located within a Source Protection Zone 3 and on a principal aquifer. Adjacent to the proposed development area is a soil processing facility. Established tree and shrub planting is located to the east of the proposed development area adjacent to the site boundary (Figure 3). The proposed development area is accessed from the south via the site access road.

The northern part of the site is known as the Holt Estate and covers an area of approximately 72 hectares. The current active phase of sand and gravel extraction is located in the north east area of the Holt Estate. Upon completion of mineral extraction phases are being progressively restored. There are no major structures within the Holt Estate other than the ground conveyor linking the current extraction area to the processing plant in Borrás Airfield. The conveyor travels south east from the active extraction area in the Holt Estate under Borrás Road to the processing plant at Borrás Airfield.

The closest properties to the proposed development area are described. Woodlands Farm is located on Borrás Road adjacent to the Holt Estate and approximately 700m north of the proposed development area. Fairholme is adjacent to the eastern boundary of the Holt Estate and is located approximately 860m north west of the proposed development area. Llan-Y-Pwll Farm lies adjacent to the site access and approximately 560m south of the proposed development area.

Borrás Head Cottage and Borrás House are located approximately 1.1km and 860m north north west of the proposed development area respectively. Borrás Head Farm is located approximately 675m north north west of the proposed development area. Borrás Hall Cottage lies 310m east south east of the proposed development area. The closest properties to the proposed development area are Borrás Hall Farm and the properties located at Borrás Hall Court which are located approximately 75m to the east of the proposed development area.

Based on information reviewed on the Defra MAGIC website the site boundary is located within 2km of statutory ecological sites. The northern boundary of the Holt Estate is adjacent to the Midland Meres & Mosses - Phase 2 Ramsar site which is allocated for the open water and peatlands and Vicarage Moss SSSI which is designated for the kettle hole complex. These sites are located approximately 1.3km north west of the proposed development area. Marford Quarry SSSI is located approximately 1.5km to the north of the Holt Estate and approximately 3km north north west of the proposed development area. The site is designated for rare invertebrate species.

Based on information reviewed on the Cadw website there are a number of listed buildings within 2km of the site. There are two Grade II* listed buildings and ten Grade II listed buildings within 2km of the site. There are no Grade I listed buildings within 2km of the site. The listed buildings are shown on Figure 4 and presented at Schedule 1 to this letter. Based on information reviewed on the Cadw website there are no scheduled monuments within 2km of the site.

Public Rights of Way crossing or adjacent to Borrás Airfield are shown on Figure 2. Footpath 12 runs adjacent to the southern boundary of Borrás Airfield before running north east into the site crossing the site access road and running north past the Millennium Eco Centre. Footpath 12 then turns east and then north along the site boundary before turning east towards the properties at Borrás Hall Court. Footpath 13 runs parallel to the site access road from Holt Road joining Footpath 12 at the point where it crosses the access road.



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Planning history

Planning permission was granted in 1965 by the former Secretary of State for Wales. Since the grant of the original permission a number of permissions have been granted for mineral extraction and associated operations such as an asphalt plant and a concrete block plant.

Planning permission reference P/2003/0579 was granted by Wrexham County Borough Council on 15 December 2006 for an extension to Borrass Quarry with operations consented until 21 February 2042. The boundary of planning permission reference P/2003/0579 (updated by reference P/2010/0043) is shown on Figure 1.

Planning permission reference P/2007/1130 was granted by Wrexham County Borough Council on 3 December 2007 for the variation of Condition 3 of planning permission reference P/2003/0579 to allow for the storage and recycling of asphalt planings. The planings storage and processing area was located adjacent to the existing mineral processing plant in Borrass Airfield. The permission was time limited to 31 December 2009. Planning permission reference P/2010/0043 was granted by Wrexham County Borough Council on 5 March 2010 for the variation of Conditions 3 and 4 of planning permission reference P/2009/0760 to allow the continued importation and recycling of asphalt planings until 31 December 2012.

Planning permission reference P/2009/0760 was granted by Wrexham County Borough Council on 2 November 2009 for the variation of Condition 3 of planning permission reference P/2003/0579 to allow for the manufacture of top soil from imported compost and fine sand arising on site.

Other planning permissions granted since 2009 include retrospective permission to display road signs and permission for the importation of clay, soil and sand/gravel arising from industrial estate access road works.

