

Report to the Development Control Committee
 Meeting to be held on 15 October 2025

Report of the Director of Environment and Planning

Wyre Borough: LCC/2023/0030, Land off Bourbles Lane, Preesall
 (Appendices 'A' refers)

Part I	Corporate Priorities: Better lives for all/ economic ambition/ stronger communities
Electoral Division(s): Wyre Rural Central	
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Summary

Purpose of the Report

To consider and determine the following planning application:

Wyre Borough: Planning application ref LCC/2023/0030
 Land off Bourbles Lane, Preesall - The extraction and processing of sand and gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to leisure end-uses, agricultural land and biodiversity enhancement, using imported inert fill.

Recommendation

The Development Control Committee is asked that planning permission be **refused** for the following reasons:

- (i) The development would have unacceptable impacts on highway safety which cannot be adequately mitigated and the development therefore conflicts with Paragraph 116 of the National Planning Policy Framework, Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP6 of the Wyre Local Plan.
- (ii) The development by reason of proximity to residential properties would have unacceptable noise and dust impacts that could not be satisfactorily mitigated contrary to Paragraph 198 of the National Planning Policy Framework, Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP1 of the Wyre Local Plan.



Background

Applicant's Proposals

1. The application is for the extraction and processing of sand and gravel with backfill of the excavation using imported inert fill materials. The sand and gravel reserves within the site total around 500,000 tonnes and would be extracted from four separate phases. Progressive restoration to restore the site would be achieved using imported inert materials (around 220,000m³ in total). The total period of the development would be seven years from commencement to completion of restoration.
2. The proposal would generate around 60 heavy goods vehicle (HGV) movements per day (in and out) associated with the export of minerals and importation of restoration materials. Hours of operation would be 07.00 – 18.00 Monday to Friday and 07.00 – 13.00 on Saturdays with no operations on Sundays and Public Holidays.
3. Following completion of the backfilling, the site would be restored to mainly agricultural land together with a number of water features/ponds and surrounding habitat together with a small leisure use including lodges to be used as part of an adjacent angling facility.
4. The individual phases of the development are as follows:-
 - Site enabling works/Phase A (six months duration): This would include the creation of a new access point off the B5270 Lancaster Road together with an access road leading into the proposed quarry. The access road would be partially hard surfaced and would include wheel cleaning facilities. Soils and the underlying sand and gravel would then be extracted from Phase A to a relatively shallow depth of two metres with the sand and gravel being stockpiled for later processing. The soils would be used to form screening bunds along the southern boundary and western side of Phase A. Imported inert backfill material and a concrete slab would then be used to raise this area of the site for the siting of quarry processing plant, offices, weighbridge and other site infrastructure. Phase A would also include the excavation of silty clay material beneath the sand and gravel to form a clean water lagoon to provide water for the processing plant to use to wash excavated sand and gravel. The silty clay material would be stockpiled for use in the restoration of Phase 1.
 - Phase 1 (approximately 18 months) – Excavation of sand and gravel to around 4.5 – 6 metres in depth. Mineral would be excavated to the depth of the water table in a 12 metre wide strip in two areas parallel to Bourbles Lane and adjacent to a property called Red Lea. Mineral would be transported to an area adjacent to the processing plant and stockpiled to a maximum height of 10 metres. The clay from the clean water lagoon would then be used to backfill the excavated strip to original ground levels following which the previously striped soils would be used to form screening bunds over the worked areas. The minerals within the remainder of Phase 1 would then be worked. Some of the mineral in Phase 1 would be worked below the water table but the mineral would be worked in wet conditions with no pumping



undertaken. Following completion of extraction, the void would be infilled using the remainder of the basal clay material and the stored soils respread over the phase.

- Phase 2 (approximately six months) :Soils would be stripped from the Phase 2 area and stored on eastern and north western sides of the phase. The mineral would be worked in a single campaign of about 4–6 weeks. Only very limited dewatering of the excavation would be required due to the shallow depth of the deposit in this phase. Any extracted water would be pumped into the silt lagoon and either soak away or recirculate into the clean water lagoon. Restoration of this phase would be to agriculture and a lake feature. Some imported fill materials may be required in this phase to create the proposed restoration contours.
 - Phase 3 (approximately 18 months) – this phase is crossed by gas and water mains and the excavation and backfilling works would be designed and phased to provide protection to these pipelines. Soils would be stripped and stored in screening bunds and the mineral transported to the processing plant stockpile. Restoration would be achieved using imported inert fill.
 - Phase 4 (12 months) – Soils would be stripped and stored in a bund on the northern boundary adjacent to Bourbles Lane. Mineral extraction would then proceed in a southerly direction towards the plant area with backfilling taking place behind.
 - Phase 5 (site restoration – approximately two years) – this includes removal of the plant, offices, weighbridge, completion of backfilling and respreading of soils across backfilled areas of the site.
5. Importation of backfill materials would take place continually across the project and either deposited directly into worked areas or temporarily stored in a stockpile adjacent to the processing plant in the event ground conditions prevent access to backfill areas. Each mineral extraction phase would be restored to agriculture and a variety of wildlife habitats including lakes/pond and other ecological features. The applicant considers that the restoration proposal would deliver a biodiversity net gain well above the statutory 10% gain compared to the value of the existing site. Following completion of restoration, the processing plant area would be used to provide a small accommodation lodge facility (up to 12 lodges) for use in conjunction with the existing fishing facility.
6. The development would provide five new jobs for the majority of the year together with six additional posts during the mineral extraction campaigns (each around four weeks duration for around 2-3 times per year). Around 15 posts would also be required for road haulage.

Description and Location of the site

7. The site is located approximately 1km east of Preesall and 2km south east of Knott End in Wyre Borough. The site would be accessed via a new junction onto the B5270 Lancaster Road approximately 200 metres west of its junction with the A588 Blackpool to Lancaster Road. Bourbles Lane runs through the centre of the site and is a rough track and bridleway linking the A588 to Little Tongues Lane in Preesall.



8. The application site measures 20 hectares and has a complex layout relating to the separate fields within which mineral extraction would take place. Phase A is located 270 metres north of Lancaster Road and is comprised of a large arable field. Phase 1 is at the western end of the site and comprises an area of rough grazing immediately to the south of Bourbles Lane. Phase 2 is an arable field immediately north of Bourbles Lane close to the existing fishing lakes. Phase 3 is comprised of a series of grazing fields to the east of Bourbles Lane and Phase 4 is a field to the west and south of Bourbles Lane that is surrounded by fencing and has been used for rearing of ducks.
9. The proposed working areas are very open with no existing landscape features such as trees or hedgerows except on the boundaries of the fields and alongside parts of Bourbles Lane. In the centre of the site are three small lakes currently used as a course fishing facility. The southern most lake would be reused during the proposal as a silt lagoon to accept dirty water from the processing plant.
10. Although the site is separated from Preesall itself there are a number of individual properties close to various parts of the site. To the east of the access road on Lancaster Road are a group of properties including Hillfield House approximately 140 metres from the access road and 270 metres from Phase A. At the eastern end of Gaulters Lane there are two properties (Borodale and Ourome) located around 210 metres from the centre of Phase A. At Phase 1, there is a property called Woodlands on the north side of Bourbles Lane located 15 metres from the Phase 1 boundary and a large kennels complex and associated property at Red Lea located 25 metres from the Phase 1 boundary. For Phases 2 and 4 there is a complex of properties and barn conversions off Bourbles Lane including Bourbles Farmhouse which would be approximately 50 metres from the boundary of both phases. For Phase 3, there are properties located off Bourbles Lane (Mytax and New England Cottage), 71 metres from the Phase 3 boundary together with a further grouping of properties near to the junction of Bourbles Lane and the A588 (140 metres from Phase 3 boundary). In terms of Preesall itself, the closest residential areas are located in the Little Tongues Lanes and Nicksons Lane areas around 180 metres south west and west of Phase 1.
11. In relation to planning and land use designations, none of the site is subject to any statutory landscape or ecological designations. However, both Phases 2 and 3 of the sites are part of a wider Biological Heritage Site. The Biological Heritage Site is known as Pilling Moss/Head Dyke and covers a large area of farm land being designated for its value for over wintering birds associated with Morecambe Bay to the north. The majority of the site is also within a flood risk area (zones 2 and 3).
12. Two pipelines (water and gas) run through the centre of the site directly north of phase A and through the centre of Phase 3.
13. Bourbles Lane is a public bridleway. A public footpath also runs through the centre of the site linking Bourbles Lane with Gaulters Lane.



Planning policy

14. National Planning Policy Framework: The following paragraphs are considered particularly relevant: 8 (achieving sustainable development), 11-12 (presumption in favour of sustainable development, 57–58 (planning conditions and obligations), 116 (highway impacts), 187 (landscape), 193 (biodiversity), 198-199 (amenity impacts and air quality), and 223–226 (planning for mineral extraction).
15. Wyre Local Plan: The following policies are relevant:
 - Policy SP1 – Development strategy
 - Policy SP2 - Sustainable Development
 - Policy SP4 – Countryside Areas
 - Policy SP8 – Health and wellbeing
 - Policy CDMP1 – Environmental protection
 - Policy CDMP2 – Flood risk and surface water management
 - Policy CDMP3 – Design
 - Policy CDMP4 – Environmental Assets
 - Policy CDMP5 – Historic Environment
 - Policy CDMP6 – Accessibility and transport
 - Policy EP9 – Holiday accommodation
16. Joint Lancashire Minerals and Waste Core Strategy:
 - Policy CS1 – Safeguarding Lancashire's mineral resources
 - Policy CS3 – Meeting the demand for new minerals
 - Policy CS4 – Identifying sites and areas for mineral extraction
 - Policy CS5 – Achieving sustainable minerals extraction
17. Joint Lancashire Minerals and Waste Local Plan:
 - Policy DM1 – Management of waste and extraction of minerals
 - Policy DM2 – Development Management
 - Policy DM3 – Planning obligations
 - Policy SA2 – Safeguarding land for access improvements
 - Policy M1 – Managing Mineral Production

Relevant planning history

18. Two previous planning applications for sand and gravel extraction in the general area of the current application were submitted in 1972 and 1976. Both applications were refused. Planning permission for a coarse fishery on land off Bourbles Lane was granted by Wyre Council in 1985 (ref 84/1699).

Summary of consultation responses and publicity exercise

19. Wyre Borough Council: Object to the application on the following grounds:-
 - Policy EP9 of the local plan requires a business plan to be submitted to new holiday accommodation outlining how the proposed business would operate



and be viable. The application has not been submitted with a business plan for the proposed holiday accommodation which forms part of the restoration scheme for the site.

- The application site is located immediately adjacent to neighbouring residential properties, and it is considered that the operation of the quarry would lead to an unacceptable impact on the amenity of these properties as a result of general noise, disturbance and dust. As such the proposal fails to comply with Policy CDMP1 of the Wyre Local Plan.

