Leighton and Eaton Constantine Parish Council's response to planning application ref 19/05509/MAW validated 20/1/20

Proposed Quarry to the east of Much Wenlock Road, Buildwas, Shropshire

Proposal: Phased extraction and processing of sand and gravel including the erection of processing plant and ancillary infrastructure, temporary storage of minerals, utilisation of existing rail siding and creation of new access road on to Much Wenlock Road; restoration of the site

Applicant: Harworth Group PLC

The mineral scheme is intended to facilitate subsequent housing development. The site is outside allocated areas identified for mineral extraction in the Shropshire Core Strategy, SAMdev MD5 planning policy.

Leighton and Eaton Constantine Parish Council objects to this Planning Application as it stands and wants to submit the following comments:

1. Transport and Highways

The Planning Statement submitted by Harworth (6.2.41) states that 'The existing road network is considered to be a suitable standard to cater for HGV movements generated by construction and operational activities on site, the site is well connected to the principal highway network, demonstrating compliance with policy MD17 of the SAM Dev Plan'.

This is the major concern for all the residents in our Parish. Although it is stated that 75% of sand and gravel will be transported by rail, 25% will still be moved on roads in HGVs. In all, according to the planning statement, 380,500tonnes will be transported by road over a 5 year period. The maximum amount transported by road will be 100,000 tonnes per year and according the Environmental Statement (14.4.17), up to 68 individual lorry movements a day could be generated.

The majority of HGV road transport will use Buildwas Bank, however, it has been suggested in the Environmental Statement (14.4.19) and the Transport Statement (4.13), that a small number will use the B4380 towards Shrewsbury.

We absolutely do not agree with the use of B4380 for any HGV traffic movement from the proposed Ironbridge site. Strict Planning Conditions making the B4380 not available to the gravel and sand transport vehicles from the Ironbridge site, using a legal agreement and monitoring for compliance, should be put in place before granting any planning permission. The reasons are as follows:

Safety

- The B4380 is a rural road. It has many properties exiting onto it along with several side roads. The road is narrow in places and has many blind bends making it particularly dangerous
- The footpath through Leighton village is very narrow in places making it difficult to navigate particularly with wheelchairs or prams without having to move into the road itself. In Eaton

- Constantine the majority of pedestrians have no raised footpath, only a marked out footpath alongside the road close to traffic.
- The B4380 is a National Cycle route and as such often has vulnerable road users. Cycle races are a regular occurrence at weekends. These are not always marshalled properly and so potentially very dangerous. The problem of cyclist's safety has been reported to police along with other safety issues including speeding traffic. We are currently awaiting a report back from the police once they have assessed the problem. (LEC Parish Council meeting January 7th 2020).
- Speeding Traffic is an identified problem in Leighton village. There is a statutory speed limit
 of 30mph but traffic monitoring and measurement in 2017 has identified that there is a
 problem with traffic exceeding the speed limit. Mouchel has written a report for Shropshire
 Council and suggested traffic calming measures are required (Report reference 1069316).
 The Parish Council has agreed with the report and we are still waiting for funding to
 implement the suggested measures. The Parish Council has asked the police to help enforce
 the speed limit.
- Safety issues concerning speeding motorcyclists, particularly at weekends, and deer roaming onto the road at certain times of year are also a problem.
- The road through Eaton Constantine and Upper Longwood is often used as a' rat run 'for traffic travelling to Wellington and the A5. Quarry traffic from the A5 does sometimes use this route and have caused local problems due to speeding, noise, dust and vibrations.
 Traffic Calming measures are in place and have helped to some extent. The road is unsuitable for HGV traffic; unfortunately, SatNavs do not always recognise this.
- An increase in HGV traffic on unsuitable roads would only create more safety issues.
 Between 2015 and 2018 there were accidents involving 12 vehicles and 9 casualties along the B4380 from Buildwas to the Atcham junction (Crashmap.com). These statistics do not include minor accidents and accidents with zero casualties which happen almost weekly.