The planning history demonstrates that Borrass Quarry is an established sand and gravel quarry with a number of ancillary and associated operations. The proposed development is located within the boundary of an existing quarry and the proposed operations are commonly associated with quarrying operations. The importation and recycling of road planings has been previously undertaken at the site and was deemed acceptable by the grant of the two previous planning permissions. The proposed development will establish recycling operations at the site that support the wider Breedon operations in the area.

Proposed development

The proposal the subject of this application is to import, store and recycle up to 75,000 tonnes per annum of road planings and import and store up to 5,000 tonnes per annum of pre-coated chippings at Borrass Quarry. The storage and recycling of up to 75,000 tonnes of road planings will be the subject of Standard Rules Environmental Permit SR2008 No11 for the operation of an inert and excavation waste transfer station with treatment. Standard Rules Environmental Permit SR2008 No11 provides for the acceptance of up to 75,000 tonnes of waste per annum and includes waste code 17 03 02 which comprises 'bituminous mixtures other than those mentioned in 17 03 01'. Accordingly, Standard Rules Environmental Permit SR2008 No11 provides for the storage and recycling of up to 75,000 tonnes per annum of road planings at the site.

Road planings are produced when the surface of a road profile is removed in advance of resurfacing. The road planings will be recycled and utilised in the production of new coated road stone, thus reducing the requirement for primary aggregates. The road planings will be imported from road maintenance and construction projects mainly within the boroughs of Wrexham and Flintshire and once processed either utilised in the Breedon asphalt plant in



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Llay which is located approximately 5 miles to the north of Borrás Quarry or sold directly from site.

Vehicles will access the proposed development area via the existing access on Holt Road along the existing access road and into the proposed development area on an existing road along the eastern edge of the proposed development area. The imported road planings will be stockpiled throughout the year in a dedicated stocking area within the proposed development area (Figure 3). Up to 20,000 tonnes of road planings will be stored in the stocking area. The height of the planings stockpile will not exceed 5m and the footprint of the stockpile area will be approximately 60m by 30m.

A mobile crushing and screening plant will be used on site to process the planings. The mobile crushing and screening plant will operate under a specific Environmental Permit. The throughput of the plant will be in the order of 100 tonnes per hour. As a result of screening operations the majority of the stockpile of planings (approximately 80%) would be processed in a period of approximately 16 to 20 days. It is anticipated that only 20% of the stockpile material will need to be crushed. The crushing and screening process will produce Reclaimed Asphalt Pavement (RAP). The aggregate stockpiles will have a maximum height of 5m until it is transferred to a storage shed. The RAP will be stored on site in a Nissen hut or similar structure. The structure will be approximately 40m by 20m and a maximum of 10m high. The location of the stocking area, processing area and the storage structure are shown on Figure 3. As the crusher and screen will be mobile and brought onto site as needed throughout the year the location of the plant is indicative, however it will be located on the western area of the proposed development area. The operations would include the use of a loading shovel in addition to the mobile crusher and screen. A loading shovel from the main quarry will be used during the planing processing and loading operations. Approximately 10,000 tonnes per annum of RAP will be loaded into HGVs and transferred to supply the Breedon asphalt production plant in Llay and the remaining RAP will be sold directly from the site.

It is also proposed to import pre-coated chippings that will be stored in four storage bays in the northern part of the proposed development area (Figure 3). Two grades of pre-coated chippings will be stored on site. Two open bays will be used to store each grade. The bays will be constructed with a 1m high concrete plinth with railway sleepers in rolled steel joists above. The bays will be 2.5m in height. The pre-coated chippings will not be stored above the height of the walls of the storage bays. A small water tank will be located adjacent to the storage bays. The pre-coated chippings will be sprayed via sprinklers mounted on the bays. A maximum of 5,000 tonnes per annum of pre-coated chippings will be imported to the site. The maximum stored on site at any one time will be 1,000 tonnes.

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 Statement¹ 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.

The current sand and gravel exportation rate from Borrás Quarry is 450,000 tonnes per annum. Based on a 5.5 day working week for 50 weeks of the year the sand and gravel exportation operations generate approximately 164 HGV movements per day (82 HGVs in

¹ Amendments to Planning Application to Extend Borrás Quarry: Supplementary Statement (2005)



and 82 HGVs out). This is considerably less than historic rates that were considered acceptable in highways capacity and safety terms.

