

HARLEYFORD AGGREGATES LTD

**Lower Hall Farm, Samlesbury,
Lancashire**

**Proposed Sand & Gravel
Extraction**

ENVIRONMENTAL STATEMENT

January 2021

Non-Technical Summary

1 INTRODUCTION

1.1 This Non-Technical Summary relates to an Environmental Statement (ES) submitted in relation to the proposed development at Lower Hall Farm (LHF), Samlesbury. The proposed development is Schedule 1 EIA development as defined in the 2017 EIA Regulations because it consists of the carrying out of development of quarrying “where the surface area of the site exceeds 25 hectares”.

1.2 The 2017 Regulations made amendments to the original EIA Regulations to provide more effective EIA by:

- streamlining ES assessments to reduce regulatory and administrative burden and reduce costs in line with the drive for smarter regulation,
- to move away from a purely procedural process to focus the ES on the issues which are significant, and
- to thereby achieve an ES which is shorter and relevant.

1.3 These aims are to be achieved by the application throughout the EIA process and in the ES of restricting assessment to addressing only those effects which are “significant”. Impacts or effects which have little or no significance need only very brief treatment.

1.4 Other amendments in the Regulations relate to providing that an ES considers, where relevant and where significant, matters relating to Climate Change, the risks of major accidents or hazards, and the requirement to take account of other relevant available environmental assessments.

1.5 The Regulations define that Environmental Impact Assessment is a ‘process’. The Regulations state that the EIA process must identify, describe and assess in an appropriate manner for each case the direct and indirect significant effects for the relevant factors. That assessment must be undertaken by competent experts.

1.6 The ES has assessed other relevant environmental assessments in the locality namely:

- the removal of Samlesbury Weir
- night-time activities at the adjacent Brockholes Centre, and
- the development of an EfW facility at Red Scar Industrial Estate.

1.7 The results of all three assessments demonstrated that the relevant developments would not give rise to likely significant harm to the environment locally or over a wider area either individually or in combination with other permitted or proposed development. They thereby demonstrate that:

- noise from the mineral operations will be masked by noise from the M6 and not lead to any significant impact on residents or designated and non-designated biodiversity sites

- air quality emissions from the mineral operations on residents amenity and health, and on designated and non-designated biodiversity sites, would not arise, or would be negligible and would be insignificant

1.8 The conclusions of those environmental assessments were accepted by the relevant statutory agencies and planning authority and permission was granted.

2 THE PROPOSED DEVELOPMENT

2.1 The application consists of the phased extraction of a net saleable reserve of some 3.0 million tonnes of sand and gravel, the erection of a processing plant and the construction of a private access road between the A59 and the process plant area.

2.2 The area of the application is mainly improved and semi-improved agricultural grassland with minor hedgerows and the occasional trees. The exception is a low lying area of a former mineral working which consists of regenerated woodland, agricultural land and a pond.

2.3 The application includes various phased landscaping and screening works; new tree and hedgerow planting; the provision of new water habitat, watercourses and ponds; and provides for the final restoration of the site to wetland, woodland and as a passive Natural Flood Management Facility. The application provides for aftercare.

2.4 On completion of the mineral extraction and processing operations the processing plant will be taken off site and the processing plant site and the private access road will be removed and the land restored mainly to woodland.

2.5 All excavated soils, subsoils, overburden and such unsuitable bedrock excavated for the access road and the plant site will be retained on site. Water used in the processing plant will be sourced from an excavated clean water pond and after use in the processing plant will be returned to a silt pond and will then drain into a clean water pond for further use in the processing plant.

2.6 The processing plant will be electrically powered. The extraction, unprocessed mineral haulage and load out will be undertaken by diesel powered mobile plant.

2.7 The development will require the removal of trees and hedgerows mainly of poor biodiversity value with the replacement in restoration of biodiversity target habitats including wetland, reed beds, ponds, and woodland. The restoration will enhance biodiversity by increasing connectivity.

2.8 The application is accompanied by a draft Unilateral Undertaking (UU) which includes obligations to maintain existing landscape and ecologically valuable woodlands, maintain new planting and other obligations. In the event that permission is proposed to be granted by Lancashire County Council (LCC) as the mineral planning authority (MPA) then the UU will be signed and submitted.

