PLUMBLAND PARISH COUNCIL

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Dear Sirs

Cumbria County Council Planning Application 2/19/9011- High Close Quarry, Plumbland

Plumbland Parish Council wish object to the re-opening of High Close Quarry on behalf of the residents of Plumbland/Parsonby and the surrounding rural community in the strongest terms for the following reasons: -

**1. Need**

Cumbria Minerals and Waste Local Plan 2015 to 2030 - 5.21

Permitted reserves of limestone at the end of 2014 were, on the basis of the information in Tables 5.1 and 5.2, more than adequate. The reserve is predicted to be exhausted in 2057, with a 27-year landbank remaining at the end of the Local Plan period in 2030.  On the basis of recent trends, i.e. the 3year rolling average sales, the landbank would be exhausted much later, in 2068; however, it is assumed that sales will pick up and the landbank is very unlikely to last that long.

This position is updated in the Cumbria and the Lake District National Park Joint Annual Local Aggregates Assessment 2018:

Looking at reserves for limestone alone (also excluding high specification aggregates) the 10-year average sales (2.07Mt) gives a landbank of 39.51 years which would run out in 2056.

Furthermore, Section 18 – Site Allocations, of the Cumbria Minerals and Waste Local Plan 2015 to 2030, which lists Site Allocations Policies to identify the sites and areas of land that will be required to implement the Minerals and Waste Local Plan’s strategic policies for working and safeguarding minerals and for managing wastes, includes the following statement in Section 18.28:

It was considered that there was no need to identify further provision for the release of general crushed rock aggregate because of the size of the current landbank.

Furthermore, High Close Quarry is specifically excluded from the Preferred Areas listed in the plan.

**2. Traffic**

All quarry traffic and employee vehicles will travel on the B5301 which is a narrow road with no road markings, blind bends, a steep hill, a single- track bridge and many other places where large vehicles cannot pass. The average width of an HGV is 2.55m and for two to pass safely 6.1m should be allowed while in Parsonby the road width is only 4.3m which is far short of that required. This road is not on the Cumbria County Council recommended HGV Routes and therefore the use by HGV’s must be presumed to be unauthorised.

The council considers the road is not adequate and the risks associated with approval of the applications and the use of this road by HGV’s is unacceptable.

**3. Sound**

The report accompanying the application is very technical but does illustrate average sound levels will increase significantly. The sound levels in the reports are average, the site will make far louder noises which will be heard much further away. The sound produced by the quarry will be significantly different to the current background sounds and be oppressive, removing outdoor amenity for residents. Blasting could occur every day the quarry is open and will be at levels sufficient to be felt in residents' homes, the noise and overpressure from these blasts will scare pets and pastoral animals.

The council consider that the increase in noise caused by the proposal, in a rural area, is completely unacceptable

**4. Dust**

The comprehensive report accompanying this application does not mention that there is a primary school within 500m of the site and does not mention the effects that this proposal will have on our children, the vulnerable and elderly. Nor is there any mention of Moota Quarry which has just been granted a 10-year extension on the basis that there is no other quarry with 5km. There is also a contradiction in the reports for Moota and High Close. Moota state the prevailing wind direction is NE whilst High Close state the prevailing wind is SW.

The council considers risk to the health of children and the elderly are unacceptable

**5. Visual Impact**

The excavation will be over an area of 180m and to a depth of 41m either side of a high-pressure gas pipeline which may or may not be re-routed with the risks that are associated with such work. Therefore, the characteristic of the landscape will be changed forever. There are also Iron Age circles adjacent to the site and advice suggests that there should be a full archaeological and geo-physical survey of the area.

The council considers that effect of the proposal on the amenity of the area and the risks associated with the gas pipeline are too great to allow approval

**6. Landfill Site**

The Waste Operations Department confirm that they have no specific knowledge of the contents of the unbonded landfill which is immediately adjacent to the site. The proposal is that there will be blasting up to the boundary and nobody knows what will happen when once the natural seal is broken by vibration, earth movements or other blasting operations. Once the seal is broken pollutants will be free to escape into the air and watercourses (once contaminated this process is irreversible) which because of the quarry’s elevated position will find their way into the parish of Plumbland and beyond and affect the health and well-being of people living, working and visiting the area.

Below is an extract from Allerdale Borough Council’s s response to the United Utilities planning application 2/2016/0045 concerning the landfill site at High Close Farm, Plumbland, Cumbria.

Contaminated Land.

The groundwater comments equally apply to the land quality function. The report acknowledges Cumbria County Council’s comments regarding the existence of High Close quarry, Plumbland as an in-filled quarry.  The landfill was resolved to accept deposits of domestic, commercial and industrial wastes and was conditioned to be lined with clay.  It should be noted that the clay lining was not installed, and leachate is not contained.  We require confirmation that the proposed development will not cause or exacerbate pollution emitted from the site. Moota Quarry has been identified for surplus arisings required for restoration which will need to comply with Waste Regulations for deposit and control.

It follows that this landfill site was not properly constructed with no monitoring and that the that the waste is not properly contained.

It is also noted that the on-site road and conveyor system crosses over the landfill site.

