

## **Advise form Keith Williams – Stansgate Planning (November 2015)**

### **Site 4**

I would bring the section about the proximity of listed building forward in your letter.

Further I would emphasise that planning law requires 'considerable weight and importance' to be given to the impact of development on the significance and setting of listed buildings. The comments I took from the NPPF in my email to you provide some guidance and I suggest you put some of it into your letter.

I am not sure if you are correct in saying The Granville and Forge Cottage 'abut' the proposed site.

It would be useful to make the point that the proposed workings would destroy the rural approach and nature of the two villages and the setting of their designated conservation areas, and the context for other listed buildings in the villages.

Apart of the issue you have fully covered in terms of the width of buffer zones for dust reasons I feel it is important not to apply the blanket 100m in the case of listed buildings. In these cases the width of the buffer zone is of importance to the setting of the listed building and this alone would justify significantly increasing the width of the zone and moreover precluding any activity or earth bunding etc within the zone.

This is the point I was trying to make for those items you have highlighted in yellow. What I am seeking to argue is that the southern boundary of the site should be field boundary to the north of Glebe Farm and Seven Elms, and nothing should take place to the south of that boundary. There should then be an ADDITIONAL buffer zone ('stand-off' area in the Council's terminology) to the north of the site boundary and this zone should be landscaped. No other activity should take place within the zone and for this reason I am suggesting the access road should be moved to the north otherwise it would be within the zone.

### **Site 5**

The comments I have made above about listed buildings apply to this site, but more so.

Dear Sir

**Re Policy S4 (Spatial Strategy and Preferred site Options) Wasperton Hill Farm – Site 4**

I strongly object to Site 4 being included in the proposed minerals plan for the following reasons

**1. Proximity to listed buildings – protecting heritage assets**

Sustainability Appraisal Report section 10.44:- *There is a listed building within this site (Wasperton Farm) and as such, significant negative effects are predicted against SA Objective 6 (to preserve and enhance sites features and areas of historic, archaeological or architectural importance and their settings). However, the policy states that a minimum 100m landscape buffer could be provided to maintain setting of listed building, reducing the effects to minor and not significant. In addition, the policy requires an archaeological evaluation which should ensure only minor adverse effects.*

**This fails to mention two other listed buildings, Forge Cottage and Seven Elms which directly abut the proposed site.**

A listed building is a ‘Designated Heritage Asset’. **The NPPF states when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.** The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building should be exceptional and LPAs should refuse consent, unless it can be demonstrated that it is possible to achieve substantial public benefits that outweigh the harm.

Other sites have been rejected on impact to heritage assets, some examples:

- Site 12 Land at Dunton Island Discounted on The Potential loss of 3 listed buildings - if buildings retained settings as a group would be harmed
- Site 16 Glebe Farm – Fenny Drayton Discounted on Impact on Heritage asset – setting of ancient monument
- Site 22 Brinklow North Site - Discounted on There would be harm to Coombe Abbey Historic and Garden 2\* - **this is a significant distance away**

**As the landscape is flat and open the impact of forming the bunds around these properties will have significant impact upon the appearance of the area and cannot be mitigated and will therefore result in failure to protect heritage assets.**

**2. Visual Appearance**

The Warwickshire Landscape Guidelines show the site to be within the ‘Terraced farmlands’ sub-area of the Avon Valley character area. The ‘Terraced farmlands’ are described as being a “*flat open intensively farmed landscape associated with fertile free draining soils over deposits of terraced sands and gravels. Although there are five river terraces in all, this landscape is largely confined to the broad expanse of the second terrace, which is particularly well developed to the east of Stratford around Wellesbourne and to the west of Bidford.*

*"The farmed landscape is dominated by intensive arable production, typically in large geometric fields. Field pattern is often poorly defined by low cut or gappy hedgerows ...."*

*"Throughout the terrace farmlands tree cover is generally rather sparse although individual wooded streamlines or isolated mature trees are prominent landscape features ..."*

