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PLANNING STATEMENT

Section 73 Application for 3No. Changes to the Limits of Extraction within
the Existing Permitted Planning Boundary of Ballswood Quarry
Relating to Planning Permission ref. P/2016/0110

at

Ballswood Quarry, off Gegin Lane, Llay, Wrexham LL12 0NU

May 2021

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1 Introduction

1.1 Background

1.1.1 This planning application has been prepared on behalf of Cheshire and North Wales Sand and Gravel Limited (hereafter referred to as the Applicant) to vary conditions 1 and 8 of Planning Permission ref: P/2016/0110 under Section 73 of the Town and Country Planning Act 1990. The purpose of the S73 application is to enable 3 proposed changes to the extraction boundary of Ballswood Quarry utilising existing quarry infrastructure and access. The proposed development will release currently sterilised mineral within the permitted planning boundary of the site.

1.1.2 Condition 1 states:

“The development hereby permitted is for the winning and working of sand and gravel only and shall be carried out at all times in accordance with the approved plans and application drawings, as amended by the conditions attached to this permission”.

1.1.3 Condition 8 states:

“Mineral extraction shall only take place from within the areas indicated on, and to the depth shown on, the approved drawings”.

1.1.4 Ballswood Quarry contains a number of different types of sand and gravel, which are worked from various “faces” within the site. The reason for the 3 changes is to release additional and higher quality reserves of building sand and sand and gravel.

1.1.5 The Planning Application falls within the red line boundary of Planning Permission ref: P/2016/0110, which was approved under the Environment Act 1990 Periodic Review of Planning Conditions (09/05/2016). Condition 2 of Planning Permission ref: P/2016/0110 sets out that mineral working is to cease by 22nd February 2042.

1.1.6 The 3 proposed changes to the extraction area fall within the red line boundary of Planning Permission ref: P/2016/0110, although outside the extraction area on the approved plans.

1.1.7 A Proposals Plan (ref: KD.BLWQ.1.D.003A) is attached outlining the 3 changes to the extraction area (Referenced as Areas A, B & C) and these areas comprise of the following mineral reserves:

- Area A – 300,000 tonnes;
- Area B – 780,000 tonnes; and

- Area C – 490,000 tonnes.

Total Proposed Additional (non-sterilised) Reserves – 1,570,000

- 1.1.8 In terms of existing reserves, it has been identified that there is 1,100,000 tonnes remaining, therefore combining existing and proposed reserves gives a total of 2,670,000 tonnes. It is anticipated that sales will continue at 500,000 tonnes per annum, which will result in ~ 5.3 years of extraction with a further year to complete restoration.
- 1.1.9 The proposal does not propose changes to the methods of quarrying at Ballswood Quarry, which will continue to be within the permitted application boundary and will be completed well within the approved end date of mineral working at the quarry. Access to the site is proposed via the existing access off Gegin Lane.
- 1.1.10 During the formulation of the development proposals, an EIA Screening Matrix has been prepared to help determine that the proposal did not constitute EIA development. The EIA Screening Matrix is attached at **Appendix 1**.
- 1.1.11 This Statement provides details of the application site as it currently exists, the site's planning history and context, the proposed development, and how the proposals may impact the local environment and community. Consideration has been given to the proposed impact on the local environment and community during the proposed mineral extraction and progressive restoration phases, and the long-term impacts of the proposal upon final site restoration and beyond.
- 1.1.12 This Statement assesses the proposed development's compliance with the various planning policies that constitute the Development Plan for the area and with other material planning considerations that are relevant to the determination of the planning application.
- 1.1.13 For completeness, this Statement should be read in conjunction with the accompanying application forms, plans and supporting technical considerations.
- 1.1.14 To assist Wrexham County Borough Council (WCBC) in arriving at a considered view, details of the proposed development and a site description are outlined below along with a broad assessment of any potential environmental effects and their significance. Greater detail of the potential environmental impacts as a result of the proposed development are contained within the accompanying ES Volume 1. In addition to environmental matters, other considerations material to the preparation and consideration of the planning application are also set out below:
- 1.1.15 This Planning Statement should be read in conjunction with the following documents and plans:

- Landscape and Visual Considerations – Kedd Limited;
- Nature Conservation and Ecology - Heatons;
- Arboriculture - Heatons;
- Noise – Kedd Limited;
- Air Quality and Dust – Kedd Limited; and
- Archaeology and Cultural Heritage – Kedd Limited.

1.1.16 In addition to the above supporting documentation the following plans are also submitted as part of this S73 application:

- Drawing No. KD.BLWQ.1.D.001 - Location Plan;
- Drawing No. KD.BLWQ.1.D.002 - Current Situation;
- Drawing No. KD.BLWQ.1.D.003A - Proposals Plan;
- Drawing No. KD.BLWQ.1.D.004A - Concept Restoration;
- Drawing No. KD.BLWQ.1.D.019 - Land Under the Control of the Applicant;
- Drawing No. KD.BLWQ.1.D.020 - Phased Restoration; and
- Drawing No. KD.BLWQ.1.D.022 - Cross Sections.

2 Site Context

2.1 Site Location

- 2.1.1 Ballswood Quarry is located at Gegin Lane, Wrexham, LL12 0NU, and is one of two active sand and gravel quarries in the County Borough of Wrexham (the other being Borrass Quarry).
- 2.1.2 Ballswood Quarry is situated approximately 4 km north of Wrexham, on the eastern edge of the village of Llay. The Quarry has access onto the A483 at its junction with the B5102 some 1.5 km north-east of the quarry. Access is gained on to the B5102 along a short stretch of an unclassified road, Gegin Lane. The stretch of Gegin Lane between the quarry access and the B5102 (Croeshowell Hill) has been improved. The A483 is a dualled highway which provides access south to Wrexham and beyond, whilst to the north the road links with the A55 before continuing in to Chester.
- 2.1.3 Vehicular access to the Quarry is shared with users of Homestead Garage, which is both a vehicle repair and testing business and an HGV haulage yard, a ready-mixed concrete producer, Dependable Concrete North West Limited and Inertia Waste, who operate an inert waste aggregate recycling facility within the Quarry.
- 2.1.4 The access into the Quarry comprises a surfaced road which leads from a bellmouth off Gegin Lane. On entering the site, the entrance to Homestead Garage is on the right-hand side whilst the entrance to the ready-mixed concrete plant and associated offices and carpark is to the left. The surfaced access road then continues to the quarry weighbridge and offices. There is a wheelwash situated on the “exit side” of the main access.
- 2.1.5 The nearest properties that might be affected by quarry activities are situated along Gegin Lane and Straight Mile/Croeshowell Hill (B5102), all of which are to the north and north-west of the site, at a minimum of 100m from Area A. The processing plant area is some 540 metres from the nearest properties. These properties lie on the opposite side of Gegin Lane and are separated from the extraction limit by a mature hedgerow (which runs along the southern side of the lane). The levels fall away from the property in a south-easterly direction dropping from c 70 metres aOD at the property to c 55 metres aOD at the top of the extraction boundary before falling sharply into the quarry itself, the floor of which is around 40 metres aOD at its lowest point.
- 2.1.6 Mount Alyn Lodge, the only property which lies to the south of Straight Mile/Croeshowell Hill (B5102), is some 140 metres north of proposed Area B.

- 2.1.7 Yew Tree Farm outbuildings lies some 200 metres to the north-east of Area B (at the nearest point) with relatively flat agricultural land between the farm buildings and the quarry.
- 2.1.8 The Homestead (residential property) is located adjacent to the existing quarry entrance off Gegin Lane, with Area C being located some 110m to the south.

2.2 Planning History

- 2.2.1 The Planning Application falls within the red line boundary of Planning Permission ref: P/2016/0110, which was approved under the Environment Act 1990 Periodic Review of Planning Conditions (09/05/2016). Condition 2 of Planning Permission ref: P/2016/0110 sets out that mineral working is to cease by 22nd February 2042.
- 2.2.2 The proposed changes to the extraction areas fall within the red line boundary of Planning Permission ref: P/2016/0110, although outside the extraction area on the approved plans. Drawing ref. DPW/BW/ROMP/16-02 illustrates the permitted phasing, DPW/BW/ROMP/16-02 illustrated this permitted Concept Restoration Scheme.
- 2.2.3 A proposed extension to the quarry was refused planning permission (ref. Wrexham CBC 2003/0357) but no documents are available online in relation to the proposed extension.

3 Description of Proposals

3.1 Development Overview

3.1.1 Ballswood Quarry contains a number of different types of sand and gravel, which are worked from various “faces” within the site. The reason for the 3 changes to the extraction area is to release additional and higher quality reserves of building sand and sand and gravel.

3.1.2 A Proposals Plan (ref: KD.BLWQ.1.D.003A) is attached outlining the 3 areas (Referenced as Areas A, B & C) and these areas comprise of the following mineral reserves:

- Area A – 300,000 tonnes;
- Area B – 780,000 tonnes; and
- Area C – 490,000 tonnes.

Total Proposed Reserves – 1,570,000

3.1.3 In terms of existing reserves, it has been identified that there is 1,100,000 tonnes remaining, therefore combining existing and proposed reserves gives a total of 2,670,000 tonnes. It is anticipated that sales will continue at 500,000 tonnes per annum, which will result in ~ 5.3 years of extraction with a further year to complete restoration.

3.1.4 The Planning Application falls within the red line boundary of Planning Permission ref: P/2016/0110, which was approved under the Environment Act 1990 Periodic Review of Planning Conditions (09/05/2016). Condition 2 of Planning Permission ref: P/2016/0110 sets out that mineral working is to cease by 22nd February 2042.

3.1.5 The 3 proposed changes to the extraction area fall within the red line boundary of Planning Permission ref: P/2016/0110, although outside the extraction area on the approved plans.

3.1.6 The proposal does not propose changes to the methods of quarrying at Ballswood Quarry, will be within the permitted application boundary and will be completed well within the approved end date of mineral working at the quarry.

3.1.7 The existing site situation and the proposed application development are illustrated on the following drawings:

- Drawing No. KD.BLWQ.1.D.001 - Location Plan;
- Drawing No. KD.BLWQ.1.D.002 - Current Situation;
- Drawing No. KD.BLWQ.1.D.003A - Proposals Plan;

- Drawing No. KD.BLWQ.1.D.004A - Concept Restoration;
- Drawing No. KD.BLWQ.1.D.019 - Land Under the Control of the Applicant;
- Drawing No. KD.BLWQ.1.D.020 - Phased Restoration; and
- Drawing No. KD.BLWQ.1.D.022 - Cross Sections.

3.1.8 The following paragraphs describing the various stages of the development.

3.2 Current Situation

- 3.2.1 As illustrated on Drawing No. KD.BLWQ.1.D.002 – Current Situation, the site is accessed off Gegin Lane which leads onto Croeshowel Hill Road to the roundabout junction of the A483. On exiting the site, vehicles pass the Homstead Garage Lorry Park to the south and the Dependable Concrete to the north. The access road leading to Ballswood Quarry reception, weighbridge and vehicle wash.
- 3.2.2 In terms of geology, the mineral reserve of sand and gravel is very diverse from fine sand to coarse sand and gravel. The location and quality of the mineral within the site also being very variable and combined with beds/horizons of overburden, interburden and clay. As such to work the quarry has involved opening up a large footprint of land, to extract the varying mineral types for processing and blending for sale.
- 3.2.3 The current mineral extraction areas being south of the sites internal access ramp and north of the ramp. Mineral being extracted by an excavator and transported by dump truck to the plant site for processing, stocking and loading onto HGV's or other vehicles for transportation off site to point of sale. As part of the current processing operations, both fresh water and silt lagoons are in place. A new silt lagoon is currently being constructed immediately north of the access ramp.
- 3.2.4 As a result of the very variable nature of the mineral and associated overburden/ interburden and clay materials up to this point it has not been possible to complete an area of restoration. However, since Cheshire and North Wales Sand and Gravel Ltd has taken over the operations at the quarry this situation is changing. Significant works have been carried out to expose mineral with the resulting non processible materials being directly placed to both the north and north western area of the site and to the south to create restoration formation levels. These works are currently on going and it is anticipated that final soil material placement to achieve final levels and profiles will be completed autumn 2021.

