

**PROPOSED EXTRACTION OF SAND & GRAVEL,
CONSTRUCTION OF PRIVATE ACCESS ROAD, DEVELOPMENT
OF A NATURAL FLOOD MANAGEMENT FACILITY, AND
RESTORATION OF SITE TO WETLAND & WOODLAND,
LOWER HALL FARM, SAMLESBURY**

DRAFT PROPOSALS

Harleyford Aggregates Ltd

Comments to John Cowley jcmarpa@aol.com

WHY EXTRACT SAND & GRAVEL?

- 1 Sand and Gravel is mainly used as an aggregate in the production of concrete**
- 2 Concrete literally underpins and is essential for all forms of built development: schools, roads, houses, factories, energy supply, infrastructure works, sewerage systems, telecommunications, ports, railways, airport runways, tunnels, drainage, etc, etc**
- 3 Everything else (the internet, holidays, street lighting, culture, coast protection, etc) ultimately depend on structures or systems based on concrete**
- 4 Repair and maintenance of those essentials also requires concrete**

HOW MUCH DO WE NEED?

- 1 Great Britain consumes about 225 million tonnes of aggregates a year, of which some 46 million tonnes is land won sand and gravel**
- 2 The consumption, per capita (about 3.5 tonnes), is much less than the European average (about 5.0 tonnes), although that may reflect inadequate investment in Infrastructure**
- 3 Some 63 million tonnes of the total GB supply of aggregate (28%) comes from recycled or secondary aggregates. Per capita, one of the largest proportions of recycled aggregate use in the World. The average for Europe is less than 10%**
- 4 Demand is expected to increase in the long run**

WHY EXTRACT HERE?

- 1 Lancashire is running out of supplies of sand and gravel**
- 2 Lancashire is rapidly running out of adequate supplies of 'high quality' concreting sand**
- 3 Lancashire will be running out of production units, falling from 6 to 1 around 2021**
- 4 This is a known and proven source of 'high quality' aggregate for concrete that can make a significant contribution to demand over some 20 years**
- 5 Near the demand centres and with good transport links**
- 6 The current Minerals Plan will expire in 2021. It makes no provision for the required new sources of supply. A Review of the Plan has stalled and therefore there is no guidance on future sites. However, any such guidance would have to find new sites**
- 7 The operations would not conflict with environmental designations or concerns**

WHATS INVOLVED?

- 1 The extraction by excavator of 3.0 million tonnes at 150,000 tonnes per year**
- 2 Processing by washing will take place in a screened process area**
- 3 About 50 hgvs per day will take the aggregate via a private road to the A59**
- 4 The excavation will be developed as a Natural Flood Management facility**
- 5 The excavation will be restored in phases to a wetland and woodland habitat**

THE DRAFT PLANS

- 1 The DRAFT proposed operations are shown on the attached plans**
- 2 The DRAFT proposals have been informed by discussions with numerous interested parties over the last few years**
- 3 Changes may be made following the conclusion of the current consultation process, which also involves discussions with numerous parties**
- 4 If, you have a concern – then that may be capable of being resolved – but only if that is brought to attention**

HIGH QUALITY SAND

The use of the term 'high quality' (or 'high grade') in relation to sand and gravel was initiated by LCC to enable the differentiation between that material which can meet relevant specifications and that which cannot. This concept was initiated, and continues to be used, because a part of the reserves of sand, particularly from glacial or beach deposits, is not capable of meeting the relevant specifications and therefore may distort the true size of the aggregate landbank.

It has been claimed that the deposit at Lower Hall Farm is of poor quality. No evidence to support that claim has been produced. Similar comments were made in relation to Lower Brockholes, but as is now clearly evident, that site was a main source of concreting aggregate for Lancashire. The available evidence confirms that Lower Hall Farm is a significant deposit of 'high quality' concreting aggregate.

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"High quality sand/sand and gravel can only be identified and proved by detailed site exploration drilling, sampling and testing.

High grade or high quality sand ... (is) sand that meets the relevant requirements of the appropriate British Standard after appropriate processing

There appears sufficient information to suggest high quality deposits may exist in areas A" (the area of the Lower Hall Farm proposal)

Lancashire Minerals and Waste Development Framework, Sand & Gravel Study Stage 2, Geoplan Limited for LCC, June 2006

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"The variability ... makes glacial deposits difficult to locate, access and work. They yield soft building sands, asphalt sands and fine concreting sands after processing.

