

## **Supporting documentation from Preesall Town Council**

**re: APPLICATION: LCC/2023/0030**

**Proposed Bourbles Quarry on Land off Bourbles Lane, Nr Preesall, Lancashire**

**Planning Application to allow the extraction and processing of sand & gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to leisure end-uses, agricultural land and biodiversity enhancement, using imported inert fill.**

The council's concerns and observations are summarised within the headings below:

### **1. GENERAL COMMENTS**

Overall, the Council has been disappointed by the quality of the application and accompanying Environmental Impact Assessment.

The documents have contained several omissions and errors including the names of roads, land included in the application that does not belong to the applicant, as well as contradicting information across different documents provided by the developer. For example, the traffic report (version 3) states that the quarry will not work on weekends, whilst it is clearly stated in the application that it will be open for half a day on Saturdays. In addition, statistics are often confusing and differ across the different supporting documents. The number of HGVs per day is very confusing, as to how many journeys there will be, and which figures include both in and out journeys. This makes it difficult, particularly for local residents without a technical background, to understand the full measure of the proposal and how it will impact them. Whilst several errors have been corrected over the consulting period, and some are minor, added together they give an impression of a lack of attention to detail, which does not inspire confidence. The Environmental Statement also states there will be no significant noise, air quality, or ecological issues and no highways issues to answer. A lack of acknowledgement of impact of the development on the local community both leads to a lack of credibility in the report but also means that crucial mitigation measures for the harm to the local community are not included. It is also unclear what the level of public consultation has been.

The Council highlights in the sections below its main concerns and information it believes to be incomplete or missing.

### **2. LOCATION AND TOPOGRAPHY**

The planning statement states that the quarry is approximately 1.5 km east of the village of Preesall. It should be noted that the quarry is in the village of Preesall and that several residential properties directly border the site. The proposed development location would directly affect St Aidan's School in Preesall, a secondary school with almost 900 pupils, less than 1km away from the site boundary. It also directly affects a primary school with around 130 pupils, a nursing home and many businesses. A second primary school is just outside the 1km boundary. Fifty-two properties are directly affected and 102 properties/businesses are indirectly affected. These figures are based on up-to-date material. Among the businesses directly affected are an archery school used by children and commercial kennels, both of which adjoin the proposed site. The site is also on prime agricultural land,

predominantly grade 2, which has been a ground for a rejection of quarrying in this area in the past.

### 3. DRAINAGE AND WATERCOURSES

There is regular flooding on the whole site, as the applicant's documents acknowledge. This has potential for watercourses to be contaminated by polluted water.

There is also potential for debris to silt up dykes and prevent the drainage system running as it should. The ability of the dyke system to work effectively and the prevention of flooding is always a major concern in this area, with areas close to the site (Sunnyside) already flooding regularly causing major distress for residents whose properties flood and also blocking off Lancaster Road to traffic. Existing flooding does not come from the sea, but from the dyke system's incapacity to cope with the amount of rainwater.

Whilst bunds would be necessary on site for protecting the amenity of residents, including from noise, many bunds would be positioned alongside dykes, on land that will be quarried and traversed frequently by HGVs, causing vibrations and movements in the land. It seems obvious that there will simultaneously be displacement of soil and other materials into the dykes, and it will be more difficult to reach them to keep them clear. Preesall Town Council believes that in the past bunds have caused flooding issues locally including at the Sharples Quarry at Tarnacre lane.

There are also fears over the impact this would have on water table levels and the potential for increased flooding in the wider area. There is a main water pipe, which runs the length of the proposed development site along Gaulters Lane towards Sandy Lane, which local residents have advised is asbestos. The deeds of the adjacent properties do not permit any development within 10ft of the pipe, which runs 6ft from the boundary of the proposed development site.

The proposals show that the plan is to raise the site by a metre. Again, the concern is that this would disrupt the existing balance of flood alleviation measures and exacerbate flooding risks elsewhere.

