



Planning Application to allow the extraction and processing of sand & 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.

**PROPOSED BOURBLES QUARRY
on Land off Bourbles Lane, Nr Preesall, Lancashire**

PLANNING APPLICATION REF LCC/2023/0030

**SITE ADDRESS: MYTAX FARM, 4 BOURBLES LANE,
POULTON-LE-FYLDE, FY6 OPE**

REF: APPEAL 6002168

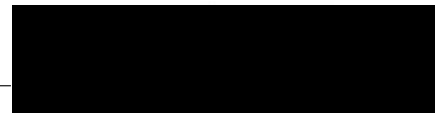
**Further information required to support planning application and under
Regulation 25 of the Town and Country Planning
(Environmental Impact Assessment) Regulations 2017.**

Response to Letter Dated 4th February 2026

Prepared by: S J Rees
B.Sc., M.Sc., C.Geol, FGS, MIQ

Date: 5th March 2026

Signed: _____



Contents

REGULATION 25 LETTER REQUESTING MORE INFORMATION

RESPONSE TO REG25 QUESTIONS

APPENDIX 1: Addendum to the Landscape and Visual Impact Assessment:
Seasonal Variation Assessment and Winter Visualisations.

APPENDIX 2: Project Vulnerability to Climate Changes and Assessment of
Greenhouse Gases Statement

APPENDIX 3: Determination of Overarching Methodology in ES

APPENDIX 4: Updated Non-Technical Summary

**REGULATION 25 LETTER FROM PINS
REQUESTING MORE INFORMATION**

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Customer Services: 0303 444 5000
e-mail: Environmentalservices@planninginspectorate.gov.uk

Liam Toland
Kedd Limited

Your Ref: LCC/2023/0030

Our Ref: Appeal 6002168

Sent by email:
liam@keddl

Date: 04 February 2026

Dear Mr Toland

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 ('THE EIA REGULATIONS')

Appeal by: Callum Baxter, Baxter Group Ltd

Site Address: Mytax Farm, 4 Bourbles Lane, Poulton-Le-Fylde, FY6 0PE

We refer to the above appeal which commenced on 2 December 2025.

The development proposed consists of 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. By virtue of Regulation 5 of the EIA Regulations the development proposed is EIA development.

The content of the Environmental Statement (ES) accompanying the planning application that is the subject of the above appeal has been considered, having regard to Regulation 2(1) and Schedule 4 of the EIA Regulations.

Following examination of the ES, the Secretary of State notifies you by this letter, pursuant to Regulation 25 of the EIA Regulations, that, to comply with Schedule 4 of those regulations (Information for inclusion in environmental statements) the appellant is required to supply the following further information:

- The appellant is asked to provide a statement outlining how the projects to be considered in the assessment of cumulative effects has been determined. The appellant should provide any evidence of any agreement with the LPA and a figure illustrating the locations of the identified projects in relation to the site.

- **Reason:** To ensure the completeness and quality of the Environmental Statement as required by Schedule 4 (4) and schedule 4 (5f) of the EIA Regulations
- The appellant is asked to provide a description of how the landscape and views would vary with the seasons, and how this has been accounted for within the LVIA.
- **Reason:** Field surveys were undertaken in May, and no winter view photography has been provided. To ensure the completeness and quality of the Environmental Statement the seasonal variations should be appropriately described.
- The appellant is requested to provide either a statement evidencing why an assessment of greenhouse gases and vulnerability to climate change is not required with reference to relevant assessment criteria and/ or thresholds OR a description of the likely significant effects of the proposed development on the environment resulting from the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change.
- **Reason:** The ES as submitted does not include reference to, or an assessment of, this impact pathway as required by Schedule 4 (4) and Schedule 4 (5f) of the EIA Regulations, or an explanation provided as to why an assessment was not required.
- The appellant is requested to provide either a statement evidencing why an assessment of major accidents and disasters is not required with reference to relevant assessment criteria and/ or thresholds OR a description of the likely significant effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/ or disasters which are relevant to the project concerned.
- **Reason:** The ES as submitted does not include reference to, or an assessment of these impact pathways as required by Schedule 4 (5d) and Schedule 4 (8) of the EIA Regulations, or an explanation provided as to why an assessment was not required.
- The appellant is requested to provide information as to how the significance of effect was determined for all topics.
- **Reason:** The overarching methodology provided within the main ES does not set out a description of what effects are significant for the purposes of the EIA.
- A revised non-technical summary (NTS) incorporating all of the elements referred to above.

We would draw your attention to court cases which have stressed the need for all the relevant environmental information in an ES to be comprehensive and easily accessible.

You can access Regulation 25 of the EIA Regulations at the following direct link:
<http://www.legislation.gov.uk/ukxi/2017/571/regulation/25/made>

<https://acp.planninginspectorate.gov.uk/>
<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>



- The appellant is also requested to provide a copy of their scoping request dated 13 June 2022 as this does not appear to have been provided.

The information is required for the purposes of the inquiry. Although it is not a statutory requirement, in the interests of transparency and openness the appellant may wish to publicise the availability of the further information in accordance with Regulations 25(3), 25(4) and 25(8) of the EIA Regulations. Please can you advise the local planning authority if the further information is publicised.

We would be grateful if you could inform us, **within 2 weeks** of the date of this letter, how long you anticipate it will take to prepare this further information, so that an expected submission date can be identified. Please send your response for the attention of the Environmental Services Team using the contact details at the head of this letter.