3.3 Proposed Changes to the Current Limit of Extraction

- 3.3.1 As illustrated in Drawing No. KD. BLWQ.1.D.003A (Proposals Plan) the proposals for the working and restoration of the development are all contained within the existing permitted application boundary. The reason for this application being to avoid the sterilisation of on-site mineral.
- 3.3.2 Please note that the Proposals Plan (Drawing No. KD.BLWQ.1.D.003A) represents a combination of the proposals including both working and restoration, and it should not be read that these works would all take place at the same time.
- 3.3.3 The plan illustrates that the site vehicle access will remain as is, with a new internal road created within the quarry/void progressively eastwards to the location of a proposed new wash plant and leading to the existing main processing plant and areas of mineral extraction.
- 3.3.4 The Proposals Plan (Drawing No. KD.BLWQ.1.D.003A) highlights that there are three areas of remaining in-situ mineral which are within the permitted planning boundary but outside of the current phased mineral extraction area:
- Area A – 300,000 tonnes;
 - Area B – 780,000 tonnes; and
 - Area C – 490,000 tonnes.
- 3.3.5 Area C located to the south west of the site office and weighbridge. The overburden, interburden, clay and mineral deposit in this area ranging from ~25 to 50m in thickness. It is estimated that the area could release an additional ~300,000 tonnes of mineral.
- 3.3.6 Area A located within the north western area of the quarry covers previously disturbed ground/ back filled land with materials which were considered unviable by a previous operator, but which have been reassessed and are now a commercial product along with in-situ sand and gravel. The thickness of overburden, interburden, clay and mineral to base of extraction being ~40m. It is estimated that this area will release ~780,000 tonnes of sand and gravel.
- 3.3.7 Area B located to the central eastern area of the quarry is currently undisturbed agricultural land adjoining the existing extracted quarry void. It is estimated that this area will release ~780,000 tonnes of sand and gravel with the thickness of the deposit varying from ~6m to 17m.
- 3.3.8 All mineral will be worked dry i.e. above the local ground water table. The base of extraction to be no lower than 25 maOD.

- 3.3.9 It is important to note that although extensive drilling and geological assessment has taken place, the nature of the deposit is very variable. All mineral tonnages and overburden volumes are therefore estimates.

3.4 Concept Restoration

- 3.4.1 The sites permitted restoration scheme is illustrated on Drawing No. DPW/BW/ROMP/16-03. The restored land use being to a mix of agriculturally managed grassland, with blocks of existing and proposed woodland, areas of wet/marshy habitat, willow planting and natural regeneration. It is noted on this plan that there are no restoration levels.

- 3.4.2 The proposed woodland species planting including Ash, Beech, Willow, Hawthorn and Alder. This mix of plants can be assimilated into the proposed restoration scheme excluding Ash species which are currently subject to Ash Dieback disease.

- 3.4.3 The Proposed Restoration Scheme as illustrated on Drawing No. KD.BLWQ.1.D.004 has been re-designed to reflect the proposed mineral extraction and the available on-site restoration materials to create final landforms and topographical levels. The landform of the restored site will integrate into in-situ surrounding boundary land via a combination of minor ~1:40 agricultural gradient slopes to the east at upper level of ~31m aOD, 1:3 species rich grassland slopes to the north and west at upper levels of ~56 to ~73m aOD and south at upper levels of 50m aOD and ~ 1:3 slopes of new tree and shrub woodland linking into blocks of ancient woodland along and within the sites southern boundary at levels of ~34 to 56m aOD. The base of the restored quarry to fall at gentle gradients from the north, west and south to an ephemeral wet grassland and wildlife/ water surface set of management pools/soakaway areas.

- 3.4.4 The land uses within the site being:

Existing Woodland	9.8 Ha
Proposed Woodland	7.5 Ha
Existing Agriculture	7.2 Ha
Proposed Agriculture	18.2 Ha
Proposed Sandy Substrate	0.3 Ha
Proposed Species Rich Grassland	7.3 Ha
Ephemeral Wet Area	1.2 Ha
Section of River Alyn	0.2 Ha

Residential Land	0.5 Ha
Commercial and Industrial Activities	2.4 Ha
Total Land Area	54.6 Ha

3.4.5 All restored land is to be subject to a 5-year Aftercare and Management Plan.

3.5 Sequential Restoration Areas

3.5.1 As illustrated on Drawing No. KD.BLWQ.I.D.020 – Phased Restoration (Schematic Restoration Sections are illustrated on Drawing No. KD.BLWQ.I.D.022), the site will be progressively restored in general accordance with the restoration stages outlined. Current on-going restoration within the north western area will be initially completed concurrently with Restoration Area 2 to the south of the quarry (which was previously extracted by others and not the current operators). Restoration will then progress concurrently within Restoration Areas 3, 4, 5 and 6 until all mineral extraction has been completed. At this point the plant site and adjacent ground is to be regraded to complete restoration.

4 Planning Policy

4.1 Introduction

4.1.1 This Chapter focuses on the main planning policy considerations including all relevant policy considerations contained within adopted and emerging policy documents. Appropriate regard is given to the emerging Development Plan as well as National Planning Policy Guidance.

Adopted Policy

4.1.2 The site falls within Wrexham CBC. The local development plan documents and Welsh national policy relevant to the proposed development at Ballswood Quarry have been reviewed:

- Wrexham Unitary Development Plan (UDP), 2005;
- Planning Policy Wales (Edition 10), 2018;
- Minerals Planning Policy (Wales) Minerals Technical Advice Note (MTAN) (Wales) 1: Aggregates (MTAN1), 2004; and
- North Wales Regional Technical Statement 1st Review, 2014.

Emerging Policy

- Wrexham Local Development Plan 2 (Deposit version currently undergoing examination), March 2018;
- Wrexham Local Development Plan 2: BP 11 Minerals Technical Paper, January 2018; and
- Welsh Government: Regional Technical Statements for the North Wales and South Wales Regional Aggregate Working Parties. Second Review - Public Consultation, September – November 2019.

4.2 Adopted Policy

Wrexham County Borough Council: Unitary Development Plan (UDP), 2005

4.2.1 Strategic Policy PS9 states that: *“provision for minerals development will be made at a level that ensures a supply of minerals set in the context of regional land bank requirements, and that takes account of environmental protection policies and the potential for the use of rail freight transport.”*

- 4.2.2 At present the site is wholly within a 'Green Barrier' the policy for which (Policy EC1) states that development in Green Barriers will only be permitted for a limited range of land uses, including those which *"maintain the openness of the Green Barrier and do not conflict with the purpose of including land within it"*. Policy preamble states that *"mineral extraction does not conflict with the purpose of Green Barrier provided it does not detract from the open character and provides high standards of restoration"*.
- 4.2.3 The site is also located within a 'Special Landscape Area' covered by Policy EC5 which states that development outside of agriculture, and that by utility service providers is strictly controlled. Furthermore, development in SLAs is required to *"conform to a high standard of design and landscaping, and special attention will be paid to minimising visual impact both from nearby and distant viewpoints."*
- 4.2.4 Policy EC12 covers flood risk, and states that development in flood plains will only be permitted where it:
- a) would not be subject to an unacceptable risk of flooding on-site; and/or
 - b) does not result in an unacceptable risk of flooding on or off-site; and/or
 - c) does not adversely affect flood management or maintenance schemes.
- 4.2.5 The UDP contains specific policies on minerals and waste development in Wrexham. Of particular interest to this Appraisal are those below:
- 4.2.6 Policy MW1 'Mineral Landbanks' states that in determining applications for aggregates, regard is had to maintaining the appropriate landbanks and the sub-regional apportionments by the North Wales Regional Aggregates Working Party will also be taken into account.
- 4.2.7 Policy MW2 is specific to sand and gravel. It offers a sequential approach to the location of sand and gravel extraction in the County Borough, as below:
- a) Firstly, on land with planning permission for mineral working;
 - b) Secondly, on extensions to active workings either where reserves are worked under (a) above are insufficient to maintain landbank requirements or when further working is necessary to enable the full utilisation of materials (in relation to their quality and composition) which would not be possible from within the existing working above;
 - c) Thirdly, new sites...
- 4.2.8 Policy MW8 provides guidance on progressive restoration of mineral sites and promotes beneficial after uses of sites as soon as practicably possible.

4.2.9 The protection of mineral resources from sterilisation is covered by Policy MW9. The policy stresses that identification of unworked resources does not provide a presumption in favour of working the identified deposits but resists non-mineral development that does not supply a resource assessment which demonstrates that no exploitable reserves exist within the development site. If non-minerals development must go ahead, prior extraction is encouraged.

4.2.10 Finally, Policy MW11 relates to Minerals Buffer Zones, in which new mineral extraction and non-mineral development will be resisted. Ballswood is listed as an active mineral site with a Minerals Buffer Zone around it. At the time of UDP adoption, it was considered unlikely that new permissions for new mineral extraction would be granted over the plan period, given the large landbank at the time.

Planning Policy Wales, 2018

4.2.11 Planning Policy Wales (PPW) provides Wales-wide policy guidance. The most recent version of PPW was Edition 10, published in December 2018. PPW includes a section solely relating to minerals development (Chapter 5.14), as discussed below.

4.2.12 Chapter 5.14 stresses the importance of construction related minerals necessary for meeting the needs of society. PPW also stresses the need to balance an adequate supply of minerals with the protection of amenity and the environment. Paragraph 5.14.3 outlines when mineral extraction is not appropriate, namely where there would be demonstrable harm to the environment, AONB, Conservation Areas, or amenity that cannot be overcome by planning conditions or agreements.

4.2.13 Sterilisation of mineral resources and mineral infrastructure by other forms of permanent development is covered by paragraph 5.14.7. The same paragraph states that “planning authorities should consider the long term and the need for preventative action to avoid the creation of problems in the future”.

4.2.14 PPW aims to ensure the sustainable supply of minerals through maintenance of landbanks. On the subject of landbanks, paragraph 5.14.18 specifically mentions the high volume of mineral resources tied up in inactive sites in mid and north Wales. The paragraph goes on to encourage the maintenance of landbanks of realistically workable reserves, especially new permissions in more acceptable locations.

4.2.15 PPW details the wider environmental considerations that should be considered accompanying any proposal for new mineral extraction. Paragraph 3.14.35 states that mineral development should be subject to *“the most rigorous examination and all major mineral developments*

demonstrated to be in the public interest before being allowed to proceed.” Consideration will include an assessment of:

- The need for the development in terms of UK considerations of mineral supply;
- The impact on the local economy of permitting/refusing the development;
- Whether alternative supplies can be made available at reasonable cost and the scope of meeting the need in another way;
- The detrimental effect of the proposals on natural and historic environment and the local community and landscape. The extent to which effects can be moderated and/or the detrimental effect of the proposals on the nature conservation interest of the site in terms of habitat / protected species / biodiversity; and
- In the case of extension to existing quarries, the extent to which the proposal would achieve an enhancement to the local landscape and provide for nature conservation and biodiversity.

Minerals Planning Policy (Wales) Minerals Technical Advice Note (Wales) 1: Aggregates (MTAN1), 2004

4.2.16 Minerals Technical Advice Note (MTAN) 1: Aggregates provides advice about how the land use planning system should contribute to the sustainable supply of aggregates and sets out detailed advice on aggregates, such as limestone, sand and gravel. Paragraph 49 requires a minimum 10 year land bank of crushed rock and minimum 7 year land bank of sand and gravel to be maintained throughout the LDP period. Where a land bank can provide for over 20 years of extraction, new allocations will not be necessary and proposals for further extraction should not be permitted apart from in exceptional circumstances. The Welsh Government has since published Policy Clarification Letter CL-05-14 which, significantly, advises that given the length of LDPs it would be prudent to come to this conclusion only if there was in place a landbank of 25 years or more.

4.2.17 Of particular pertinence for Ballswood Quarry is MTAN1’s Buffer Zones guidance. MTAN1 builds upon the principle of Buffer Zones in that *“within the buffer zone, no new sensitive development or mineral extraction should be approved.”* Buffer zones are defined from the outer edge of the area where extraction and processing operations take place / will take place, including site haul roads. Buffer Zones for sand and gravel extraction (and no blast extraction) and hard rock quarries are set out below:

- Sand and gravel (and others where no blasting is permitted): 100m; and

- Hard rock quarries: 200m.

North Wales Regional Technical Statement 1st Review (2014)

- 4.2.18 The North Wales Regional Technical Statement was published in 2009 and set out the regional need for aggregates and how this would be met within individual authorities, in line with the requirements of the MTAN which states a minimum 7 year landbank for sand and gravel should be maintained during the entire plan period. The document has since been reviewed and a North Wales Regional Technical Statement 1st Review published in 2014. The Review identifies that the Local Planning Authority should make provision for 0.58 million tonnes per year of sand and gravel until the end of the LDP Plan period and 7 years thereafter.