### 4. ACCESS ARRANGEMENTS

#### 4.1 Highways

There are only 2.5 ways in and out of Preesall and Knott End, if Green Dick's Lane is included (part of Green Dick's Lane is in Pilling). The traffic plan covers 84m to/from the access to the site, which is wholly inadequate as it does not take into account the very real issues that quarry traffic will face on the way to and from the site and which will impact local residents and businesses.

The proposed quarry would be situated adjacent to the B5270 and A588 Burned House Lane. When the approach road from the A585 is closed because of traffic or accidents, or there are problems along the A588 itself, narrow country lanes - which are totally unsuitable for HGVs - are the only alternative way for residents to reach their homes and businesses and for emergency and other vehicles to reach residents.

#### 4.2 The A588

The A588 has been previously classed as the third most dangerous road in the country according to official statistics.

The traffic will have to come from out of area to access the proposed site - whichever direction is used, it is not suitable for the volume of traffic involved. Coming from the east the traffic would need to navigate Fold House Corner at Pilling and coming from the west it would need to navigate the junction of Burned House Lane and Hallgate Lane. Both corners have blind bends, are extremely narrow and have been the sites of multiple accidents.

Even for usual traffic there are pinch points on the road from Shard Bridge. For example, the road past the school in Stalmine is a daily issue with normal traffic.

An application for fracking in Roseacre was turned down because it would cause an increase in traffic which would result in "an unacceptable impact" on rural roads and reduce road safety. This application includes HGVs having to turn Pointer corner, Preesall Park corner, Lancaster Road corner and Fold House Corner as well as HGVs navigating tight country roads with no pavements to safeguard pedestrians and that are frequently used by equestrians and other vulnerable users.

#### 4.3 The B5270 'Lancaster Road'

The siting of the access road to the quarry on the B5270 gives rise to traffic safety and local amenity concerns on the stretch of the B5270 close to its junction with the A588 as the road at this point is narrow, on a sharp bend and has a number of properties close to the road.

The B5270 is 5.1 metres wide and an HGV is 2.5 metres wide, so there is insufficient width to meet oncoming traffic. This road has recently been resurfaced and is already showing signs of subsidence.

The B5270/A588 is a regular bus route between Knott End and Lancaster, which makes the traffic implications worse. Eight St Aidan's school buses use both this route and Burned House Lane twice a day, some pupils walk to the school and some sections of these roads have no pavement. An increase in the type of traffic proposed poses a severe risk to both vehicle users and pedestrians. Some houses on the B5270 already have issues with shaking as lorries pass and this is only likely to be exacerbated. There are no safe access arrangements to the site on the main roads.

#### 4.4 Unclassified roads and bridleways

It is appreciated that the developer recognises that Little Tongues Lane and Bourbles Lane, Nickson's Lane and Gaulters Lane are extremely narrow and totally unsuitable for the size/amount of vehicles proposed.

#### 4.5 HGV traffic

Although figures are confusing there will be a substantial increase in the amount of HGV vehicular movement which also has the potential to directly impact the parishes of Hambleton, Stalmine, and Pilling along with those further afield.

The traffic report states that there are several businesses located along the length of Lancaster Road meaning Lancaster Road is currently already used by HGV's and PSV's. There are different classifications of HGV, however, with currently very few four axle vehicles that need to access the villages of Preesall and Knott End, with most HGVs being delivery trucks of 3 axles or less for local food shops or pubs. Those used for the quarry development would not be 'road friendly'. Four-axle tippers are solid and would cause more vibrations and noise and damage to the roads.