Fluvial ... deposits are associated with major rivers ...They yield high quality sand ..."

Strategic Minerals Issues, Joint Lancashire Minerals and Waste Development Framework, LCC; November 2007

“The prime resource blocks for future sand and gravel mineral aggregate extraction in the study area are the terraces of the Lower Ribble”

Aggregate Extraction and the Geoarchaeological Heritage of the Ribble Valley and Kirkham Moraine, Oxford Archaeology (North), University of Liverpool, 2007 (updated 2008)

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“The site (Lower Hall Farm) was identified as part of the JLMWLP Lower Ribble Valley Broad Area of Search ...There is therefore strong evidence that a high quality sand deposit is likely to exist.”

C Ballam, Proof of Evidence on Behalf of Lancashire County Council, Appeal by Tarmac, Runshaw, March 2008

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“Preference will be given to the release of sand and gravel reserves which provide for the maximum practicable contribution of high quality sand”

Policy CS3, Lancashire Core Strategy, Adopted 2009

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“The variability ... makes glacial deposits difficult to locate, access and work. They yield soft building sands, asphalt sands and fine concreting sands after processing.

Fluvial ... deposits are associated with major rivers ...They yield high quality sand ...”

Joint Lancashire Local Aggregate Assessment, LCC, April 2015

SUMMARY OF DEPOSIT LOWER HALL FARM

“The sand and gravel deposits at Lower Hall Farm, Samlesbury form part of a raised fluvial river terrace sequence as shown on the 1:50,000 scale geological map Sheet 75 (Preston).

A detailed borehole survey was carried out in March 2008 by A J Geoff Ltd. Bulk samples were collected showing that the resource consists of generally clean to silty, well graded, brown to pale brown, sand and rounded gravel (mainly quartzite and flint with some sandstone). The samples were subject to grading analysis by M&B Geotechnical Services.

The borehole survey proved that the sand and gravel deposit varies in thickness from some 3 to 7 m across the site. The grading analyses confirm that the material will comply with the relevant specification for concreting aggregate (BS EN 12620 ‘Aggregates for Concrete’).

After allowance for discards the total net saleable reserve is some 3.0 million tonnes consisting of about 60% sand (1.8 million tonnes) and about 40% gravel (1.2 million tonnes).”

Eur Geol Richard Fox, BSc, C Geol, C Eng, FIMMM, FIQ, FGS, FRGS
Richard Fox & Associates Ltd

Past President: European Federation of Geologists
Formerly: Manager, Aggregate Development Department, RMC Aggregates
Editor: 1st & 2nd Editions, “Aggregates – Sand, Gravel and Crushed Rock Aggregates for Construction”,
Geological Society of London

THE MINERALS PLAN: ALLOCATIONS, LANDBANK & RESERVES

The current adopted Minerals Plan expires in 2021. The Plan makes no provision by way of any allocations or any policy for bringing forward new sites beyond that period. In his report on the Plan, the Inspector concluded that there was therefore a risk that the Plan was 'unsound'. If that was his conclusion then LCC would have had to start the Plan again and address the position post 2021. However, LCC promised that a reviewed Plan, to 2032, would be in place by May 2017. On that commitment the Inspector did not make the plan 'unsound'.

May 2017 has now gone. The review has not progressed. There is no guidance on the quantities of sand and gravel required for the future. There is no guidance on where new sites might be located. A review started now will probably not be in place until the expiry of the current Plan period. Such a review will need to consider demand to at least 2035. Reserves will, in effect, be contained within a single inactive site (Runshaw) after 2021.

There is perception that a landbank above the minimum justifies refusal. That is not the case. The NPPG states – “There is no maximum landbank level ... each application for minerals extraction must be considered on its own merits regardless of the length of the landbank.”

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“Policy CS3 proposes to release additional land ... helping to redress the current imbalance in ... reserves in terms of high-grade sand. The need for high-grade sand is confirmed”

Report of the Inspector for the Examination into the Lancashire Minerals & Waste Core Strategy Development Plan Document; August 2008

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“On balance, I consider it is better that the present Local Plan is adopted ... on the understanding that a review of the plan (and the associated Core Strategy) is commenced with the minimum of delay. At the hearing sessions the JAs gave an undertaking that such a review and roll-forward would take place. This commitment is included in the current Local Development Scheme (dated October 2012)”

Report of the Inspector for the Examination into the Lancashire Site Allocations & Development Management Policies Local Plan; June 2013

“it is anticipated that the review could be carried out over two years, with an anticipated adoption during the winter of 2016”

Report to the Joint Advisory Committee for Strategic Planning; February 2014

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“The three authorities are required to produce and maintain an up to date Minerals and Waste Development Scheme setting out the timetable and procedures for producing local plans.”