4.3 Emerging Policy

- 4.3.1 Emerging local planning policy has been considered in order to provide some understanding of the likely trajectory relevant planning policy will take. This is invaluable when considering long-term options for a site's potential. The emerging policy for the site is summarised below:

Wrexham Local Development Plan 2 (Deposit version currently undergoing examination),
March 2018

- 4.3.2 The Wrexham Local Development Plan 2 (LDP2) will cover a plan period up to 2028 and is currently at examination. The LDP2 is therefore at a very late stage in its preparation and its content can therefore be given a degree of weight and its contents considered in the determination of planning applications.
- 4.3.3 The LDP2 Deposit version contains Policy SP17 'Minerals Supply and Safeguarding' which aims to direct new development away from areas underlain by minerals of importance and encourages prior extraction. SP17 continues the use of buffer zones but aims to ensure the continued contribution towards the regional need for aggregates. Mineral extraction within the County Borough which contributes towards maintaining an adequate supply of minerals in sustainable locations with high quality restoration is supported.
- 4.3.4 There are six minerals and waste policies contained within the LDP2 Deposit version, three of which are relevant to the potential extraction of primary aggregates / mineral extraction at Ballswood.
- 4.3.5 Policy MW1 'Minerals Safeguarding' states that within Mineral Safeguarding Areas, non-mineral development will only be permitted where it can be demonstrated that the mineral underlying does not merit extraction, the need for the non-mineral development outweighs the need to protect the resource, prior extraction is possible, the non-minerals development

is temporary, or essential infrastructure supporting supply of minerals would not be compromised or would be provided elsewhere.

4.3.6 Policy MW2 'Mineral Buffer Zones' states that development in mineral buffer zones must not compromise current or planned mineral extraction. A sufficient buffer between extraction and any sensitive development must be maintained.

4.3.7 Policy MW3 'Sustainable Supply of Minerals' states that proposals for mineral extraction outside of Extraction Exclusion Areas *"will be supported where they are necessary to enable the local authority to meet a need identified at the regional level, or the needs of the industry concerned provided it can be demonstrated that:*

- *There would be no unacceptable impact on the highway taking into account the proposed access and routes to be used for transportation,*
- *Noise levels would not have an adverse impact on sensitive receptors,*
- *Air quality would not be adversely affected by dust, smoke or fumes,*
- *Satisfactory provision can be made for the management of any mineral wastes which would be generated by the proposal,*
- *Where blasting is proposed, vibration would be within acceptable limits at nearby sensitive receptors,*
- *There would be no adverse impact on water resources, either through pollution of surface or groundwater or by increasing the risk of flooding,*
- *There would be no significant adverse visual impact on areas of landscape importance,*
- *Any adverse visual impacts can be satisfactorily mitigated through the use of landscaping both during the development and following completion of the development,*
- *The proposal would not compromise adjacent land through instability, and*
- *Satisfactory restoration and after-use is proposed."*

Wrexham Local Development Plan 2: BP 11 Minerals Technical Paper, January 2018

4.3.8 The LDP2 is supported by a Minerals Technical Paper (January 2018) that builds upon Welsh national guidance and outlines the background behind the approach to minerals development contained within the LDP2. The Technical Paper refers to mineral safeguarding and explains that a relatively large distribution of variable quality sand and gravel are present in Wrexham.

There are strategically important workings in Wrexham located in both glaciofluvial sand and gravel deposits. Given the extensive distribution of sand and gravel it is recommended in the Technical Paper that the LDP focuses on 'Category 1' sand and gravel through its safeguarding policy, which consist of reserves considered to be of national importance in Wales, the glaciofluvial and river terrace sand and gravel deposits.

- 4.3.9 Regarding Buffer Zones, the Technical Paper states that buffer zones of 100m are placed around all existing active quarries in Wrexham. It states that *"the identification of a buffer is not a moratorium on all development but does require it to be demonstrated that any development which would occur within the buffer zone would not itself inhibit quarrying operations, either through the introduction of sensitive development or through the direct sterilisation of areas which would be required for quarrying development"*.

Welsh Government: Regional Technical Statements for the North Wales and South Wales Regional Aggregate Working Parties. Second Review - Public Consultation, September – November 2019

- 4.3.10 Minerals Technical Advice Note 1: Aggregates (2004) (MTAN 1) requires the preparation of Regional Technical Statements (RTS) for the areas covered by both the South Wales and North Wales Regional Aggregates Working Parties (RAWPs). Whereas MTAN1 develops the national policy set out originally in Minerals Planning Policy Wales (now part of Planning Policy Wales - PPW), the RTS provides the supporting detail which allows this to be implemented.
- 4.3.11 The original RTS documents for both regions were completed in 2008 and are required, by MTAN 1, to be reviewed every five years. The First Review was undertaken in 2013/2014 and this, the Second Review, commenced in 2018.
- 4.3.12 The Review comprises this main document and the Regional Appendices for North Wales and South Wales, which are issued separately. The two components of the new RTS for each Region are intended to provide a strategy for the future supply of construction aggregates within that Region, taking account of the latest available information regarding the balance of supply and demand, and current notions of sustainability (see below). Together, the two revised RTSs aim to ensure that an adequate and steady supply of aggregates can be maintained throughout Wales (and beyond, in the case of materials that are exported), taking into account the key objectives of sustainable supply outlined in MTAN 1.

4.4 Summary of Main Policy Considerations

- 4.4.1 A review of the Development Plan for the site and other policy documents/guidance has indicated the need to ensure the delivery of an environmentally responsible and acceptable

scheme of mineral operations at Ballswood Quarry which weighs the benefits of the proposed development against all aspects of the proposal's environmental, social and economic impacts.

4.4.2 In reviewing the planning policies relevant to the proposed development, the following policy considerations are of particular relevance and are listed below.

- The Need and Supply of Sand and Gravel
 - Consideration of Emerging Local Plan Policy and the role of Ballswood Quarry in future sand and gravel supply
 - Sub Regional Apportionment and Landbank implications.
- Development, Growth and Economic Considerations; and
- Environmental and Technical Considerations.

4.4.3 These issues are tackled within the following chapters of this planning statement.

5 Sand and Gravel Needs Assessment

5.1 Introduction

1.1.1 In reviewing the planning policies relevant to the proposed development, the following sand and gravel need considerations are of particular relevance and are discussed below.

1.1.2 Issues of relevance:

- The Need and Supply of Sand and Gravel
 - Consideration of Emerging Local Plan Policy and the role of Ballswood Quarry in future sand and gravel supply; and
 - Sub Regional Apportionment and Landbank implications.

5.2 Need and Landbank Considerations

Wrexham

5.2.1 North Wales is a net exporter of aggregates with Wrexham being an important supplier of sand and gravel both within the region and in neighbouring England.

5.2.2 Wrexham is the largest producer of sand and gravel in the North Wales region and has two active sand and gravel sites, which includes Ballswood Quarry, with the other being Borrass Quarry.

RTS 1st Review

5.2.3 The North Wales Regional Aggregate Working Party publishes an annual survey which sets out the level of sales for aggregates within the region. Due to commercial confidentiality and the limited number of sites elsewhere within the region, data for Wrexham is combined with figures for other sand and gravel producing authorities including Flintshire and Gwynedd. The 2015 annual survey identified that there was a 24 year landbank in North East Wales and a 21 year landbank across the whole of North Wales using a 10 year sales average. No requirement for sand and gravel was identified within the RTS 1st Review for Wrexham due to the level of existing reserves at the end of 2015, and in an effort to try to re-balance the distribution of supply within the region. Nevertheless, a requirement has been identified in Flintshire and Denbighshire which, in the absence of additional provision, could place additional pressure on sites in Wrexham. Policy MW3 of the Deposit version Wrexham Local Development Plan 2 is flexible and provides criteria against which an application for sand and gravel extraction could be assessed.

RTS 2nd Review - Main Document and Appendix A (North Wales)

- 5.2.4 Para A33 of RTS Appendix A states that there are extensive glaciofluvial sand & gravel deposits, primarily in Wrexham (where they are worked at Borrass and, intermittently, at Ballswood).
- 5.2.5 Para A39 of RTS Appendix A sets out that in the case of land-based sand and gravel extraction in North-East Wales, the current supply pattern is dominated by one site within Wrexham (i.e. Borrass Quarry), although smaller contributions are also made by three other active (or intermittently active) pits: one other in Wrexham (i.e. Ballswood), and two in Flintshire. Para A39 goes on to state that there is a shortfall of existing permitted reserves of sand & gravel in Wrexham, though in that case the landbank (in 2016) stood at 19.6 years. Nevertheless, there is a need for further allocation within that area, in order to meet RTS requirements.
- 5.2.6 Table A1 of RTS Appendix A sets out the 10-year and 3-year Total Land-Won Primary Aggregates Sales Averages (to 2016) for each LPA in North Wales. Wrexham's figures are 0.435 mtpa based on 10yr average sales and 0.514 mtpa based on 3yr average sales. Figures for Wrexham are only for sand and gravel.

Local Planning Authority	10-yr Average Aggregate Sales (total) (mtpa)	3-yr Average Aggregate Sales (total) (mtpa)	Highest of 3-yr and 10-yr ave. sales in each LPA (mtpa)	Proportion from crushed rock sources
Denbighshire	0.329	0.043	0.329	100%
Flintshire	2.663	3.204	3.204	93.77%
Wrexham	0.435	0.514	0.514	0%
Conwy + Snowdonia NP	0.955	0.813	0.955	100%
Gwynedd	0.868	0.898	0.898	84.56%
Isle of Anglesey	0.236	0.255	0.255	100%
TOTAL, North Wales			6.155	86.6%

- 5.2.7 Table 5.2 of the Main Document sets out the Assessed Sub-Regional and LPA Apportionments, North Wales.

Local Planning Authority	OPTION A			OPTION B			Preferred Annualised Apportionments (mtpa) (By default = Option A, but modified in some cases (red figures) to allow for Option B or qualitative observations as noted in column to right)
	highest of 10-yr and 3-yr Ave. Aggregate Sales (total) (mtpa)	% share of Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates ¹ (mtpa)	Annualised Future Housing Requirement from Local Plans	% share of Sub-Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates ² (mtpa)	
N. WALES TOTAL (from Stage 2)				7.738			
Wrexham	0.514	8.35%	0.646	517	34.93%	1.777	0.646

Notes:

- The annualised apportionments for Option A were obtained by applying the percentages in column 3 (representing each LPA's share of Regional historic sales totals) by the Regional Apportionment total from Stage 2 (as shown at the top of the table).
- The annualised apportionments for Option B were obtained by applying the percentages in column 6 (representing each LPA's share of sub-regional housing requirement

- 5.2.8 In terms of an apportionment for the future provision of land-won primary aggregates, RTS Appendix A states that the planning authority is required to make future provision for land-

won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Wrexham - Land-won sand & gravel provision: 0.646 million tonnes per year until the end of the Plan period and for 7 years thereafter
- The total apportionments for Wrexham, as calculated in Tables 5.4 and 5.6 of the Main Document, over the 22-year horizon required for sand & gravel are 14.217 million tonnes for land-won sand & gravel. These figures compare with existing landbanks of 12.652 million tonnes for sand & gravel; and
- With regards of Surpluses, Shortfalls and Allocations for land-won sand & gravel, Tables 5.4 and 5.5 of the Main Document reveal that new allocations to meet RTS requirements over the next 22 years will be required within Flintshire, Wrexham, Gwynedd and Ceredigion. In terms of Wrexham, it states that the landbank is currently adequate, at just under 20 years, but a further allocation is needed to meet the RTS requirement over the full plan period. Therefore, in order to address the sand & gravel shortfall, new allocations totalling at least 1.565 million tonnes will need to be identified within the Wrexham area.

Flintshire

Flintshire Local Development Plan 2015-2030 Deposit Plan September 2019

5.2.9 Policy STR16: Strategic Planning for Minerals sets out that Flintshire's important mineral resources will be sustainably managed by among other things: contributing towards the regional supply of mineral through the allocation of 1.4 million tonnes of sand and gravel through the extension to existing quarries, in collaboration with Wrexham County Borough Council.

5.2.10 Policy EN25: Sustainable Minerals Development sets out allocated extensions to the following quarry sites for sand and gravel:

- EN25.3 Extension to Ddol Uchaf Quarry (Sand and Gravel)
- EN25.4 Extension within Fron Haul Quarry (Sand and Gravel)

Extension to Ddol Uchaf Quarry	Sand and Gravel	9.95ha.	1.4 million tonnes	Site originally put forward by operator was too close to residential properties. The gradient of the site was too steep to allow extraction to its northern extent. Boundary of the proposed allocation was changed to account for this.
Extension within Fron Haul Quarry	Sand and Gravel	3.2ha.	900,000 tonnes	Proposed extension within the existing footprint of the consented Fron Haul underneath plant/buildings.

5.2.11 The North Wales Regional Technical Statement (RTS) 1st Review has identified a requirement for Flintshire to allocate at least 1.4 million tonnes of sand and gravel. The Deposit Plan sets out that the allocations identified in Policy EN25 are sufficient to meet the identified need over the Plan Period.