The traffic statement also says that the A588 has very low HGV / PSV content an A-class route and such will have no difficulties accommodating the development traffic. This ignores

the high accident rate on the road and the fact there are no alternative routes should there be problems along this road. Additionally, whilst the traffic statement takes into consideration different levels of HGV use on average on different days, it crucially does not consider that there will be different levels of HGV traffic at different times of the day. If the quarry opens at 7am the likelihood is there will be queues of HGVs and tipper style trucks waiting to get into the quarry from far earlier than 7am with nowhere identified for them to park. The A588, which is the main route for many residents from Preesall and surrounding villages to access work, school, the doctor, shopping and emergency services, will potentially be a long traffic queue to access the quarry. Early morning traffic will also coincide with school buses who will not be able to pass and children walking to school on roads including the B5270, which does not have any pavement.

#### 4.6 Other traffic

Increased HGV use will cause inevitable problems that will impact all residents and businesses, but there are particularly serious implications for emergency vehicles, fire engines and access to health facilities with 'one road out' to hospitals in Blackpool or Lancaster. Residents are already far from a hospital. District nurses travel in from Great Eccleston. There are no fixed provisions in the villages themselves and many elderly are isolated.

Some of the other traffic that the roads already struggle to accommodate and which will hamper HGV movements, and therefore the movement of the whole population of the area, include holiday lodges and caravans being moved regularly - including to a new site on Staynall Lane in Stalmine. There are also frequent agricultural vehicles, particularly in the summer, and at harvest time, when the quarry plans to be at its busiest, including silage and slurry services for the three dairies in Preesall, Cockerham and Hambleton.

Finally, whilst the proposed quarry aims to promote tourism at the end with the inclusion of fishing lodges, not enough attention is given to the detrimental effect of the proposed quarry and its associated traffic on current visitors, including motorcyclists who visit Knott End and its cafes, shops and pubs twice a week for six months of the year, and equestrians who use the roads daily, and travellers with horses and traps who use the road frequently and have meet ups at the Bourne Arms.

#### 4.7 Accidents

The Council was surprised to read that the area has a low incidence of accidents. The glaring omission is the A588, with the application focusing only on a small area of road close to the quarry entrance. Over the last few years there has been on average around 17 accidents per year on the A588 according to the LCC collision record. There have also been regular accidents on the Burned House Lane/ Fold House corners. On the smaller Lancaster Road, freedom of information requests from local residents showed there had been 112 reported complaints on road quality near the proposed access site with several including damage to vehicles. Only last week there was a collision on Lancaster Road on the blind corner near the proposed quarry entrance between a car and a scheduled bus service. Luckily there were no fatalities, but this caused considerable difficulties and delays on Burned House Lane and Head Dyke.

#### 4.8 Other vulnerable road users

Road safety has not been adequately addressed for cyclists, equestrians and pedestrians. There is new guidance on safe passing distances and speeds for people driving when overtaking a vulnerable road user that include leaving at least 1.5 metres when overtaking

cyclists and at least 2 metres when overtaking horses and pedestrians. It is unclear how this will happen on the A588 never mind the B5270.

Accessibility for pedestrians, cyclists should not be prejudiced in any way according to the Wyre Local Plan (2011-2031). Lancashire aims to encourage children to walk to school and several children use Lancaster Road to walk to and from St Aidan's. Meanwhile, at least two residents present at a recent Preesall Town Council meeting reported experience of children being 'clipped' by traffic whilst walking to/from school on roads with no pavements (Lancaster Road and Burned House Lane).

There is also no information in the report on general safety and security measures on the site, including to ensure that children and others are not able to access it and be harmed in any way.

## 5. PUBLIC FOOTPATHS AND BRIDLEWAYS

The Council notes there is a substantial network of footpaths and bridleways in the local area, which are important to the local community and must stay open at all times. It is acknowledged that consideration has been given to the location of the footpaths and bridleways, as well as alternative arrangements for their use and crossing whilst the proposed quarry is in operation. However, there are concerns that noise and machinery will still affect horses. Preesall Town Council notes that people have populated this area to live a green life and rear their horses. Why should their lifestyles be affected?