2.9 The development application will produce a net immediate and long-term increase in wetland, ponds, hedgerows and woodland habitat. The development operations will provide passive substantial and significant flood alleviation capacity which can subsequently be incorporated into a formal flood management scheme subject to any additional relevant permissions and permits.

3 ALTERNATIVES

INTRODUCTION

3.1 The EIA regulations provide that where a developer considers alternatives to the proposed development then such alternatives should be assessed in the ES in so far as they are reasonable alternatives as may be considered by the developer.

3.2 The alternatives considered are identified below.

1. Alternative supply from other deposits in the control of the Applicants
2. Alternative supply from other deposits in the control of the Trustees
3. Alternative methods of working at LHF
4. Alternative processing plant location at LHF
5. Alternative access routes/junctions to/on the A59
6. Alternative transportation modes
7. Alternative restoration

ALTERNATIVE SUPPLY FROM OTHER DEPOSITS IN THE CONTROL OF THE APPLICANTS

3.3 The Applicants have no other deposits in their control in the vicinity of LHF or elsewhere in Lancashire.

ALTERNATIVE SUPPLY FROM OTHER DEPOSITS IN THE CONTROL OF THE TRUSTEES

3.4 The application does not extend over all the land in the control of the Trustees. There are some other deposits of sand and gravel elsewhere in that land.

East of application area

3.5 The application area is part of the largest deposit of fluvial sand and gravel in the control of the Trustees. Part of this deposit to the east and

south running up to Seed House Farm, Seed Park Wood and Bezza House is excluded from the application. Due to potential environmental and infrastructure constraints coupled with the non-commercial yields this area does not represent an alternative to LHF.

Adjacent to Junction 31 of the M6

3.6 There are two small fluvial deposits located to the south of the Ribble and southwest and southeast of the M6/A59 junction respectively.

The SW sector

3.7 In the south west sector the deposit consists of sand and gravel in a floodplain and a terrace. The workable mineral is around 240,000 tonnes gross. The site is used for agriculture mainly for arable crops with no significant biodiversity interests. There are no hedgerows within the site but it does contain a few mature trees. The area is mainly flat and exposed and visually prominent from the A59/M6.

3.8 This alternative will not meet the supply requirements; will not postpone the need for permission at LHF; and will have operational difficulties. It remains a potential site for a small scale operation but is not an alternative to LHF.

The SE Sector

3.9 The deposit here is more extensive but marginal and thin. The potential gross yield is less than 200,000 tonnes and is probably uneconomic.

3.10 The area is currently to agricultural use and contains a number of hedgerows and mature trees but is of no significant biodiversity value. The area is flat and exposed and visually prominent from the A59. There are a number of water supply boreholes in this area which would restrict extraction operations.

3.11 This alternative will not meet the supply requirements; will not postpone the need for permission at Lower Hall Farm; and will have operational difficulties. It remains a potential site for a small scale operation but is not an alternative to LHF.

Other Minor Deposits

3.12 There are no other commercially viable deposits.

ALTERNATIVE METHODS OF WORKING

3.13 The proposed working method involves working that part of the deposit above the water table 'dry' and then that part within the water table 'wet'. The alternative considered would be to de-water the deposit by cells and work it all 'dry'.

3.14 That has been rejected due to additional pumping costs, further noise generation and the risk of inflow or harm to the River Ribble and groundwater resources. Such methods would also slow down the restoration of the extraction area and delay/conflict with its early availability for flood relief.

3.15 This is a commercially viable alternative but has been rejected because of the potential greater environmental and amenity harm and the delaying effect on restoration and flood alleviation potential.

ALTERNATIVE PROCESSING PLANT LOCATION

3.16 The proposed processing plant location benefits from being located nearest to where the private access road reaches the site as well as being screened from the nearest residential property by existing mature woodland and buildings associated with Bezza Nursery.

3.17 Alternative locations at LHF (both within the application area and other land to the east) would not be able to utilise those benefits, be more exposed and require more visual and noise screening, and/or would be closer to residential property.