RTS 2nd Review

5.2.12 The total apportionments for Flintshire, as calculated in Tables 5.4 and 5.6 of the main document over the 22-year horizon required for sand & gravel is 4.912 million tonnes for land-won sand & gravel. This figure compares with existing landbank of 1.369 million tonnes for sand & gravel. In order to address the resulting shortfalls, new allocations totalling at least 3.543 million tonnes of sand & gravel will need to be identified within the LDP. This is a substantial increase compared with the requirements set out in the First Review.

5.2.13 As can be seen from the proposed allocations in the Deposit Plan set out above, these are insufficient to meet the RTS 2nd Review requirement.

Denbighshire

Annual Monitoring Report 2019

5.2.14 No planning permission has been granted for the extraction of sand and gravel since LDP Adoption in June 2013.

5.2.15 The RTS 1st Review has identified a need to allocate 2.2 million tonnes sand and gravel

5.2.16 Regional reserves in excess of 14 million tonnes sand and gravel remained at the end of 2017, equating to a 20 year landbank using a 3 year sales average.

RTS 2nd Review

5.2.17 The RTS 2nd Review makes no apportionment for sand and gravel in Denbighshire over the 22-year horizon required for sand & gravel. The document goes on to state that although Denbighshire has a zero apportionment for natural sand & gravel, and no existing permitted reserves, it does have potential resources – particularly within the Clwyd Valley, between

Denbigh and Ruthin. Some of these fall within the Bryniau Clwyd AONB, but others do not. It may be possible for these areas to be worked, in future, as alternatives to the deposits in adjoining parts of Flintshire, should that be come necessary. It would therefore be useful for the two authorities to work collaboratively on this and, if necessary, for the allocation requirements for Flintshire to be shared.

- 5.2.18 However, as set out above in terms of Flintshire, the proposed allocations in the Deposit Plan are insufficient to meet the RTS 2nd Review requirement. This therefore leaves Denbighshire requiring sand and gravel resources from other Council's and in particular Wrexham, given that it is the largest producer of sand and gravel in the North Wales region.

Cheshire West and Chester

Cheshire West and Chester Council Local Aggregate Assessment 2019

Sand and Gravel Imports

- 5.2.19 In terms of sand and gravel imports, Table 7 of the LAA sets out the consumption of total sand and gravel in Cheshire (land-won and marine-dredged) for aggregate use in 2014 by source and identifies that 10-20% of a total 171,000 comes from Wrexham.

Sand and Gravel Exports

- 5.2.20 In terms of sand and gravel exports, Cheshire West and Chester is a key supplier of high quality sand and gravel in the North West. Material is exported to neighbouring mineral planning authorities as well as to destinations further afield. Table 5 of the LAA provides export destination data for the period 1 January to 31 December 2018 for all active sites within the borough alongside export data for 2014, 2016 and 2017 for comparison (data for 2015 is not available due to confidentiality issues).
- 5.2.21 As set out in table 5, 43% of overall sales in 2018 (342,308 tonnes of a 796,066 tonnes sales total) were exported outside of Cheshire West and Chester and Cheshire East. As set out at paragraph 12.19, demand from within Cheshire, accounts for approximately 57% of overall sales. There is no data available to split this down between Cheshire West and Chester and Cheshire East, but it would be expected that the majority of the sales would be within the Borough, but sales to Cheshire East would still be significant.
- 5.2.22 Paragraph 13.1 sets out that there will be continuing demand for sand and gravel aggregate from within the borough throughout the Plan period and beyond and the level of demand is likely to increase in the future.

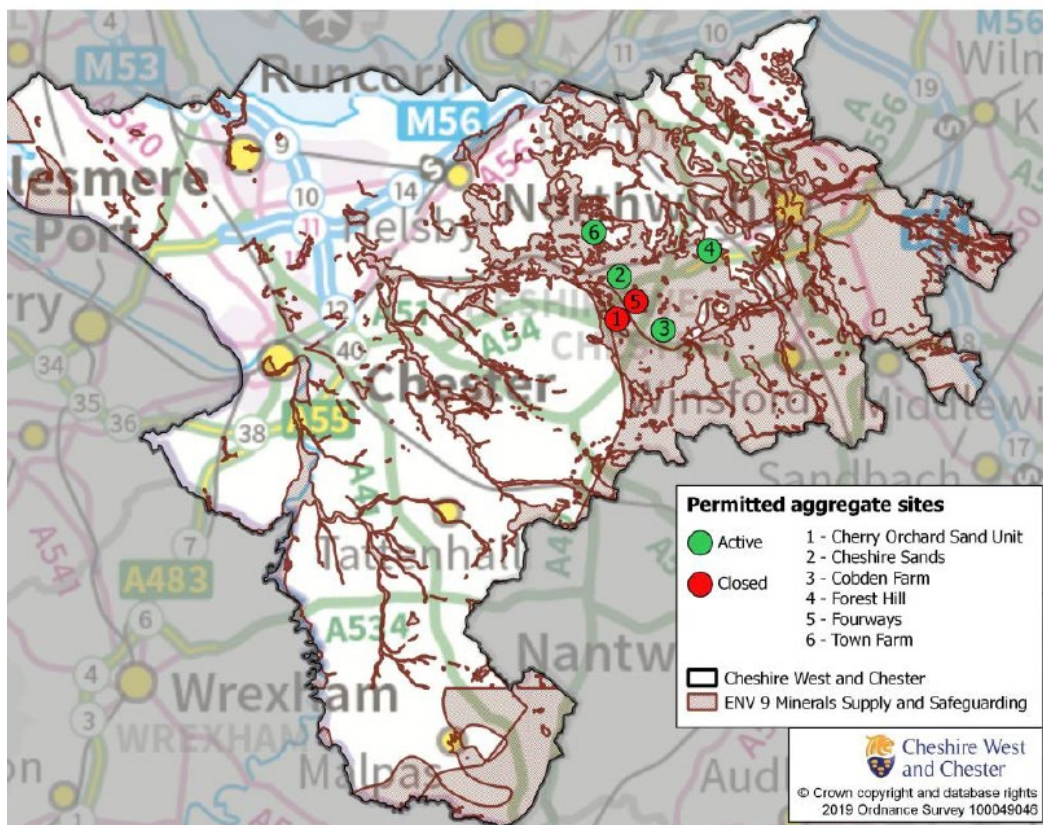
Landbank

5.2.23 Table 10 of the LAA provides sand and gravel landbank calculations for the borough as at 31 December 2018 using both the current apportionment figure of 0.80mt per annum and 10 year average sales of 0.58 mt per annum.

5.2.24 Table 10 of the LAA shows that the landbank provides a landbank of 9.81 years based on a ten year average sales and 7.24 based on the annual apportionment figure.

Active Sand and gravel Sites

5.2.25 The LAA identifies 4 active sand and gravel quarries in Cheshire west and Chester, all of which are located in eastern part of the Council area.



5.2.26 On review of the active sites, the planning permission for 2 of these expires in 2021 i.e. Cobden Farm and Forest Hill. Furthermore, it appears that Town Farm closed in 2018 and the operators have stated that the remaining sand is of poor quality and is not worth extraction.

5.2.27 In terms of Cheshire Sands, the extant planning permission (ref: 11/04200/MIN) at Cheshire Sands makes provision for the extraction of approximately nine million tonnes of sand over a 30 year period with an average extraction rate of between 300,000 to 650,000 tonnes per annum.

5.2.28 As set out at paragraph 4.12 of the LAA, if reserves deplete in line with permissions, the borough will only have one operator and one site by 2022 i.e. Cheshire Sands.

Table 3 Overview of reserve depletion to 2042

	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042
Cherry Orchard Sand Unit	Closed																								
Cheshire Sands																									
Cobden Farm																									
Forest Hill																									
Fourways	Closed																								
Town Farm		Closed																							

Cheshire West and Chester Local Plan (Part Two) Land Allocations and Detailed Policies

5.2.29 The Cheshire West and Chester Local Plan (Part Two) Land Allocations and Detailed Policies has allocated an extension to Forest Hill, identified a Preferred Area at Moss Farm and north of the railway forming an extension to Forest Hill and identified an Area of Search.

5.2.30 The Local Plan (Part Two) also allocates a site at Rudheath Lodge, Cranage, for silica sand extraction and this site will also produce a proportion of aggregate sand. This site is partly within Cheshire West and Chester and partly within Cheshire East.

5.2.31 The proposed site at Forest Hill was made up of two parts, one within the operator's ownership and one under different ownership. The whole site was identified as suitable and with no unacceptable impacts that cannot be mitigated. The part within the operator's ownership has been allocated for sand and gravel, with the other part, and some additional adjacent areas identified as a Preferred Area. Initial assessments undertaken by the operator indicate that approximately 230,000 - 560,000 tonnes of sand could be extracted from the allocated site, depending on whether this is extracted by dry or wet working methods. Approximately 560,000 tonnes could be extracted from the Preferred Area adjacent to Moss Farm, plus additional sand from the area north of the railway, for which the anticipated level of sand and gravel extraction has not yet been assessed.

5.2.32 A planning application for a proposed Northern extension to the quarry (north of the railway line) for the extraction of approximately 350,000 tonnes of sand at a rate of approximately 75,000 tonnes per annum (ref: 19/02452/MIN) is currently under consideration.

5.2.33 In terms of Rudheath Lodge, Planning permission has been granted for the extraction of 3.3 million tonnes to be extracted over 12 years. The site is split between the Cheshire West and Chester and Cheshire East, with rough half the reserve in each council area. In terms of sand, 75% of the resource is comprised of silica sand, this leaves 825,000 tonnes of construction sand. Given the 12 year extraction timeline, this gives roughly 70,000 tonnes of construction sand per annum and equates to circa 35,000 tonnes per annum in Cheshire West and Chester (dependent on phasing).

Permitted Reserves

5.2.34 In terms of the allocated and permitted sites discussed above, by 2022, it appears that the Council's sand and gravel site will comprise the following:

- Cheshire Sands - 300,000 to 650,000 tonnes per annum
- Forest Hill – 75,000 tonnes per annum
- Rudheath Lodge – circa 35,000 tonnes per annum
- Total 760,000 tonnes per annum

5.2.35 This is below the annual apportionment figure of 800,000 tonnes per annum and given the anticipated increase in demand of the export of aggregate, which was at 342,308 tonnes, this points to potential increasing need for importation of sand and gravel to meet the demand and maintain an adequate landbank.

Greater Manchester, Merseyside and Halton, and Warrington

5.2.36 As set out in the Greater Manchester, Merseyside and Halton, and Warrington LAA, the North West imported 140,000 tonnes of sand and gravel from North Wales in 2014.

5.3 Conclusion

5.3.1 As set out in the RTS 2nd Review, the total requirement for Wrexham over the 22-year horizon required for sand & gravel is 14.217 million tonnes for land-won sand & gravel. These figures compare with existing landbank of 12.652 million tonnes for sand & gravel. The RTS sets out that in order to address the sand & gravel shortfall, new allocations totalling at least 1.565 million tonnes will need to be identified within the Wrexham area.

- 5.3.2 Ballswood is running out of sand and gravel, therefore changes to the quarry extraction boundaries within the permitted planning boundary are required by the Council for the continued supply from Ballswood Quarry in order to maintain the existing landbank never minding an additional 1.565 million tonnes to address the shortfall.
- 5.3.3 In terms of a review of surrounding authority areas, as assessed above, the following need and demand is identified:
- Flintshire – Identified shortfall of 3.543 million tonnes of sand and gravel.
 - Denbighshire – Has no apportionment for the 22 year period set out in the RTS 2nd Review, although the RTS 1st Review (2014) identified a need to allocated 2.2 million tonnes of sand and gravel. There are no existing permitted reserves.
 - Cheshire West and Chester – Historically imported sand and gravel from Wrexham (2014). Currently producing below annual apportionment sand and gravel figure with an anticipated increase in demand for the export of sand and gravel, which was at 342,308 tonnes.
 - The north west region of Greater Manchester, Merseyside and Halton, and Warrington – Imports 140,000 tonnes of sand and gravel from North Wales (2014 figures).
- 5.3.4 Therefore, notwithstanding the need to maintain the existing landbank and address the shortfall within Wrexham, exports from Ballswood will also be required to address the demand and landbanks from surrounding authorities within Wales and England.

6 Development, Growth and Economic Considerations

6.1 National Sales Trends for Aggregates

- 6.1.1 The minerals products industry is a vital enabling sector of the UK economy, which has a broad impact on overall economic activity. As the largest element of the construction supply chain, a supplier of key materials to many other industries, and the largest material flow in the UK economy, a healthy domestic mineral products industry is essential for the UK.