## 6. HABITATS

It is well noted that the site is adjacent to and functionally linked land to a designated SPA, close to an SSSI and that part of the site is a Biological Heritage Site.

The original ecological appraisal submitted was from 2019 and for a tourism development on a much smaller scale and site than the quarry. Whilst Preesall Town Council appreciates that more site visits and surveys have been carried out in Ecological Impact Assessment, including a species mapping by drone, in its objection to the Scoping Document, Preesall Town Council has noted that a water vole survey needs to be carried out. This has not been done and there has been no explanation as to why.

In addition, Fylde Bird Club has submitted that the Ecological Impact Assessment has seriously undervalued the importance of the site, including the Zone Of Influence (ZOI) as Functionally Linked Land by Natural England. According to Fylde Bird Club, the applicant's Ecological Impact Assessment document fails to recognise the existence of a wealth of bird records that support the Functionally Linked Land designation, despite the fact that these data were supplied to Envirotech by Fylde Bird Club. The applicant's report leads the reader to conclude that the land is of little importance to overwintering birds whereas evidence unequivocally confirms that it is extremely important to the birds of the SPA. For over 50 years this area of land has been known to bird watchers as a hotspot for wintering Pink-footed Geese and that is still the case today.

The RSPB has objected to the proposal due to concerns about Pink-footed Geese, the Whooper Swan, Whimbrel and Black-tailed Godwits and requested survey work that spans at least two years.

The Council would also like to highlight that the Ecological Impact Assessment states that there is no evidence of bats roosting in or near the site. Two local residents living directly adjacent to the site have reported bats roosting in trees in their gardens (Woodlands and the

kennels). The fact that this has not been included in the application would seem to be a failure both to monitor the ecology of the area, and to consult with local residents.

The council reiterates its wish to see evidence of detailed environmental studies undertaken throughout the year which show how wildlife corridors would be impacted by the proposed works and the risks to key species and migratory birds.

## 7. ENVIRONMENTAL IMPACT ASSESSMENT

### 7.1 Health

Local authorities have a statutory obligation to take appropriate steps to improve the health of the people who live in their area as well as obligations under the Equality Act to ensure non-discrimination in enjoyment of rights. The potential impact on health of the proposed quarry is significant, with a potential higher level of respiratory disease such as asthma, COPD and nasal infections being found in those living near quarries. There would be a need to keep doors and windows closed to minimise risk of toxic dust entering properties. The potential for immune system disorders, lung cancer, silicosis, kidney disease and chronic obstructive pulmonary disease as a consequence of exposure to silica dust is also recognised as a risk from quarrying. Even after vehicle wheel washing, there is potential for significant additional dust created by HGVs entering and exiting. Noise pollution also brings increased stress for neighbours from vehicle movements. Imported inert waste would come from all over Lancashire. This is nonbiodegradable, thus contradicting the biodiversity improvements claimed. The vehicles would also increase CO<sub>2</sub> emissions, something that Wyre Council is aiming to reduce as part of the climate emergency initiative. Preesall Fleetwood Charity School is a forest school with an extensive outdoor curriculum and extracurricular activities. Although Huckleberry's Nursery and Carter's Charity School – a beach school - aren't within the 1km radius they are directly north of the proposed quarry. This area is subject to strong winds which would easily carry sand and dust particles in their direction. The council would wish this to be factored into the assessments.

The applicant believes there to be no harm to the local residents from the proposed works. This is untrue as the scoping study and application alone have caused severe stress to a number of residents. The proposed works would have a detrimental impact on those living in the vicinity, whether that be from noise, vibrations, dust, increased vehicular traffic or general loss of amenity. The council is disappointed that none of this has been recognised and that the human element impact of the proposal has still not been addressed.