20. Preesall Town Council: Object to the application and make the following comments:-

- Disappointed in the quality of the application with contradictory information on the nature of the proposal
- The proposal would directly affect St Aiden's School in Pressall, a local primary school, a nursing home and many businesses. Fifty two properties would be directly affected and 102 properties/businesses indirectly affected.
- The site is located on Grade 2 agricultural land which has been a reason for rejecting quarrying operations in this area before.
- There is regular flooding on the whole site and therefore potential for watercourses to be contaminated by polluted water. The site is traversed by dykes which need to be kept clear to prevent flooding. The proposed operations including earth bunding would prevent maintenance access to the dykes or result in blockages therefore increasing flood risk.
- Highways – The A588 is a dangerous road and is not suitable for the volume of traffic proposed. Traffic would have to negotiate the Fold House Corner at Pilling or the Burned House Lane junction both of which are very narrow, have blind bends and multiple accidents. Lancaster Road is also very narrow with no pavements for pedestrians.
- There are potential noise impacts on horse riders using Bourbles Lane.
- The site is of value to ecology including birds as noted in the response from the Fylde Bird Club. The applicant's ecological surveys appear to be deficient to understand the value of the site to birds and other species such as water voles and bats.
- The potential health impacts are significant particularly from dust which is known to cause several health issues including from silica which has not been addressed in the Environmental Impact Assessment. Silica dust impacts are particularly important for children and there is no information on how such impacts will be managed.
- Noise – the baseline assessment of background noise levels only involved two 15 minute periods of monitoring which is inadequate to properly assess noise impacts.

21. Hambleton Parish Council: Object to the application and express disappointment that the Parish Council were not a consultee on the application but nevertheless raise the following issues:

- Whilst there is a need for construction aggregates, it is unclear why materials cannot be worked from the quarry at Runshaw rather than Preesall.



- Dust impacts would be impossible to mitigate especially in dry weather. Dust would impact upon crops and there are also concerns regarding the silica content in the dust.
 - The applicant has studied highway impacts on the route between the quarry access and the A588 but not on the wider network. The A588 is in the top 10 of routes for fatalities and in either direction on the A588 vehicles will be travelling on narrow and unsuitable roads. The additional heavy goods vehicles would cause more damage to the roads and additional noise impacts for residents living alongside these roads.
 - The proposal would conflict with the Government's air quality strategy.
22. Pilling Parish Council: Has serious concerns regarding the impact of the proposal on residents from traffic conflict, air pollution including dust, noise and mental health stress as follows:
- The Parish Council draw attention to safety issues on the A588, particularly at Fold House where the road is of a width where no vehicles can pass an heavy goods vehicle and also at Stakepool. The Parish Council consider that the County Council must receive funding from the applicant to improve the A588.
 - The Parish Council also raise concerns about dust impacts from the extraction, processing and transport of materials which raise concerns respiratory problems.
 - Heavy goods vehicle movements would give rise to noise impacts through Pilling particularly when empty.
 - Parts of the site are Biological Heritage Sites, and this should be taken into account in the decision on the application.
23. Thurnham with Glasson Parish Council: Their chief concern relates to traffic movements by heavy goods vehicles. The local road network cannot absorb the volume of heavy goods vehicles that are proposed. The A588 in Thurnham Parish has some very difficult bends where two heavy goods vehicles cannot pass and unless the applicant presents a coherent plan for managing heavy goods vehicle access, the application should not be approved.
24. Forton Parish Council: Concerns raised about the potential for significant numbers of heavy goods vehicles to travel northwards to reach the M6 which would involve using Cockerham Road which is narrow country lane not suitable for heavy goods vehicles. The bridge over the canal in Forton already suffers from regular damage. The Parish Council request that the application is refused.
25. Cockerham Parish Council: Object due to the health and safety implications of increased traffic past Cockerham school. Greater levels of heavy goods vehicle traffic would cause wear to the white lining on the A588 which has been used as a safety measure.
26. Stalmine with Staynall Parish Council: Object – whilst they appreciate the need for aggregates, consider that other areas that do not affect the villages of Wyre



should be considered. The parish are also concerned about the traffic impacts of the development and associated pollution and noise.

27. Lead Local Flood Authority: No objection subject to conditions requiring the development to be carried out in accordance with the submitted flood risk assessment and sustainable drainage strategy.
28. Environment Agency: No objection. However, due to the highly irregular shape of the site boundary, the Environment Agency do not consider the groundwater modelling to be representative across the site as a whole. In addition, the Hydrological Impact Assessment is ambiguous about the need for an abstraction licence for both dewatering and mineral washing. Therefore a condition should be imposed requiring a scheme of groundwater monitoring to be submitted providing for further monitoring boreholes, monitoring throughout the duration of the development and submission of an annual monitoring report.
29. Lancashire County Council Landscape (comments provided by Atkins Ltd): The landscape and visual assessment methodology and findings are compliant with best practice. A number of issues are raised regarding the need for further information, but it is unlikely that this would change the overall reporting of the findings. Further landscape detail should be secured through appropriate planning conditions including details of planting and a landscape management plan for a minimum of 30 years.
30. County Archaeology Service: The site has a low potential to contain significant archaeological remains. The proposed site is low lying and therefore not an attractive location for occupation in the past as evidenced by nearby Preesall which is 15–20 m higher than the application site. Consequently no further evaluation is needed. The site is crossed by the former Garstang and Knott End railway line and it is considered that the line of the route should be retained in the restoration proposals as a public right of way with a public information board providing details about the former railway line.
31. Lancashire County Council Highways Development Control: Object to the application as they consider the proposal would have a detrimental impact on highway safety. They have raised the following issues:
 - Site access – the applicant has submitted swept path drawings showing heavy goods vehicle manoeuvres on the access road. The drawing does not take account of wing mirrors of heavy goods vehicles and therefore the Highway Authority is unable to fully assess whether two way movement of heavy goods vehicles on the access road would be possible. The applicant has provided details about how heavy goods vehicles into and out of the site would be managed to avoid two way heavy goods vehicle movements and as these are not on the public highway, Highways accept the principles.
 - Visibility Splays onto Lancaster Road: Lancashire County Council carried out a traffic survey on Lancaster Road in October 2023 which found that the 85th percentile speeds in both directions were 37mph. For a road with these speeds, the visibility splay requirements would normally be 2.4 metres by 58 metres in both directions. For a 2.4 metre setback, it is likely that the



visibility to the west of the site access would be limited to approximately 30 metres, a shortfall of 28 metres from the required standard.

- Trip generation – the highway authority welcome the applicant's proposal to limit heavy goods vehicle movements during school pick up and drop off times. However, it is unclear how heavy goods vehicles travelling to the site during these times will be managed – where will these heavy goods vehicles wait? If the proposal is approved the Highway Authority would wish to see a condition restricting maximum levels of heavy goods vehicle movements.
- Impacts on Lancaster Road: The Highway Authority have carried out their own traffic survey on Lancaster Road which concludes that the proposed development would result in an increase in average hourly heavy goods vehicle traffic of 51% eastbound and 50% westbound. There are no capacity concerns on Lancaster Road. However, Highways do have significant concerns regarding the suitability of Lancaster Road to accommodate additional heavy goods vehicle traffic as a result of insufficient widths to allow heavy goods vehicles to pass. This could increase the frequency of heavy goods vehicles having to reverse to allow another heavy goods vehicle to pass raising safety issues for other vehicles and vulnerable road users including cyclists, pedestrians and equestrians. Lancaster Road has no physical pedestrian segregation from the live carriageway.
- Impacts on the A588: There are two locations on the A588 where there are existing highway safety issues. These are at the Fold House Farm bend in Pilling and at the Burned House Lane/B5377 Park Lane junction between Stalmine and Preesall. The proposal would increase the number of heavy goods vehicle using these sections of the A588 which would lead to an increased risk of collisions for all road users.

32. Natural England: Consider that the application could have potential significant effects on nearby designated sites and deep peat. Natural England require further information to determine the significance of these impacts and potential for mitigation. The further information required includes a Habitats Regulations Assessment demonstrating consideration of potential impacts on designated ecology sites, information on the integrity of the deep peat and suitability for restoration and further information to meet the requirements for sustainable minerals development as set out in the National Planning Policy Framework. Without this information, Natural England say that they may object to the proposal.
33. Lancashire County Council Public Rights of Way: Comment that a footpath and bridleway run through the site. The footpath would be obstructed by the development and therefore it would be necessary to agree a temporary diversion during the period of the development.
34. UK Health Security Agency: Quarry operations are likely to give rise to some dust and respirable particulate emissions. However, the applicant has followed both planning and professional guidance in assessing the significance of these. UK Health Security Agency note that although particulate concentrations will remain well below the relevant air quality standards, such pollutants are non – threshold and population health impacts may occur from changes in pollution concentrations even below the air quality standards. The applicant has provided an assessment of Respirable Crystalline Silica (RCS). It should be noted that a



range of occupational health standards to Respirable Crystalline Silica (RCS) do exist in the UK and other countries and the most recent Health and Safety Executive workplace exposure limits classify Respirable Crystalline Silica (RCS) as carcinogenic with no safe exposure level. Controls to minimise Respirable Crystalline Silica (RCS) releases and off site impacts should be reviewed given that sand, a potential source of Respirable Crystalline Silica (RCS), would be a proportion of the mineral removed during quarrying.

35. Lancashire County Council Public Health: Consider that without mitigation, there would be a realistic possibility of negative health impacts occurring during operation of the quarry. This is likely to be a combination of increases in particulate matter and dust, respirable crystalline silica, noise and heavy goods vehicle traffic. The risk factors should be adequately addressed through planning conditions. This should include a dust management plan extending to how materials are stored and transferred during operations, securing vegetation on screening bunds and requiring dust monitoring. With regard to respirable crystalline silica, it is recommended that the applicant completes further work to demonstrate that any risks to exposure will not impact the health of residents. In relation to noise it is recommended that a noise management plan be secured through conditions. Specific consideration should be given to minimising the impact of traffic increases on properties along the haulage routes and limiting dust exposures to users of public rights of way that pass through the site.
36. Cadet Gas: No objection but draw attention to gas pipeline infrastructure which passes through the proposed site. The applicant must ensure that the proposed works do not impinge on legal rights of access and or restrictive covenants that exist.
37. United Utilities: A water main and associated easement affect the site. The information submitted with the application does not include any evidence of the exact line of the water main and width of the easement. Therefore United Utilities currently object to the application until such time as the exact alignment has been identified. United Utilities state they will then be able to recommend planning conditions for the protection of the water main during construction and completion of the development. United Utilities state they are satisfied with the site drainage proposals subject to a condition dealing with the detailed design.
38. Representations: Approximately 2000 representations objecting to the application have been received. A proportion of these are cyclostyle/petition type letters. The issues raised are summarised as follows:
39. Need for the minerals
 - Whilst there is a declining landbank position in Lancashire, there are other pending applications that should be utilised rather than creating a new development in an inappropriate setting. With the other pending applications, existing sites, marine imports and recycled materials, there is sufficient supply.



40. Pollution

- The heavy goods vehicle traffic movements will result in increased air pollution, including Nitrogen Dioxide (NO₂) concentrations on local roads.
- The quarrying activities will result in increased dust pollution to the local area particularly silica dust. This is a great concern for the residents who suffer with respiratory problems, the elderly and local livestock.
- There is concern about dust travelling away from the site due to the high wind speeds (average 12mph), prevailing wind direction and the size of the bunds to be built.
- The 250m boundary for potential dust impacts used in the applicant's assessment starts at the centre of the site, but taken from all boundaries of the site, the number of houses affected increases to around 150 properties.
- Increased noise pollution from quarrying activities will be heard by residents as the surrounding land is flat with little to no screening.
- There is evidence that quarrying can have a negative impact on water quality in surrounding areas for both humans and wildlife.
- There is concern around where the runoff from the minerals washing plant will be pumped to/stored.
- There is concern around the lack of atmospheric monitoring suggested.
- It contradicts National Planning Policy Framework which promotes enhancing biodiversity and reducing pollution.