**As the landscape is flat and open – bunding and other ‘screening’ of works would be an alien feature harmful to the area. Likely to be in place for many years. The land is open to public views for highway and PROWs**

### **3. Land Classification – The Best and Most Versatile Land**

The best and most versatile agricultural land is defined as grades 1, 2 and 3a. Wasperton Hill farm is Grade 2 and 3a. There is only small percentage (12%) of agricultural land in Warwickshire that are grades 1 and 2). Government policy states (National Planning Policy Framework (NPPF) published in March 2012) *Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality*

The Wasperton Hill Farm site consists of Grade 2 and 3a land –There are a number sites with lower grade land that have been rejected and no weighting has been applied to the assessment to determine preferred sites on basis of land quality.

The proposed mineral plan states (Site Assessment Methodology for Allocating Sand and Gravel Sites - Table 2 Decision making-questions and assessment scores says: Would the proposed site result in the loss of best and most versatile agricultural land (1,2 and 3a and 3b)?

It goes on to say - If response is **significant loss of the best and most versatile agricultural land and agricultural land cannot be restored to its original or enhanced state then: - Site may be inappropriate for minerals development**

When Ian Grace (WCC planning officer) was asked directly at Barford Village minerals plan preferred options and policies presentation (18<sup>th</sup> November 2015) –“Can you ensure that the land will be restored to its original state or enhanced?” – Replied – “It is not possible to guarantee this”.

Therefore by the council’s own evaluation the land is **inappropriate for minerals development**

When planning permission to extract gravel on this site was rejected on Appeal in 1993 the Secretary of State conceded that a number of environmental objections were ‘significant’, including that ‘visual intrusion would be created’, that ‘the site makes a positive contribution to the pleasant countryside extending either side of the River Avon’, that ‘there would be some material harm to the appearance of the locality’, and that ‘the site includes land of the best and most versatile quality, some of which would be **permanently lost** to agriculture’. **Nothing has materially changed and therefore this should still apply**

#### 4. Land Restoration 1 – Inert Waste

The proposed mineral plan states (Site Assessment Methodology for Allocating Sand and Gravel Sites - Table 1 Agricultural Land): - *Loss of agricultural land can be avoided if the site can be restored to its previous grade through acceptable infilling and/or through lower land levels.*

The proposed mineral plan states: – (*preferred options and policies - key Issue 2*) *One problem related to the increase in recycling of aggregate material is that so much material is now being recycled that there is now not enough material to fill the quarry voids quickly once extraction has been completed. It may take longer for quarries to be restored back to agriculture if that is the proposed end use. This can be a problem for communities which may be left with an un-restored quarry for several years longer than they had initially been promised.*

Potential developer – Hanson (responsible for restoration) - contradicts this and states (request for sites proforma) states: -*inert waste material would be imported to achieve restoration to original ground level.*

**Based upon current and forecast inert waste material availability it will not be possible (or cost effective) to transport inert material in the volume required to restore the ground to its original level**

#### 5. Land Restoration 2 – Lowering Levels

The proposed mineral plan also states (Site Assessment Methodology for Allocating Sand and Gravel Sites - Table 1 Agricultural Land): *One potential solution to this is to encourage the use of low level land restoration so that less fill material is needed to restore sites back to agriculture. Another solution is to focus on restoring part of the site to the best and more versatile agricultural land leaving the remainder to be used for nature conservation and recreational uses.*

The proposed mineral plan states (preferred options and polices – site 4 Wasperton states): – *it would be restored to agriculture with imported inert fill and by lowering the level of the land*  
**Restoration by lowering land will result in ground level being too close to the water table and land waterlogged for extended periods. Therefore soil will be substandard (as per previous Wasperton gravel extraction) – and fails to comply with Government Policy**