“The outcome of the review will be the adoption of the Minerals and Waste Local Plan 2017-2032 in summer 2017”

“It is a requirement of the regulations that local plans be produced in accordance with the local development scheme. Progress towards producing local plans is measured against the timetable set out in the development scheme; this is a key test of the soundness of the local plan at examination.”

Report to the Joint Advisory Committee for Strategic Planning; September 2014

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“It is five years since the adoption of the Core Strategy; consequently a review of the principles and evidence, and the policies developed to implement them, is timely.”

“it is likely that the extension to the plan period will result in a need to allocate more sites for some mineral types ... to meet projected demand.”

Local Plan Review – Scoping Consultation, LCC, November 2014

SIGNIFICANT CONCRETING AGGREGATE SOURCES AND RESERVES IN LANCASHIRE

| Site | Significant Source | Concrete Aggregate Reserves | Extension Possible |
|--------------------|--------------------------------|--------------------------------------|--------------------|
| Higher Brockholes | Yes | None – Worked out 2007 | No |
| Lower Brockholes | Yes | None – Worked out 2017 | No |
| Lydiate Lane | No (some fine sand) | Minor – Worked out circa 2021 | No |
| Sandons Farm | No | None – Worked out circa 2020 | No |
| German Lane | No (Inactive: insignificant) | None – Worked out | No |
| St Annes Foreshore | No (not ‘high quality’) | None | No |
| Runshaw | Yes (Inactive: fine sand only) | Part of circa 4.10mt – Expires 2027 | Unknown |
| Sharples Quarry | Yes | Circa 0.40mt – Worked out circa 2021 | No |
| Bradleys Sand Pit | No | Minor/None – Worked out circa 2021 | Unknown |

Discounting German Lane (insignificant reserves and inactive for many years) there were 6 active sand and gravel quarries, and 1 inactive quarry, a total of 7, with reserves, at end 2016 in Lancashire.

One active quarry, St Annes Foreshore, extracts sand from within a Natura 2000 site and it is likely that this permission will have to be revoked particularly as the sand is not of ‘high quality’ and also because extraction harms the Natura 2000 site beyond the extraction area. Extraction at St Annes is also likely to conflict with or be harmful to coast protection considerations.

Discounting St Annes leaves 6 relevant quarries with reserves. Apart from the inactive operation at Runshaw, 5 of these 6 quarries will effectively run out of reserves (even though their permissions may continue) by end 2021, or shortly afterwards.

A Review of the Minerals Plan will therefore have to address not just the need to allocate new reserves, but also to provide a number of new sites to maintain production.

WHY WE NEED CONCRETING AGGREGATE

Aggregate is essential for the production of concrete. Concrete is essential for the provision of housing, commerce, public services, telecommunications, energy supply and all infrastructure works. Without concrete, those developments cannot be undertaken. Alternatives (glass, steel, wood, plastic, etc) are less sustainable and cannot replace concrete in many uses. The supply from recycling has reached its economic and sustainable limit.

Completing the Preston City Deal will require very substantial quantities of concrete. Lower Hall Farm is the only proposed site for concreting aggregate in the City Deal area. Supply of this essential material from Lower Hall Farm would be the most sustainable option.

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“Construction activity will be dominated by our need to upgrade and renew vital infrastructure, including in energy and transport, whilst also building more housing. Strategic infrastructure projects currently in the pipeline ... will only be possible if future aggregates supply can support the levels of demand that are anticipated.

Recycling and secondary materials, alongside increased imports, will have a role to play, but they are no game changer.”

Aurelie Delannoy, Chief Economist, Mineral Products Association, June 2017

“The government has already signalled a welcome intention to invest in ... infrastructure. It now needs to make good on its promises”

Carolyn Fairbairn, Director General of the CBI, Sunday Telegraph, June 2017

The government's new £2 billion aerospace technology hub should be in East Lancashire. Euravia boss Dennis Mendoros, Ribble Valley Tory MP Nigel Evans and Burnley Liberal Democrat Gordon Birtwistle all said the proposed enterprise zone next to the BAE Systems factory at Samlesbury would be the ideal site.