Up to 74,999 tonnes per annum of road planings will be imported to the site. Based on a 5.5 day working week and a 50 week year the importation of asphalt planings and subsequent exportation of processed RAP will generate approximately 28 HGV movements per day (14 HGVs in and 14 HGVs out). Up to 5,000 tonnes per annum of pre-coated chippings will be imported. 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 (1 HGV in and 1 HGV out). 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.

It is proposed that the life of the recycling facility is linked to the life of Borrás Quarry. Consistent with the quarry operations at the site the planings and pre-coated chippings will be imported between the hours of 0630 and 2200 Monday to Friday and 0630 and 1300 on Saturdays. Restrictions to the working hours suggested by the Environmental Protection Officer in the consultation response to application reference P/2020/0153 dated 25 March 2020 have been taken into account. The processing of the planings will be restricted to between the hours of 0730 and 1800 Monday to Friday and 0800 and 1300 on Saturdays. There will be no importation or processing operations on Sundays or Bank Holidays.

No changes are proposed to the main quarry operations as a result of the proposed development. Mineral reserves present in the proposed development area will be extracted at the end of the operations. Plant and any residual stockpiles will be removed from the area prior to extraction.

Planning policy and environmental considerations

Planning law in Wales is the subject of the Town and Country Planning Act 1990² as amended, the Planning and Compulsory Purchase Act 2004 and the Planning Act 2008³ as amended by the Localism Act 2011⁴ and the Planning (Wales) Act 2015⁵ and associated regulations. Land use planning in Wales is a plan led system. In accordance with Section 38 of the Planning and Compulsory Purchase Act 2004 all planning decisions should be in accordance with the development plan unless material considerations indicate otherwise.

At a national level the objectives of the planning acts together with government policy in respect of planning are delivered through guidance published in the Planning Policy Wales (PPW)⁶, the Technical Advice Notes (TANs), Minerals Technical Advice Notes (MTAN) and policy clarification letters. Paragraph 5.14.12 of the PPW states:

'The contribution of recycled waste materials and secondary aggregates should be taken into account where these can be used satisfactorily and realistically instead of primary land-won minerals...'

The Development Plan for the site comprises the Wrexham Unitary Development Plan (WUDP) 1996-2011⁷ (2005). Wrexham County Borough Council are in the process of

² Town and Country Planning Act 1990 c.8

³ Planning Act 2008 c.2

⁴ Localism Act 2011 c.20

⁵ Planning (Wales) Act 2015

⁶ Welsh Government (2021) Planning Policy Wales Edition 11

⁷ Wrexham Unitary Development Plan 2005 (WUDP)



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producing a new Wrexham Local Development Plan (WLDP) 2013-2028⁸. The examination into the plan was held in September and October 2019. Further hearings for the examination of the plan were held in February and March 2020. According to the WCBC website in March 2021 the examination of the plan is still ongoing. Consideration has been given to the policies included in the Deposit Draft of the WLDP.

The main planning considerations in the determination of this planning application are environmental considerations comprising landscape character and visibility, noise, transport network and traffic movements, cultural heritage, ecology, surface water drainage and amenity together with mineral resources and waste management. The relevant planning policies are considered below.

Landscape character and visibility

The site is located in the Green Barrier. 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.

Policy PS2 of the WUDP states that:

'Development must not materially detrimentally affect countryside or landscape/townscape character...'

Policy DM1a of the WLDP states that:

'All development must accord with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape in terms of its siting, layout, scale, height, design, density, use of materials and landscaping'

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 development is in accordance with Policy PS2 of the WUDP and Policy DM1a of the WLDP.

The proposed development may be visible from the nearest receptors due to the introduction of the crusher and associated storage building. The crusher will be up to 4.45m tall and the proposed storage hut will be a maximum height of 10m. The stockpiles will be limited to 5m high and will screen the bays for the storage of the pre-coated chippings from the receptors to the south and south east. There is an approximately 2m high vegetated screening bund to the south of the access road which will screen the development from the sensitive receptors to the south and south east. There is a block of woodland on the southern boundary of Borrás Airfield to the north west of the Borrás Quarry access road which will screen long distance views of the proposed development from the south west. There is an established belt of trees to the north east of the proposed development area which will screen views of the operations from the east.