6.2 Ballswood Quarry and Economic Considerations

- 6.2.1 Granting Planning Permission for the 3 proposed changes to the extraction area of Ballswood Quarry would maintain the employment for 11 jobs for approximately ten years if the scheme is approved. Aside from the sand and gravel need (as set out above), the proposed development will help provide and secure jobs for people directly and indirectly employed as part of the quarry operations and which contribute to the local economy through wages, business rates, use of local suppliers, and at a national level; to the economy through aggregates levy and other taxation processes. The proposed quarry would provide a significant contribution to the local economy. It is estimated that this contribution would equate to approximately £750,000 to £1,000,000 per annum (based on the Applicant's other operations) on external suppliers and on goods and services over the life time of the development, as well as contributing to the national and local tax base.
- 6.2.2 There are limited alternative employment opportunities in the immediate locality. Also, the extractive industries (i.e. mining and quarrying) are much more capital intensive than other sectors of the British economy and have very high levels of labour productivity (measured by Gross Value added per employee). Gross value added (GVA) is defined by the Office for National Statistics (ONS) AS "the contribution to the economy of each individual producer, industry or sector."
- 6.2.3 In the mining/ quarrying sector, workers generate over £110,000 of value added per year. This is more than 2.5 times the national average and higher than many sectors which are often described as high value activities (Source: 'Capital Economics 'The Foundation For a Strong Economy: October 2012', available from www.mineralproductsorg.com). The GVA in the mining and quarrying sector represents very good value to the economy and contributes positively to economic growth.

- 6.2.4 In addition to high GVA, the mining/ quarrying industry produces high levels of immediate consumption in comparison to other industry sectors i.e. purchases of goods and services (with spending particularly high in the transport and construction sectors).
- 6.2.5 The above considerations are important as they provide an indication of the wider/ indirect effects of quarrying, including how the expenditure generated from this activity is likely to be distributed across other parts of the local economy, and hence whether jobs could be retained or generated in these sectors.
- 6.2.6 The quarry depends on its suppliers to provide critical goods and services to act as inputs to maintain the production process. The absolute level of expenditure can be very variable, reflecting the ad hoc nature of capital investment in what is one of the most capital intensive industries.
- 6.2.7 Some of the major suppliers provide a blend of equipment and services, from a range of local and non-local premises. These considerations, taken in combination with the year-on-year variations reported above, mean that accurate cost data is difficult to predict and should not be over-interpreted, particularly as regards the level of stimulus that is being provided to the very local economy. This is partly due to the fact that the economic effects arising from the site also affect remote locations such as the company/ suppliers regional and head offices where a number of employees might be based to provide the support services. Identifying the exact economic benefit is therefore somewhat difficult. However, what is clear is that without the site there will be a significant deficit in the local economy based on annual costs incurred at present.

6.3 Conclusions

- 6.3.1 As set out in section 5 of this statement, a positive determination of this planning application would provide a viable and high quality mineral supply to meet identified need, as required by both adopted and emerging Minerals Local Plan Policy.
- 6.3.2 11 jobs will be retained by the proposed development and it will aid employment to be maintained across a range of industries, many of which depend directly upon quarrying, for business. As well as the direct benefits to the Applicant and the employment effects which benefit their workforce, there will be a series of spin-off benefits.
- 6.3.3 In addition to the direct and indirect benefits of the proposal, it will also induce benefits to the local and national economy through a multiplier effect. The overall contribution to the local economy from the site is significant.

7 Environmental and Technical Considerations

7.1 Introduction

- 7.1.1 Technical reports on environmental matters accompany this application and these are discussed in summarised form below:

7.2 Landscape and Visual Impact Assessment

- 7.2.1 A Landscape and Visual Impact Assessment (LVIA) has been prepared by Kedd Limited, a Planning, Landscape Architectural and Environmental Design Consultancy. This assessment report accompanies this planning application and the main findings are summarised below:
- 7.2.2 Desktop and Site survey visual assessment works have taken place within a 5km study area around the Site. The existing quarry elements and features which have been identified as potentially resulting in adverse visual effects including the higher elevated, unrestored western and northern quarry faces, areas of disturbed ground, and to a lower degree, quarry plant and equipment. The majority of quarry plant and equipment being located within the quarry void.

Potential Visual Effects

- 7.2.3 Six differing visual Zones have been identified where receptors including residents for properties, users of public open space and PROW, along with road users, can potentially view the existing quarry and proposed development. These Zones representing a type of view of the Site which may be available to individual receptors within them. These are outlined in Table 7.1 below:

Zone	Distance from Site	Receptor Type of View
1	Receptors are located between ~1km and 3km of the Site	Receptors look west from lower or similar elevations to the Site. Views are panoramic, of which the quarry comprises an element. The eastern and southern minor extension areas are screened from view. Extraction and restoration works to Area B will be observed.
2	Receptors are located between ~20m to 3km of the Site	Receptors tend to look up towards the Site from a lower elevation, looking west. Views are contained / vistas, generally of the upper ridge elements of the quarry.
3	Receptors are located adjacent to the Site to ~1km of the Site	Receptors tend to look west from similar / lower elevations to the Site. Views are both open and contained / vistas, principally of the upper north / north western quarry faces.

4	<i>Receptors are located adjacent to the Site to 200m from the Site's western boundary</i>	<i>Receptors look east / south east across and over the Site from similar or higher elements. Views are principally of the Site's western boundary vegetation; on-going restoration works and of the current eastern faces and plant site.</i>
5	<i>Receptors are located generally between 400m to 600m of the Site's southern boundary</i>	<i>Receptors look north / north east towards the Site. Potential views are very restricted by existing landform and vegetation structure. Possible views from 1st floor windows of the site office, weighbridge area and higher south facing quarry face.</i>
6	<i>Receptors are located at a distance of ~1km to 3km +</i>	<i>Receptors look south and west towards the Site. The higher elements may be observed as skyline features, specifically during the winter months, as part of a wider panoramic view or vista.</i>

7.2.4 Of 32N° individual representative visual receptor locations within these Zones, it is assessed that no receptor is currently receiving a Significant Adverse Visual Effect from existing quarry activities.

7.2.5 In assessing the potential visual changes resulting from the proposed development which include the progressive restoration of the western / north western quarry faces, the changes to mineral extraction and overall continuation of phased working and restoration, it is concluded that there will be no change in the overall level of visual influence of the quarry compared to the existing situation. Individual representative receptors will observe a change in view over the operational period as currently exposed faces and disturbed land is restored, but this will be offset by other areas of continued / new extraction and operational activity. Receptors in Zone 4 will receive a reducing impact as existing vegetation continues to establish.

7.2.6 At restoration all quarry plant and machinery will be removed from site. The resulting restored quarry landform is considered capable of assimilation and integration into the local area and all quarry land established as either woodland, agricultural land sandy substrate or species rich grassland. These land uses and landforms reflecting the local landscape character and visual setting.

Potential Landscape Effects

7.2.7 The Site is not located within a National Designated Landscape. In respect of Landscape Character, the Site and its regional area are located within the Deeside and Wrexham National Landscape Character Area. In respect of the LANDMAP descriptive characterisation, Ballswood Quarry has its own classification (Visual and Sensory Area WRXHMV058). The area

being characterised by bare disturbed sand, which is constantly changing due to the nature of its landuse. The quarry is located adjacent to three further Aspect Areas, WRXHMV054, 057 and 069, and within and adjacent to Wrexham Landscape Supplementary Planning Guidance landscape character areas 8 – Gwessyllt, Llay, Gresford, Borrass (within which the Site is located), 9b River Alyn Valley, and 13c Dee Terraces.

7.2.8 Overall, it is assessed that the proposed operational development will not result in any Significant Adverse Effects on any of the regional / local landscape character areas / types identified. The development itself is located within both the LANDMAP Visual and Sensory Area WRXHMV058, and the Wrexham Landscape Character Area Guidance Area 8, Gwersyllt, Llay, Gresford, Borrass, which have historical and current associations with mineral development, including the long term Ballswood Quarry site, Area 8 also incorporating recreational opportunities at a local level. The LANDMAP classification area relating to Ballswood Quarry itself and noting its economic importance.

7.2.9 The scale and nature of the proposed development, set within the context of the existing operational Ballswood Quarry, is considered to be capable of physical integration and absorption into the local landscape setting. Upon final restoration of the quarry, the potential Significance of Effect is assessed as between and Slight and Moderate Beneficial, through the reinstatement of a landform and morphology characteristic of the Alyn valley landscape, and the establishment and long term management of large areas of native woodland planting, additional hedgerow planting, areas of species rich grassland and reinstated agricultural land, along with the removal of quarry operational infrastructure (plant and vehicular movements).

Cumulative Assessment

7.2.10 The potential for cumulative landscape and visual effects has been assessed and it is considered that there will be No Significant cumulative degradation or adverse effects on landscape and visual receptors as a result of the proposed development.

Conclusions

7.2.11 In respect of landscape planning policies, the proposals offer opportunities to meet and enhance Wrexham Unitary Development Plan policies, including biodiversity enhancement (Policy PS11 and EC6), to promote agriculture (Policy EC2), and the significant establishment of trees and woodlands (Policy EC4 and NE3).

7.2.12 At a landscape policy level, with respect to the designated Special Landscape Area, which covers a narrow strip of land to the east of the Site (within the planning permission boundary) spreading out to cover land to the east and north east, due to the scale and nature of the existing landscape and the proposed additional mineral extraction, it is not considered that the associated impacts at a landscape scale would be Significant. Progressive restoration,

including the planting of large areas of additional native tree / woodland, the establishment of new native hedgerows and areas of species rich grassland, along with the reinstatement of productive agricultural land mitigating the effects of additional working and providing long term landscape enhancements.

7.2.13 Emerging policy within the Wrexham Local Development Plan, yet to be adopted, includes the operational Ballswood Quarry site as a Designated Site of Nature Conservation and Geological Importance. Based upon the ecological survey work carried out as part of this application, combined with the current landscape and visual elements and features which comprise the quarry, its proposed designation status appears very premature and not founded on the current baseline situation. The progressive and final restoration for the Site will create both landform and vegetative structure and habitat, which will allow the promotion of species diversity and geodiversity.

7.2.14 It is therefore consider that the proposed development scheme for the release of currently sterilised mineral within the existing Site permitted planning boundary is acceptable and appropriate in Landscape and Visual Effects, and in accordance with landscape orientated designations and policies.

7.3 Ecology and Nature Conservation

7.3.1 Ecological work has been undertaken by Heatons which is informed by a Preliminary Ecological Assessment in order to obtain information of designated sites of nature conservation interest, and a suite of ecological surveys undertaken in 2020 as follows:

- GCN eDNA Surveys;
- Breeding bird surveys;
- Bat activity and roost surveys; and
- Reptile surveys.

7.3.2 The PEA and survey reports accompany this planning application, and the following provides a summary of the findings and recommendations:

7.3.3 There are three statutory designated sites located within 2km of the site boundary. It is not anticipated that the proposed works will have any impact on any of these Statutory Designated Sites.

7.3.4 There are seven non-statutory designated sites within 2km of the site boundary. The closest of these is the Ballswood Quarry and Cockpit Wood (LWS) which covers the existing quarry and the wider extending broad-leaved semi natural woodlands. It is not anticipated that the proposed works will have an impact on this LWS as the habitats within this designation are to

be retained during the extent of the works. In addition, it also not anticipated that the proposed works will have an impact on any of the other non-statutory designated site within 2km of the site boundary.

Habitats

- 7.3.5 Habitats present within the site include broad-leaved semi natural woodland, broad-leaved plantation woodland, semi-improved species poor grassland, scattered scrub, tall ruderal vegetation, scattered trees and arable fields. There are also areas of bare earth and standing water associated with the existing quarry workings.
- 7.3.6 It is recommended that suitable stand-off distances are observed in areas of where boundary woodlands are to be retained. It is recommended that 5m is observed from the northern boundary woodlands and a 10m stand-off distance is observed from the southern boundary woodlands.
- 7.3.7 The restoration proposals are to include the planting of broad-leaved semi natural woodland and a number of hedgerows across the site. It is recommended that the woodlands include the planting of woodland species similar to what is present within the existing boundary woodlands. Hedgerow planting should contain a range of native species including hawthorn, blackthorn and hazel with small quantities of holly, guelder rose (*Viburnum opulus*) dog rose, and dogwood.

Species

- 7.3.8 Development within the site has the potential to have a minor impact on bats, birds, reptiles and GCN. However, the majority of the habitats located within the existing quarry lack connectivity from the wider area due to ongoing quarry workings. In addition, the majority of the boundary habitats are to be retained during the extent of the works.
- 7.3.9 The large horse chestnut tree located within the existing quarry compound is to be removed during the proposed works. This tree has been assessed to provide a moderate suitability for roosting bats as there were a number of split limbs and cracks observed within the tree.

