

15 July 2020
Our ref: BRE/BO/TJC/1744/01

S Greenland
Planning and Enforcement Officer
Planning and Regulatory
Wrexham County Borough Council
Guildhall
Wrexham
LL11 1AY

BY EMAIL ONLY

Dear Simon

Borras Quarry – Planning application reference P/2020/0153

We are in receipt of the Screening Opinion dated 19 March 2020 provided by Wrexham County Borough Council in respect of planning application reference P/2020/0153. We have reviewed the Screening Opinion and present at Schedule 1 our comments on the Screening Opinion. As you will see we consider that it is necessary to clarify a number of points in the Screening Opinion including the loss of Best and Most Versatile agricultural land, protected species, traffic and the sterilisation of mineral. For clarity we have reproduced text from the Screening Opinion in Schedule 1 together with providing our comments. We present at Schedule 2 an aerial photograph and photographs of the proposed development area for your information.

Based on comments provided by the Ecological Officer and Natural Resources Wales (NRW) and taking into account the recent restrictions on movement, an ecological survey was carried out at the site during the week commencing 25 May 2020. We are preparing responses to the comments provided by the Ecological Officer and the consultation response provided by NRW and will submit these responses shortly.

We trust that the information provided is helpful. Should you have any queries or need any further information please do not hesitate to contact us.

Yours sincerely



Guy Titman

cc J Davies, Breedon Southern Limited
M Young, Breedon Southern Limited

Encs Schedule 1 – Comments on the Screening Opinion produced by Wrexham County Borough Council and dated 19 March 2020 in respect of planning application reference P/2020/0153
Schedule 2 – Aerial photograph of the proposed development area and photographs taken at the site on 18 November 2019



FS 23915

Schedule 1 to the letter to Simon Greenland dated 15 July 2020

Comments on the Screening Opinion produced by Wrexham County Borough Council and dated 19 March 2020 in respect of
planning application reference P/2020/0153

Question/Section (Extract from the Screening Opinion)	Wrexham County Borough Council (WCBC) comment	Comment/response
STAGE 1 – INITIAL EIA SCREENING ASSESSMENT		
2B Schedule 2 (i) <i>Is the project listed as a description of development under Column 1 of Schedule 2 of the EIA Regulations? If Yes, note under which description of development in Column 1 of Schedule 2 i.e. paragraphs 1-12.</i>	<i>Paragraph 11b</i>	The description of development for 11(b) is ' <i>Installations for the disposal of waste...</i> '. The proposed development is for the processing of recovered road planings for reuse and does not involve waste disposal. The description of development which better describes the proposed development is ' <i>13(a) Any change to or extension of development of a description listed in Schedule 1 (other than a change or extension falling within paragraph 24 of that Schedule) where that development is already authorised, executed or in the process of being executed.</i> '
2B Schedule 2 (iv) <i>Are the applicable thresholds/criteria in Column 2 exceeded/met? If Yes, note which applicable threshold/criteria...</i>	<i>11(b) the area of the development exceeds 0.5 hectares</i>	The proposed development will involve a change to a development within a quarry where the surface of the quarry site exceeds 25 hectares and therefore meets the following threshold and criteria in respect of description of development 13(a) ' <i>(ii) in relation to development of a description mentioned in a paragraph in</i>

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		<i>Schedule 1 indicated below, the thresholds and criteria in column 2 of the paragraph of this table indicated below applied to the change or extension are met or exceeded...Paragraph in Schedule 1...19...Paragraph of this table 2(a)'. The applicable thresholds and criteria in respect of Paragraph 2(a) comprise 'Quarries and open cast mining and peat extraction (unless included in Schedule 1) – All development except the construction of buildings or other ancillary structures where the new floor space does not exceed 1,000 square metres.'</i>
STAGE 2 – DETAILED EIA SCREENING ASSESSMENT P/2020/0153 BORRAS QUARRY		
Question 2(a) Existing and Approved Land Use Are there any transport routes which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	<i>The proposal has the potential to increase traffic on the A534 and Wrexham Industrial estate link road...</i>	The traffic movements associated with the proposed importation of asphalt plantings and subsequent exportation of processed Reclaimed Asphalt Pavement (RAP) are well within the historic traffic movements associated with Borrass Quarry.
Question 2(b) Relative Abundance, Available Quality and Regenerative Capacity of Natural Resources in the Area and its Underground Are there any areas on or around the location which	<i>Part of the site lies within area subject to UDP policy MW9: Protection of Mineral resources.</i>	The proposed development will not affect mineral resources. As stated in the Planning Policy section of the letter to Wrexham County Borough Council dated 4 March 2020 the proposed development will not result in the sterilisation of mineral resources. The plant and any structures within the proposed development area

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<i>contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?</i>		will be removed on completion of the road planings recycling operations and the mineral in Phase Airfield 4 will be extracted. The proposed development accords with Policy MW9 of the UDP.
Question 2(c) Absorption Capacity of the Natural Environment Are there any other areas on or around the location which are important or sensitive for reasons of their ecology, or are used by protected, important or sensitive species of fauna or flora, which could be affected by the project?	There is potential for the site to be occupied/used by Great Crested Newts and bats. The development would result in a degree of habitat loss...	The proposed development area is located on an area of existing hard standing that was formerly occupied by a concrete block making plant. At Schedule 2 we present an aerial photograph of the proposed development area and photographs taken at the site on 18 November 2019 to demonstrate the existing hard standing. It is proposed that the existing hard standing is retained as part of the development proposals. No buildings will be removed as a result of the proposed development. The proposed development will therefore not result in habitat loss and provides limited suitable terrestrial habitat for Great Crested Newts (GCNs) or bats. As the presence of GCN cannot be discounted due to the proximity of the proposed development site to known GCN breeding ponds and terrestrial habitat an ecological appraisal comprising a site visit by an ecologist has been undertaken and the results will be provided under separate cover.

