



Minerals
Waste
Environment

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Your ref: 2023/91949

Our ref: 320/1-20232709-L1.1_Response_2

Farzana Tabasum

Sent by email

27th September 2023

Dear Farzana,

RE: PLANNING APPLICATION REF: 2023/91949 – PEACE WOOD QUARRY – RESPONSE 2

This letter forms the second response to your email of 8th August 2023. This letter will also address the consultee comments from the Environment Agency (EA), dated 25th August 2023. The queries addressed in this letter will use the numbers in your email, save for the EA response, which will be labelled as such.

Query 3

It is intended that the bunds will be created from topsoil and subsoil. These will be stored separately and the divide between the materials clearly marked on site, and on a plan / topographic survey once the bunds are completed. It is noted that the exploratory drilling at The Site did not reveal significant depths of subsoil, but nonetheless, any stripped will be retained.

The bunds will be seeded with an appropriate grass / wildflower seed mix and maintained weed free through hand-pulling and re-seeding where required. The use of herbicides to control weed growth will only be used as a 'last-resort', if weeds cannot be controlled through mechanical methods.

Additional information based on the above has been added to the plan referenced: *320/1-Ext-3*(revision 6.0).

Query 4

It is noted that there is a typo where query 4 is labelled as 43) – we have addressed it here as query 4. Interburden and overburden are unlikely to constitute significant volumes. Nevertheless, any interburden and overburden encountered would be stored within the confines of the extraction area(s) without prejudicing operations.

Query 5

The creation of the bunds could be carried out in a linear fashion, to prevent heavy machinery traversing the area between the extraction area and the bunds. The existing access track would be used to transport soils to the bunds, and machinery would seek to limit its movements to only areas where the bunds will be emplaced. It will be necessary for an excavator to operate from adjacent to the bunds in order to achieve the correct profiles, but this will be limited to immediately adjacent areas, and if necessary, these areas will be re-seeded at the same time as seeding of the bunds.

Query 6

As discussed during the site visit, given the small scale of The Site, the two proposed phases are effectively the same size as a 'cut' would be at a larger site. Additionally, since The Site benefits from several different clay horizons with different properties, which horizons are worked when, and quantities extracted will depend on the contracts won and requirements of the operator and cannot be stated in advance. However, a generalised working direction has been added to the plan referenced *320/1 – EXT-3* (revision 6.0).

In addition, cross-sections of the phases have been commissioned, and will be provided as soon as possible.

Query 8

As discussed on site, we did provide a Biodiversity Net Gain (BNG) calculation, which demonstrated a net gain of 28.82% in terms of habitats, and 35.01% in terms of hedgerows. However, it may be possible to plant some trees immediately in the southwest corner of The Site. We would prefer to see the Council's ecologist's response before committing to this however, as the guidance around BNG is that gains should be *meaningful*, and therefore the planting of only a few trees would be significantly more meaningful if delivered as part of the entire restoration scheme.

The new tree planting referred to would take place on the northern boundary of The Site, where an existing area of woodland / scrub may be enhanced through infill planting. It appears from the site visit, that since this was proposed, this area of scrub has advanced and this may no longer be possible, though the potential will still be explored and planting carried out where appropriate, prior to commencement.

Environment Agency Response

We welcome the comments made by the EA, and are agreeable to a condition relating to the protection of water resources. However, we cannot agree to the wording of the condition as it is both too broad, and, covers areas for which information has already been provided through the application or would be provided via other means. For example, phasing plans have already been provided, and an aftercare scheme would be required by condition. We therefore propose updated wording as follows:

The development hereby permitted may not commence until such time as a scheme for the following matters has been submitted to, and approved in writing by, the local planning authority:

- the storage of hazardous materials, chemicals, oil and / or fuels*
- the use of the above at the site, for example for plant maintenance, including locations where this is carried out*
- the provision of road and wheel cleaning facilities (if applicable);*

The scheme shall, where necessary, be supported by detailed calculations and include a programme for future maintenance. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing/phasing arrangements embodied within the scheme, or any details as may subsequently be agreed, in writing, by the local planning authority.

The importation of wastes would require an Environmental Permit, for which programmes of monitoring would be required. It is therefore not necessary to duplicate a monitoring regime through the planning process.

Given the nature of the proposed development, it is considered that there is a low risk of pollution. As per practices at the current site, operations such as re-fuelling are carried out in designated areas, and during active operations at The Site, a spill kit would always be present. Details of good-working



practices, such as use of the spill kit and how fuel may be stored at The Site, would be provided through the scheme required by the condition.

If the above condition wording is not satisfactory to the Council, we would welcome suggested rewording for review.

We trust the above answers the queries so far, but if further clarification is required, please do let us know.

Yours sincerely,
for THE MINERAL PLANNING GROUP LTD.

MARK SMEDLEY
MINERALS, WASTE AND ENVIRONMENTAL CONSULTANT