Protected Species Surveys

- 7.3.10 A number of specialist protected species surveys have been commissioned as follows:

GCN eDNA Surveys

- 7.3.11 GCN eDNA samples were undertaken on four waterbodies. Ponds 1, 2 and 3 were located within the existing quarry and Pond 4 is located approximately 200m to the west of the site boundary.

- 7.3.12 The results of the GCN eDNA test were negative for all four ponds testing within the site and within 500m of the site boundary. It is not anticipated that GCN would be present within any of the waterbodies scoped out as part of the HSI assessment.
- 7.3.13 In the unlikely case that any GCN are discovered during the works, then all works must be stopped immediately, and a suitably qualified ecologist must be informed so the issue can be dealt with accordingly.

Breeding Bird Surveys

- 7.3.14 A combined total of 33 bird species were observed within the site during the surveys. This total includes the tawny owl recorded as an incidental sighting during a bat activity survey. Of the recorded species, 24 were confirmed as potential breeding species. This indicates that the site has a 'local' level of importance. These breeding bird species include many common and widespread opportunistic species.
- 7.3.15 The proposed development has the potential to impact on four Red List species (house sparrow, linnet and skylark and song thrush) and five Amber List species (black-headed gull, dunnoek, greylag goose, mallard, swift and tawny owl).
- 7.3.16 The desk study found a number of species of high conservation concern and medium conservation concern that were not observed on site. It is considered that these species may have been present within the habitats on the nearby land but do not occur within the site. Therefore, it is considered that these species are unlikely to be impacted by the proposed works.
- 7.3.17 It is considered that the site mainly provides suitable habitat for opportunistic breeding bird species making use of the created habitats present within the existing quarry. A number of bird species were also recorded using the boundary woodlands, arable fields and hedgerows. It is considered that with the implementation of the above recommendations and the habitats within the proposed restoration proposals, the long-term avian diversity of the site would be improved.
- 7.3.18 It is considered that the site provides suitable habitat for a wide range of breeding bird species that will be impacted by the proposed works. However, with the implementation of the above recommendations, it is considered that the long-term avian biodiversity of the site would be improved.

Bat Activity and Roost Surveys

- 7.3.19 Bat activity surveys were undertaken between on the 29th May 2020, 31st July 2020 and on the 13th August 2020. Three bat roost surveys were undertaken on the 21st July 2020, 7th August 2020 and on the 13th August 2020. The survey visit on the 7th August was undertaken at dawn.
- 7.3.20 The site is generally an open quarry site with marginal woodland/scrub habitat surrounding the site, on the north boundary there is a broad leaved semi natural woodland running along Gegin Lane. Scrub habitat and tall ruderal are found scattered around the quarry with species-poor semi improved grassland margins on the east of the site. Southern boundaries also consist of broad leaved woodland and the River Alyn flowing through the base of the site.
- 7.3.21 A total of four species of bat were recorded throughout the site; these were common pipistrelle, soprano pipistrelle, noctule and brown long eared bats.
- 7.3.22 Mitigation recommendations and enhancements for these species have been outlined within the Bat Survey Report above and include the plantation of woodland and hedgerows to replace the ones lost.
- 7.3.23 It is noted that the horse chestnut tree in the compound is to be removed, which was found to have both brown long eared bats and soprano pipistrelle bats emerging from the trunk holes. The data recorded during the roost surveys is only valid for one year as roosting bats can frequently change roosting locations on a yearly basis. Therefore, this tree will require additional emergence re-entry surveys conducted during the survey season, closer to date when the tree is to be removed.
- 7.3.24 In the case no roosting bats are identified during later surveys, a climbing tree inspection should be completed by a suitably licenced bat ecologist within 48 hours prior to the tree's removal. This survey can be completed alongside the tree removal as part of a soft feeling technique.
- 7.3.25 In the event that roosting bats are identified during any of the above surveys, a Mitigation Licence for a European Protected Species Licence (EPSL) will be required from Natural Resource Wales (NRW) prior to the tree removal being completed.
- 7.3.26 As the horse chestnut tree within the site is to be removed, it is recommended that bat boxes are installed within the woodlands to be retained surrounding the site boundary. Six bat boxes should be installed on trees to be planted within the landscape scheme.
- 7.3.27 The hedgerows and woodlands that will be lost during development, should aim to be replaced by replanting elsewhere on site, only off site if all the potential onsite areas have been exhausted.
- 7.3.28 Site enhancement recommendations have also been outlined to further improve the site for foraging and roosting bats.

Reptile surveys

- 7.3.29 No reptiles were recorded during the seven surveys performed for June to August 2020. The surveys were performed during the desired weather conditions, therefore, it is assumed that there are no reptiles in the areas surveyed.
- 7.3.30 If any reptiles are to be discovered during the works, they must be stopped immediately and a qualified ecologist must be informed so the issue can be dealt with accordingly.
- 7.3.31 A peak count of one common toad was recorded onsite during the reptile surveys. A number of grasslands and waterbodies are to be created within the site as part of the proposed restoration strategy. This will therefore increase the habitat diversity for this species within the site and the local surrounding area.
- 7.3.32 Overall, in terms of ecology and nature conservation, with the implementation of the recommended mitigation measure, the proposed development and operations are in accordance with the objectives of the Development Plan, the emerging Wrexham Local Development Plan 2 and other material policy considerations.

7.4 Arboriculture

- 7.4.1 A Tree Survey has been prepared by Heaton's and the findings are summarised below:
- 7.4.2 The survey results are shown in the Tree Survey Schedule at Appendix A. The root protection areas are shown in the Tree Constraints Plan at Appendix B. The Tree Constraints Plan has been produced to inform the design process.
- 7.4.3 A total of six individual trees were surveyed. Two trees have been placed in Category A, two trees in Category B and two trees have been placed in Category C. No trees were identified as veteran trees.
- 7.4.4 Of these trees (Tree Survey Schedule is included at Appendix A of the Arboricultural Report), T1, T5 and T6 are to be removed in order to facilitate the proposed works. T2, T3 and T4 are to be retained during the extent of the works. The impact of removing T1 is considered to be **high** because of its value as a Category A tree and a tree protected under Tree Preservation Order (TPO).
- 7.4.5 The impact of removing T5 and T6 is considered to be **low** because these trees are semi mature and in arboricultural terms were considered to be low value Category C trees.
- 7.4.6 The proposed restoration strategy includes a significant amount of **mitigation and enhancement** in the form of:
- a) Native tree and shrub planting; and

b) Long Term Management Plan.

7.4.7 In respect of a) it is proposed to plant and establish 20,500 new trees and shrubs. These will help recreate and diversify local landscape character and setting, create new habitat suitable for wildlife connectivity and Biodiversity. The planting will also help visually support ancient woodland along the southern boundary of the site. The planting will commence in winter 2021/22 and would progress as land becomes available through restoration.

7.4.8 It is assessed that the removal of T1 will have a minor short-term impact due to the removal of a landscape feature and also due to the removal of habitat for roosting bats. However, the large areas to be replanted will have a major medium/long-term positive impact replacing this existing landscape feature with larger areas of broad-leaved woodland and creating future habitat for roosting and foraging bats as well as habitat for other protected species.

7.4.9 Overall, in terms of arboriculture, the proposed development and operations are in accordance with the objectives of the Development Plan, the emerging Wrexham Local Development Plan 2 and other material policy considerations.

7.5 Noise

7.5.1 A review of noise has been carried out and an Environmental Scheme prepared, which accompanies this Planning Statement.

7.5.2 The 3 proposed changes to the extraction area fall within the red line boundary of Planning Permission ref: P/2016/0110, although outside the permitted extraction area on the approved plans.

7.5.3 The proposal does not propose changes to the methods of quarrying at Ballswood Quarry, all development will be within the currently permitted application boundary and will be completed well within the approved end date of mineral working at the quarry.

7.5.4 The existing planning permission for operations at Ballswood Quarry (Planning Permission ref: P/2016/0110) already specifies conditions that limit the levels of noise (conditions 9 and 10).

7.5.5 The proposed Areas B and C move extraction operations closer to potentially sensitive receptors. Given that the current operational status quo will be maintained and there is no history of any complaints regarding sensory impact it is considered that mineral extraction can be undertaken within the 3 proposed changes to the extraction area without causing a significant impact to public amenity from noise arising. Furthermore, the 3 proposed changes to the extraction area accord with Minerals Planning Policy (Wales) Minerals Technical Advice Note (Wales) 1: Aggregates (MTAN1), Buffer Zones guidance. MTAN1 builds upon the principle of Buffer Zones in that "within the buffer zone, no new sensitive development or mineral extraction should be approved." Buffer zones for sand and gravel extraction are set

at 100m. Area B is the closest to sensitive receptors but it is proposed to maintain a 100m buffer to properties on the opposite side of Gegin Lane in line the MTAN1.

- 7.5.6 For the purpose of providing supporting information for this application, an Environmental Scheme in terms of noise has been prepared. The scheme proposes the procedures to be adopted and outlines the measures to be taken in order to identify, mitigate, control and monitor noise impact. The scheme draws upon operational good practices, recognised good practice, relevant national policy as set out in MTAN1, Planning Guidance (Wales) Technical Advice Note (Wales) 11 Noise (TAN11), Welsh Office, October 1997, other guidance documents and relevant British Standards.
- 7.5.7 In summary, it is concluded that with appropriate mitigation measures, the relevant site noise limits can be complied with. The assessment concludes that noise from the proposed quarry will not cause an unacceptable impact. The objectives of the adopted and emerging Development Plan documents are met.

7.6 Air Quality and Dust

- 7.6.1 A Dust Impact Assessment has been carried out and the report accompanies this Planning Statement.
- 7.6.2 The potential for fugitive dust emissions from the proposed excavation of sand and gravel at the 3 proposed changes to the extraction area is minimal due to the inherently high moisture content of the 'as dug' material. Although there is potential of wind-blow during handling. However, given the distance from any receptors and the difference in height between the quarry working area and the nearest properties, and dust raised during the extraction of the sand will be contained within the quarry.
- 7.6.3 There is a risk during dry, windy weather of generating dust during the transportation phase, when vehicles are used to take the sand to the processing plant. In order to minimise dust creation then in these conditions internal haul roads will be sprayed with water using the on-site bowser, to "wet down" loose particles. Nevertheless, appropriate mitigation will be employed at all stages of the development.
- 7.6.4 With the deployment of the mitigation measures recommended in this assessment, it is considered that along with the high moisture content of the extracted material, this should ensure negligible dust impact from the proposed development.
- 7.6.5 Overall the effect on air quality of this development with the implementation of suitable dust mitigation measures is considered to be not significant, and the proposed development is to be compliant with policies contained in the adopted and emerging Development Plan.

7.7 Transport

- 7.7.1 In terms of transport, this planning application proposes that vehicle movements and associated highways matters will remain similar to those currently experienced.
- 7.7.2 The Quarry has access onto the A483 at its junction with the B5102 some 1.5 km north-east of the quarry. Access is gained on to the B5102 along a short stretch of an unclassified road, Gegin Lane. The stretch of Gegin Lane between the quarry access and the B5102 (Croeshowell Hill) has been improved. The A483 is a dualled highway which provides access south to Wrexham and beyond, whilst to the north the road links with the A55 before continuing in to Chester.
- 7.7.3 Vehicular access to the Quarry is shared with users of Homestead Garage, which is both a vehicle repair and testing business and an HGV haulage yard, a ready-mixed concrete producer.
- 7.7.4 The access into the Quarry comprises a surfaced road which leads from a bellmouth off Gegin Lane. On entering the site, the entrance to Homestead Garage is on the right-hand side whilst the entrance to the ready-mixed concrete plant and associated offices and carpark is to the left. The surfaced access road then continues to the quarry weighbridge and offices. There is a wheelwash situated on the “exit side” of the main access. The aggregate recycling facility is located to the right of the main quarry access route, beyond the weighbridge, towards the bottom of the Quarry.
- 7.7.5 In summary, the proposed development should not be refused on transport grounds as it is compliant with the adopted and emerging Development Plan.

7.8 Archaeology and Cultural Heritage

- 7.8.1 An archaeology and cultural heritage desk-based assessment of the archaeological potential of land at Ballswood Quarry in relation to a S73 planning application for the changes to 3 areas of the extraction boundary accompanies this planning application. The findings of the assessment are summarised below:
- 7.8.2 The assessment involved the examination of available records relating to the quarry and the 3 proposed changes to the extraction area including documentary, cartographic and aerial photographic from sources such as Historic Wales, Archwilio (the Welsh Historic Environment Records online), the Clwyd-Powys Regional Historic Environment Record and the Archaeological Assessment carried out by The Clwyd-Powys Archaeological Trust (November 2002) in relation to a planning application for an extension to Ballswood Quarry (ref: P/2003/0357).