41. Landfill

- Who will police and enforce what will be used for landfill?
- The inert material could end up being hazardous waste.
- A nearby field to the site was used for tipping general waste. How do we know this will not happen again?

42. Highways

- The increased traffic will block residential, school and businesses access.
- There are no pavements on the A588 which is already dangerous to pedestrians, cyclists, and horse riders, never mind increasing heavy goods vehicle movements also.
- Lancaster Road has no streetlights.
- The local roads are narrow and of inadequate quality. They have blind and sharp bends. The A588 road is a narrow winding road, and a larger vehicle must move onto the other side of the road to navigate around the sharp/blind bends - what happens if two of these meets?
- Lancaster Road is on a bus route and a further 80 heavy goods vehicles will give rise to highway safety issues particularly for vulnerable road users due in adequate road widths, lack of verge and restricted visibility due to hedgerows.
- Shard Bridge is already weak and has needed many improvements.
- The roads are already riddled with large potholes and increased vehicular movements will only escalate the damage.



- Any large vehicle movements cause damage to nearby properties and they are 17th century build houses and cottages which lack foundations. The increased heavy goods vehicle movements will only increase this damage.
- It is requested that traffic is monitored to show current traffic levels prior to a decision being made.
- The mud/sludge on heavy goods vehicles will cause damage to the roads and local buildings when they leave the site.
- A part of Lancaster Road has been recently re-surfaced (because of dangerously deep potholes) and is already showing signs of collapse in some areas. This is just from normal day to day traffic.
- The A588 already has a lot of road traffic accidents, one including a child being severely injured while crossing the road from the school bus. Other accidents have resulted in fatalities. The A588 has been named one of the top five most dangerous roads to travel on in the UK.
- There are particular highway safety concerns at the Burned House Lane junction on the A588 and at Stakepool in Pilling also on the A588.
- Traffic around drop off and collection times at local schools are already congested without the added heavy goods vehicle movements.
- Local cycling clubs are concerned for their safety when cycling around the application site.
- Concerns were raised around the traffic contingency plans to suspend or divert traffic if there are road closures/blockages.
- The increased heavy goods vehicle movements would affect the current bus timetable – should a bus and heavy goods vehicle meet they would not be able to pass each other.
- The applicant's proposals to cut back the grass verges to widen Lancaster Road is not viable as these verges are owned by the homeowner not the applicant or Lancashire County Council Highways. There are also issues regarding the exact location and geometry of the access road and junction with Lancaster Road.

43. Biodiversity

- The application site lies within Pilling Moss, a Biological Heritage Site, home to Lancashire Key Species and a winter-feeding ground for Pink-footed Geese and Whooper Swans.
- The site affects a Special Protection Area (SPA) and Special Area of Conservation (SAC) and borders the Lune Estuary Site of Special Scientific Interest (SSSI).
- The application site is home to numerous protected animals including otters, Great-Crested Newts, Skylarks, Osprey and Red-listed birds, such as Turtle Doves, found on the Red List of the UK Conservation Status Report.
- The quarrying activities will affect nearby arable farming and cause a disturbance to the wildlife associated with Morecambe Bay.
- The application contradicts Lancashire County Council's plans to increase Green Space in the County.
- The proposal will destroy natural habitat and result in the loss of Grade 2 agricultural land.
- There are fears of landscape contamination because of the proposal's activities.



- The proposed development may require the removal of hedgerows protected under the Hedgerow Regulations 1997.

44. Health

- Concerns are raised about the health of local students/teachers as a local school, and its school field is within 1.5km of the site.
- The local area to the application site is densely populated by the elderly and those with health problems who have moved to the area for health reasons.
- A huge concern for residents is the health implications of living so close to an active quarry and living on the transport/access routes for the heavy goods vehicles travelling to/from the site.
- The application is causing stress amongst the residents and is affecting their mental health.
- There is a national initiative to encourage people to take part in physical activity. Residents say the application would make it extremely dangerous for people to cycle, horse ride, walk or run on the rural roads surround the site.
- Objections are raised that Public Health were not initially consulted.
- Preesall is a place of peace. They fear that quarry-related noise and dust may aggravate health conditions, affecting both their health and family life.
- There is concern about exposure to harmful substances like crystalline silica, a known carcinogen, and PM2.5 particles produced by the quarry operations. Unlike the quarry workers, residents say they would be exposed to such dust without protection putting their health and well being at serious risk.
- The UK health regulations about quarries are outdated in comparison to World Health Organisation (WHO) standards.
- Granting planning permission would be a huge contradiction to the Lancashire Walks to School Day Initiative, as it would not be safe to do so.
- Neighbouring farmers and landowners object to the potential air pollution and particle contamination to the grazing and crop fields.
- A nearby dog rescue centre, rehoming charity, and kennels, as well as a local cattery, are likely to be adversely affected by dust, noise, and ground vibrations from the proposed development. These pose a serious risk to the welfare of the animals, many of whom are already vulnerable, potentially leading to the closure of these essential services and the euthanasia of un-rehomed animals.
- The overall health risks associated with the proposed quarrying operations would increase pressure on local Healthcare facilities including Over Wyre Medical Centre.

45. Flood Risk

- The application site is within a flood zone and a Groundwater Protection Zone.
- The roads leading to the application site already often flood due to local dykes which struggle with current water levels.
- The proposal will increase flood risk as it is currently free draining as the substrate is a porous sand and gravel. When the quarry is infilled with less



porous inert waste, this will increase the risk of flooding and affect local drainage ditches.

- Lancashire County Council's Mario mapping software classifies the proposed site as being in a "Flood Warning Area". To grant this proposal would be in contradiction to Lancashire County Council's Local Strategy.
- Residents have raised concerns that the water table in the area lies approximately 1.7 metres below the surface, beneath which exists a layer of unstable sand. The proposed quarrying activities may increase the risk of land slippage and ground instability.

46. Other

- The quarry would be a scar on the landscape.
- The 9m high soil bunds will surround local properties and block their views.
- There are frequently used public footpaths which cross the proposed site.
- The proposal will influence the levels of tourism to the local area, including Knott End, therefore affecting local shop, caravan sites and activity centres.
- Seagulls are already considered a nuisance in the area, and when the infilling of quarry begins, this will only increase the amount and size of the birds to the area.
- Concerns have been raised as impact on the nearby existing historic salt caverns in the area.
- Enforcement of the planning permission and proposed activities are a concern for many parties.
- The proposal violates Wyre Local Plan (Policy SDMP6) and the National Planning Policy Framework by compromising road safety; not protecting a public right of way; and not providing a safe and adequate access route.
- There are concerns about the derelict farmhouse to be demolished so that a potential new lodge site can be built.
- Request that councillors visit the site and the potential access roads to see how bad the situation currently is and how close residents are to the proposal site.
- The visual/landscape assessment uses photographs taken in summer photographs when the industry standard is a winter assessment.
- There is a lack of clarity regarding the proposed holiday lodges following the development.

47. Non planning issues

A number of comments have also been received raising matters which are not material considerations. These include:

- Impact on property values.
- The integrity and transparency of the applicant and the land acquisition process that took place prior to the application being submitted.
- A lack of confidence in the impartiality of the planning application.



48. Representations have also been received from the following:

Rt Hon Ben Wallace (former MP for Wyre and Preston North): Raised concerns regarding the transportation of materials over roads within his former constituency. The road through Hambleton often has no footways and the development would compromise highway safety of all road users and residents along the proposed access routes.

Cat Smith (MP for Lancaster and Wyre): Presented a petition in Parliament against the development in July 2022 and highlighting concerns regarding health implications of dust impacts and silica particulates. Considers that the dust impacts of the development would have serious health impacts for local residents. There are also issues relating to loss of natural habitats, noise and heavy goods vehicles on local roads.

County Council Matthew Salter (Divisional Member): Objects to the application. He considers that there is no safe route of access to the site and that Lancaster Road is not suitable for the considerable number of heavy goods vehicles proposed due to conflict with other road users. He also considers that the applicant's traffic assessment is inadequate and does not properly represent the safety issues on the affected roads. He is also concerned about the potential for additional heavy goods vehicle traffic to affect local schools and the need to impose suitable conditions prevent such movements if planning permission is granted. Concerns are also raised regarding ecological impacts particularly in terms of impacts on Morecambe Bay and protected species, the use of inert fill to restore the site and the proximity of properties to the application site. In particular risks of dust, particularly respirable silica dusts and associated health impacts and a lack of adequate assessment by the applicant is a concern. Issues are also raised regarding possible impacts on local business, potential for increased flooding risk and impacts on users of public rights of way. Councillor Salter understands that there is sufficient mineral reserves to meet Lancashire's needs but even if reserves were insufficient, the impacts are such that planning permission should be refused.

49. Five letters of support for the proposal have been received which raise the following issues:-

- The gravel would be used locally which reduces the carbon footprint of supply.
- Lancashire needs new supplies of sand and gravel.
- The project would create new wildlife habitats.
- The development would create employment and future leisure facilities.
- The applicant has demonstrated that all environmental, health and transport issues have been addressed.
- The proposals is only a continuation of historical mineral extraction on the site.



Options and Proposals

Assessment of Planning Application:

50. This planning application is primarily for the development of a new quarry to supply sand and gravel materials. Sand and gravel is used in a wide range of construction products including concrete, asphalt, mortar, pipe bedding and drainage applications as well decorative aggregates. The mineral deposit in this location is a former storm beach deposit which has been proven through two phases of borehole investigations on the site which demonstrated the presence of sand and gravel on the site between 1.5 to over 6 metres in thickness. Material recovered from the boreholes was tested and showed the deposit to consist of 60% sand, 36% gravel and the remainder silt. The mineral deposit is therefore of a high quality and is capable of being processed into materials that can be used for a wide variety of construction materials. In addition, to the mineral extraction, inert waste (excavation soils and clays) would also be deposited at the site to achieve the proposed restoration contours.
51. The applicant has undertaken an Environmental Impact Assessment of their proposals following previous Environmental Impact Assessment screening and scoping exercises carried out with the County Council. The applicant's Environmental Statement investigates the likely significant environmental effects of the proposal and sets out mitigation measures that are required to reduce or eliminate impacts. The environmental topics covered in the applicant's Environmental Statement are highways/traffic, visual/landscape, ecology, water resources and flooding, noise, air quality and archaeology.

Planning Policy

52. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. In considering the issues that arise from the proposed development, it is necessary to take into consideration the relevant policies of the Development Plan and the planning history of the site and all other material planning considerations. Government policy including the National Planning Policy Framework is a material consideration that should be given appropriate weight in the decision-making process.
53. The National Planning Policy Framework affirms that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.



54. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
55. The Development Plan for the site comprises the Lancashire Minerals and Waste Core Strategy/Local Plan and the Wyre Borough Local Plan.
56. Paragraph 11c of the National Planning Policy Framework requires that development proposals that accord with an up to date development plan should be approved without delay. Paragraph 11d requires that where there are no relevant policies or the policies which are the most important for determining the application are out of date, planning permission should be granted unless;
- The policies in the National Planning Policy Framework which protect areas or assets of particular importance provide a strong reason for refusing the development or;
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the proposal.
57. The Wyre Local Plan was adopted in 2023 and is therefore up to date for the purposes of decision making. The Joint Lancashire Minerals and Waste Core Strategy and Local Plan had adoption dates of February 2009 and September 2013 respectively with the plan period for both documents running until the end of 2020. Some of the policies in those plans may therefore be considered to be out of date for the purposes of decision making. If those policies are the most important for determining the application, the provisions of Paragraph 11d of the National Planning Policy Framework would apply. A judgement on whether individual policies are out of date for the purposes of Paragraph 11d revolves around the degree of conformity with the current National Planning Policy Framework and the topic area and wording of the policy. For this proposal, it is considered that Policies CS4 and CS8 of the Core Strategy and Policies M1



and LF2 of the Local Plan are now out of date as these policies deal with provision of minerals and waste management capacity over the plan period. Policy DM2 of the Local Plan, however, dealing with general assessment of environmental impacts is considered to be up to date as it remains in general conformity with the National Planning Policy Framework.

Need for the development.

58. Chapter 17 of the National Planning Policy Framework deals with the sustainable supply of minerals. Paragraph 222 states that *'it is essential that there is a sufficient supply of minerals to supply the infrastructure, buildings, energy and goods that the country needs'*.
59. Paragraph 224 requires that *'great weight should be given to the benefits of mineral extraction including to the economy'*. In considering proposals for mineral extraction, mineral planning authorities should a) *As far as practicable, provide for the maintenance of land banks of non-energy minerals from outside National Parks, the Broads, National Landscapes and World Heritage Sites, scheduled monuments and conservation areas.*
60. Most construction materials are produced using aggregates. These are either sourced from sand and gravel deposits or from hard rock quarries (limestone or gritstone in the case of Lancashire). Paragraph 226 of the National Planning Policy Framework concerns the maintenance of supply of aggregate minerals. It requires mineral planning authorities to plan for a steady and adequate supply of aggregates by:
 - a) Preparing an annual Local Aggregates Assessment to forecast future demand based upon a rolling average of 10 years sales data and other relevant local information and an assessment of all supply options (including recycled sources).
 - e) using landbanks of aggregate minerals reserves principally as an indicator of the security of aggregate minerals supply and to indicate the additional provision that needs to be made for new aggregates extraction.
 - f) using landbanks of at least 7 years for sand and gravel.
61. The Joint Lancashire Minerals and Waste Core Strategy and Local Plan (JLMWLP) is part of the adopted development plan for the site and the application should be determined in accordance with those policies unless material considerations indicate otherwise. The Core Strategy and Local Plan contain policies for the future supply of sand and gravel in order to ensure a steady and adequate supply of aggregate minerals and to meet the minimum landbank requirements within Paragraph 226 of the National Planning Policy Framework.
62. Policy CS3 of the Core Strategy (published in February 2009) states that provision will be made for the extraction of 10.8 million tonnes of sand and gravel between 2001 and 2021. It stated that the provision would be met through a combination of rolling forward and identifying a minimal range of new sites and relying on the maximum contribution from secondary and recycled aggregate. The policy stated that based upon the position at the end of 2005,



provision will be made for the release of land containing not less than 4.1 million tonnes of sand and gravel by 2021. Preference was given to the release of sand and gravel reserves which provide for the maximum practicable contribution of high quality sand.

63. There was further development of the policy for minerals and waste in Lancashire through the Minerals and Waste Local Plan (published September 2013). Policy M1 of the Local Plan states *'that development will not be supported for any new extraction of sand and gravel, limestone or brickshale'*. The reason for the change in policy approach from the Core Strategy was that planning permissions were granted for around 6.4 million tonnes of sand and gravel in the period between the Core Strategy being adopted and the Minerals and Waste Local Plan being published. Given the additional permitted reserves, no further releases were required through the Local Plan to maintain the landbank requirement in national policy.
64. Both the Core Strategy and Minerals and Waste Local Plan are now dated. The Core Strategy was published before the National Planning Policy Framework was issued. Although the Joint Lancashire Minerals and Waste Core Strategy and Local Plan was adopted following the National Planning Policy Framework being published, the Inspector at the examination into the draft Joint Lancashire Minerals and Waste Core Strategy and Local Plan considered that the minerals supply policies (specifically policy M1) did not comply with the national policy in the National Planning Policy Framework. This was due to the effective prohibition on further aggregate mineral permissions under policy M1 which the Inspector considered did not reflect national policy, most specifically that the policy set a ceiling on reserves of aggregate minerals rather than requiring maintenance at levels of **at least** the stated landbank requirements as required by the National Planning Policy Framework. Nevertheless, the Inspector allowed the Joint Lancashire Minerals and Waste Core Strategy and Local Plan to proceed towards adoption but with a recommendation that the County Council commenced an immediate review of the Plan.
65. The County Council publishes annual Local Aggregates Assessments (LAA's) as required by Paragraph 226 of the National Planning Policy Framework. These assessments use sales data along with predictions of demand to monitor landbank performance and to indicate the need to release additional reserves. The most recent 2023 Local Aggregates Assessments (based on 2022 data) reported sales of sand and gravel of 229,000 tonnes with permitted reserves of 4.4 Mt. Landbank durations are calculated on the basis of the average sales over the previous 10 year period which for sand and gravel provided a landbank of seven years within the 2023 Local Aggregates Assessments. The Local Aggregates Assessments noted that the landbank would begin to be eroded below the seven year level in 2026 if no further reserves were permitted. The current position is that the landbank of sand and gravel reserves in Lancashire is around 4.3 million tonnes; at or slightly above the minimum landbank requirement of seven years.
66. Besides landbanks, it is also important to consider adequacy of supply as required by Paragraph 226 of the National Planning Policy Framework. This is chiefly in terms of the ability of the existing permitted quarries to meet the



forecast demand for aggregate minerals. The North West Regional Aggregate Working Party sub regional apportionment for sand and gravel supply in Lancashire is 440,000 tonnes per year. The supply position was considered in the 2023 Local Aggregates Assessment which notes that sales had reduced considerably due to the closure/exhaustion of reserves at a number of existing sand and gravel quarries including Lower Brockholes, St Annes Foreshore, Clayton Hall, Sandons Farm and Tarnacre Farm. Currently, the remaining operational sites are not capable of producing at the level required to meet the sub regional apportionment.

67. The remaining reserves are held in a very small number of quarries with the only active sites being Bradleys Sandpit (Preston) and Lydiate Lane (Leyland). By far the largest proportion of permitted reserves (4.1 Mt) is held in one site at Runshaw, Euxton which is non operational. Paragraph 226(g) of the National Planning Policy Framework states that mineral planning authorities should plan for a steady and adequate supply of aggregates by ensuring that large landbanks bound up in very few sites do not stifle competition. This is particularly relevant given that most of the landbank is held at a single site which is making no contribution towards supply. Even if the Runshaw site was to commence production, it is subject to an output restriction which limits heavy goods vehicles leaving the site to 60 per day thereby limiting the ability of this site to meet the forecast demand. Furthermore, the planning permission for the Runshaw site expires in mid 2026 and it is not known at present whether the operator of the site (Tarmac) will be making a planning application to extend the time period of permission.
68. In terms of other planning applications for sand and gravel extraction, there are current applications at Lower Hall Farm, Salmesbury nr Preston and Gale Moss near Chorley. However, both applications were submitted a considerable time ago and are undetermined due to unresolved planning issues.
69. Policy M1 of the Joint Lancashire Minerals and Waste Core Strategy and Local Plan is considered to be the most important consideration in this application as it provides the basis for assessing the need for new sand and gravel reserves. However, Policy M1 is now dated as it applies to a time period between 2006 and 2020. In addition, the policy does not reflect current National Planning Policy Framework guidance on the supply of minerals. Taking into account these considerations, it is considered that Policy M1 and its prohibition of permissions for further sand and gravel extraction now carries no weight in the determination of this planning application.
70. In summary, whilst the overall landbank of sand and gravel in Lancashire might still meet the seven year requirement in the National Planning Policy Framework, nearly all the reserves are held in one site which is non-operational and where the permission, unless extended, will expire in mid 2026. The remaining operational sites have very limited reserves and outputs and therefore the ability to ensure a steady and adequate supply of sand and gravel aggregates as required by national policy is severely constrained. The resources at this site are of good quality and can be processed to produce a range of aggregate materials. It is therefore considered that the proposal would meet a pressing and demonstrable need for new sand and gravel reserves in



Lancashire to which significant weight should be attached. However, that need has to be balanced against the environmental impacts of the proposal.

Inert waste backfilling :

71. The applicant proposes to infill the site with imported inert waste material. As part of the mineral resource is located below the natural water table, infilling of the excavations is required to allow the working phases to be restored back to agricultural use. Infill materials would either be imported and tipped directly into worked out areas of the site or would be used to form a stockpile adjacent to the plant area in the event that ground conditions during the winter make it difficult to access areas under restoration.
72. Policy LF2 of the Joint Lancashire Minerals and Waste Local Plan supports development for the landfill of inert waste that cannot be recycled or recovered at Scout Moor Quarry in Rossendale and on land to the south of Jameson Road Landfill Site, Fleetwood. However, the policy does not preclude other sites being brought forward and in any event the policy is now dated and therefore carries reduced weight in the consideration of the application. There is a need to import material to allow the effective restoration of the site, and to permit the restoration of high quality agricultural land. The waste importation aspects of the development are considered to be acceptable in terms of the broad policies for waste management.
73. The main environmental impacts of this proposal relate to highways, proximity to residential properties including noise and dust issues, landscape/visual, water/flooding, ecology and archaeology.

Highways

74. The applicant has included a transport assessment within their Environmental Impact Assessment which investigates highway safety and capacity issues on the roads that would be affected by traffic from the proposed site.
75. The site would be accessed via a new junction onto the B5270 Lancaster Road. The new junction would be configured so that traffic from the site could only travel into/out of the site to/from the east. Lancaster Road at this point is subject to a 30 mph speed limit and leads after a distance of 240 metres to a priority junction with the A588. The A588 is subject to a 50 mph limit at this point and can be followed eastwards/northwards towards Pilling/Lancaster or west/south towards Hambleton/Poulton le Fylde. At the proposed rates of working the development, (including the mineral extraction and backfilling operations), would give rise to an average of 40 heavy goods vehicle movements (in and out) per day. At a maximum, the development would give rise to 60 heavy goods vehicle movements (in and out) per day.
76. The applicants Transport Assessment provides information on existing conditions on Lancaster Road and the A588. On the A588, the applicant estimates that total traffic flows will increase by 0.5% assuming that traffic splits equally at the Lancaster Road/A588 junction. In terms of heavy goods vehicles, there would be an increase to 2.8% of total flows. Increases in heavy goods



vehicles on Lancaster Road would be significantly higher (around 50%) due to lower overall existing traffic volumes and heavy goods vehicles on this road. The applicant also states that there has only been one injury accident at the A588/Lancaster Road junction in the last nine years and therefore considers that there are no fundamental highway safety issues on the affected roads.