ALTERNATIVE ACCESS

Alternative location of junction on the A59

3.18 The location of the junction on the A59 is limited by the north-south line of the high pressure gas main to the east (and land ownership limitations just beyond) and the extent of ownership to the west. No better alternative location for an access on the A59 exists.

Access via Potters Lane

3.19 Potters Lane is partly a public road and partly a private road which is also a bridleway available for walkers, horse riders and cyclists. The route provides access to residential and commercial property as well as agricultural operations and to the Samlesbury Primary School and Samlesbury Church. The route is now part of an identified cycle network to primarily provide a route off of the A59 for cyclists between the wider Preston area and the expanding enterprise zone at the former Samlesbury Airfield.

3.20 Potters Lane is not a viable alternative due mainly to the extent of environmental and amenity impacts and the inadequacies of the road.

Alternative Route to the A59

3.21 The route of the private access road was defined following consultation with the Trustees and the relevant tenant farmers. That engagement produced some suggested alternatives which have been assessed but discarded as the alternatives investigated produced greater impact on the environment, amenity and farming and have been rejected.

Access via Higher Brockholes and Junction 31 of the M6/A59

3.22 Both the former Higher Brockholes Quarry and Lower Brockholes Quarry accessed the highway network via a purpose designed junction layout onto the M6/A59 junction. The former Higher Brockholes Quarry is now a nature reserve and visitor centre, the Brockholes Centre, owned by the Lancashire Wildlife Trust (LWT).

3.23 The applicants have fully engaged with LWT to see if a viable route could be developed across the former quarry, and across the River Ribble using the existing M6/A59 junction. Those discussions concluded that the movements of hgv's would probably be unacceptable. This route is therefore not an available alternative.

3.24 The crossing of the River Ribble would require a bridge spanning the river located upstream from Bezza Brook. There were no significant engineering limitations with such a structure that were not resolvable. Visual impact and noise were identified as significant issues for residents at Samlesbury.

3.25 Flooding occurs in and around where the access road goes under the M6 alongside the right bank of the Ribble. Likely scenarios under Climate Change include more severe flooding events. It would be undesirable to have the operational area potentially isolated by flood events.

3.26 The new bridge would need to have robust security protection works to prevent unauthorised access, vandalism and damage and also unauthorised access to the operational site beyond and to prevent people putting themselves into danger. Realistically such works would be both difficult to maintain and a major visual intrusion.

3.27 This alternative access has been rejected because of access difficulties and potential impacts on amenity of local residents, flood risk issues and risk management in relation to the access and specifically the bridge over the Ribble.

ALTERNATIVE TRANSPORT MODE

3.28 Mineral companies are strongly encouraged by policy at national and local level to investigate the transport of mineral by modes other than by road to reduce traffic on the highways, and such associated environmental costs, and thereby produce a more sustainable solution.

Waterborne Transport

3.29 Transporting aggregate along waterways by barge is in comparison with road transport more fuel efficient and produces less CO₂

per tonne mile. Policy CS5 in the Adopted Core Strategy supports such alternatives.

3.30 Harleyford Aggregates are one of a very few mineral extraction companies in the UK with experience in using barge transport to deliver aggregate along inland waterways and the Company has therefore evaluated using barges as an alternative access and transport mode.

3.31 The river displays high variability over the year and over days in water depth and flow. It is effectively unconstrained and adjacent to the extraction site has an irregular bottom form with locally extensive shoals and shallows formed from gravel derived from upstream erosion. There are rock bars in the bed downstream,

3.32 The infrastructure required would consist of:

- (i) a fleet of barges (probably constructed specifically for this one-off contract);
- (ii) a relatively simple loading facility at the bankside near/adjoining the plant area, and
- (iii) an unloading wharf with direct access to the river (if possible at all states of tide if tidal) and then the main highway network

3.33 Loading and unloading will produce impacts of noise, and also of light pollution, which may be intrusive and incapable of mitigation.