In order to support the smooth facilitation of our service we strongly advise that you correspond via the email address at the head of this letter rather than by post.

A copy of this letter has been sent by email to Lancashire County Council and the Rule 6 Party, Preesall and Knott End against Quarry Application.

Yours sincerely

Tom Oliver

Tom Oliver

**Operations Lead – Environmental Services Team
(Signed with the authority of the Secretary of State)**

Cc: Lancashire County Council
Preesall & Knott End against Quarry Application

Where applicable, you can use the internet to submit documents, to see information and to check the progress of cases through the Planning Portal. The address of our search page is:
<https://acp.planninginspectorate.gov.uk/>

RESPONSE TO REG 25 QUESTIONS

1. INTRODUCTION

- 1.1 At the request of Mr Tom Oliver (Operations Lead – Environmental Services Team) a Regulation 25 request for more information has been made for the purposes of the Planning Inquiry in a letter to Mr Liam Toland dated 4th February.
- 1.2 Greenfield Environmental Ltd prepared an Environmental Statement (ES) as part of the requirements for an Environmental Impact Assessment (EIA) for the proposed minerals development on the “Bourbles” site. This ES (dated July 2023) was presented in support of a minerals planning application for “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”.
- 1.3 The letter sets out the required additional to be submitted following an examination of the ES. A response to each of the requested items is provided below.

2. RESPONSE TO REG 25 REQUEST

- 2.1 The appellant is asked to provide a statement outlining how the projects to be considered in the assessment of cumulative effects has been determined. The appellant should provide any evidence of any agreement with the LPA and a figure illustrating the locations of the identified projects in relation to the site

RESPONSE:

Chapter 17 of the submitted ES was titled “Cumulative and In-Combination Effects” (pages 57 – 59). Para 17.1.1 stated that “the LCC Scoping Opinion does not specifically identify that the EIA/ES should assess the likelihood of cumulative and in-combination effects, however it is usual for EIAs to make some consideration of this”.

The methodology for undertaking this assessment was set out as:

Successive cumulative effects - the impacts caused by the proposed development in conjunction with other developments that occurred in the past, present or are likely to occur in the foreseeable future

Simultaneous cumulative effects - the combined action of a number of different projects, occurring simultaneously with the project being assessed

In-combination effects - the combined action of different impact effects

The conclusion of the assessment is stated as “The cumulative and in-combination impact effects of the proposed development have been assessed as negligible to minor adverse generally, with the potential for moderate adverse in-combination effects for a short-term (4-6 week extraction campaign period). The cumulative and in-combination impact effects are assessed as acceptable and are therefore not considered significant.”

As stated above, Lancashire County Council (LCC) did not request this assessment be made as part of the ES, but it was carried as “best practise” and as part of the requirements of the EIA regulations and. It should be noted that at the time of the application, as subsequent to the submission of the application, there are no identified new projects (such as housing schemes) or new local council allocations in the vicinity of the application site.

This response has been accepted by PINS as set out in an email from Lucy Hicks dated 18th February 2026.

- 2.2** The appellant is asked to provide a description of how the landscape and views would vary with the seasons, and how this has been accounted for within the LVIA. The reason given is - Field surveys were undertaken in May, and no winter view photography has been provided.

RESPONSE: SEE APPENDIX 1

- 2.3** The appellant is requested to provide either a statement evidencing why an assessment of greenhouse gases and vulnerability to climate change is not required with reference to relevant assessment criteria and/ or thresholds OR a description of the likely significant effects of the proposed development on the environment resulting from the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change.

The reason for the request is stated as “ES as submitted does not include reference to, or an assessment of, this impact pathway as required by Schedule 4 (4) and Schedule 4 (5f) of the EIA Regulations, or an explanation provided as to why an assessment was not required”.

RESPONSE: - SEE APPENDIX 2

- 2.4** The appellant is requested to provide either a statement evidencing why an assessment of major accidents and disasters is not required with reference to relevant assessment criteria and/ or thresholds OR a description of the likely significant effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/ or disasters which are relevant to the project concerned.

RESPONSE:

This was not included in the request for the Scoping Opinion and not requested by LCC in their Scoping response. This is not an issue that is deemed relevant to a small-scale sand and gravel extraction and processing operation with very limited site infrastructure of facilities within the site boundary.

The definition of a major incident from the Health & Safety Executive (HSE) is clear and it should be noted that all quarry operations are covered by the Quarries Regulations 1999 that set's out all Health and Safety guidance and requirements for all quarries.

This response has been accepted by PINS as set out in an email from Lucy Hicks dated 18th February 2026.

- 2.5** The appellant is requested to provide information as to how the significance of effect was determined for all topics. Reason: The overarching methodology provided within the main ES does not set out a description of what effects are significant for the purposes of the EIA.

A revised non-technical summary (NTS) incorporating all of the elements referred to above.

RESPONSE: SEE APPENDIX 3 & APPENDIX 4

- 2.6** The appellant is also requested to provide a copy of their scoping request dated 13 June 2022 as this does not appear to have been provided.

RESPONSE:

Scoping Opinion has been provided to PINS – email 11th February 2026.

APPENDIX 1

Addendum to the Landscape and Visual Impact Assessment: Seasonal Variation Assessment and Winter Visualisations.

APPENDIX 2

Project Vulnerability to Climate Changes and Assessment of Greenhouse Gases Statement.

APPENDIX 3

Determination of Overarching Methodology in ES

APPENDIX 4

Updated Non-Technical Summary