Policy EC1 of the WUDP states that:

'Within Green Barriers, development will only be granted planning permission if it is for agriculture, forestry, essential facilities for outdoor sport and

⁸ Wrexham Local Development Plan (WLDP)



recreation, cemeteries and other uses of land which maintain the openness of the Green Barrier and do not conflict with the purpose of including land within it'.

Policy MW6 of the WLDP states that:

'...Proposals for waste management will be supported provided: vi. Any visual impacts would be minimised through the storage of wastes'.

Any views of the proposed development would be in the context of and within the footprint of an existing established minerals extraction site. The proposals do not conflict with the purposes of including land in the Green Barrier. It is considered that the proposed development is in accordance with Policy EC1 of the WUDP and Policy MW6 of the WLDP.

Any impact on landscape character and visibility as a result of the ongoing mineral extraction and ancillary operations at the site has previously been considered acceptable. It is concluded that the proposed development will not have an unacceptable impact on landscape character or visibility. The development is in accordance with the policies in the WUDP and the emerging policies in the WLDP with respect to landscape character and visibility.

Noise

Noise levels associated with the operations at the site are the subject of planning Condition 28 of Planning Permission reference P/2003/0579 at the nearest residential receptor to the proposed development area, Borrás Hall Court, the noise limits are as follows:

	Free field LAeq 1 hour Noise Limit (dB)			
Monitoring location	Monday Saturday 0630 to 0730	to Monday to Friday 0730 to 1800 and Saturday 0730 to 1300 (excluding Bank Holidays)	Monday Saturday 1800 to 2200 (excluding Bank Holidays)	to Any other time
Borrás Hall*	50	55	45	42

*Referred to as Borrás Hall in the extant planning permission. This property is referred to as Borrás Hall Court throughout this report in accordance with the existing OS data.

The reason given on the Planning Permission for Condition 28 is *'to protect the amenity of local residents and in accordance with good planning practice'*. A noise survey at the site to collect noise emission data regarding the existing site operations was undertaken on Tuesday 10 December 2019. The noise level data obtained was used in a noise modelling exercise which is described in Appendix A enclosed with this letter.

Policy GDP1f of the WUDP states that:

'All new development should ensure the safety and amenity of the public and safeguard the environment from the adverse effects of associated noise,arising from development.'



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Policy MW4 of the WLDP states that:

'Proposals for the management of secondary and recycled aggregates will be supported outside settlement boundaries provided they meet the following criteria ... ii. They would not have an adverse impact on residential amenity through noise...'

Policy MW6 of the WLDP states that:

'Proposals for waste management will be supported provided iii. There would be no adverse impact on residential amenity by virtue of noise...'

Policy DM1b of the WLDP states that:

'All development must not have an unacceptable effect on the amenity of the occupiers of nearby properties/land by virtue of noise ... and provides a satisfactory standard of amenity for the occupiers/users of the development itself'.

A noise assessment is presented at Appendix A. 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. In accordance with the restrictions suggested by the Environmental Protection Officer at WCBC in the consultation response to application reference P/2020/0153 dated 25 March 2020 the processing of the planings will be restricted to between the hours of 0730 and 1800 Monday to Friday and 0800 and 1300 on Saturdays. Crushing and screening of road planings will not be undertaken outside these hours. Based on the operations at Borrás Quarry including the proposed development resulting in noise levels within the limits specified in Condition 28 it is concluded that the proposed development will not result in an adverse impact on residential amenity by virtue of noise. The development is in accordance with the policies in the WUDP and the emerging policies in the WLDP with respect to noise.

Traffic network and traffic movements

Policy DM1f of the WLDP states that:

'All development must not give rise to highway safety problems on site or in the locality'.

Policy T1 of the WLDP states that:

'Proposals for new development will be supported where they: iii. Do not compromise the safe, effective and efficient use of the highway network and do not have an adverse impact on highway safety or create unacceptable levels of traffic generation'.

Policy SP12 of the WLDP states that:

'Wrexham's transport network will be developed in a safe, efficient and sustainable manner through the following measures: i. Restricting development that would have an unacceptable impact on the safe and efficient operation of the transport network'.