3.34 The nearest possible unloading site is located downstream on the south side of Wallend Road west of Preston.

3.35 The loading and unloading operations will give rise to significant environmental impacts which cannot be effectively mitigated and would be intrusive both at a loading wharf at Samlesbury and potentially at the unloading facility.

3.36 The total transport impacts (fuel consumption, CO₂ etc emissions), including the onward transport from the unloading wharf, are, in total, potentially significantly greater than that of just using road haulage.

3.37 However, due to the inadequacy of water depth, major river bed engineering works and dredging with associated works on bridges and infrastructure would be required to enable barging. These works would not be acceptable for environmental reasons.

3.38 Barging is not a viable alternative due to access problems along the river; the actual net increase in fuel and CO₂ etc emissions; possible impacts of infrastructure on protected sites and the environment of the river; and impacts on the environment and amenity at Samlesbury and on the Ribble.

RETAIN NEW ACCESS ROAD AS A PUBLIC ROAD

3.39 It was suggested that the private access road should be made part of the public highway on completion of operations. No further representations have been made on this alternative.

ALTERNATIVE RESTORATION SCHEME

Restoration to Agricultural Land Using Landfill

3.40 It was suggested that all of the site should be restored to intensive agriculture by the importation of waste. This was rejected due to an oversupply of voids and a very significant shortfall of suitable material.

3.41 It was also rejected as landfill would increase environmental and amenity impacts and lead to the loss of the biodiversity and flood management opportunities

Public Access

3.42 Greater public access over the site either by the construction and designation of new public footpaths or unconstrained public access is suggested in policy. No specific requests for new rights of access were made by the public. New public access would harm the potential biodiversity opportunities, create site management problems and has been rejected.

OVERALL CONCLUSION ON ALTERNATIVES

3.43 The applicant has fully considered all relevant alternatives in its control. None of the alternatives are more operationally viable, or will provide material to meet the supply requirements for concreting sand and gravel for Lancashire in sufficient volumes, at the requisite time, and at less environmental and amenity cost, than extraction at Lower Hall Farm.

4 THE ASSESSMENT OF LIKELY EFFECTS

INTRODUCTION

4.1 The ES addresses the scale of effects. Possible harmful effects may be demonstrated by the assessment, with or without mitigation, to be insignificant and therefore require no further consideration.

4.2 The background baseline surveys in this ES were used as part of the iterative process to define and refine the development works. That process has taken place over the last few years in conjunction with discussions with the planning authority and others.

Evolution of the Environment without the Development

4.3 An outline of the evolution of the local environment without implementation of the proposed development is required to be provided. Any change will continue to be affected primarily by human actions

associated with normal farming or land management processes. There will be no discernible change.

EFFECTS SCREENED OUT

4.4 An ES is only required to address 'likely significant effects'. Effects which will not arise, or are unlikely to arise, or which in an initial assessment are unlikely to be significantly harmful, can be 'screened out' from consideration. The following effects have been 'screened out'.

Bird Strike

4.5 The proposed operations are outside the relevant threshold for consideration.

Conservation Areas and Historic Landscapes

4.6 The proposed operations are not within any designated Conservation Area or designated historic landscape.

Fishing and Fisheries

4.7 The proposed operations provide for the retention and improvement of access to the bank of the river. Existing fisheries interests in the river will not be affected by the development.

Geological Conservation and Geomorphological and Geological Risk Impacts

4.8 There are no geological or geomorphological conservation sites within the application area.

Green House Gas Emissions

4.9 Green House Gas emissions from the very few vehicles visiting the site or in operation on the site are negligible.

Hazardous Substances

4.10 No explosives or hazardous substances will be used or produced on site.

Heat

4.11 No thermal processes are to be undertaken on site.

Lighting

4.12 No extraction, processing or transport etc operations will be undertaken in the hours of darkness.

Major Accident Risk

4.13 The proposed development is not vulnerable to a major accident or disaster, nor will it give rise to or enhance any such event.

Odour

4.14 No putrescible materials will be used or produced.

Public Rights of Way

4.15 The development will not require the closure or diversion of any public right of way.

Radiation

4.16 No radioactive materials will be used on site.

Trees, Woodland and Hedgerows, Ancient or Veteran Trees

4.17 The operations involve the minimal removal of trees and hedgerows. They operations will not affect any ancient or veteran tree nor affect any Ancient Woodland.