#### 6. Land Restoration 3 – Summary Policy

Sustainability Appraisal Report section 10.47 states - *The site is currently in agricultural use and the majority of the site is Grade 2 and Grade 3 agricultural land resulting in significant negative effects on part of SA Objective 14 (to protect and enhance material assets such as best quality agricultural land). However, the policy states that the grade 3 agricultural land can be restored.*

**Therefore by not stating grade 2 land can be restored – one can assume there is an acceptance that this cannot be achieved and therefore fails to comply with government policy.**

**To summarise, the land is classified as the best and most versatile (Grade 2/3a) and is currently intensively used for agriculture (growing salad crops). The proposal is to restore the land based upon inert filling and/or lowering the ground level, however these will not restore land to original quality and upon this the proposal should be rejected.**

## 7. Proximity to conservation areas – Wasperton and Barford

The proposed site abuts Barford village and is opposite Wasperton. **Both** these villages are conservation areas. The proposed workings would destroy the rural approach and nature of the two villages and the setting of their designated conservation areas, and the context for other listed buildings in the villages

Other sites have been rejected on being too close to the conservation area – a couple of examples:-

Site 23 Barnwell's Barn Farm, Lawford Heath - The setting of Thurlaston Conservation Area would be harmed by working the southern area.

Site 18 Church Farm Sherbourne Parcel 2 is likely to affect the setting of Sherbourne Conservation Area

**Site 4 would have far larger impact upon Barford and Wasperton Conservation than either of the two examples stated would create, but has failed to be mentioned.**

## 8. Dust and Noise

DUST -Technical Guidance to the national planning policy framework (2012) makes it clear that unavoidable dust emissions are controlled, mitigated or removed at source. The relationship of the proposed activities on the site and the impact on nearby properties could be significant.

The guidance states (Section 27) - In line with research carried out by Arup Environmental/Ove Arup and Partners and the University of Newcastle upon Tyne in 1995 and 1999 respectively, additional measures to control PM10 might be necessary if, within a site, the actual source of emission (e.g. the haul roads, crushers, stockpiles etc.) is within 1,000m of any residential property.

Industry Standard dictates: "Smaller dust particles remain airborne for longer, dispersing widely and depositing more slowly over a wider area. Large dust particles (greater than 30  $\mu$  m), which make up the greatest proportion of dust emitted from mineral workings, will largely deposit within 100m of sources. Intermediate-sized particles (10–30  $\mu$  m) are likely to travel up to 200–500m. Smaller particles (less than 10  $\mu$  m) which make up a small proportion of the dust emitted from most mineral workings, are only deposited slowly but may travel 1000m or more"

Respirable particles, i.e. those less than 10 micrometers in diameter, have the potential to cause effects on human health, depending on exposure levels." Whilst dust suppression methods will significantly reduce the deposition of dust in the locality they cannot eliminate it.

From the 1995 Department of Environment (DOE) detailed technical report on buffer Zones:  
*The DOE study concluded that severe or persistent concerns about dust are most likely to be experienced near to significant dust sources, (generally within 100m). In practice, standoff distances are often incorporated into local planning policy, with distances of 250-500 metres typically adopted.*

National Practice: -

- Scottish regional authorities now take a recommended **250 metres** as a starting point of discussion and basis for planning.

- Buckinghamshire minerals and waste local plan. In the case of mineral development, a minimum distance of **200 metres** is usually required.
- Leicestershire Minerals and Waste Plan Response to Issues Buffers should be a minimum of **500metres** for quarries and crushers
- South Lanarkshire Minerals Local Plan In any event an absolute minimum stand-off distance will be set at **250 metres**.
- Somerset County Council: minimum of **250metres** for low-output quarries (<250kt/annum) and a minimum of **400 metres** for higher-output aggregate quarries (>250kt/annum)
- British Geological Survey guideline - The use of buffer zones to isolate dust sources from surrounding communities, often incorporated into local planning policy, with distances of **250-500 metres** typically adopted.
- Nottinghamshire Mineral and Waste Development Framework: - This acknowledges that the impact of dust is most likely to be experienced within 100 metres of its source, although its impact could potentially be felt further away. **250 metres** seems a reasonable and straightforward compromise.