The council considers that the risks to human health and well-being are too great to allow approval.

**7. Hours**

There is a discrepancy in hours.

Hours of working of the Quarry 7 -1900 Mon-Fri

7.1200 Sat

Hours of working of the Access Road 7 – 1800 Mon - Fri

Working on site 1800 - 2200

There is no use of the access on a Saturday?

This means that the quarry will be used at times when the access will not?

The council consider the proposed hours are too long and should be reduced by at least 1 hour both ends of the day with no working on site at any other time. There must be a condition stating there will not be any working on site on any Sunday or Bank Holiday.

**8. Light Pollution**

There are concerns that this industrial site in a rural location will bring light pollution which in this setting is unacceptable.

**9. Cumulative Effect**

Approval to recommence quarry operations at High Close Quarry will be in direct contravention of the principle of the formal justification reported by the Assistant Director of Environment & Regulatory Services, Cumbria County Council, dated 17 November 2014 in regard to Application No. 2/14/9006 - Moota Quarry Extension.

4.54 Cumbria MWDF Generic Development Control Policy DC 3 (Cumulative Environmental Impacts) requires the cumulative impacts of minerals proposals to be assessed in the light of other land-uses in the area.  In compliance with this policy, the applicant has considered the cumulative impacts of continuing operations at Moota Quarry within a 5km radius of the site.  The assessment refers to Clints Quarry, a dormant limestone quarry approximately 800m to the east of Moota Quarry, as the only other potential mineral working within this ‘study area’; that it is a designated SSSI and unlikely to be worked within the next 10 years, and that any proposal to re-open it would be subject to an Environmental Impact Assessment.  There are, in fact two other potential workings within the area, High Close Quarry and Wharrels Quarry, approximately 1km to the north and 2.6km, respectively, to the north west of Moota Quarry.  These are both limestone quarries, however, they are dormant, unlikely to be worked within the next ten years and any re-opening would again be subject to EIA.

4.55 The assessment concludes that there would be little or no potential for cumulative effects from remaining areas or land uses within the 5km radius of the site and no potential for cumulative effects from sensitive receptors.  There would be the potential for distant combined views beyond 5km from the occasional discrete elevated location, but the cumulative effects would be barely discernible.  Significant cumulative visual or landscape effects are not predicted.

4.56 The planning assessment has shown that the individual impacts of the proposed extension and continuation of operations at the site could be adequately mitigated through the proposed measures and through the attachment to any permission of planning conditions.  The quarry currently operates with no unacceptable cumulative or combined effects and there is no reason to believe that the proposed extension would change this situation.

**Proposed Planning Conditions**

The council have considered the proposed planning conditions (Appendix 11) and consider them to be generic, generally not site specific, do not deal with anticipated problems and in some cases unenforceable as demonstrated below: -

Proposed Condition 3

The condition means that apart from between 2200 and 0600 work can take place on the site which is unacceptable in a rural setting and so close to a village. As Bank Holidays generally fall between Monday and Friday they and Sundays should be specifically excluded from the permitted hours of work.

Proposed Conditions 4- 6

Who has the skill and is going to monitor these conditions?

Proposed Condition 7- 8

Who is going to monitor particle velocity for a period of 6 months? It is presumed that Cumbria County Council will not be in a financial position to carry out such work. Any measuring by the applicant could be called into question?

What is a vibration sensitive property? It is not defined

Proposed Condition 9 – 10

There is no mention of where the depth of 117m is to be taken from?

There is no condition requiring the Applicant to carry out a survey of the existing watercourses now and during the site operations to see if there have been any pollution/changes.

Proposed Condition 11

Which qualified person is going to check compliance and how often?

There has been no base line test so problems cannot be identified

There is no mention of watering down in times of high wind or dry weather to prevent dust leaving the site?

Proposed Condition 13

Once the topsoil has been respread there should be no vehicle movements over it.

Proposed Condition 14

When not in use the artificial lighting units should be also switched off would be a good starting point?

Proposed Condition 15 – 16

What facilities are on site to ensure that vehicles are not carrying mud onto the highway?

There should be a condition which requires the maximum number of vehicles carrying aggregates from the site to turn left to the A595 and right to the A596 so that this can be monitored.

All service vehicles attending the site should enter using the A595 and not through Aspatria on the A596

All HGV’s attending the site should be prohibited from using C2001, U2279, U2278, U2086, U2100, U2085, U2083, U2081, and U2084 at all times.

There is no evidence of baseline pollutants being gathered at various points in the parish particularly the school

Proposed Condition 17

There should be a condition requiring re-planting of tree as each phase is completed.

Additional Planning Conditions

The council considers that there are no safeguards in the proposed conditions for the defective unbonded adjacent landfill site which requires a survey now and during the quarrying operations to prevent pollutants from leaving the landfill and entering the air or watercourses.

The council believes it has demonstrated a great deal of uncertainty and risks with this application and the proposed conditions are not enough to ensure the site can be operated without interference to the health and well-being of the residents of Plumbland/Parsonby and the surrounding area. The council would therefore request that the application be refused

Yours sincerely

Trevor Gear

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Clerk to Plumbland Parish Council