

Lancashire County Council
Development Management Group
Environment Directorate
PO Box 100
Preston
Lancashire
PR1 0LD

Our ref: NO/2021/113331/01-L01
Your ref: LCC/2021/0007
Date: 12 March 2021

Dear Sir/Madam

PRIOR EXTRACTION OF SAND / GRAVEL AND SUBSEQUENT RESTORATION WITH INERT ENGINEERING FILL TO FACILITATE A PLATFORM FOR EMPLOYMENT DEVELOPMENT, OR AGRICULTURE, WITH PERIPHERAL LANDSCAPING; LAND NORTH OF A674 MILLENNIUM WAY, NORTHEAST OF M61 JUNCTION 8

Thank you for consulting us on the above application on, 16 February 2021.

Environment Agency position

We object to the planning application, as submitted, because the applicant has not supplied adequate information to demonstrate that the risks to groundwater resources can be safely managed. Without a risk assessment showing the contrary, the risks to groundwater from this development are considered unacceptable. We recommend that planning permission should be refused on this basis in line with paragraph 170 of the National Planning Policy Framework.

Reasons

The site is located upon a Secondary A Aquifer and insufficient information has been provided to demonstrate that the risks to groundwater resources can be safely managed.

'The Environment Agency's approach to groundwater protection' A5 - Supply of adequate information states: 'The Environment Agency expects developers and operators to provide adequate information to statutory bodies, including the Environment Agency, when submitting their proposals. This is so that the potential impact on groundwater resources and quality can be adequately assessed. In particular, where new techniques, operations, products or substances are involved, developers or operators should be prepared to supply specific relevant data to allow the risk to groundwater to be assessed'.

Environment Agency
Cumbria & Lancashire Area Sustainable Places Team: clplanning@environment-agency.gov.uk
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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The planning application is for mineral extraction of some 300000 tonnes of sand and gravel from the area immediately next to Junction 8 of the M61 motorway. The area covering the planning application is approximately 9.9ha in size. A Supporting Statement including Section 8 Hydrogeological Risk Assessment has been submitted in support of this application.

We have reviewed the above and have the following comments/recommendations: The application states the proposal is for non-mineral extraction in preparation for the development of an industrial site, that outline planning permission has been granted for, by the importation of inert waste material to construct engineered development platform.

The area is underlain by glaciofluvial sand and gravel at surface in the main part of the site and peat deposit in the northern part. Sand and gravel is classified as a Secondary A Aquifer due to its permeability and ability to store and support water supplies on a local scale. In some cases these deposits form an important source of base flow to rivers.

The Supporting Statement indicates that 5 trial pits were excavated across the site in order to determine the groundwater level in an upper superficial deposits. It is stated that trial pits demonstrated water levels across the whole site to be at 4.5m below ground level and it is intended to excavate the mineral to 3.5m depth so to preserve a 1m thick layer above the water table. We note however that trial pits logs were not provided with the statement and no further evidence to demonstrate the findings of the investigation were included. Additionally there are two drainage ditches present within the site boundary that would suggest rather shallow groundwater. It is also considered that the peat deposit located in the northern part of the site would be to certain degree supported by surface water and drainage ditches depending on groundwater flow in the upper layers. Despite the report stating that the excavation will not take place in this part of the site and a 10m stand off from the peat deposit is planned, it is considered that removing sand and gravel could potentially impact on this part of the surface geology.

The HRA submitted with the application focuses on the pollution aspect of the groundwater protection (source-pathway-receptor links) in assumption that the excavation will remain dry and minimum 1m above the groundwater level. It is however considered that further information with regard to groundwater levels as explained will be required in order to demonstrate that this is the case.

We are of the opinion that further information is required to enable assessment of the proposal and impact it may have on the groundwater resources and wider environment. In order to demonstrate groundwater levels (and that the excavation remains dry and 1m above the local groundwater level) the applicant will be required to install groundwater monitoring points and monitor groundwater levels for period of time including sessional variations. Minimum 3 groundwater monitoring points around the site will be required to monitor groundwater levels and to determine groundwater flow direction also in view of the future restoration plans including waste deposit on site. This will also need to be supported by the water feature survey that will assess all surface and groundwater dependent water features in the vicinity that may be potentially affected by the proposed works.

Also close vicinity of the Leeds & Liverpool Canal and potential impact on its integrity after removing top layers of superficial deposit is of concern but this seems to have been considered by the Canal & River Trust.

Overcoming our objection

We will maintain our objection until we receive a satisfactory risk assessment that demonstrates that the risks to groundwater resources posed by this development can be safely managed.

Advice to applicant

This development will require an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016, Regulation 12. You should be aware that there is no guarantee that a permit will be granted.

The applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues arising from the permit application process.

Yours faithfully

Mr Jeremy Pickup
Planning Advisor - Sustainable Places

E-mail clplanning@environment-agency.gov.uk