The existing site access is well established and provides direct access to the strategic network. The traffic movements associated with the proposed development can be accommodated within the historic acceptable traffic movements associated with the site. It is



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concluded that the traffic movements proposed will not result in an unacceptable impact on the transport network or highway safety. The development accords with the emerging policies in the WLDP.

Cultural heritage

Policy SP16 of the WLDP states that:

'Development will only be supported where it conserves, protects and enhances the following cultural and heritage assets of the County Borough and, where appropriate, their settings:...i. Listed Buildings and in particular those on the Buildings at Risk Register;'

There are a number of listed buildings within the vicinity of the site as shown on Figure 4. The majority of the listed buildings identified on Figure 4 are 1km or more from the proposed development area. The listed buildings and the distances of the listed buildings from the proposed development area and site are provided in Schedule 1. It is considered that the proposed development will not result in significant impact on the historical setting of listed buildings located 1km or further from the proposed development due to the distance of the listed buildings from the development area boundary, existing development, existing vegetation and the presence of the A534 and A5156.

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 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 Borrás 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 Borrás Hall. The existing vegetation is shown on Figure 3. The proposed development is unlikely to further affect the setting of Borrás Hall.

Borrás 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 Borrás Head will be long distance views within the wider context of the existing Borrás Quarry. There is established vegetation located south east and adjacent to Borrás 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 Borrás Head due to the distance of the listed building from the proposed operations, the existing vegetation and the context of the current mineral site. It is considered that the development does not conflict with Policy SP16 of the WLDP.

Ecology

Policy PS2 of the WUDP states that:

'Development must not materially detrimentally affect...the quality of the natural environment.'



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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.

Policy GP1h of the WUDP states that:

'All new development should... safeguard sites and areas of nature conservation and wildlife interest...'

Policy SP15 of the WLDP states that:

'Development will only be supported where it protects conserves and enhances the natural environment including...protected Species and their habitat;'

An ecological survey of the proposed development area was undertaken on 27 May 2020. The survey included land and waterbodies within a 250m radius of the proposed development area and a review of the habitats in the wider quarry. A copy of the technical note that summarises the findings of the survey is presented at Appendix B. 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. The proposed development is not in conflict with the policies in the WUDP and the emerging policies in the WLDP with respect to ecology.

Surface water drainage

Policy DM1i of the WLDP states that:

'All development must not increase the risk of flooding but makes adequate provision for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact upon the water environment;'

The proposed development area comprises a concrete surface from which incident rainfall will drain to ground. This is consistent with the requirements of Standard Rules Environmental Permit SR2008 No11. The Generic Risk Assessment in respect of Standard Rules Environmental Permit SR2008 No11 states that the risk to groundwater for the operations (Inert and Excavation Waste Transfer Station with treatment) is low and given that *'Permitted wastes unlikely to contaminate groundwater'* with the controls the subject of the Environmental Permit the residual risk to groundwater from the proposed activities is very low. It has been agreed with NRW during the determination of planning application reference P/2020/0153 that a drainage strategy for the proposals is not necessary and based on the NRW guidance it is concluded that the proposal would not result in an unacceptable impact upon the water environment.

Amenity

The imported asphalt planings and pre-coated chippings will not result in the generation of dust. 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



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that have the potential to generate dust. It is unlikely that significant odour would be generated from the proposed operations.

Policy GDP1f of the WUDP states that:

'All new development should ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of...air...from industry and quarrying and...odour...arising from development'.

Policy DM1c of the WLDP states that:

'All development must safeguard the environment from the adverse effects of pollution of...air...arising from development'.

Policy MW6 of the WLDP states that:

'Proposals for waste management will be supported provided: iii. There would be no adverse impact on residential amenity by virtue of ...dust or odour...'

There will be no unacceptable impacts with respect to dust or odour as a result of the proposed development. The development accords with the policies in the WUDP and the emerging policies in the WLDP.

Mineral resources

Policy MW9 of the WUDP states that:

'Resources of sand and gravel, and clay will be safeguarded from non-mineral development in order to prevent the sterilisation of unworked minerals deposits. The identification of mineral resource areas gives no presumption in favour of the working of any deposits. Within such areas non-mineral development will be strongly resisted unless a resource assessment (or other information) is provided to demonstrate that no exploitable reserves exist within the development site. Where non-mineral development which materially prejudices minerals resources is granted planning permission on land holding minerals deposits, provision should be made for the prior removal of mineral deposits'.