77. Paragraph 116 of the National Planning Policy Framework states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network, following mitigation, would be severe taking into account all reasonable future scenarios.
78. Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan states that minerals or waste management operations will be supported where it can be demonstrated that all impacts that would cause demonstrable harm can be eliminated or reduced to acceptable levels.
79. Policy CDMP6 of the Wyre Local Plan deals with accessibility and transport. The policy states that development will be permitted provided that it meets the requirements of the Core Development Management Policies and it has been demonstrated that a number of requirements are satisfied including the following that are relevant to the proposed development:
- 1b) *Road safety and the safe and efficient and convenient movement of all highways users (including bus passengers, refuse collection vehicles, the emergency services, cyclists and pedestrians) is not prejudiced.*
 - 1c) *Safe and adequate vehicular, cycle and pedestrian access to and from and circulation within, a proposal site would be provided.*
 - 3. *Where a development has an adverse impact on the existing highway network, developers or operators will be required to provide or contribute to such works to the transport network including sustainable travel measures as are necessary to mitigate these impacts.*
 - 4. *Where the above requirements can only be satisfied through the undertaking of off-site works the costs of these shall be borne by the developer.*
80. The access and transport issues have been the subject of considerable discussion between the applicant and Lancashire County Council Highways.
81. With regard to the site access, the issue relates to the dimensions of the visibility splay to be provided particularly to the splay to the west of the proposed access. The access position for vehicles leaving the site has been moved as far to the east as is possible within the applicant's ownership to maximise the visibility to the west. A visibility splay of 43 metres would meet the standard for a road with a speed limit of 30 mph. However, in this case, traffic surveys have shown that the 85th percentile speed is 37 mph. Highways consider that a splay of 2.4 x 58 metres should be provided to reflect the actual speed of traffic and that a splay of that dimension is not achievable. The applicant considers that the required splay should reflect the speed limit of the road rather than the



speed of illegal driving and that the correct approach should be to design the access to the speed limit of the road supported by measures (such as speed indicator device and signage) to 'enforce' the speed limit. In any event, the applicant maintains that a splay significantly longer than 43 metres can be provided by maintaining the hedge to the west (which is within the highway) to a height of one metre which would allow visibility over the hedge. The applicant considers this could be the subject of a planning condition.

82. With regards to Lancaster Road, from the proposed access, the road curves to the south before a junction with the A588. At pre application stage, officers noted potential issues at this location regarding the width and curvature of the road and advised the applicant to investigate an access direct onto the A588. However, that has not been possible due to ownership issues. Use of Lancaster Road is therefore the proposed access option.
83. The applicant has designed the site access so that all traffic leaving the site would have to travel eastwards towards the A588 as this minimises the length of Lancaster Road that would be used by quarry related traffic.
84. Lancashire County Council Highways consider that there is no highways capacity issue on Lancaster Road even with predicted maximum levels of heavy goods vehicle movements which could be controlled through a planning condition. The issue relates to the ability of traffic (particularly heavy goods vehicles) to pass on this section of highway.
85. There has been considerable discussion between the applicant and Lancashire County Council Highways regarding the ability of heavy goods vehicles to pass on Lancaster Road. The current width of Lancaster Road is around 5.5 metres. There are no footways and the verges, where they exist, are less than 0.5 metres wide. The highway boundaries are formed either from hedgerows or short sections of wall fronting properties. The applicant considers that additional width can be provided by cutting back the road side face of the hedgerows by a further 300 mm on each side providing sufficient width for heavy goods vehicles to pass satisfactorily and that drivers can 'pull in' their wing mirrors to provide greater passing clearance if required. Highways consider that highway widths will be less than shown diagrammatically as drivers are unlikely to drive against hedges to prevent damage to their vehicles meaning that two-way heavy goods vehicle movements along Lancaster Road will be restricted. Heavy goods vehicles would need to stop to pass each other safely or may need to reverse on the live carriageway to find a suitable passing point. Such reversing manoeuvres would be a risk to other road users, particularly vulnerable users such as pedestrians, cyclists or horse riders, where very little verge refuge exists. Highways therefore consider that the use of Lancaster Road would create highway safety issues that cannot be overcome through any highway improvements or use of planning conditions.
86. The applicant has said that all their heavy goods vehicle traffic would be managed through a Construction Management Plan so that heavy goods vehicles would not leave the site when another heavy goods vehicle was approaching Lancaster Road. Alternatively, they would wait on the highway if there were vehicles leaving the site or if heavy goods vehicles needed to avoid



school opening/closing times. However, it is unclear where heavy goods vehicles travelling towards the site would wait and, in any event, this does not address the issue of quarry related traffic passing other heavy goods vehicles or large vehicles on the network. Lancaster Road is located on a bus route.

87. Highways have also highlighted two locations of concern on the A588 that would be affected by development traffic and where two way heavy goods vehicle and vehicular movements are not possible without conflict. Firstly, there is an area near the access to Fold House Farm on the western side of Pilling and secondly the junction of the A588 and the B5270 Park Lane and Cemetery Lane approximately 1.5 km south of the application site. At either location there could be an increase in heavy goods vehicles of around 37 movements per day depending on the distribution of vehicle movements from the site.
88. Highways consider that at Fold House Farm; two way heavy goods vehicle movements are not possible due to the width of the highway and the alignment affecting forward visibility resulting in heavy goods vehicles having to wait or reverse to allow passing. The applicants have proposed a signage scheme at this location to provide advance warning of the restricted highway, but the Highway Authority question its likely effectiveness as it would still not overcome the possibilities of heavy goods vehicles having to reverse at this location with highway safety implications. At the A588/B5270 junction, Highways draw attention to four injury accidents at this location in the last five years with two of the accidents involving heavy goods vehicles. Highways acknowledge that there are existing issues at this junction but are concerned about a further increase in heavy goods vehicle traffic at this junction. They are concerned that two way heavy goods vehicle movements are not possible at this junction, there is a lack of inter visibility along the A588 due to the location of two detached properties and there is no formal segregation for sustainable road users. Taking into account the increased volume of the heavy goods vehicles on this road due to the development, Highways consider that there will be a greater risk of collisions.
89. A number of mitigation measures for these impacts have been investigated by the applicant. However, Lancashire County Council Highways consider that they would either not address the impact, would be unworkable or cannot be delivered on land within the applicant's control. Highways therefore object to the proposal.
90. Paragraph 116 of the National Planning Policy Framework requires that planning applications should only be refused on highway grounds if the impacts on safety would be unacceptable or the residual cumulative impacts would be severe. It is considered that the development would result in unacceptable impacts on safety at a number of locations and given the inability to provide satisfactory mitigation, the impacts would be severe. The highway objection to the development is therefore considered to be justified in terms of Paragraph 116 of the National Planning Policy Framework and there is a conflict with Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP6 of the Wyre Local Plan.



Landscape Matters

91. The applicant has included a Landscape and Visual Impact Assessment (LVIA) within their Environmental Impact Assessment. The Landscape and Visual Impact Assessment includes a description of the baseline position including the existing landscape character, designations and visual receptors, identifying the aspects of the proposal which will have landscape impacts and finally an assessment of landscape and visual impacts including from 13 representative viewpoints around the site.
92. Paragraph 187 of the National Planning Policy Framework states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the intrinsic character and beauty of the countryside and of trees and woodland.
93. Policy CDMP4 of the Wyre Local Plan deals with Environmental Assets and states that development proposals should where possible provide enhancements in relation to the environmental assets in this policy and seek to minimise or eliminate net environmental impact. Development will be permitted where following implementation of any required mitigation, there is no unacceptable impact on environmental assets or interests including green infrastructure and trees and hedgerows. In relation to landscape issues, the policy requires that new development should have regard to National Character Areas and take into consideration the site's landscape setting including local and long distance views. Development should have no unacceptable cumulative impact on landscape character within or outside of settlement boundaries and principle elements and features associated with it. Development proposals should be designed to avoid negative landscape effects and where this is not possible impacts should effectively mitigate.
94. The site is not located within any protected landscape area. In terms of landscape character, the site is located within Natural England's Lancashire and Amounderness Plain National Landscape Character Area and the Knott End – Pilling/North Fylde Mosses character area within the County Council's Landscape Strategy. The chief key landscape features for these areas are noted as the field boundaries, network of raised lanes, uncultivated peat mosslands and reclaimed mosses devoid of development.
95. The site currently consists of a number of arable and grazing fields together with an area used for rearing wildfowl. It displays a number of landscape features that are characteristic of the area including hedgerows and large moss fields. However, there are very few distinctive landscape features within the site itself. The only hedgerow removal would be restricted to a 55 metre length along the north side Lancaster Road to achieve the access and visibility splay and to short lengths to construct the haul roads into individual working phases. No significant trees or other distinctive landscape features would be removed.
96. The flat nature of the site would limit landscape and visual impacts. However, there would still be some landscape impacts. Soil screening bunds would be erected around the southern and western boundaries of the plant site which would supplement the screening provided by the retained perimeter hedgerows



in this area but it is likely that, due to their height the stockpiles and processing plant would still be visible from some points on Lancaster Road, surrounding properties off Lancaster Road and Gaulters Lane. These impacts would be experienced over the full duration of the mineral extraction and most of the backfilling operations. The only elevated local viewpoint is from Pressall Hill from where distant views (around 600 metres) are gained over the application site and given the scale and duration of the site and phased nature of the operation. However, it is not considered that visual impacts from this location would be significant given the phased development and relatively short overall timescale.

97. There would also be visual impacts from the working of each phase of the site. These impacts would predominantly be from Bourbles Lane as this runs adjacent to every phase of the site. Some screening would be provided by soil mounds constructed parallel to the lane although some views of active working areas would still be gained as the soil mounds would not extend around the full perimeter of working areas. However, such impacts would be short term only over the duration of working and backfilling for each phase and in some locations would be screened by the existing high hedgerows that exist along Bourbles Lane.
98. Longer term, the site would be restored close to the existing levels using imported backfill materials with the addition of pond features within each mineral working phase. Large parts of site would be restored to agricultural use with the addition of areas of tree and shrub planting. It is considered that the proposals would allow the working areas to be restored in a way that would respect local landscape character and the further landscaping works proposed would provide new landscape features. Whilst there would be some visual impacts during the working period, the development would not require the removal of important landscape features or give rise to significant or long term changes to the landscape.
99. A public footpath runs through the centre of the site. Lancashire County Council Public Rights of Way have suggested that the footpath would need to be diverted but the route would not be directly affected by any of the proposed working areas. The footpath (FP203027) would therefore not require diversion. The footpath and Bourbles Lane (which is a bridleway) would be crossed by the haul roads leading to various working areas where there are potential conflicts between footpath/bridleway users and quarry trucks. However, it is considered that any impacts could be managed through suitable fencing/signage. There would be some loss of amenity of these routes as there would be visual impacts along some parts of the route as well as the impacts of excavation/tipping and traffic. However, they would be relatively short term for each phase and have to be viewed in the context of the usage of the routes.
100. The proposal is therefore considered to be acceptable in landscape/visual amenity terms and complies with Paragraph 187 of the National Planning Policy Framework and Policy CDMP4 of the Wyre Local Plan.



