

Dear Jonathan Haine,

I am writing to respond to Planning Application LCC/2023/0030 as the local County Councillor for Wyre Rural Central on behalf of the communities I represent, to object to the application, and to set out considerations for refusing this application in this location.

Road safety and impact on the Highways network

There is simply no suitable Highways access to the site, from a road safety and amenity perspective, and there are compelling reasons for concern about the number of HGVs required for this project and the adverse impact they would have on the wider highways network.

It should be noted that the transport statement provided by the applicant states clearly on page 2 that no currently existing road would be suitable for HGV traffic to access the site, with the application predicated upon the idea that a new entrance could be constructed on the B5270, and the clear implication that no alternative other than this proposed entrance could be made suitable. As such in no circumstance should any site traffic be permitted to make use of Bourble's Lane to enter the site at any stage of the development, nor is there a need to discuss alternative routes beyond noting their unsuitability.

It should be noted that page 2 paragraph 2.3 incorrectly states that no traffic would turn left when leaving the site onto Lancaster Road, but I understand this to be intending to state that all traffic will turn left onto Lancaster Road/ no traffic should turn right heading towards Knott End/ Cartgate.

In any case I believe that the B5270/ Lancaster Road is not suited to the very considerable number of HGV movements proposed. I am very concerned about conflict with other traffic, including school traffic and buses, and also with pedestrians including school children and horse riders. The road is narrow and it is not clear that HGVs and buses moving in opposite directions could sufficiently easily navigate regular meetings.

It is also clearly the case that safety assessments that have been carried out are utterly inadequate. Page 10 of the Transport Assessment indicates that the traffic safety record in this area is good, however it is clear that this incorrect position is due to only considering accidents on Lancaster Road/ the B5270 itself, however the A588 which it connects to, and which all HGVs would travel along, has a particularly poor safety record. The A588 has in the past been regularly assessed to be the third most dangerous road in England, and the junction of the A588, the B5377 and Cemetery Lane is a known accident hotspot which has seen consistent accidents including injury accidents in recent years. It is also the case that HGVs have played a part in many of the accidents at this junction, and the County Council is in the process of consulting on forbidding right turns onto the B5377 due to the concerns that HGVs already bring at this junction.

The potential impact of up to 40 laden, and 40 unladen HGVs needs to be considered in the context of an already unsafe road, and the failure to take this into account in the assessment provided by the applicant renders it unsatisfactory. As such there is an urgent need for further safety

assessment work which should consider the A588 from the Shard Bridge, to the east of Cockerham, at the very least.

There is also a need for clear HGV routing information well in advance of committee consideration as additional HGV movements will bring safety concerns in passing Stalmine Primary School, but could also have a detrimental impact on St William's Catholic primary school in Pilling, if HGVs use Garstang road in Pilling to connect to the A6. Cockerham Parochial C of E primary school could also be affected if HGVs were to use Main Street and Cockerham Road to access the A6. This is in addition to the impact on St Aidan's C of E high school from competing with school parents and school buses and the risks to children accessing the primary or secondary schools in Preesall.

As such, in the unwelcome circumstance of approval being granted, it would be essential for conditions to be in place to prevent HGVs passing these schools at the school starting and ending times, and clear measures would need to be in place to enforce agreed routes, and agreed times of travel on these routes by the HGVs coming to and leaving the quarry site.

There should also be a clear condition to require drive on/ drive through wheel washing facilities, to prevent inadequate wheel washing resulting in mud being spread to the surrounding roads and causing safety issues and dust pollution.

A great safety concern with using Lancaster Road is that there is no refuge area, or safe location for a large vehicle to park outside the application site. In the event of an HGV attending the site earlier than the permitted hours of operation, should they queue on Lancaster Road while waiting for the appropriate time to commence work, this queueing could result in a substantial safety risk to all road users in this area.

In the circumstance where this application were to be given approval, it would be essential that full consideration be given to how queuing traffic waiting to enter the site would be managed, and there would be need for a plan and conditions to be agreed and enforced, however this safety risk seems to me hard or impossible to fully mitigate

Ecological impacts

I am deeply concerned about the ecological impacts of this proposal on an area of important habitat for rare birds, in particular it is essential that pink footed geese and whooper swans are protected from noise and displacement, and the harm that could be done to them is a compelling reason to see this location as inappropriate for this sort of activity. Given the proximity to the Morecambe Bay Site of Special Scientific Interest and the presence of these bird species the perspectives of the RSPB, Natural England, the Lancashire Wildlife Trust and the Fylde bird club need to be taken very seriously.