Vibration

4.18 No blasting will take place. Vibration from vehicles or plant will be unidentifiable at the nearest sensitive property.

Waste

4.19 No material will be imported and placed in or on the site.

5 LIKELY SIGNIFICANT EFFECTS

Archaeology & Heritage Assets

5.1 Archaeological impact effects are addressed in the Heritage & Archaeological Assessment.

5.2 There are no Scheduled Ancient Monuments within the site or the general location. There are no listed buildings or structures within the site, although there are a six listed buildings or structures in the surrounding area of which two (Samlesbury Lower Hall and Seed House Farmhouse) are the only such in the vicinity of the operational land.

5.3 The archaeological report notes that the extraction area is likely to have been the subject to regular flooding since prehistoric times making the extraction and processing area unsuitable for settlement or defensive works and therefore unlikely to hold such archaeological evidence. The report notes that there is no evidence of defensive works. The report also notes that the former sand and gravel workings will likely have removed any archaeological evidence in that location.

5.4 The report does not identify any significant negative environmental effects. It considers that the development, if permitted, should include archaeological investigation and evaluation in accordance

with a Written Scheme of Investigation as agreed with the relevant planning authority.

Biodiversity

5.5 Biodiversity effects are addressed in the Ecological Assessment. Some of the potential effects considered in that report, particularly in relation to lighting, pollution, dust and noise, will not arise or are negligible and have therefore been removed from further consideration.

5.6 The report considers potential ecological effects on designated sites. There are no International, European or National designated sites within the site. The report concludes that the proposed operations would not have any impact or any significant impact on the designated Bowland Fells SPA or Ribble and Alt Estuaries SPA, or the relevant species in those SPAs, which sites are located distant from the operational area. Possible impacts on the Red Scar SSSI, located across the river, and a number of Biological Heritage Sites arising from lighting, pollution, etc are discounted or assessed as negligible.

5.7 The report then considers habitats in general and notes that any impacts are almost wholly restricted to the loss of agricultural land of low intrinsic ecological value and that while small sections of woodland (which is mainly natural regeneration since 1960 in a former sand and gravel extraction area), hedgerow (mainly of poor condition and low intrinsic value), and a few individual trees will be lost, extensive woodland planting, and the provision of new hedgerows, will not only mitigate that loss but connect the currently isolated woodland and other habitat components across the location. The woodland lost is not part of any identified Ancient Woodland.

5.8 The report concludes by identifying the extensive new habitat areas provided and the value of these habitats to enhance the Brockholes Centre and provide green infrastructure.

5.9 The proposed operations therefore do not produce significant negative environmental effects on protected areas, habitats or species. They have the potential to provide a range of new environmental assets. Provisions are made in the UU to allow access for suitable scientific research.

Dust and Air Quality

5.10 The assessment of the effect of dust and air quality is set out in the Air Quality Impacts report. This report notes that dust is the only potentially significant factor.

5.11 Given the relative distances and guidance the report confirms that a detailed dust assessment is not required and reliance on preventing dust issues can be provided by good practice which can be provided by the MPA via a condition.

5.12 The report assesses that no significant negative effects will arise. The report notes that there is no evidence or likelihood of harm to human health or to protected sites.

5.13 The report concludes that new screening and landscaping provisions included in the proposal will further mitigate any potential dust arisings such that no significant environmental or amenity effects will arise.

Hydrogeology & Flood Risk

5.14 Hydrogeological and associated effects are set out in the Hydrogeological and Flood Risk Assessment report.

5.15 The report concludes that there are no significant negative hydrogeological environmental impacts arising.

5.16 In relation to flooding the report concludes that sand and gravel extraction is defined in the NPPG as a water compatible use in the floodplain. The report notes that the provision of the extraction void would provide a net environmental benefit through flood alleviation.

Landscape & Visual Impact

5.17 Landscape and visual effect considerations are addressed in the Landscape and Visual Impact Assessment report.

5.18 The site is not within, adjacent or visible from a National Park or Area of Outstanding Natural Beauty. The site lies within the Green Belt but the proposed operations will comply with objectives to preserve openness and enhance the purposes for which Green Belts are designated.