It is common knowledge that health services are already struggling, including at the doctors' surgery level. Figures from Over Wyre Medical Centre indicate there are 11,519 patients currently serviced by the surgery. Of these the Preesall Town Council would like to highlight that: 507 patients are registered with COPD; 844 with asthma; 110 with bronchitis; 1302 with cardio-vascular disease; and there are 1144 aged 80+, all of whose conditions have the potential to be affected by a significant increase in dust, noise and traffic. The elderly are also at particular risk from the effects of silica dust as are children.

There are particular concerns about the health and rights of children whose best interests should be taken into account in any decision. Although Preesall Town Council has stressed the direct impact the traffic will have on roads where children walk to school, it should also be noted that their schools and homes are in close proximity to the quarry. Children are one of the groups most impacted by the negative effects of silica dust, the effects of which have not been adequately dealt with in the EIA. Children also have the right to a safe environment to live and play in.

## 7.2 Noise

Impact on local amenity is a key issue for a development of this size close to local residents, with noise and dust are crucial in this regard. Any impact must be shown to be acceptable, particularly to those properties nearest the site.

The Council is disappointed in the initial baseline assessment conducted by the applicant on such an important issue. Only two periods of monitoring of 15 minutes each were conducted at seven locations across the site. The duration of monitoring is entirely inadequate to accompany an Environmental Impact Assessment and should have been longer term i.e. 48-72 hours or longer to establish the prevailing conditions and diurnal variations, which are likely to be lower than those indicated in the report. There is also no study of low frequency noise which is a serious issue for quarries. The proximity of human receptors had also been measured from the access and not for people walking on their property. Residents are entitled to enjoy their own property and home peacefully (see Human Rights Act). This should be taken into consideration by the local authorities when taking any decision or actions.

## 7.3 Dust

Again the Council would like to note that there are residents who live far closer than the 1.5 km implied in the planning statement. It needs to be shown that any impact of dust is acceptable including to those nearest the site. Government policy is to achieve cleaner air and the Wyre Local Plan (2011-2031) states development will only be permitted where it (i) Will not give rise to a deterioration of air quality in a defined Air Quality Management Area or result in the declaration of a new AQMA. (ii) Where development will result in, or contribute to, a deterioration in air quality, permission will only be granted where any such harm caused is significantly and demonstrably outweighed by other planning considerations and appropriate mitigation measures are provided to minimise any such harm.

In a bill to ensure that any quarry is built at least 1km away from settlements, Matt Western MP has highlighted research that “none of the air quality standards for silica are adequate to protect people living or working near sand mining sites. The danger of airborne silica is especially acute for children.” Despite being requested to pay attention to this in their report, the Council can find no information on how the very serious effects of silica dust will be managed.

Again the Council considers the baseline to be ineffective, taking part in the autumn during wet weather when the application claims the quarry will be working less.

## 8. CONCLUSIONS

Preesall town councillors voted unanimously to object to the proposals put forward in the application on the grounds that on balance the detrimental impact to residents, businesses, health, traffic, highways and road safety, wildlife and the whole ecological environment would be severe.

At the heart of Preesall Town Council's objection is the knowledge that the road network is not suitable for this many large vehicles and that there is currently no safe access point for HGVs in the proposal with the B5270 unacceptable in the Council's view.

At a time when we should be looking to reduce our carbon footprint and protect the natural environment the council, on the evidence available, believes this proposal would do the opposite and the council would be derelict in its duty to its residents, neighbouring parishes and the environment if it did not oppose the proposals as presented, in the strongest terms.

The Council is disappointed with the assessments, which appear not to recognise the harm that the proposal would have on the area of the planned extraction site and the wider community.

Finally, perhaps because of the applicant's insistence that there is little to no harm to the local area, there is equally little in the application in the way of mitigation or compensation for harm to the local community. The longer-term small number of commercial fishing lodges and the removal of a hatchery business in no way compensate for the impact on health and wellbeing, loss of amenity, ecology and biodiversity that this application will cause.

The council would like to ask that it is copied into any documentation regarding this application.

Your sincerely,

Preesall Town Council

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