Environmental

- Increased noise, dust and emissions along with vibration damage caused by HGV traffic is a worry to local residents.
 - The quality of life for residents living in the villages along the B4380 could be adversely affected. The villages of Buildwas, Leighton, Atcham and the hamlet Lower Longwood are all sited along the B4380. Villages just off the B4380 such as Wroxeter, Eaton Constantine and Garmston will also be negatively affected.
- The Parish of Leighton and Eaton Constantine has 37 listed buildings recorded. 2 properties are Grade 2 Star. One of these Grade 2 Star properties, Baxters House, is sited on the road through Eaton Constantine and could possibly be damaged by the vibrations caused by HGV traffic. The Kynnersley Arms public house is an important heritage building in the Parish with parts going back to the Domesday Book. Concerns over damage to this property along with the possible drop in business caused by increased HGV traffic so close to the building has been expressed. The majority of the Grade 2 properties in the Parish are sited along the B4380 or on the Eaton Constantine road so need to be protected from damage by HGV traffic.

• The quality of the surface of some of Shropshire's rural roads, including the B4380, is not fit to carry the 20 tonne HGVs stated as the vehicles to be used in the Environmental Statement of the Planning Application. The road surface is very uneven in places and potholes are a regular occurrence. The weight of extra HGV traffic can only make the problem worse and damage the surface further.

The Transport Statement looked at the scenario that the railway option was not available and how this would affect the HGV loads per day. It was concluded that there could be 188 two way HGV movements per day. (Table 5.6). The sensitivity test concluded that the Quarry would not generate traffic volumes sufficient to represent a material increase in traffic on the highway network, and no further assessment is required. (6.9)

The Environmental statement (14.4.21) states that 'overall, it is concluded that the effect of the proposed development on traffic impact can be summarised as a temporary impact of negligible significance'.

The Parish Council cannot agree with these conclusions due to the reasons stated above.

If the proposed rail link does not come into fruition the Parish Council would request that the extra 75% product would remain on site and only removed by road under strict agreed levels using a legal agreement.

2. Viability of the sand and gravel extraction

Will the extra 1.9 million tonnes extraction of sand and gravel from the proposed windfall site adversely affect the economic viability of the allocated extraction sites identified in policy SAM Dev MD5?

The viability of the allocated sites already listed in policy SAM Dev MD5 could possibly be put in jeopardy by flooding the market with an extra 1.9m tonnes of sand and gravel. It is stated in the planning policy MD5, that the identified sites should provide all sand and gravel in the first instance. There is also a need to control potential cumulative impacts.

MD5 policy also states: 'The market area for sand and gravel aggregates produced in Shropshire is generally local and little produced from Shropshire is currently exported eastwards to the main markets in the West Midlands due to availability of more proximate and higher quality materials closer to these markets.'

Are the products from the Ironbridge site of good enough quality for these proposed West Midland markets and is there a requirement for the product? If markets cannot be found for the extracted sand and gravel over the stated timeline for extraction, how long will the sand and gravel be allowed to be stockpiled on the former Ironbridge Power station site? Being close to Shropshire Hills AONB visual and landscape environmental impact could be adversely affected.

3. The environmental impact of the extraction process

The Planning Statement submitted states that assessments on the predicted operational levels of noise, air quality, vibration damage, water quality on site have concluded as being of negligible effect, after mitigating measures have been undertaken. Can we be assured that these will be checked and monitored by Shropshire Council. The Pool View Caravan Park is very close to the operations and will be most affected by any negative environmental impacts. This could affect the quality of life of residents and tourists living here.

4. What will be the Carbon footprint of such works?

Due to the Climate Emergency, will the machinery used for all works and transport be of low carbon emissions? Will this be monitored? How will the works affect carbon targets in the County?

5. Hours of operation

Work on site is to start at 7am and finish 7pm Monday to Friday and 7am till 1pm on Saturdays. Will the HGVs leave the site outside these hours? This would be of great concern to all residents living on the HGV routes. The noise from the HGVs could negatively impact on the quality of life for those living along the transport routes. Is it reasonable to still be transporting goods at 7pm in our rural location? Empty lorries travelling to the site before 7am could cause unreasonable noise disturbance also, particularly when they hit potholes in the road or drive on uneven surfaces.

Ironbridge is an important heritage site and tourist area. A starting time of 7am on Saturdays seems unreasonable and may negatively impact on the tourist trade. Hours of operation should be restricted to cause minimum negative impacts on the local economy and quality of life. Hours of operation should be restricted using Planning Conditions.