- 7.8.3 No sites are currently recorded within the exiting quarry or the 3 proposed changes to the extraction area in the SMR. Seven sites as set out in Archaeological Assessment carried out by The Clwyd-Powys Archaeological Trust (November 2002) have been identified within the extension area in relation to a refused planning application for an extension to Ballswood Quarry (ref: P/2003/0357). These 7 sites, will not be affected by the proposed development in its present form.
- 7.8.4 There remains the possibility that sub-surface traces of further sites are present within the 3 proposed changes to the extraction area. In order to ensure that the potential for these sub-surface archaeological remains is taken into account, a watching brief should be undertaken during the stripping of topsoil and overburden. Sufficient time and resources should be allowed to ensure the preservation by record of any archaeologically significant features which may be revealed.
- 7.8.5 In terms of cultural heritage, the listed structures discussed in section 4 above or the Marford Conservation Area are not affected visually by the current Works or the proposed development.
- 7.8.6 Overall, no clear archaeological or cultural heritage constraints have been identified that would render the proposals contrary to the objectives and policies of the development plan. The objectives of the Development Plan, the emerging Wrexham Local Development Plan 2 and other material policy considerations are met.

7.9 Flood Risk Assessment and Water Management

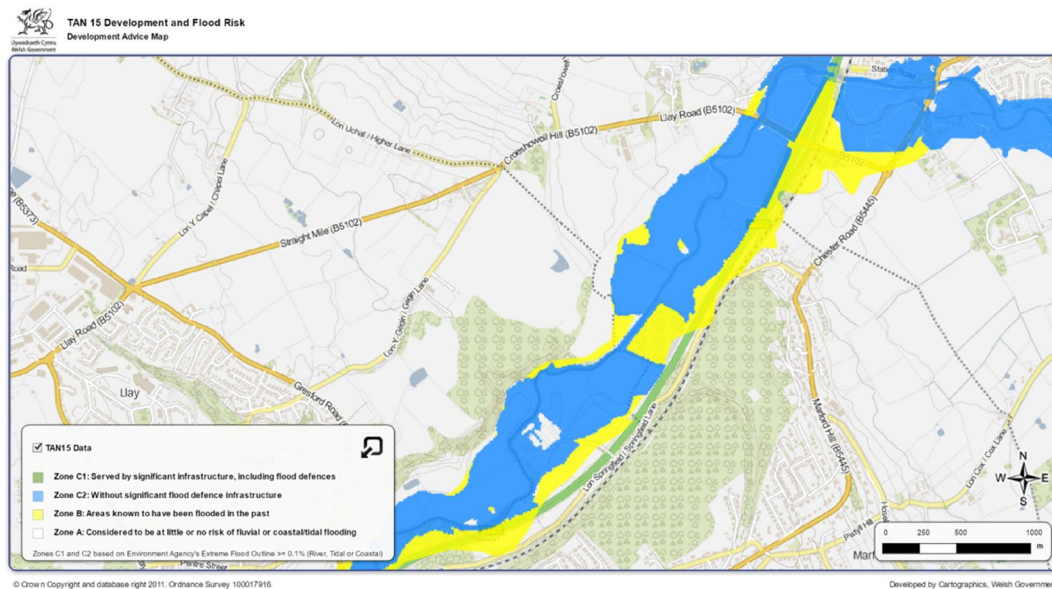
Flood Risk Assessment

- 7.9.1 Technical Advice Note (TAN) 15: Development and Flood Risk (July 2004) provides technical advice, which supplements policy set out in Planning Policy Wales, in relation to development and flooding.
- 7.9.2 The general approach of Planning Policy Wales, supported by the TAN, is to advise caution in respect of new development in areas at high risk of flooding. The overarching aim is (in order of preference) to:
- Direct new development away from those areas which are at a high risk of flooding; and
 - Where development has to be considered in high risk areas (Zone C) only those developments which can be justified on the basis of the tests outline in the TAN can be located within such areas.
- 7.9.3 TAN 15 sets out that mineral extraction sites and associated processing facilities are a Less

Vulnerable Development.

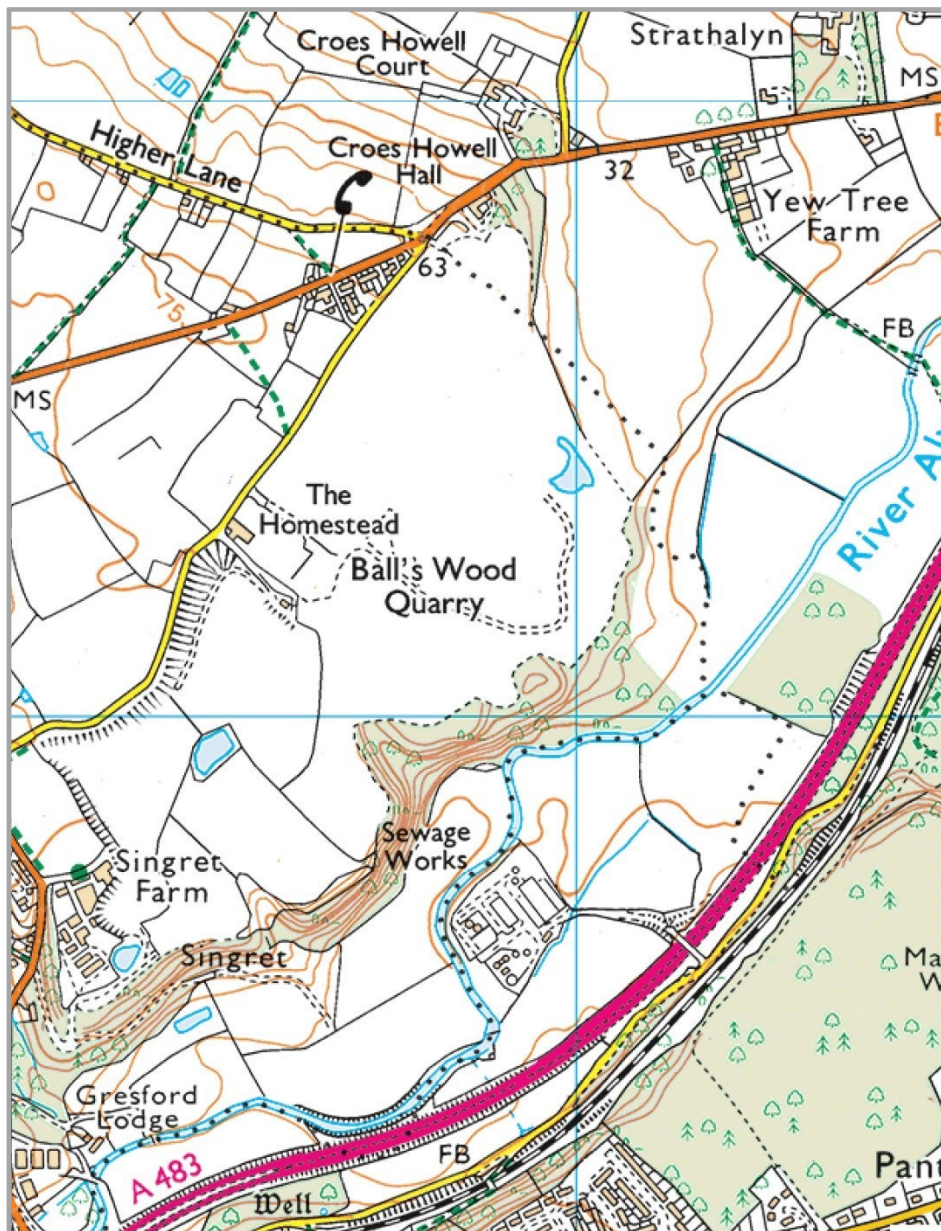
- 7.9.4 In January 2015 updated Development Advice Maps (“DAM”) were issued by the Welsh Government to be used alongside the TAN. Figure 7.1 is an extract from the DAM covering Ballswood Quarry. The DAM shows Zone C2, areas of floodplain without flood defences, in blue whilst the yellow Zone B denotes areas which have flooded in the past.

Figure 7.1 - DAM



- 7.9.5 As can be seen from the DAM at Figure 7.1, none of the 3 proposed changes to the extraction area lie within either Zone C2 or Zone B flood risk areas with the 3 areas located within Zone A - Considered to be at little or no risk of fluvial or coastal/tidal flooding. This is because of the topography of the southern boundary of the quarry which comprises a steep slope which runs down to the River Alyn which constrains the lateral extent of the flood plain (see Figure 7.2 below).

Figure 7.2 Site Topography



Water Management

- 7.9.6 Ground water monitoring has taken place at Ballswood Quarry via a combination of extraction, borehole drilling and the dipping of piezometer boreholes on adjoining land to the south east – see Drawing No. KD.BLWQ.1.D.025 (attached at **Appendix 2**).
- 7.9.7 In summary, existing ground water levels have been observed to vary between 22.9 maOD to 24 maOD within the current extraction area/disturbed land within the quarry. There is a trend from the north and west of the site to the south and east of lower ground water levels. These figures include drilling borehole water strike information.

- 7.9.8 It is proposed that the base of extraction in the 3 proposed changes to the extraction area is to be no deeper than 25 maOD i.e. the quarry is to be worked dry. Therefore, there will be no impacts on ground water.
- 7.9.9 On the basis of the above, therefore, there will be no consequences of flooding or ground water on the proposed 3 areas, ensuring a continued safe and secure working environment throughout the life of the development.

8 Conclusion

- 8.1.1 This Planning Statement has been prepared on behalf of the Applicant, Cheshire and North Wales Sand and Gravel Limited, who propose 3 changes to existing extraction limits at Ballswood Quarry for the extraction of sand and gravel with progressive restoration.
- 8.1.2 This Statement has considered the application site as it currently exists, the site's planning history and context, the proposed development, and how the proposals may impact the local environment and community. Consideration has been given to the proposed impact on the local environment and community during the proposed mineral extraction and progressive restoration phases, and the long-term impacts of the proposal upon final site restoration and beyond.
- 8.1.3 This Statement has assessed the proposed development's compliance with the various planning policies that constitute the Development Plan for the area and with other material planning considerations that are relevant to the determination of the planning application.
- 8.1.4 Geological investigations have identified that Ballswood Quarry contains a number of different types of sand and gravel, which are worked from various "faces" within the site. The reason for the 3 changes to the extraction boundary is to release additional and higher quality reserves of building sand and sand and gravel than the nature and quality of remaining reserves in the existing quarry.
- 8.1.5 In terms of existing reserves, it has been identified that there is 1,100,000 tonnes remaining, therefore combining existing and proposed reserves (1,570,000) gives a total of 2,670,000 tonnes. It is anticipated that sales will continue at 500,000 tonnes per annum, which will result in ~ 5.3 years of extraction with a further year to complete restoration.
- 8.1.6 Ballswood is running out of sand and gravel, therefore changes to the extraction area of the quarry are required by the Council for the continued supply from Ballswood Quarry for the next 22 years in order to maintain the existing landbank never minding an additional 1.565 million tonnes to address the shortfall.
- 8.1.7 Furthermore, notwithstanding the need to maintain the landbank for Wrexham, exports from Ballswood are also required to meet the demand and landbanks within Flintshire, Denbighshire, Cheshire West and Chester and the north west region of Greater Manchester, Merseyside and Halton, and Warrington.
- 8.1.8 In terms of economic considerations, aside from the sand and gravel need (as set out above), the proposed development will help maintain 11 jobs which will contribute to the local economy through wages, business rates, use of local suppliers, and at a national level; to the

economy through aggregates levy and other taxation processes. The development would make a significant contributor to the local economy. It is estimated that this contribution would equate to £750,000 to £1,000,000 per annum based on the applicant's other operations.

- 8.1.9 In summary and having full regard to the Development Plan, it is considered that given the proposal provides clear benefits of contributing to the steady and adequate supply of sand and gravel to be maintained by WCBC. Weight should also be attributed to the associated benefits to the local economy and the acceptable environmental impact of the proposal, as determined by appropriate environmental assessment.
- 8.1.10 In overall conclusion, it is considered that the proposal is environmentally acceptable and supports the economic, social and environmental roles of sustainable development. Where adverse impacts do arise, they are not significant and appropriate methods of working and other mitigation measures can be promoted that are capable of further reducing the effects of any such impact.
- 8.1.11 All mitigation can be formalised as appropriate through the imposition of planning conditions and other development control mechanisms. The potential environmental and local amenity impacts are therefore considered acceptable and the proposal accords with Development Plan policy.
- 8.1.12 Accordingly, the findings of this statement suggest that overall, the development will be environmentally acceptable and will accord with the development plan. It is therefore respectfully requested that planning permission be granted.