I also note with some surprise indications within the ecology report provided by the applicant, that they did not find great crested newts on site. Given that there is a known presence of great crested newts on Preesall Hill, and I recall that a great crested newt was found in the vicinity of Sunnyside Terrace/ Cartgate in 2018/2019 when work was being undertaken on a culvert, it strikes me as likely that there are great crested newts on the application site. As such I would want to see further

surveys to ensure that it can either be definitively demonstrated that they are absent from the site, or that the appropriate consideration and accommodation can be made for them, ahead of this application being brought to the Development Control Committee.

Inappropriate location for inert infill

I understand that the Environment Agency would not normally permit landfill of inert waste below the water table, and I believe that the County Council should enforce standards that are at least as demanding as this. I would point out that the water table is generally very high in this entire area, due to the proximity to the sea and low land levels. This should rule out the possibility of inert infill in this location. Contamination of ground water/ aquifers is also a significant concern locally and it is not clear how this could be acceptably managed or mitigated.

I note that in the Environment Agency's consultation response they refer to the need for an abstraction permit, and I understand there is also a permitting process for inert infill. In the unwelcome event of permission being granted for this application, there should be a clear process for all necessary permits to be demonstrated to the County Council ahead of any work commencing.

Impact on neighbours and the wider community

A major consideration against quarrying in this location is the extreme proximity to a large number of properties. There are approximately 150 properties within a 250m radius of the extent of various phases of the site, and therefore there is a particularly large number of people, including the elderly (who are most likely to live in such a rural area) and those with pre-existing health conditions who will be significantly impacted by dust, noise, and health concerns from the site.

There is a pressing need to further assess potential risks to the health of local residents before this application comes to the Development Control Committee. I state this because of the significant anxiety locally about the risks of silica and potential long term impact of very small silica particles on health, but also considering that the County Council's Development Control team explicitly requested that the applicant commission an assessment of these health risks in response to the scoping process, yet the documentation submitted with the current application fails to sufficiently assess or explore how to manage these health risks. The fact that this has not been carried out is indicative that insufficient information has been supplied for the full consideration of this issue.

I also believe that dust and noise concerns could cause issues more widely within Preesall and Pilling, but the most substantial effect is likely to be on residents in the closest proximity

There is a clear need to fully take on board the perspective of the Wyre Borough Council environmental health team, and the views of the Lancashire County Council Public Health team, as well as the substantial local concerns that have been raised.

I note that the Air quality assessment submitted by the applicant refers to the need for a dust management plan to be prepared and submitted to the County Council ahead of operations

commencing. In my view this should be prepared and made available for public consideration ahead of the overall application being brought to the Development Control Committee.

I am also concerned that although page 16 of the air quality assessment states clearly that existing dust levels are mainly influenced by road traffic and agricultural activity, the potential dust implications of the large number of HGVs movements to and from the site don't appear to have been clearly assessed/ quantified.

Should this application be approved despite these substantial concerns, there should be conditions in place to require live dust monitoring not just on the boundary of all properties in close proximity to the site, but there should be discussion with local property owners and monitoring of dust impacts on outside areas/ gardens to ensure that they are still able to make full use of outside areas. And there should be a clear procedure for work on site to pause in the event of dust exceeding acceptable thresholds, any incident should be immediately reported to LCC, and plans should be put in place to work with County Council Officers to rectify whatever failure in dust management has led to thresholds being exceeded. There should also be a clear process for local residents to be able to contact those operating on site at all times in case there is an issue that needs to be resolved, and the County Council should be able to take action against the site operators if they fail to facilitate a communication channel for residents. Given that the applicant's transport assessment is predicated on not having vehicle movements on Saturdays, and the need to manage impacts on residents nearby, there should also be a condition to prohibit any work on site on the weekend

Impact on local businesses

I am very concerned about the economic impact on local businesses in the community, including in very close proximity to the site. We have an archery and air rifle range, caravan sites, and pet care facilities that are very concerned about reduced economic viability due to the proximity to the quarry, and the effect of the noise and dust and additional highways usage and loss of amenity. I would also point out that even for businesses that are further away from the proposed site, including shops, pubs, cafes, and the ferry, given that a substantial number of customers travel in from Over-Wyre, congestion and reduced safety on the highways network could have a substantial impact on these businesses.