Planning4Minerals (P4M) stresses that "**Prevention of dust generation is critical**, once in the open air ...the operator will have little or no control over where [dust] settling occurs." P4M expects the "use of buffer zones to isolate dust sources from surrounding communities, often incorporated into local planning policy, with distances of **250-500 metres** typically adopted

**The proposed 100m standoff is therefore completely insufficient and as a minimum a 250metre standoff should be specified from all properties.**

To Summarise; - based upon the above, Site 4 would be very harmful to local landscape and community, and local residents maintain that, on these grounds, **IT SHOULD BE REJECTED**.

However if it is to take place:

- stand-off from Wellesbourne Road should be significant (circa 250m) and advance tree planting undertaken plus temporary bunding next to working area
- Field to north of access drive to Glebe Farm/Seven Elms should be omitted from site (All this field is within 250m of Wellesbourne Road and Glebe Farm).
- North West corner of field to east of Seven Elms should be omitted from the site. (This is all within 250m standoff for Seven Elms/Seven Elms Barn). It must be noted that the width of the buffer zone is of importance to the setting of the listed building and this alone would justify significantly increasing the width of the zone and moreover precluding any activity or earth bunding etc. within the zone
- Existing hedgerow trees to north of Glebe Farm/Seven Elms should be southern extent of site
- A minimum of 100m stand-off **WITHIN** the site should be provided and suitably landscaped
- Access to Site 4 should be to the north of the stand-off area, not within it
- A proper road access with traffic lights or other appropriate means to allow heavy vehicles to freely access the A429

- Plant/processing area, parking and access well away from southern boundary and residential properties

**The above matters should be reflected in the Plan/written into the policy not left to planning application stage.**

Yours Faithfully,

Dear Sir

**Re Policy S5 (Spatial Strategy and Preferred site Options) Glebe Farm – Site 5**

I strongly object to Site 5 being included in the proposed minerals plan for the following reasons

1. Proximity to listed buildings – protecting heritage assets

Seven Elms is Grade II listed

Sustainability Appraisal Report, Sustainability Objective 06 is to: - *Protect and enhance the setting of Conservation Areas, Listed Buildings, SAMs and other features of cultural, historical and archaeological value.*

A listed building is a 'Designated Heritage Asset'. **The NPPF states when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.** The more important the asset, the greater the weight should be. **Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building should be exceptional and LPAs should refuse consent, unless it can be demonstrated that it is possible to achieve substantial public benefits that outweigh the harm.**

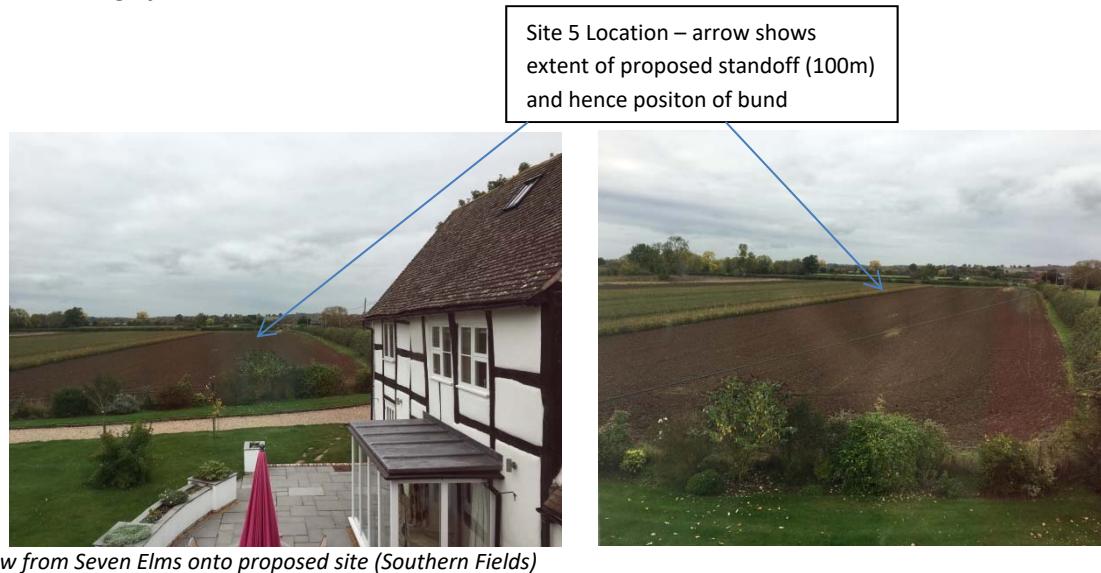
Desk top landscape assessment of potential mineral sites performed by WCC (Plan 7 – Glebe Farm Wasperton:

Mitigation

**Given the broad area of moderate sensitivity for visibility it will not be easy to mitigate the development.** The wooded streamlines, primary hedgerows (hedgerows along the roadside, public footpath, farm and parish boundaries) and field pond must be excluded from the development area and protected by an adequate buffer zone that extends beyond the tree canopies. Advance native tree planting is recommended but this must be restricted to enhancing the wooded streamlines and hedgerows. Woodlands of any size are uncommon within the terrace of farmlands landscape

**Conclusion - It will not be possible to mitigate in landscape terms for quarrying in this location. Visibility and inherent rural character are key considerations AND RECOMMENDED THAT IN LANDSCAPE TERMS IT SHOULD NOT BE PUT FORWARD**

As part of the assessment (Section 10.44) it stated that: - *significant negative effects are predicted against SA Objective 6 (to preserve and enhance sites features and areas of historic, archaeological or architectural importance and their settings). However, the policy states that a minimum 100m landscape buffer could be provided to maintain setting of listed building, reducing the effects to minor and not significant.*



The Sustainability Appraisal fails to properly assess impact of development and apparently fails to realise Seven Elms is a listed building. It proposes that adverse impacts of development can be mitigated to an acceptable standard. This is not an acceptable approach with regard to Site 5 the site should be omitted, as with other sites that were considered for example:

- site 12 Land at Dunton Island Discounted on The Potential loss of 3 listed buildings - if retained settings as a group would be harmed

**It is clearly obvious that by installing minimal 100m standoff and creating a bund will have significant detrimental impact on the setting of Seven Elms with the existing flat, very open aspect and therefore CONTRAVENES THE NPPF AND IS CLEARLY IN CONTRAVENTION OF SUSTAINABILITY OBJECTIVE 06 AND ON THIS POINT ALONE THIS SITE SHOULD BE REJECTED**

## 2. Visual appearance

The proposed mineral plan states (Preferred Options and Policies Document - Development Management Policies states: - ***Proposals for mineral development should protect and where possible enhance the quality and character of the countryside and valued landscapes.***

Sustainability Appraisal Report section 10.51 states:- ***As this site has to be developed in conjunction with Site 4, the cumulative effect on local landscape is likely to result in significant effects due to the extent of both sites, the loss of local landscape features and the visual impact on nearby residential receptors. Whilst the policy allows for the restoration of the site back to agricultural land using imported inert fill and by lowering the level of the land, permanent changes to local landscape are likely to occur. Cumulatively, these sites are assessed as having significant negative effects on SA Objective 5 (to conserve and enhance the quality of the landscapes and townscapes). The policy***

*wording requires a minimum landscape buffer of 100m from Glebe Farm and Seven Elms which should help to minimise the visual effects.*



*View from Seven Elms onto proposed site (Northern Fields)*

**The Sustainability Appraisal Report clearly accepts that there will be '*Significant negative (permanent) effects*'. As demonstrated in point 1 above it is clearly evident that simply installing a bund 100m from Seven Elms will go no way to mitigate against these effects (which would remain after completion of gravel extraction) and on this basis the proposal for site 5 should be rejected.**