The proposed development will not result in the sterilisation of mineral resources. The plant and any structures within the proposed development area will be removed prior to the extraction of the mineral in Airfield 4. The proposed development accords with the policies in the WUDP.

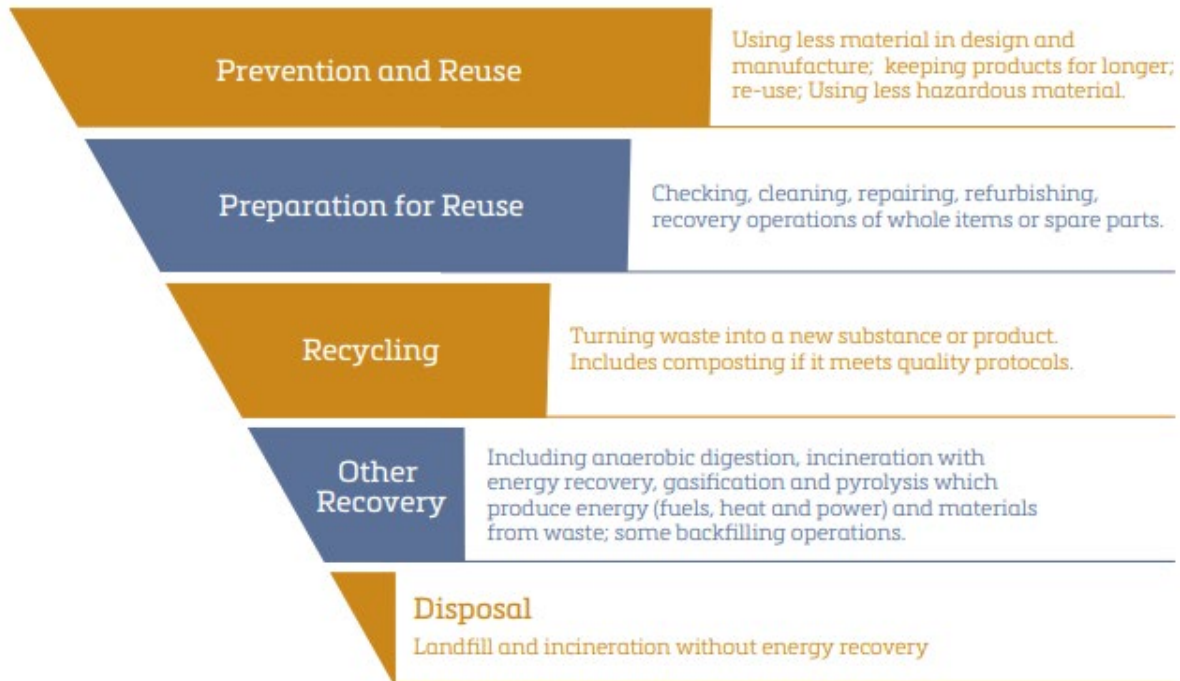
Waste management

Planning Policy for Wales (PPW) states that the waste hierarchy provides the key starting point for all types of waste management proposals. The waste hierarchy is presented at Figure 11 of the PPW.



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Figure 11: Waste Hierarchy



The proposed development will recycle road planings for reuse as Recycled Asphalt Planings (RAP). The development will move waste up the waste hierarchy by preparing materials for reuse. Policy PS10 of the WUDP states that:

‘Priority in waste management will be given to minimising the volume of waste generated, followed by maximising the re-use and recycling as much waste as possible...’.

Policy MW6 of the WLDP states that:

‘Proposals for waste management will be supported provided i. The proposal would move the management of waste up the waste hierarchy...’.

A Sustainability Appraisal Report⁹ was published by WCBC in February 2018 as part of the evidence base on which the emerging WLDP will be developed. The Sustainability Appraisal Report identifies 12 objectives that reflect the aims of the WLDP. Objective SO11 of the Sustainability Appraisal Report aims to:

‘Ensure development meets the needs of society and industry, now and in the future, through ensuring adequate protection and supply of high quality minerals. This objective will be achieved by...Promoting the recycling and use of secondary aggregates.’