Mr Evans said: "This project should be based at Samlesbury. I shall be lobbying Prime Minister David Cameron on this."

Lancashire Telegraph; March 2013

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A new £430 million business and industrial park at the western end of the M65 has been welcomed ... the Cuerden Strategic Site will not only create 2,500 jobs on a 160 acre site near Preston but boost growth in Blackburn, Burnley and as far as Pendle. The Lancashire County Council project is part of the Preston City Deal.

Ribble Valley Tory Mr Evans said "With the BAE Enterprise Park at Samlesbury, this is further good news for jobs locally and confirms the M65 as a major employment and business corridor."

Lancashire Telegraph; November 2014

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"the (Preston City Deal) deal will generate ... more than 20,000 new jobs ... nearly £1 billion growth in GVA ... 17,420 new houses ... £2.3 billion in leveraged commercial investment. A current lack of strategic investment to deliver critical infrastructure could seriously limit the future prospects of the City Deal. The EZ is set to become one of Europe's largest centres for advanced engineering and manufacturing, but the pace and scale of its future success, in part, will rely on the efficient functioning of the local and national highway network ... the City Deal infrastructure investment will improve accessibility. There is ... policy and political support for development; however, the failure to provide certainty of critical infrastructure investment is preventing the realisation of this pent-up development."

Preston, South Ribble and Lancashire City Deal, Preston City Council, Lancashire County Council, South Ribble Borough Council and Lancashire Enterprise Partnership

TRANSPORT CONSIDERATIONS

After processing, the aggregate will be removed from the site in contracted HGV tippers to customers. All this traffic, and staff cars and service vehicles will use the new private access road from the A59. No traffic will use Potters Lane. On average 25 vehicles will be used per day to remove the aggregate with allowance of another 5 vehicles (staff cars and service vehicles). The access road will be surfaced in concrete and blacktop and provided with drainage systems preventing mud being tracked onto the public highway. The access road is single track width with passing places. It is of adequate capacity for the traffic levels. A speed limit of 15mph will be monitored and enforced. Speed bumps are not required on the access road.

Alternative access routes and methodologies have been assessed including a bridge across the Ribble to Brockholes and barging along the Ribble. These have been rejected due to operational difficulties and poorer sustainability outcomes.

The traffic associated with the operation will be similar to, but more sustainable than, that at Sharples Quarry and Lower Brockholes Quarry combined, and less than that at the former Higher Brockholes Quarry. Vehicles accessing and leaving the site using the eastbound carriageway of the A59 will be around 30 per day. Total vehicle numbers per day using that length of road were around 19,000 in 2015 and are predicted to rise to circa 22,000 by 2023 following the development of the Samlesbury Aerodrome Enterprise Zone. The relevant planning permission for the EZ has concluded that the network will be adequate for the traffic flows. The continuing contribution of sand and gravel extraction traffic to total flows is wholly inconsequential to traffic flows on the A59.

The junction of the access road with the A59 has been designed as a left-in, left-out junction and meets all the relevant highway design requirements for such a junction. There are excellent visibility sight lines to the west and east. The access road does not impinge on the high pressure gas main and the development works are entirely outside the buffer zone for that gas main.

The access road will be integrated into the landscape with extensive tree and hedgerow planting and with a sustainable drainage system. In the event of an emergency blocking Potters Lane the access road will be made available for use by local residents.

MINERAL EXTRACTION & THE GREEN BELT

The site is located in the Green Belt. Mineral extraction is often erroneously considered as being incompatible with the Green Belt. However, national policy states that mineral extraction is one of only a very few land uses that can be “appropriate” in the Green Belt. That policy position has been confirmed by Lancashire County Council in many decisions on mineral sites proposed in the Green Belt.

“The NPPF provides guidance on the types of development appropriate in Green Belt”

South Ribble Local Plan 2012-2026, South Ribble Borough Council

“Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are ... mineral extraction”

National Planning Policy Framework (NPPF) Para 90

“The true position surely is this. Development that is not, in principle, “inappropriate” in the Green Belt is, as Dove J, said ... development “appropriate to the Green Belt.”