### **3. Access**

A draft plan has been produced and provided by W.C.C (Estates Department) showing vague detail of the extraction site. Access for Seven Elms Farmhouse and Seven Elms Barn has been removed. To retain the existing (and only) access for which **we have a legal right of access** (which also provides mains services to the properties) would sever the site and significantly reduces the possible working area and makes site working much harder. Documentation submitted both as part of the consultation and those held by W.C.C only make reference to a footpath (PROW W100) – which it states would have to be temporarily diverted during the development of the site. **There is no reference to access to Seven Elms/Seven Elms Barn** – which we would assume is not viable to temporarily divert.

This access is used by children and **is also a public footpath** which would require regular crossing by heavy machinery and therefore would prove a significant safety hazard.

### **4. Site Area and Extraction Volumes**

Very Small Site. -Quoted in proposed mineral plan as *14Ha providing 0.3m Tonne*. This area has **not taken into consideration** the statutory requirements for stand-off, the need to maintain access to Seven Elms and Seven Elms barn and retention of existing hedgerows. Taking these into account (and only stand-off of 100m) would leave four very small areas **with an area of no more than 8Ha - (almost half quoted by WCC)**, refer to attached map.

Of six proposed trial pits **only four were excavated** (all on one side of the site). Of these **four only one could reach the base** due to collapse therefore the mineral thickness of 2.0m has to be conjecture rather than fact as this data comes effectively from only one trial pit. **Accepting this information and using same assumptions as those used by Hanson for calculating mineral from adjacent site 4 the actual extractable volume is no more than 0.228m Tonnes and significantly less than the figure proposed.**

In order to attempt to mitigate for proximity to listed building (Section 1) or Visual appearance (Section 2) or dust and noise (section 8) increasing the stand-off area (even for Seven Elms/Seven Elms Barn only) to 250 or even 200m makes **the site completely unviable**, see plan below.



*Standoff Zones for Seven Elms/Seven Elms Barn*

Other sites have been rejected on insufficient Area:

- Site 10 Barn Covert, Lea Marston (6.47Ha)
- Site 11 Marston Fields Farm, Lea Marston (15.3Ha)
- Site 17 Land at Bagington (50Ha) - **100m stand offs to existing individual properties, nursery, golf course and future housing would reduce working area making it possibly unviable**
- Site 19 Millers Bank, Dunnington (5Ha)

Spatial Strategy and Preferred Site Options Section 7.25 - this site can only be worked in conjunction with Site 4 and not as a freestanding mineral site. If site 4 has an area of 110Ha and proposed developer has only put forward reduced area of 60Ha – it begs the question why would they want to suffer the expense of a second planning application and ongoing costs for an additional 8Ha (at maximum)

**THIS SITE - SITE 5, IS THEREFORE TOO SMALL AND TOO CLOSE TO NEIGHBOURING PROPERTIES TO BE VIABLE AS A SITE – EVEN IN CONJUNCTION WITH SITE 4 AND SHOULD BE REJECTED ON THIS BASIS ALONE**

## 5. Land Classification – The Best and Most Versatile Land

As with Wasperton Hill Farm Glebe farm is grade 3A agricultural land (The Best and Most Versatile) There are number sites with lower grade land that have been rejected and no weighting has been applied to the assessment to determine preferred sites on basis of land quality.

The proposed mineral plan states (Site Assessment Methodology for Allocating Sand and Gravel Sites - Table 2 Decision making-questions and assessment scores says: Would the proposed site result in the loss of best and most versatile agricultural land (1,2 and 3a and 3b)?