Impacts on agricultural land

101. The applicant has provided an assessment of agricultural land quality based upon a survey of soil types and condition. The site has 4.7 hectare of Grade 2 and 2.6 hectare of Grade 3a agricultural land, both falling within the best and most versatile category. All other parts of the site are Grade 3b and below.
102. Paragraph 187 of the National Planning Policy Framework and footnote 65 state that planning decisions should contribute to and enhance the natural and local environment by recognising the economic and other benefits of best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of higher quality.
103. Policy CDMP4 states that development which is likely to lead to the permanent loss of the best and most versatile agricultural land will not be permitted unless supported by other policies in the plan or it is demonstrated that the loss is outweighed by other planning considerations
104. Minerals can only be worked where they occur and, on this site, where sand and gravel is located close to the surface, it gives rise to the highest quality agricultural land due to its free draining characteristics. Phases 1, 2 and part of Phase A of the site are Grade 2 and 3a quality. The restoration of those areas is predominately to agriculture with small areas being restored to wetland features. Provided that the soils within those areas are properly handled and stored during soil stripping and restoration phases, it is considered that there would only be a small loss of best and most versatile agricultural land and this loss has to be considered in the context of limiting the volume of imported materials and the biodiversity gains that would be achieved from providing the wetland features. On the other areas of the site, it is possible that agricultural land quality could be improved given the opportunity to improve drainage through appropriate restoration. Soil handling could be the subject of a planning condition should planning permission be granted. Taken as a whole, it is likely that the impact on best and most versatile agricultural land quality would be minor and would be outweighed by other considerations. The development is therefore acceptable in terms of Policy CDMP4.

Archaeology

105. Sand and gravel extraction including the stripping of soils has the potential to destroy areas or features of archaeological interest. The applicant has included a historic environment desk based assessment within their Environmental Statement. The assessment noted 42 known heritage assets within the study area, 30 of which are at risk of direct impact. Three of these are of medium significance as they are historic hedgerows with the remainder being of low significance as they comprise other hedgerows or features associated with the former Garstang and Knott End Railway.
106. Paragraph 207 of the National Planning Policy Framework requires applicants to describe the significance of any heritage assets that would be affected and where a development includes or has the potential to include heritage assets



with archaeological interest, developers should submit an appropriate desk based assessment and where necessary a field evaluation. In determining planning applications, Paragraph 208 states that planning authorities should identify and assess the particular significance of any heritage asset including the effect on the setting taking into account evidence and any necessary expertise. They should take these issues into account when considering the impact of a proposal on a heritage asset to avoid or minimise any conflict between the conservation of an asset and any aspect of the proposal.

107. Policy CDMP5 of the Wyre Local Plan deals with historic environment impacts. It sets out policy for assessing impacts of development on designated and undesignated heritage assets and that proposals must be accompanied by evidence to allow such an assessment to be undertaken.
108. The County Council's Historic Environment Team have reviewed the application and assessment. The response notes that the site is a low lying area and therefore, historically, would not have been an attractive area for occupation and therefore no further archaeological investigation is required. It is noted that the former railway line runs through the site. It is therefore requested that consideration is given to retaining the former railway line as part of the site restoration as a public right of way and that an interpretation board be provided. Designating the railway line as a right of way would appear to be difficult as it extends outside of the applicant's ownership. However, it would be possible to provide an interpretation board on the existing public footpath that crosses the railway line. It is considered that this matter could be the subject of a planning condition should planning permission be granted.
109. Given the likely absence of significant archaeological interest within the site, the proposal is therefore considered to be acceptable in relation to Policy CDMP5 of the Wyre Local Plan.

Local Amenity (Noise and dust)

110. The applicant has included a noise and air quality assessment within their Environmental Statement. The noise assessment was undertaken by carrying out a measurement of existing ambient noise levels at seven locations in the vicinity of the site and then applying noise level data from the mobile and fixed plant to be used at the site to arrive at predicted noise levels for the residential properties located around the site. The air quality assessment has included a measurement of the current ambient dust climate in the vicinity of the site and the climatic conditions assessed to provide an indication of the likely frequency of dust impacts. Potential dust sources have been identified and best practice dust controls measures recommended in order to reduce impacts at nearby sensitive locations.
111. Paragraph 198 of the National Planning Policy Framework states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should a) Mitigate the reduce to a minimum



potential advert impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life

112. In relation to air quality issues, Paragraph 199 of the National Planning Policy Framework states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants taking into account the presence of Air Quality Management Areas and Clean Air Zones and the cumulative impacts from individual sites in local area. Opportunities to improve air quality or mitigate impacts should be identified such as through traffic and travel management and green infrastructure provision and enhancement.
113. Paragraph 201 states that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land rather than the control of processes or emissions (where these are the subject to separate pollution control regimes. Planning decisions should assume that these regimes will operate effectively.
114. Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan states that development for minerals and waste management operations will be supported where it can be demonstrated that all material social, economic or environmental impacts that would cause demonstrable harm can be eliminated or reduced to acceptable levels.
115. Policy CDMP1 of the Wyre Local Plan relates to environmental protection. It states that development will be permitted where it can be demonstrated that the development will be compatible with adjacent existing land uses and would not lead to significant adverse effects on health, amenity, safety and the operation of surrounding uses and for occupants or users of the development itself with reference to noise, vibration, odour, light, dust other pollution or nuisance. Applications will be required to be accompanied where appropriate by relevant impact assessments and mitigation proposals.
116. Although the application site is located in a rural area, there are a number of residential properties located close to various parts of the proposed working area. A distinctive feature of the proposal is that rather than the site being comprised of one large working area as is common to many quarry sites, this site is split into a number of isolated phases divided up by the various existing properties and connecting roads that are located across the mineral resource area.
117. The following table shows the separation distances between the nearest properties and different areas/phases of the site:

Property name/location	Distance from property to site
Hillfield House, Pointer Farm, Lancaster Road	140 m to access road/190 metres to plant site boundary
Ourome, Gaulters Lane	25 metres to soil storage area/240 metres to plant site, 250 metres to Phase 1 extraction

Woodlands, Bourbles Lane	15 metres to Phase 1 extraction
Crossing Cottage	160 metres to Phase 3 extraction
Red Lea Kennels, Bourbles Lane	25 metres to Phase 1 extraction/200 metres to Phase 2 extraction
Bourbles Farm House, Bourbles Lane (three properties)	50 metres to Phase 2 extraction, 110 metres to Phase 3 extraction, 20 metres to Phase 4 extraction
Mytax/New England Cottage, Bourbles Lane	50 metres to Phase 3 extraction, 160 metres to Phase 4 extraction, 250 metres to plant site
Lyndale Farm (A588)	190 metres to Phase 3 extraction

Noise Impacts

118. The Planning Practice Guidance states that mineral planning authorities should aim to establish a noise limit through a planning condition so that noise at a noise sensitive property does not exceed the background level by more than 10 dB(A) during normal working hours. Where it will be difficult not to exceed the background level by this amount without imposing unreasonable burdens on the operator, the limit should be set as near to that level as practicable. Increased temporary daytime noise limits of up to 70dB(A) for periods up to 8 weeks in any year should be considered to facilitate essential site preparation and restoration work and construction of baffle (screening) mounds where it is clear that this will bring longer term environmental benefits to the site or its environs. The Planning Practice Guidance states that Mineral Planning Authorities should take account of the prevailing acoustic environment and consider whether noise from proposed operations would give rise to:

- A significant adverse effect
- An adverse effect
- Enable a good standard of amenity to be achieved

119. Assessment of impacts should include whether noise exposure would be above or below the significant observed adverse effect level and the lowest observed adverse effect level.

120. In response to comments on the initial Environmental Impact Assessment, the applicant submitted an amended noise assessment. The day time background noise levels at the properties listed above on Monday to Friday varied between 37 and 43 dB(A) with very slightly lower noise levels (-1 dB(A)) on Saturdays.

121. The predicted worst case noise levels at the properties listed above are as follows:-

Property name/location	Background noise Level dB(A)	Max. Difference between site noise and background (dB(A))	Max. Difference between site noise and 55 dB(A) limit



Hillfield House, Pointer Farm, Lancaster Road	43	+3 (Phase A)	-9 (Phase A)
Ourome, Gaulters Lane	37	+10 (Phase 1)	-8 (phase 1)
Woodlands, Bourbles Lane	40	+13 (Phase 1)	-2 (Phase1)
Crossing Cottage	38	+3 (Phase 3)	-14(Phase 3)
Red Lea Kennels, Bourbles Lane	40	+12 (Phase 1)	-3 (Phase1)
Bourbles Farm House, Bourbles Lane (three properties)	40	+13 (Phase 4)	-2 (Phase 4)
Mytax/New England Cottage, Bourbles Lane	43	+8 (Phase 3)	-4 (Phase 3)
Lyndale Farm (A588)	47	-1 (Phase 3)	-9 (Phase 3)

122. The applicant's noise assessments shows that the proposed operations can meet the 55 dB(A) level at all locations. However, at all of the above locations bar one, predicted noise levels would be above the background +10 dB(A) level. At four locations, Ourome, Woodlands, Red Lea and Bourbles Farm, the background would be exceeded by +10dB(A) level or greater and noise levels would be close to the 55 dB(A) limit. This is primarily due to the relatively quiet existing background noise levels and close proximity of the working area to these particular properties.
123. Mineral working and backfilling would normally take place on a campaign basis (4–6 weeks duration on 2-3 occasions per per) and therefore noise impacts from the mineral working phases would not be continuous over the full duration of the development - there might be periods when there is little extraction or backfilling with the only activity being processing of stockpiled material or import of infill material to stockpile. However, during campaigns activity levels would be significant with dump trucks running continuously from working phases to the plant site. A similar manner of operation would also take place during backfill to move imported waste material from the plant site to restoration areas.
124. The applicant recognises that Phase 1 of the site is very close to Woodlands and Red Lea. However, this phase of the site contains the thickest mineral reserves up to 6 metres in depth and therefore the applicant wishes to maximise mineral recovery from this area. Normally with mineral workings, soil screening bunds would be established on the site perimeter prior to any mineral working taking place to provide protection to nearby properties. However, adopting this practice within Phase 1 would sterilise the mineral below the bund footprint. Therefore it is proposed to work the mineral in a 12 metre wide strip to the depth of the watertable before backfilling the excavation to original ground levels. During these operations, there would be no noise protection in place for either Woodlands or Red Lea and only when backfilling is complete would perimeter soil bunds be established before working the remainder of Phase 1.
125. It would also be the case that activity on the different phases of the site would often take place concurrently. For example, at Red Lea when Phase 2 is being worked, restoration works would take place on Phase 1, at Bourbles Farm



House, Phase 3 will be subject to restoration works whilst Phase 4 is being worked for minerals and at Mytax/New England Cottages it is likely that simultaneous noise impacts would be experienced from Phase 4 working, Phase 3 restoration and from mineral processing in Phase A. Due to the layout of the site and location of the properties, some of these noise impacts would affect more than one property façade at any one time. Due to the existing background low noise levels, it is considered likely that noise impacts from the site as experienced at many properties around the site would be considerable and intrusive compared to the existing position and would exceed the significant observed effect level.