I would also point out that there is a precedent already for substantial economic impacts on a business adjacent to the quarry in the wider local area, as there have been known impacts from quarrying in Tarnacre on a local agricultural business there, and it is essential that the potential risks to business in Preesall are fully considered at this stage in the planning process, to prevent the risks of future harms being identified at a point when they cannot be remedied.

Further assessments of the potential economic impact on local businesses should be carried out ahead of this application coming to the Development Control Committee and consideration be given to possible mitigation.

Should this application be approved despite these substantial concerns, a condition should be in place to set some money to one side, to compensate businesses affected in the event of demonstrable loss of income following the commencement of quarry operations.

Flood Risk

The Flood Risk Assessment provided by the applicant is a source of some concern. In particular it is stated that the nearest recent flood event has been 750m west of the site boundary, and was in 2012. This is incorrect, Sunnyside terrace which is 300-400 m from the proposed site entrance has had a substantial recent history of flooding concerns including property flooding at least as recently as 2018. There have also been a number of significant flooding events in this area with 6 occasions that required the deployment of a pump on site in 2020 alone. Sunnyside Terrace has an official pumping plan agreed with Wyre Borough Council to defend properties in instances of extreme weather.

Given this proximity of the site to a known flood risk area, it would be essential that no additional water whatsoever were to be allowed to drain towards Lancaster Road/ the dyke system serving Sunnyside Terrace. It is also the case that the drainage system east of Pilling Lane is generally at or over capacity in times of heavy rainfall, and additional water flows in this direction also pose unwelcome risks. Nonetheless the properties to the west and south of the site remain the greatest concern. The surrounding dyke system ought to be carefully assessed ahead of work taking place to ensure drainage is not inadvertently affected in a damaging way, and there would be value in commissioning a LiDAR survey to capture land heights and drainage channels ahead of any work taking place, and to assist work and restoration of the site should approval be granted.

It is also important to note, given the known flood risks in the Sunnyside area, that procedures are in place for Wyre Borough Council or Lancashire County Council to permit a temporary road closure of Lancaster Road through to Cartgate, should there be a risk of property flooding. If approval were to be granted for this application therefore, it would be essential for there to be a procedure for all work to cease and all deliveries to be suspended due to the road closure, and to prevent HGV drivers being put in a difficult position as they would be unable to access the site. There would also need to be consideration of how workers on site could be evacuated/ leave the site if the road needed to be closed.

The failure to include all relevant information on local flood risks demonstrates that the current assessment documentation is insufficient to capture the potential flood risks, and more work urgently needs to be done to take this into account.

Public Rights of Way

The importance of maintaining access to public rights of way must be fully considered at the point of an application being determined and given that footpath 0203028 crosses the site and that bridleway 0203021 is bounded by parts of the site the rights of the public to use these routes needs to be considered and in my view should be maintained throughout any potential works.

I note that within the documentation submitted by the applicant it is indicated that the continued usage of the public rights of way could be maintained throughout work on the site by erecting fences and having crossing points for vehicles to safely access different sections of the site without the need to close the footpath or the bridleway. As such, in the disappointing circumstance where approval were to be given for this application, clear and explicit conditions should be applied to protect the bridleway on Bourble's lane and the footpath through the site, for the entire period of operation and restoration.

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My understanding is that there is sufficient material reserves for Lancashire's needs including at the currently inactive Runshaw Quarry site, and even if the Council were to have insufficient reserves they should still reject an application that has clearly unacceptable health, ecology, highways and other impacts, and to me this application is untenable on this basis.

To conclude I Strongly feel the impact on the community would be totally unacceptable with too many residents living in too close proximity, and local flooding and traffic safety issues being so severe that any risk of exacerbating them should not be countenanced. Having spoken to many residents of Preesall and Knott End, and of Pilling, I can confidently state that although views may vary, the vast majority of people living in the communities that will be affected are strongly opposed to having a quarry operate in this location. In the disastrous circumstance of permission being granted I have suggested a number of conditions that would give some mitigation or capacity to manage some of the consequences of this application, however the reality is even with the best possible conditions, and operation and management of the quarry it would have a severely detrimental effect on the surrounding area for the duration of operations, and it is clear that this application in this location should be refused

Yours faithfully,

Matthew Salter

County Councillor, Wyre Rural Central