It goes on to say - If response is **significant loss of the best and most versatile agricultural land and agricultural land cannot be restored to its original or enhanced state then: - Site may be inappropriate for minerals development**

When Ian Grace was asked directly at Barford Village minerals plan preferred options and policies presentation (18<sup>th</sup> November 2015) – “Can you ensure that the land will be restored to its original state or enhanced?” - Replied – “It is not possible to guarantee this”. Therefore by the council’s own evaluation the land is **inappropriate for minerals development**

When planning permission to extract gravel on adjacent Wasperton Hill Farm (Site 4) was rejected on Appeal in 1993 the Secretary of State conceded that a number of environmental objections were ‘significant’, including that ‘visual intrusion would be created’, that ‘the site makes a positive contribution to the pleasant countryside extending either side of the River Avon’, that ‘there would be some material harm to the appearance of the locality’, and that ‘the site includes land of the best and most versatile quality, some of which would be **permanently lost** to agriculture’. **Nothing has materially changed and therefore this should still apply**

## 6. Land Restoration 1 – Inert Waste

The proposed mineral plan states (Site Assessment Methodology for Allocating Sand and Gravel Sites - Table 1 Agricultural Land): - *Loss of agricultural land can be avoided if the site can be restored to its previous grade through acceptable infilling and/or through lower land levels.*

The proposed mineral plan states: – *(preferred options and policies - key Issue 2) One problem related to the increase in recycling of aggregate material is that so much material is now being recycled that there is now **not enough** material to fill the quarry voids quickly once extraction has been completed. It may take longer for quarries to be restored back to agriculture if that is the proposed end use. This can be a problem for communities which may be left with an un-restored quarry for several years longer than they had initially been promised.*

**Based upon current and forecast inert waste material availability it will not be possible (or cost effective) to transport inert material in the volume required to restore the ground to its original level**

## 7. Land Restoration 2 – Lowering Levels

The proposed mineral plan also states (Site Assessment Methodology for Allocating Sand and Gravel Sites - Table 1 Agricultural Land): *One potential solution to this is to encourage the use of low level land restoration so that less fill material is needed to restore sites back to agriculture. Another solution*

*is to focus on restoring part of the site to the best and more versatile agricultural land leaving the remainder to be used for nature conservation and recreational uses.*

Land at Glebe farm **is very low lying** and is already close to the water table for significant parts of the year.

**Restoration by lowering land will result in ground that is waterlogged or submerged for extended periods. As such it such it will not/cannot be returned to agriculture. The soil will be substandard (as per previous Wasperton gravel extraction) but more so – and fails to comply with Government Policy.**

Fields to the west of the A429 had mineral extracted some thirty years ago. It has taken over twenty years with these fields barren before it has been possible to grow anything in them. The same would result if mineral were extracted from Glebe farm

**To summarise the land is classified as the best and most versatile (Grade 2/3a) and is currently intensively used for agriculture (growing salad crops). The proposal is to restore the land based upon inert filling and/or lowering the ground level, however these will not restore land to original quality and upon this, the proposal should be rejected.**

#### **8. Dust and Noise**

*DUST -Technical Guidance to the national planning policy framework (2012) makes it clear that unavoidable dust emissions are controlled, mitigated or removed at source. The relationship of the proposed activities on the site and the impact on nearby properties could be significant.*

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Industry Standard dictates: “Smaller dust particles remain airborne for longer, dispersing widely and depositing more slowly over a wider area. Large dust particles (greater than 30  $\mu$  m), which make up the greatest proportion of dust emitted from mineral workings, will largely deposit within 100m of sources. Intermediate-sized particles (10–30  $\mu$  m) are likely to travel up to 200–500m. Smaller particles (less than 10  $\mu$  m) which make up a small proportion of the dust emitted from most mineral workings, are only deposited slowly but may travel 1000m or more”

Respirable particles, i.e. those less than 10 micrometers in diameter, have the potential to cause effects on human health, depending on exposure levels.” Whilst dust suppression methods will significantly reduce the deposition of dust in the locality **they cannot eliminate it.**