Dust/air quality

126. The Planning Practice Guidance in relation to mineral workings states that where dust emissions are likely to arise, mineral operators should prepare a dust study which should include establishing baseline conditions, identify site activities that could lead to dust impacts without mitigation, identify site parameters that could increase potential dust impacts and recommend mitigation measures including modifications to site design. Proposals should also be included for monitoring and reporting of dust emissions.
127. The applicant has prepared an air quality assessment in accordance with this guidance. The assessment also covers impacts from Respirable Crystalline Silica. The assessment includes an analysis of weather data including rain fall and wind speed as key factors affecting dust emissions. Based on the data, the applicant estimates that weather conditions conducive to dust emissions will occur on approximately 22 days per year. Analysing the layout and nature of the mineral extraction operation and the distance to properties, the applicant's air quality assessment concludes that five properties (Bourbles Farm, Crossing Cottage, Red Lea, Woodlands and Mytax/New England Cottage) are at medium risk of dust impacts with seven other properties having a low risk of impact. Provided that dust suppression measures are implemented, the applicant concludes that dust emissions at all locations would be minimised and have a negligible effect.
128. The risk of dust impacts depends primarily on the distance and direction from the dust source to sensitive properties, climatic conditions and other mitigating factors including the character of the materials being handled or application of water as a mitigation measure particularly on haul roads and vehicle circulation areas. Some of the mineral reserve would be worked below the natural water table and even where dewatering has taken place it is likely that sand and gravel materials would be sufficiently wet that significant dust emissions would not be created during mineral excavation. Processing of materials would also utilise water to clean the mineral and therefore significant dust emissions from that source are also unlikely. The processing area would also be hard surfaced minimising the production of dust and improving the effectiveness of mitigation measures.
129. The aspects of the operation with the most significant risks of dust emissions are the operations to strip and store soils and the haulage of sand and gravel and imported restoration materials between individual phase areas and the



processing plant. These dump truck movements would take place on unsurfaced haul roads where there is a considerable risk of dust impacts should mitigation not be applied or effective. Dust from quarry sites is usually larger size particles therefore meaning that impacts reducing impacts reduce quickly from source. However, at the application site there are a number of properties that are located very close to individual working phases or proposed haul routes where there is no mitigation through distance from source and which are therefore at considerable risk of dust impacts. Mineral working and backfill campaigns would be more likely during summer months given ground conditions and water management issues and which are the times of the year when dust issues could be more prevalent.

Impacts of dust on health

130. The applicant's air quality assessment includes discussion of human health effects. This includes an assessment of fine particulates (Pm10 and Pm 2.5). The applicant concludes that exposure to either of these particulates would not exceed the relevant Air Quality Objectives. Health impacts from HGV traffic emissions are also possible particularly in relation to NOx levels. However, neither the site nor any location on the roads around the site are located within an existing air quality management area that has been designated for the purpose of NOx levels. The site would not add heavy goods vehicles to areas of existing congestion or generate levels of heavy goods vehicle traffic that would be significant in terms of air quality impacts.
131. The other health and air quality issue that has been raised in many representations and in the response from Lancashire County Council Public Health and the UK Health Security Agency concerns Respirable Crystalline Silica (RCS). Exposure to dust containing crystalline silica can cause a serious lung disease known as silicosis. Sand and gravel materials can contain silica rich materials, the proportion depending upon the geology of the areas from where the sand and gravel was derived. When crushed or abraded such as through screening/sizing processes, there is potential for silica rich dusts to be produced. The applicant has considered the representations on this matter and notes the Health and Safety Executive guidance which states that silicosis is a disease that has only been encountered in employees in industries where there might be significant exposure to silica dust such as in quarrying, stonemasonry, construction and foundries. No cases have been documented among members of the general public indicating that environmental exposure levels are not sufficiently high to cause this disease.
132. It is likely that the raw materials would normally be wet or at least damp when admitted to any processing machinery and water would be used to clean the materials to remove fines (silt) which would reduce dust emissions from processing. The operator would be required to monitor exposure of employees to Respirable Crystalline Silica and given that measures would have to be taken to minimise occupational exposure for this reason, it is unlikely that there would be environmental exposure to Respirable Crystalline Silica at a level that would cause wider health impacts. The relatively short timescale of this proposal should also be taken into account in the assessment of Respirable Crystalline



Silica impacts. In summary, it is considered that risk of exposure to Respirable Crystalline Silica dust can be a reason for objection to the proposal.

133. In conclusion, on amenity impacts, whilst this site is relatively small scale in terms of many sand and gravel workings, it is located very close to a number of residential properties. In relation to noise, the existing background levels are low and therefore at certain properties the noise increases due to the development would be significant. The separation distances are such that there is very limited scope to implement effective mitigation measures in terms of noise and dust impacts. It is considered that the potential impacts of noise and dust would be harmful to the amenity of local residents and would be contrary to Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP 1 of the Wyre Local Plan.

Water Environment/Flooding

134. The development has the potential to impact upon the water environment. Some parts of the mineral resource are below the natural table. Phase 1 would be undertaken with no dewatering but pumping of groundwater would be undertaken in Phases 2-4 to achieve a localised lowering of the water table to allow working of sand and gravel in dry conditions to maximise recovery of the mineral resource. Mineral excavation would generally be undertaken in the summer months to minimise the dewatering that would be required. Extracted water would be pumped to other parts of a working phase where it would recirculate. Phase A would include construction of a lagoon which would be used to supply clean water to the processing plant to remove silt from the mineral. Washing water would then be pumped to one of the existing fishing lakes which would be utilised as a settling lagoon with an overflow back into the clean water lagoon. Excess water would be discharged to the adjacent field drain which links with the Cockers Dyke Drain or Wheel Foot Watercourse which flow to the sea.
135. The applicant has provided a hydrogeological risk assessment to investigate the implications for ground and surface water. The assessment lists the ground and surface water resources that are potentially affected and the analyses the risk. The main assets at risk are the underlying sandstone bedrock which is designated as a principle aquifer (a major public water supply) and the Wyre Estuary/Morecambe Bay as these areas are subject to high level ecological designations and are therefore sensitive to polluting inflows.
136. Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan states that development for minerals and waste management operations will be supported where it can be demonstrated that all material social, economic or environmental impacts that would cause demonstrable harm can be eliminated or reduced to acceptable levels. This would include impacts relating to ground and surface water or flooding
137. Policy CDMP4 of the Wyre Local Plan states that development which would have an unacceptable effect on the quality or yield of groundwater or surface water resources will not be permitted. Development within a source protection zone will be required to demonstrate no adverse impact to ground water quality



including through leakage. Development should also protect water quality of existing water resources such as water courses, coastal waters and ground waters.

138. The proposal includes a number of mitigation measures to prevent impacts. The drawdown of ground water levels through pumping may reduce the volume of water entering local water courses. However, the contribution to stream/ditch flows from the application site is minimal particularly given the different phases of the site which are physically separate. Excavation would take place during summer months to reduce the volume of dewatering required and pumped water would be recirculated back into the ground or discharged to ditch systems thereby replacing any loss of flow. In terms of groundwater impacts, the sand and gravel is underlain by glacial till and tidal silt material which isolates groundwater in the sand and gravel from the deeper aquifer and therefore the likely effect would be minor. There are also potential issues of water quality arising from water discharges from the site. However, any water discharge either from the settlement lagoon or from excavation dewatering would be the subject of a permit which would contain controls on water quality.
139. The Environment Agency do not raise any objection to the application but due to the irregular shape of the application site do not consider that the groundwater monitoring undertaken to date is representative of conditions across the whole of the site. The Environment Agency therefore request additional monitoring boreholes to be installed and subject to monitoring and reporting throughout the duration of mineral working. This matter could be the subject of a planning condition should permission be granted.
140. In relation to flooding the whole of the site is located with Flood Zone 3 (area at highest risk of flooding). The National Planning Policy Framework requires all development proposals within flood zones 2 and 3 to be accompanied by a site specific flood risk assessment and the applicant has provided an Flood Risk Assessment to comply with this requirement.
141. The National Planning Policy Framework, Paragraph 181 requires that it should be ensured that development does not increase flood risk elsewhere. Development should only be allowed in areas at risk of flooding where it can be demonstrated that within the site, the most vulnerable development is located in the areas of lowest flood risk, the development is appropriately flood resistant and incorporates sustainable drainage systems. Policy CDMP2 of the Wyre Local Plan contains similar requirements.
142. Many representations from local residents draw attention to existing flooding issues in the area and highlight significant flooding events in the area in 2017, 2019 and 2021 affecting the Gaulters Lane, Lancaster Road and Sunnyside Terrace areas.
143. The location of the development is dictated by the occurrence of the mineral resource and therefore it is not possible to move the development to an area of lower flood risk. In addition, sand and gravel quarries are considered to be a water compatible development in terms of flood risk vulnerability. The main issue relates to the risks of the development increasing flooding elsewhere



either through bunds and stockpiles affecting the operation of the existing floodplain, runoff from the hard surfaced plant area or through pumping of groundwater surcharging existing watercourses during high rainfall events. However, the soil mounds would not be extensive alongside existing ditches and dykes and the additional run off potential from hard surfaced areas would be mitigated through the additional storage created through mineral working excavations which can be pumped back into watercourses once flooding events have subsided. Dewatering activities and discharge to watercourses would have to be managed so that such activities did not coincide with storm events or when tide levels might cause 'tide blocking' issues. This would normally be managed through an Environment Agency dewatering permit which would contain 'hands off' clauses. The site would also be restored close to or slightly below existing contours and therefore flood storage capacity of the site would not be reduced compared to the existing situation. This would have to be the subject of a planning condition to control the final restoration levels. The Lead Local Flood Authority have raised no objection to the development subject to it being undertaken in accordance with the submitted Flood Risk Assessment and Surface Water Sustainable Drainage Strategy. This could be the subject of a planning condition. For these reasons, it is considered that the development would not increase the risk of flooding elsewhere.

144. Taking these issues into account, it is considered that the ground and surface water and flooding impacts of the development are acceptable in terms of Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policies CDMP2 and CDMP 4 of the Wyre Local Plan.

Ecology

145. The Environmental Statement includes an ecological assessment. This assessment was based upon a desk top study and data search to identify the presence of notable habitats and protected species. This was followed a number of site surveys to obtain botanical information and data on overwintering birds, bats and other protected and notable species and nesting birds. Although the planning application was submitted before the introduction of mandatory biodiversity net gain, the applicant has nevertheless completed a biodiversity net gain metric showing how the restoration proposals would increase the biodiversity value of the site above the existing level.
146. The assessment notes that the nearest ecological site with statutory protection is the Morecambe Bay Ramsar and Special Area of Conservation/Special Protection Area the boundary of which is located around 1300 m from the site. Parts of the application site are also subject to a non statutory Biological Heritage Site designation which relates to the importance of the site for over wintering wildfowl including pink footed geese and whooper swans. The habitats on the site are comprised of arable land which is species poor, improved and amenity grassland around the existing fishing lakes and phase 1 and neutral and marshy grassland to the east (Phase 3) which are still improved but have higher ecological value. There are no ancient or veteran trees within the site and the hedgerows within the site are generally species poor. None of the ponds in the area that were eDNA tested for the presence of Great Crested Newts returned a positive result or were considered suitable for other



amphibians. Bats and Brown Hare were detected on the site during surveys but in low numbers. The main ecological interest of the site and land immediately adjacent relates to over wintering birds which associated with the nearby Morecambe Bay area, and which use parts of the application site and adjacent areas for foraging. Impacts on other breeding bird species are considered to be minor.