The proposal will contribute to the supply of secondary aggregates. The co-location of the recycling operations at an existing quarry (and close to the Breedon asphalt production plant in Llay) provides significant environmental and highways advantages and will reduce the use of primary aggregates. The proposal will contribute to WCBC achieving its sustainability

⁹ Sustainability Appraisal Report (Deposit Plan) February 2018



objectives by recycling and utilising secondary aggregates. The proposed development accords with the PPW, the policy in the WUDP and the WLDP.

Conclusion

Breedon Trading Limited are proposing to import, process and store road planings and to import and store pre-coated chippings at Borrass Quarry. There is policy support for the recycling and reuse of materials at a local and national level. The proposed development enables the recycling and reuse of road planings as high quality aggregate for use in road and construction projects. The proposed development area within an existing quarry is well screened and not subject to environmental designations. The proposal comprises activities that are commonly associated with quarrying operations and that are consistent with those which have previously been authorised by Wrexham County Borough Council. It is concluded that the proposal will not result in changes to the life of the quarry, the quarry restoration or the phasing. Based on a restriction of operations associated with processing road planings to 0730 to 1800 Monday to Friday and 0800 to 1300 on Saturdays the additional operations at the site will not give rise to noise levels that will exceed the restrictions in the extant planning permission.

The proposal has been considered against the relevant planning policy and it is concluded that the proposed operations are unlikely to generate significant adverse effects in terms of landscape character and visibility, traffic network and traffic movements, cultural heritage, ecology, surface water drainage or noise and amenity. The proposal would contribute to the sustainable use of materials by recycling and reuse and is appropriately located in a suitable location in policy and environmental terms.

Should you have any queries regarding the application or need any clarification please do not hesitate to contact us.

Yours faithfully



Guy Titman

cc J Davies, Breedon Aggregates

Encs

Schedule 1 - Listed buildings in the vicinity of Borrass Quarry as shown on drawing reference BRE/BO/03-21/22327

Figure 1 – The site location (drawing reference BRE/BO/03-21/22324)

Figure 2 – The planning application boundary and proposed development area (drawing reference BRE/BO/03-21/22325)

Figure 3 – The proposed development area (drawing reference BRE/BO/03-21/22326)

Figure 4 – The location of listed buildings in the vicinity of Borrass Quarry (drawing reference BRE/BO/03-21/22327)

Appendix A – Noise Assessment (report reference R20.10608/2/JM)

Appendix B – Ecology survey technical note dated 13 July 2020

Planning application forms



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Schedule 1 to the letter to Wrexham County Borough Council dated 21 April 2021

Listed buildings in the vicinity of Borrás Quarry as shown on drawing reference BRE/BO/03-21/22327

Ref	Name	Grade	National Grid Reference	Approximate distance from the boundary of planning permission reference P/2003/0579	Approximate distance from the proposed development area
A	Borrás Hall	II*	SJ 37121 52590	90m ENE	115m ENE
B	Borrás Head	II*	SJ 36709 53256	240m NE	695m NNW
C	Plas Bostock	II	SJ 38003 52747	975m ENE	1000m ENE
D	Hoseley Bank Farmhouse	II	SJ 36788 53963	300m NNE	1245m N
E	Greenbank	II	SJ 35389 54363	530m NNW	2220m NNW
F	Base of Cross	II	SJ 34619 54388	1030m NW	2850m NW
G	Pant-yr-ochain Hotel	II	SJ 34613 53371	500m WNW	2220m WNW
H	Borrás Farm	II	SJ 35256 52506	285m WNW	1515m W
I	Cherry Hill	II	SJ 35254 52131	380m SW	1485m WSW
J	The Lodge	II	SJ 34811 51654	1000m SW	2140m WSW
K	95 Dean Road, Wrexham, LL13 9EG	II	SJ 34860 51550	1020m SW	2120m WSW
L	93 Dean Road, Wrexham, LL13 9EG	II	SJ 34864 51544	1020m SW	2120m WSW

FIGURES

APPENDIX A
NOISE ASSESSMENT

APPENDIX B

ECOLOGY SURVEY TECHNICAL NOTE DATED 13 JULY 2020