From the 1995 Department of Environment (DOE) detailed technical report on buffer Zones:  
*The DOE study concluded that severe or persistent concerns about dust are most likely to be experienced near to significant dust sources, (generally within 100m). In practice, standoff distances are often incorporated into local planning policy, with distances of 250-500 metres typically adopted.*

National Practice: -

- Scottish regional authorities now take a recommended **250 metres** as a starting point of discussion and basis for planning.
- Buckinghamshire minerals and waste local plan. In the case of mineral development, a minimum distance of **200 metres** is usually required.
- Leicestershire Minerals and Waste Plan Response to Issues Buffers should be a minimum of **500metres** for quarries and crushers
- South Lanarkshire Minerals Local Plan In any event an absolute minimum stand-off distance will be set at **250 metres**.
- Somerset County Council: Higher output aggregate quarries **400 metres**
- British Geological Survey guideline - The use of buffer zones to isolate dust sources from surrounding communities, often incorporated into local planning policy, with distances of **250-500 metres** typically adopted.
- Nottinghamshire Mineral and Waste Development Framework: - This acknowledges that the impact of dust is most likely to be experienced within 100 metres of its source, although its impact could potentially be felt further away. **250 metres** seems a reasonable and straightforward compromise.

Planning4Minerals (P4M) stresses that "Prevention of dust generation is critical, once in the open air ...the operator will have little or no control over where [dust] settling occurs." P4M expects the "use of buffer zones to isolate dust sources from surrounding communities, often incorporated into local planning policy, with distances of **250-500 metres** typically adopted

**Seven Elms and Seven Elms Barn lie due east of the proposed Glebe farm site on flat land. Therefore the proposed 100m standoff is therefore completely insufficient and as a minimum a 250m standoff should be specified from all properties**

#### **9. Archaeology**

Remains of an ancient priory close to East Side of A429 and it is an Ancient Scheduled Monument and therefore at close proximity to site 5. **A Full Archaeological Assessment prior to inclusions in mineral plan** should be performed. – Any ground works at Seven Elms has required an archaeologist to be present during excavation. This would add additional cost to a very questionably viable site.

#### **10. Contamination of water course**

Thelsford Brook which runs to the south side of this site, feeds into the River Avon. As extraction will occur below the water table the site will require pumping out during extraction. This will lead to volumes of sand and silt being discharged into the River Avon – causing ecological damage.

#### **11. Blight at Seven Elms and Seven Elms Barns**

These two properties are the only owner occupied dwellings in the proposed sites 4 and 5. Seven Elms farmhouse was in the process of being sold when notified of proposed site 5. The sale immediately fell through and as such demonstrates that both properties are significantly blighted at potential of site 5 becoming a preferred option. Any financial gain to Warwickshire county council for the development of site 5 **will be at the direct cost to the properties at Seven Elms.**

**Therefore significant Statutory Blight is evident in the event of site 5 being included in the mineral plan**

To summarise the development of the Glebe farm site would result in:

- The proposed plan would cause permanent damage to the setting of a listed building and fails to protect a heritage asset. It must be noted that the width of the buffer zone is of importance to the setting of the listed building and this alone would justify significantly increasing the width of the zone and moreover precluding any activity or earth bunding etc. within the zone
- Permanent impact upon the visual appearance
- No provision for Access made for Seven Elms/Seven Elms Barn
- Extractable area significantly smaller than being promoted and therefore of questionable viability
- Permanent Loss of prime agricultural land
- Loss of one of few tenanted small holdings
- Significant safety issues of dust and noise that would require extending bund to effectively cover the whole working area.

**Glebe farm is a small site with very small potential capacity. The damage that would occur from extracting on this site far outweighs any small benefit from the minimal material that could be obtained. THE PROPOSAL IS ILL CONCEIVED AND LACKS DILIGENT CARE AND ATTENTION TO ITS DETAILS. THIS SITE SHOULD BE REJECTED AND REMOVED FROM THE MINERAL PLAN**

Yours Faithfully