147. The applicant has proposed a variety of mitigation measures for ecological impacts. These include compensatory landscaping and progressive restoration proposals, a construction environmental management plan to cover the operational period detailing ecological protection works during construction/quarrying operations, protection of existing trees and hedgerows. In relation to impacts on overwintering bird species, the applicant is proposing not to undertake operations on Phase 2 during any time when there is voluntary or statutory suspension of wildfowl shooting within the Morecambe Bay and Duddon Estuary Special Protection Area. This scheme is designed to help with the conservation of overwintering birds associated with Morecambe Bay by preventing disturbance to them during prolonged cold weather events when the birds are most vulnerable to disturbance. The applicant considers that whilst the scheme operates to prevent shooting, it could also be used to trigger suspension of quarrying activities which could also have disturbing impacts for over wintering birds.
148. The applicant considers that the restoration proposals will provide a biodiversity net gain of 25% in habitat units, 229% gain in woodland/scrub units and 50% gain in watercourse units therefore exceeding the 10% minimum net gain if this application had to meet the statutory standard.
149. Paragraph 187 of the National Planning Policy Framework requires that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity including by establishing new coherent networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species. When determining planning applications:-
 - If significant harm to biodiversity cannot be avoided, adequately mitigated for, or as a last resort compensated for, planning permission should be refused.
 - Development on land within or outside a Site of Special Scientific Interest and which is likely to have an adverse impact on it should not normally be permitted.
 - Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodlands) should be refused unless there are wholly exceptional reasons.
 - Opportunities to improve biodiversity in and around developments should be integrated as part of their design especially where this can secure measurable net gains for biodiversity.
150. Policy CDMP4 of the Wyre Local Plan requires that development proposals should provide environmental enhancements in relation to the environmental assets identified in the policy and seek to minimise or eliminate net

environmental impact or be accompanied by proposals to mitigate impacts or provide off site compensation measures. The policy requires that development affecting an internationally designated site should require adequate mitigation measures or compensatory habitat creation and where harm to designated sites cannot be avoided, mitigated or compensated for, it will not be permitted. Development affecting habitats or species of local importance including Biological Heritage Sites will not be permitted unless the harm caused is significantly and demonstrably outweighed by other planning considerations and appropriate mitigation can be secured or as a last resort, the loss is replaced or adequately compensated.

151. As the application is for Environment Impact Assessment development and is also within the consultation zone of the Morecambe Bay Site of Special Scientific Interest, Natural England have been consulted. Their initial response was that the applicant had not properly addressed the requirements of the Habitats Regulations as insufficient information had been provided to assess impacts on the Morecambe Bat Special Protection Area. Further information was required to assess the value of parts of the site and adjacent areas for overwintering birds that are associated with the Morecambe Bay area. Natural England also raise issues regarding the presence of peat soils within Phase 3 and consider that they should be protected for their role in storing and capturing carbon. Similar comments are made by the County Council's Ecologist.
152. To address the concerns of Natural England a second season of overwintering bird surveys was undertaken during the 2023/24 period to better characterise the numbers of birds and species using the site and adjacent areas, zones of influence, the types of habitats found within the site and the appropriateness of mitigation measures. Further information was also provided to address impacts on other ecological interests raised by the County Council's Ecologist. In relation to impacts on European sites and over wintering birds, it was noted that 21 species of wildfowl or wader used the site or zone of influence during the surveys. However, the applicant notes that most of the over wintering bird activity by relevant species was on fields outside of the site (but within the potential zone of influence). The main potential impact is therefore displacement of birds, particularly Whooper Swans and Pink Footed Geese, as more than 1% of the over wintering population of these species within the Special Protection Area was found within the potential zone of influence. The applicant has referred to the noise assessment that has been prepared in relation to residential properties as evidence of the noise levels and likely disturbance impacts that are likely to be experienced by birds in off site locations.
153. In their response Natural England still consider that insufficient information has been provided to determine whether the likelihood of significant effects on the European wildlife site can be ruled out. In particular this relates to noise impacts of the proposed development and should include existing baseline noise levels and predicted average and maximum noise levels with a noise contour map provided to show how noise would affect adjacent land used by bird species at each phase of the site.



154. The Lancashire County Council Ecologist comments that the surveys in relation to toads, water voles and bats have now been adequately completed. In respect of European sites, the Lancashire County Council Ecologist states that the impacts on these protected sites cannot be concluded until the county council has undertaken a Habitats Regulations Assessment and it is recommended that this is in the form of a shadow Habitats Regulation Assessment undertaken by the applicant. Without this assessment it is not possible to conclude that the impacts on the European site are acceptable and therefore there would be a conflict with Policy CDMP 4 of the Wyre Local Plan. Officers consider that it may be possible for the applicant to produce a shadow Habitats Regulation Assessment demonstrating an absence of impacts or that impacts can be satisfactorily mitigated. However, production of a shadow Habitats Risk Assessment is a major piece of work, the need for which has to be viewed in the context of the other issues that are raised by this application.
155. With regard to the peat issues raised by Natural England no deep peat was recorded in any of the geological investigations but some of the top/subsoils on small parts of the site did have peaty characteristics. However, there are no proposals to remove these materials from the site, and they would be reused as part of the site restoration. No phase of the site is of particularly long duration and therefore the development would not require any long term soil storage. Where possible soils would be stripped and placed directly into restoration areas to avoid storage and double handling. If planning permission were granted, it could be subject to a condition requiring a soil handling and storage strategy which would address any issues relating to protection of soil quality.

Restoration and Afteruse

156. The proposals provide for the restoration of the site predominately to agriculture but with the additional ponds/lakes within each mineral working phase. These would include peripheral woodland and scrub to provide a variety of new wildlife habitats thereby giving rise to an increase in biodiversity value above the existing site. It is proposed that some of the new water features could be used as fishing although, if planning permission were to be granted it is considered that there should be agreement on which features could be used for fishing, and which would be retained as purely nature conservation features. This could be dealt with through a planning condition. Subject to the details of site restoration and aftercare being the subject of planning conditions, it is considered that the site restoration proposals for the mineral working areas are acceptable.
157. In the Phase A area, the applicant proposes to retain the hardstanding that would be constructed for the processing plant. This would be used as a platform for up to 12 holiday lodges to be used in association with the fishing facility. The applicant states that such accommodation now needs to be provided as part of a modern course angling facility and that use of the existing fishing lakes has declined due to the lack overnight accommodation on the site.
158. Policy EP9 of the Wyre Local Plan deals with holiday accommodation. It states that holiday accommodation site will be permitted where they meet the



requirements of the Core Development Management Policies and provided that they satisfy the following criteria:

- The totality of the development including on site services is of appropriate scale and appearance to the local landscape.
 - Any new building and supporting infrastructure is necessary.
 - New tourism accommodation site incorporating new build accommodation will need to be supported by a sound business plan demonstrating long term viability.
159. The number of units is relatively small, and they would be located on part of the site that is relatively distant from the nearest properties with potential to increase screening through further landscaping as part of site restoration. Subject to scale and designs of buildings and landscaping being approved at a later date it is considered that the overall impact of the development would be appropriate in terms of local landscape.
160. However, Wyre Borough Council has raised objection to the application on the ground that no business plan has been submitted with the application to support the proposed holiday units therefore conflicting with Policy EP9. It is considered that the number of accommodation units is relatively small and could be justified within a business plan in relation to the existing and proposed fishing facilities. Although the applicant has not provided a business plan as required by the policy, this needs to be considered in the context of the other impacts of this proposal.

Conclusions

161. National Planning Policy Guidance requires that great weight should be attached to the benefits of mineral extraction and that planning authorities should plan for a steady and adequate supply of aggregate materials. Whilst the landbank of sand and gravel reserves within Lancashire might meet the National Planning Policy Framework requirement, the current supply is significantly below the required apportionment levels. The proposed development would provide a new source of such materials and would assist in meeting the policy requirement for a steady and adequate supply. The minerals supply benefits are therefore a factor that weigh heavily in favour of the development.
162. The benefits to the supply of minerals have to be weighed against the impacts of the proposed development and any mineral working proposal will always have some environmental impact. Subject to the imposition of suitable conditions, it is considered that the proposal would be acceptable in terms of landscape and visual impacts, ecology, archaeology and the water environment and the restoration proposals could have some positive benefit in terms of landscape enhancement. However, due to the layout of the site and the proximity to the nearest properties, it is considered that there would be significant noise and dust impacts that would cause harm to the amenities of local residents living adjacent to the proposed working areas. The highway network in the area that would be affected by the additional heavy goods vehicle traffic also there are a number of locations where there would be significant



highway safety impacts. These impacts cannot be satisfactorily controlled through conditions or other planning controls. On balance, it is considered that the combination of the amenity impacts, and highway safety implications outweigh the benefits of this proposal and there is a conflict with Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policies CDMP1 and CDMP6 of the Wyre Local Plan.

Recommendation

163. That planning permission be **refused** for the following reasons:

- (i) The development would have unacceptable impacts on highway safety which cannot be adequately mitigated and therefore conflicts with Paragraph 116 of the National Planning Policy Framework, Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP6 of the Wyre Local Plan.
- (ii) The development by reason of proximity to residential properties would have unacceptable noise and dust impacts that could not be satisfactorily mitigated contrary to Paragraph 198 of the National Planning Policy Framework, Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP1 of the Wyre Local Plan.

Consultations

164. Consultation and publicity on this application has been undertaken in accordance with the requirements of the Town and Country Planning (Development Management Procedure Order) 2015. In terms of publicity the application has been advertised by press and site notice and local residents have been notified by individual letter. The consultation responses and representations that have been received are summarised above.

Context and Implications

Legal (including Human Rights)

165. The Human Rights Act 1998 requires the County Council to take into account the rights of the public under the European Convention on Human Rights and not to act in a manner incompatible with those rights. Article 1 of Protocol 1 states that an individual's peaceful enjoyment of their property shall not be interfered with except as is necessary, in accordance with the law and as is proportionate. This application were it to be approved would be likely to generate a degree of impact on neighbouring properties, which would breach these rights. Although the applicant also has rights to use his land, it is considered that these rights are outweighed by the need to protect local amenity, the environment, and the safety of the local highway network.

Financial

166. Generally financial matters are not a consideration in a planning application. There are no financial implications for the County Council in following the recommendations of this report.



Equality and Diversity

167. Under the provisions of the Equality Act 2010, specifically Section 149 Public Sector Equality Duty (PSED), all public bodies are required in exercising their functions to have due regard to eliminate discrimination, harassment, victimisation or other prohibited conduct because of protected characteristics; advance equality of opportunity of groups who share protected characteristics and foster good relations between different people or communities when carrying out their activities/community cohesion.
168. The protected characteristics groups under the 2010 Act include: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It should also be remembered that people could have combinations of protected characteristics.
169. The Public Sector Equality Duty has been applied, and balances equalities impacts with the other benefits and/or harms arising from the application in order to come to a decision in the public interest. It is not considered in this case that there will be a disproportionately adverse impact on any protected characteristic.

Risk Management

170. Consideration has been given to the risk management implications associated with this application. The Committee is advised that the decision taken must be based on the evidence and information contained within the report, guidance contained both in the report, supplementary reports, officers' presentation and discussion. Provided any decision is taken in accordance with the above then there are no significant risks associated with the decision making process.

Appendices

Appendix	Title
Appendix 'A'	Presentation

List of Background Papers

Paper	Date	Contact/Tel
None		

Part II Reason

N/A