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Statement of reasons	<i>The proposal will result in the loss of BMV land, will have an urbanising effect on a currently greenfield site and will increase traffic on the local highway network. It has the potential to impact upon protected species and lead to the sterilisation of mineral resources.</i>	As stated above the proposed development area is located on existing hard standing hence will not result in the loss of BMV land. The proposed development area is located within the context of an existing large scale, operational quarry with associated operations and plant including conveyors and minerals processing plant. Historically very similar operations to those proposed have been temporarily undertaken at the site (planning permission references P/2007/1130 and P/2009/0760). It is considered based on the context of the wider site and the historic operations that have been undertaken at the site that it is unlikely that the proposal will have an urbanising effect. In addition and as explained above:- 1. The traffic movements associated with the proposed importation of asphalt plantings and subsequent exportation of processed RAP are well within the historic traffic movements associated with Borrass Quarry.

Question/Section (Extract from the Screening Opinion)	Wrexham County Borough Council (WCBC) comment	Comment/response
		2. The proposed development area is of limited value for protected species due to the nature of the hard standing and lack of vegetation. However, the presence of GCN cannot be discounted due to the proximity of the proposed development site to known GCN breeding ponds and terrestrial habitat. An ecological appraisal comprising a site visit by an ecologist has been undertaken and the results will be provided under separate cover. 3. The proposals will not result in the sterilisation of mineral resources.

Schedule 2 to the letter to Simon Greenland dated 15 July 2020**Aerial photograph of the proposed development area and photographs taken at the site on 18 November 2019**

Image 1 Aerial photograph of the proposed development area showing the approximate locations of the planings stockpiling area (A), the mobile processing plant (B), the Reclaimed Asphalt Pavement (RAP) storage shed (C) and the pre-coated chippings storage bays (D).

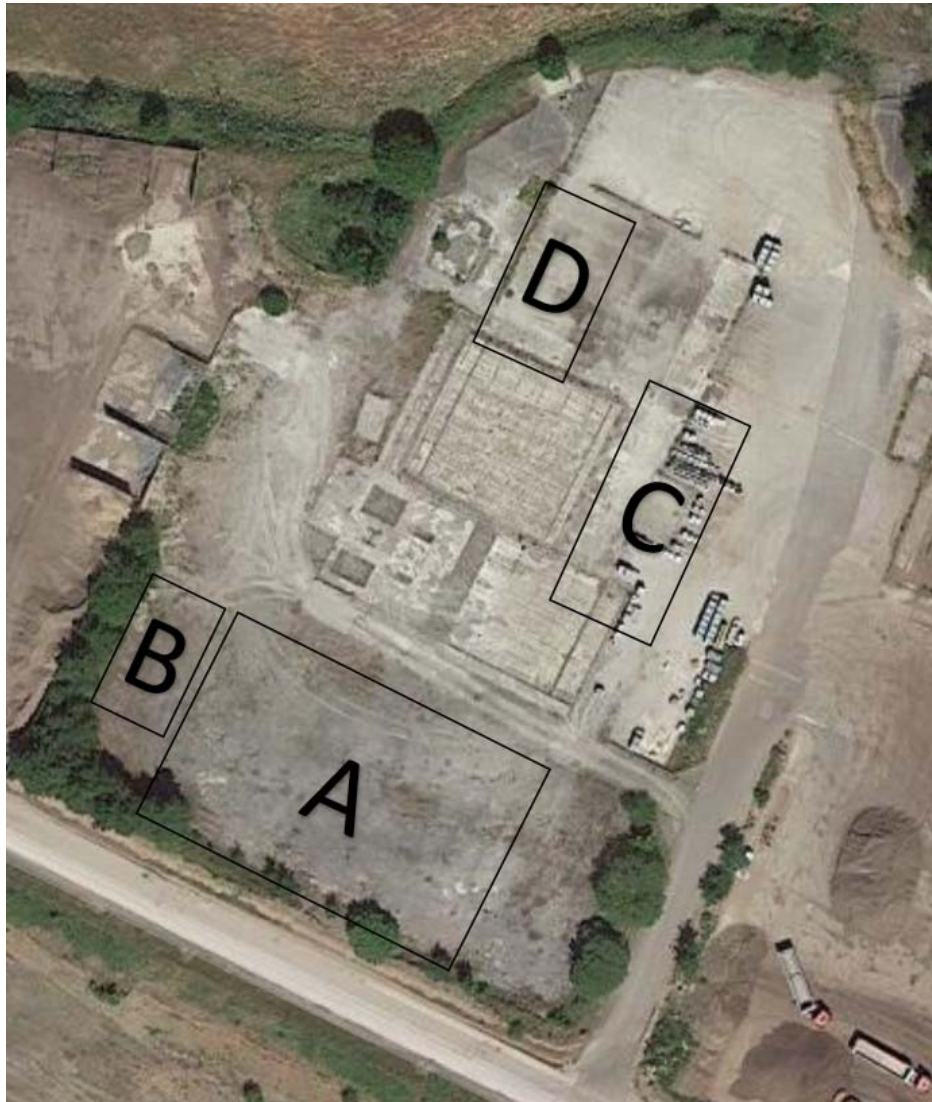


Image 2 Photograph of the location of the proposed planings stockpile area and the mobile processing plant (looking south).



Image 3 Photograph of the location of the proposed RAP storage shed (looking east).



Image 4 Photograph of the location of the proposed pre-coated chippings storage bays (looking north).