5.19 In relation to landscape the report notes the changes to the landscape of the extraction area from open agricultural to mineral working and then to water and woodland complies with sustainability, provisions in the NPPF and NPPG and the current LCC Landscape Strategy, such that any negative environmental impacts are offset by significant positive environmental and sustainability gains.

5.20 The report notes that the changes arising from the development will provide positive landscape and visual impact environmental effects.

Noise

5.21 The assessment of the effect of noise is set out in the Noise Impact report. That report concludes that noise at the nearest dwelling can be mitigated to accepted thresholds. With such mitigation in place no significant negative environmental or amenity effects will arise.

5.22 The report also notes that there is no evidence or likelihood of harm to protected sites and that the impact of noise from transport movements on the A59 would be 'Negligible'.

Soils

5.23 Soil and agricultural land assessment is set out in the Soils and Agricultural Land Classification report. The report describes the current soil characteristics and its use. Some of the soils are of the best and most versatile grade.

5.24 The proposed operations will have a negative effect on agricultural land but this is not in itself a significant negative environmental effect and is mitigated by net biodiversity gain and flood alleviation provision.

Transport & Highways

5.25 Transport and highway matters are considered in the Highway Statement and the Infrastructure Design Statement respectively.

5.26 Those reports confirm that the transport effects and highway impacts arising from the relevant movements are negligible; that the junction on the A59 can meet relevant specifications; and that the design and construction of the access road and crossing of Bezza Brook meet relevant standards and that therefore no significant transport, environmental or amenity effects will arise.

CONCLUSION

5.27 The development as proposed with the relevant mitigation does not cause any significant impact on people, or their health or on any aspect of the environment.

6 CUMULATIVE EFFECTS

INTRODUCTION

6.1 The EIA regulations provide that an ES should describe any significant cumulative effects of a development with other existing and proposed development, where that is a reasonable requirement, to assess the environmental effects of the development.

Other Mineral Sites

6.2 There are no other mineral operations in the area.

Other Development

6.3 The planned growth and development works associated with the Preston City Deal and major employment centres, such as that at Red Scar Industrial Estate and at Samlesbury aerodrome, will increase impacts on resource use, land use change, traffic generation, etc in general and distributed across the whole area. Development at the Red Scar Industrial Estate has been identified as being insignificant itself or in combination.

CONCLUSION

6.4 There are no significant negative cumulative effects associated with the development at LHF.

7 POSITIVE ENVIRONMENTAL EFFECTS

7.1 The relevant sections of the ES identify a number of positive environmental effects arising from the proposed development.

7.2 These effects range from the provision of substantial areas of specific biodiversity target habitats and linking of woodlands by significant new planting, substantial flood attenuation capacity and water pollution mitigation, to more tenuous but also significant mitigation such as absorption of CO₂, the provision of green infrastructure, the maintenance of “openness”, etc.

7.3 The provision of new or additional biodiversity habitat is outlined in Table 1 below.

Table 1

Feature/ Habitat	Existing/Lost	To be provided	Timescale
Large Water Body	Circa 1 ha (poor)	Circa 20ha (designed to maximise wetland biodiversity)	From start becoming bigger over time
Small Ponds	Nil	7 within influence zone of existing ponds	At start
Watercourses	Nil	Circa 650 metres, including linking new ponds	Most at start
Trees/Woodland	< 50 individual plus 2.5 ha wood in former mineral site	Circa 16.0 ha	Circa 5.0 ha at start rest in phases
Hedgerow	<450 metres (short lengths or poor and thin with gaps)	Circa 900 metres	Circa 600m at start, rest at end
Reed Beds	Nil	Circa 5.0 hectares	In phases

8 CONCLUSION

8.1 The ES demonstrates, subject to the mitigation proposed, that there will be no significant negative environmental effects associated with the development on its own or cumulatively.

8.2 It also demonstrates that there will be significant positive environmental effects from the start of the development, increasing in significance throughout the development and at final restoration.