R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJ

RECENT SAND & GRAVEL OPERATIONS & GREEN BELT IN LANCASHIRE

| Site | In Green Belt? |
|--------------------|-----------------------------------|
| Higher Brockholes | Yes |
| Lower Brockholes | Yes |
| Lydiate Lane | Yes |
| Sandons Farm | Yes |
| German Lane | Yes |
| St Annes Foreshore | Yes (stockpiling and office area) |
| Runshaw | Yes |
| Sharples Quarry | No |
| Bradleys Sand Pit | No |

*“the Planning Inspector ... concluded that ... **the site would contribute to the achievement of objectives for the use of land within Green Belt** ... the Planning Inspector’s views on Green Belt is shared in respect of this application.”*

Officers Report, Sandons Farm Extension, 20 May 2015

*“Paragraph 90 of the NPPF states that **mineral extraction is not inappropriate development in the Green Belt** provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt.*

Officers Report, Lydiate Lane Extension 13 July 2016

*“Although the site is located in the Green Belt, **mineral workings are appropriate uses of land in such areas** provided they preserve openness and do not conflict with the purposes of including land in the Green Belt”*

Officers Report, Lower Brockholes Extension, 12 September 2016

THE PROJECT WILL ASSIST FLOOD MANAGEMENT

The extraction area lies within the floodplain of the River Ribble and within Flood Zones 2 and 3. It has been suggested by some local residents that extraction will increase flooding. That view may arise due to the position that the screening banks and current management of the former Higher Brockholes Quarry prevent over-bank flooding into what was another part of the Ribble floodplain.

However, the strategy at Lower Hall Farm is designed in accordance with the objectives of Natural Flood Management of using the excavation as a 'washland' to store flood waters and then release them when the peak flood event has passed. Such works necessary for that will be included in the scheme. The storage capacity will be up to the order of 1,000,000 cubic metres.

Sand and gravel working is specifically identified in the NPPG as one of a very limited range of developments which are water-compatible in relation to flood risk. As such the scheme does not conflict with the NPPG, meets the objectives of large scale flood mitigation, and the provision of important wetland habitat, and is in accordance with policies and strategies for managing flooding risk in the Ribble.

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"It is important that the inquiry into preventing flooding goes forward ... We need to improve our strategy ... Vast sections of the Ribble Valley are still at risk of flooding, yet there is no plan in place to prevent this disaster from occurring again"

Comments of Nigel Evans MP on the National Flood Resilience Review, January 2017

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"There is a good case for seeking to address both the loss of wetland habitat and the potential for improved flood mitigation. Defra should develop revised guidance on biodiversity and flood management to encourage a more integrated approach and to help reverse the decline in wet habitats"

Wetlands, Land Use Change and Flood Management, A joint Statement prepared by English Nature, the Environment Agency, The Department for Environment, Food and Rural Affairs (Defra) and the Forestry Commission, October 2003

“Natural flood management ... is being promoted as a novel way of reducing flood risk ... Natural flood management (NFM) varies in its effectiveness, for example, water storage or flooding land are often more effective ... NFM can reduce erosion and benefit water quality, carbon storage & biodiversity. These positive effects may sometimes be more valuable than the reduction in flood risk. Washlands ... allowed to flood to reduce flooding downstream ... have been used extensively in flood alleviation schemes throughout Europe ... The biodiversity benefits of washlands can be large”

POSTNOTE 396, Parliamentary Office of Science & Technology, December 2011

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“Changing weather patterns have made structural defences less effective at managing flooding. An approach that employs a range of natural flood management measures ... is likely to reduce the probability of flooding ... The catchment-wide approach is commonly based around measures that enhance, restore or mimic natural processes ... a key component of this is allowing identified areas to flood in order to decrease the flood risk elsewhere”

POSTNOTE 484, Parliamentary Office of Science & Technology, December 2014

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“Engineered hard flood defences can only ever be part of the solution. We have seen the benefits of natural flood management”

National Flood Resilience Review, HM Government, September 2016

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“it should be recognised that mineral deposits have to be worked where they are ... sand and gravel extraction is defined as ‘water-compatible development’”

National Planning Policy Guidance, Paragraph 018 Reference ID 7-018-20140306

DEMAND IS NOT CREATED BY THE MINERAL INDUSTRY OR HARLEYFORD AGGREGATES

We, all of us; the public, manufacturing industry, the NHS, football clubs, MPs calling for infrastructure, etc; create the continuing demand for sand and gravel.

This may arise because we need more or better homes, better schools, airports to take us away on holiday, efficient sewerage systems, instant telecommunications, 'green' energy supply, safe foodstuffs, etc.

There is no environmental or resources 'free lunch'.