Appendix 1 – EIA Screening Matrix

**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2017 SCREENING MATRIX**

1. CASE DETAILS			
Applicant	Cheshire and North Wales Sand and Gravel Limited	Brief description of the project / development	Section 73 Application to enable 3 proposed changes to the extraction boundary of Ballswood Quarry utilising existing quarry infrastructure and access. The proposed development will release currently sterilised mineral within the permitted planning boundary of the site. The proposed extension areas fall within the red line boundary of Planning Permission ref: P/2016/0110, although outside the extraction area on the approved plans. Planning Permission ref: P/2016/0110 was approved under the Environment Act 1990 Periodic Review of Planning Conditions (09/05/2016). Condition 2 of Planning Permission ref: P/2016/0110 sets out that mineral working is to cease by 22nd February 2042. The proposal does not propose changes to the methods of quarrying at Ballswood Quarry, will be within the permitted application boundary and will be completed well within the approved end date of mineral working at the quarry.
LPA	Wrexham County Borough Council		
2. EIA DETAILS			
Is the project Schedule 1 development according to Schedule 1 of the EIA Regulations?			No
If YES, which description of development (THEN GO TO Q4)			Click here to enter text.
Is the project Schedule 2 development under the EIA Regulations?			Yes
If YES, under which description of development in Column 1 and Column 2?			13 Changes and extensions (b) Any change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed. (i) The development as changed or extended may have significant adverse effects on the environment; or

**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2017 SCREENING MATRIX**

	(ii) in relation to development of a description mentioned in column 1 of this table, the thresholds and criteria in the corresponding part of column 2 of this table applied to the change or extension are met or exceeded.
Is the development within, partly within, or near a 'sensitive area' as defined by Regulation 2 of the EIA Regulations?	Yes
If YES, which area?	Chwarel Singret SSSI is adjacent to the western red line boundary of the existing quarry and proposed extension Area A.
Are the applicable thresholds/criteria in Column 2 exceeded/met?	Yes
If yes, which applicable threshold/criteria?	Category 2a (extractive industry) defines all quarries to be caught by the thresholds and require Environmental Impact Assessment.

Question		(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)	(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
		Briefly explain answer to Part 2a and, if applicable and/or known, include name of feature and proximity to site (If answer in Part 2a / 2b is 'No', the answer to Part 3a / 3b is 'N/A')	Is a significant effect likely, having regard particularly to the magnitude and spatial extent (including population size affected), nature, intensity and complexity, probability, expected onset, duration, frequency and reversibility of the impact and the possibility to effectively reduce the impact? If the finding of no significant effect is reliant on specific features or measures of the project envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment these should be identified in bold.	
1. NATURAL RESOURCES				
1.1 Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?		Yes This application relates to a well established quarry, with the proposed extensions to the extraction boundary within the red line boundary of Planning Permission ref: P/2016/0110, which was approved under the Environment Act 1990 Periodic Review of Planning Conditions (09/05/2016). The topography will change due to the extensions to the extraction area. However, the permitted restoration scheme is to a low level and the restoration levels of the scheme as part of this proposal will be indistinguishable from the approved scheme.	No	No, as the aim of the proposed restoration scheme is to build on the approved restoration scheme for the site to create a distinct, sustainable, agriculturally and wildlife managed landform and landscape, which is capable of integration and enhancement into the adjacent Wooded Lowland Valleys, Open Rolling Lowland and Flat Open Lowland Aspect Areas.
1.2 Will construction or operation of the project use natural resources above or below ground such as land, soil, water, materials/minerals or energy		Yes The proposal is for the extraction of sand and gravel.	No	It is considered that the proposal is a sustainable form of development by utilising available mineral and returning the land post extraction back to a beneficial after use.

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
which are non-renewable or in short supply?				
1.3 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?	Yes	The proposal is for the extraction of sand and gravel, which would otherwise be sterilised.	No	No. Permitting the proposed extension areas would avoid the sterilisation of mineral reserves.
2. WASTE				
2.1 Will the project produce solid wastes during construction or operation or decommissioning?	N/A			
3. POLLUTION AND NUISANCES				
3.1 Will the project release pollutants or any hazardous, toxic or noxious substances to air?	N/A			
3.2 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes	The proposed extensions would not introduce any new sources of noise within Ballswood Quarry, which could not be addressed by compliance with existing conditions.	No	No significant impacts anticipated, taking into account appropriate mitigation that could be secured by condition as is the case with the current operations. Operations would continue to comply within permitted levels.
3.3 Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	No	The implementation of good working practice with regard to use and storage of hazardous material will mitigate any impact. Development undertaken to date at Ballswood Quarry has not led to contamination of land or water from release of pollutants.		

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
3.4 Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No	Ballswood Quarry has been quarried for a number of years and there is no indication that environmental standards have been exceeded.		
4. POPULATION AND HUMAN HEALTH				
4.1 Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?	No	No change from that currently permitted at Ballswood Quarry.		
4.2 Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example due to water contamination or air pollution)	No	No change from that currently permitted.		
5. WATER RESOURCES				
5.1 Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?	No	According to the Natural Resources Wales Development Advice Map, the existing quarry and proposed extension areas are located in Zone A - considered to be at little or no risk of fluvial or coastal/tidal flooding. Therefore, on the basis of the above, there will be no consequence of flooding on the continued development of the quarry, ensuring a safe and		

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
		secure working environment throughout the life of the proposed development. It is proposed that the base of extraction in the proposed extension areas is to be no deeper than 25 maOD i.e. the quarry is to be worked dry. Therefore, there will be no impacts on ground water.		
6. BIODIVERSITY (SPECIES AND HABITATS)				
6.1 Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local))).	No	The planning application has been informed by is informed by a Preliminary Ecological Assessment in order to obtain information of designated sites of nature conservation interest, and a suite of ecological surveys undertaken in 2020 as follows: • GCN eDNA Surveys; • Breeding bird surveys; • Bat activity and roost surveys; and • Reptile surveys. Within the Proposals Map submitted as part of the Wrexham LDP2 submission, which is current going through examination, Ballswood Quarry is designated as a Local Designation for Nature Conservation and Geological Importance. The site is an active sand and gravel quarry, which can be worked until 22nd February 2042. Therefore, it is considered that this designation is due to the on going quarrying operations and phased restoration scheme at the site, which will provide geological and biodiversity enhancement.		

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
		The proposed restoration scheme is to build on the approved restoration scheme for the site to create a distinct, sustainable, agriculturally and wildlife managed landform and landscape. Features include for the retention of bare sandy ground to link to Chwarel Singret SSSI for geological interest and biodiversity enhancement.		
6.2 Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?	No	The planning application has been informed by is informed by a Preliminary Ecological Assessment in order to obtain information of designated sites of nature conservation interest, and a suite of ecological surveys undertaken in 2020 as follows: • GCN eDNA Surveys; • Breeding bird surveys; • Bat activity and roost surveys; and • Reptile surveys. The proposed restoration scheme is to build on the approved restoration scheme for the site to create a distinct, sustainable, agriculturally and wildlife managed landform and landscape.		
7. LANDSCAPE AND VISUAL				
7.1 Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by	No	The site is not designated in terms of areas or features protected for their landscape or scenic value. Chwarel Singret SSSI is adjacent to the western red line boundary of the existing quarry and proposed extension Area A. Chwarel Singret is of special interest for an exposure through a sequence of deposits that has a major bearing on interpretations of the		

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
the project? ¹ Where designated indicate level of designation (international, national, regional or local).		Quaternary history of north-east Wales. The Chwarel Singret exposure shows a thick sequence of gravel, sand, silt and till deposits. Similar deposits, but predominantly sand and gravel, cover a significant part of the Wrexham area and make up a large body of sediment that has become known as the 'Wrexham Delta Terrace'. Quarrying operations within Area A will be carried out sensitively to ensure that there is no impact on Chwarel Singret SSSI. The proposed restoration scheme include for the retention of bare sandy ground to link to Chwarel Singret SSSI for geological interest and biodiversity enhancement.		
7.2 Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)	No	The existing permitted quarry and proposed extension areas is generally well screened, particularly from residential receptors near to the north west boundary of the site where Gegin Lane meets the B5102. Due to the topography of the surrounding area there are no locations in which the site is highly visible.		
8. CULTURAL HERITAGE/ARCHAEOLOGY				
8.1 Are there any areas or features which are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by	No	Historic Wales, the map enabled portal for historic environment information in Wales was consulted and no significant impacts are anticipated. The proposed 3 relatively small extensions will have no greater impact on any areas or features which are protected for their cultural heritage or archaeological value.		

¹ See question 8.1 for consideration of impacts on heritage designations and receptors, including on views to, within and from designated areas.

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).		An Archaeology Desk Based Assessment has been carried out for the proposed extension areas.		
9. TRANSPORT AND ACCESS				
9.1 Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	No	There are no routes located on or in close proximity to the site which are used by the public for access to recreation or other facilities.		
9.2 Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No	Beyond the continuation of traffic movements associated with the extraction of sand and gravel from Ballswood Quarry, there are no additional traffic/highway effects caused by the proposed development in the vicinity of the site.		
10. LAND USE				
10.1 Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.	N/A			

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (<u>only if Yes in part 2a</u>) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
10.2 Are there any plans for future land uses on or around the location which could be affected by the project?	No			
11. LAND STABILITY AND CLIMATE				
11.1 Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	No			
12. CUMULATIVE EFFECTS				
12.1 Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?	No	There are no cumulative impacts that will arise from the scheme in combination either within itself or with other existing/ proposed developments that would render the proposed extension of time unacceptable.		
13. TRANSBOUNDARY EFFECTS				
13.1 Is the project likely to lead to transboundary effects? ²	No	Unlikely. No complex effects anticipated.		

² The Regulations require consideration of the transboundary nature of the impact. Due to the England's geographical location the vast majority of TCPA cases are unlikely to result in transboundary impacts.

5. CONCLUSIONS – ACCORDING TO EIA REGULATIONS SCHEDULE 3

This Screening Opinion relates to a proposal to enable 3 proposed changes to the extraction boundary of Ballswood Quarry which was most recently approved under the Environment Act 1990 Periodic Review of Planning Conditions (09/05/2016). Condition 2 of Planning Permission ref: P/2016/0110 sets out that mineral working is to cease by 22nd February 2042.

The site is not subject to any other statutory ecological, landscape, historic or other constraints, and is not within an area identified as being at risk of flooding.

The site is a working sand and gravel quarry with a permitted operational life to 22nd February 2042. The proposed development is to enable 3 proposed changes to the extraction boundary of Ballswood Quarry utilising existing quarry infrastructure and access. The proposed development will release currently sterilised mineral within the permitted planning boundary of the site. The extension areas fall within the red line boundary of Planning Permission ref: P/2016/0110, although outside the extraction area on the approved plans. It is considered unlikely that the existing conditions will change to any great extent and any change is likely to be minimal. Further consideration has been given to the ecological and archaeological implications of the site and the suitability of existing conditions.

Given the nature of the proposed development and the criteria considered and addressed above, no significant environmental impacts of more than local importance are identified that would justify a decision to require an Environmental Impact Assessment.

6. SCREENING DECISION

If a SO/SD has been provided do you agree with it?	N/A	
Is it necessary to issue a SD?	Yes	
Is an ES required?	No	
7. ASSESSMENT (EIA REGS SCHEDULE 2 DEVELOPMENT)	OUTCOME	
Is likely to have significant effects on the environment	ES required	
<u>Not</u> likely to have significant effects on the environment	ES not required	✓
More information is required to inform direction	Request further info	

Appendix 2 – Ground Water Plan (Drawing No. KD.BLWQ.1.D.025)

Ballswood Quarry

Ground Water

Ground water identified and monitoring has taken place at Ballswood Quarry via a combination of extraction, borehole drilling and the dipping of piezometer boreholes to adjoining site land to the east. In summary existing ground water levels have been observed to vary between 22.9 maOD to 24 maOD within the current extraction area / disturbed land within the quarry. These figures include drilling borehole water strike information.

There is a trend from the north and west of the site to the south and east of lower ground water levels.

The proposed base of extraction is to be no deeper than 25m aOD i.e. the quarry is to be worked dry.

Section 73 Planning Application - Ground Water

LEGEND

- Application Boundary (Permitted Boundary)
- WM1 Ground Water Monitoring Boreholes / Water Strikes
- WL 20.2 Ground Water Readings

CHESHIRE & NORTH WALES
SAND & GRAVEL LTD.



PROJECT:
Ballswood Quarry - Section 73 Application

TITLE:
Ground Water

REF NO:
KD.BLWQ.1.D.025

DATE: August 2020 SCALE: 1:5,000 @ A3

STATUS:
FINAL



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