

Supporting documentation from Preesall Town Council re:

APPLICATION: SCP/2022/0003

PROPOSAL: SCOPING OPINION REQUEST FOR SAND & GRAVEL
EXTRACTION

LOCATION: LAND OFF BOURBLES FARM, PREESALL

The council's concerns and observations are summarised within the headings below:

1. LOCATION AND TOPOGRAPHY

The proposed development location includes St Aidan's School in Preesall, a secondary with almost 900 pupils, yet this has been omitted from the plans. It also directly affects a primary school, a nursing home and many businesses. A second primary school is just outside the 1km boundary. Fifty-two properties are directly affected and 102 properties/businesses are indirectly affected. These figures are based on up-to-date material.

Among the businesses directly affected are an archery school used by children and commercial kennels, both of which adjoin the proposed site.

There is insufficient information as presented to fully determine the impact to all these homes, schools and businesses.

2. DRAINAGE AND WATERCOURSES

There is regular flooding on the whole site, as the applicant's documents acknowledge. This has potential for watercourses to be contaminated by polluted water.

There is also potential for debris to silt up dykes and prevent the drainage system running as it should. There are also fears over the impact this would have on water table levels and the potential for increased flooding in the wider area.

There is a main water pipe, which runs the length of the proposed development site along Gaulters Lane towards Sandy Lane, which local residents have advised is asbestos. The deeds of the adjacent properties do not permit any development within 10ft of the pipe, which runs 6ft from the boundary of the proposed development site.

The proposals show that the plan is to raise the site by a metre. Again, the concern is that this would disrupt the existing balance of flood alleviation measures and exacerbate flooding risks elsewhere.

The ability of the dyke system to work effectively and the prevention of flooding is always a major concern in this area.

6.1.4 Population and Human Health States: The proposed development is not considered to result in any increase in harm to the local population. It then goes on to consider water impact, focusing on a time at some distant point in the future when more fishing lakes are proposed. It does not take into account that existing flooding

does not come from the sea, but from the dyke system's capacity to cope with the impact of climate change. Neither does it address the issue of flood risk over the stated 5 to 6 year period. The council would wish to see the details of any Hydrological, Hydrogeological and Flood Risk Assessment carried out.

3. Access arrangements

3.1 Highways

Situated adjacent to the B5270 and A588 Burned House Lane, the latter is the third most dangerous road in the country according to official statistics. The approach road from the A585 has recently been closed on three occasions after accidents, leaving narrow country lanes as the only alternative. The B5270 is 5.1 metres wide and an HGV is 2.8 metres wide, so there is insufficient width to meet oncoming traffic. This road has recently been resurfaced and is already showing signs of subsidence.

The B5270/A588 is a regular bus route between Knott End and Lancaster, which makes the traffic implications worse. St Aidan's school buses also use this route, but this has been omitted from the plans. In addition, some pupils walk to the school and some sections of these roads have no pavement. An increase in the type of traffic proposed poses a severe risk to both vehicle users and pedestrians.

Some houses on the B5270 already have issues with shaking as lorries pass and this is only likely to be exacerbated.

There are no safe access arrangements to the site on the main roads. Little Tongues Lane and Bourbles Lane, which are extremely narrow, are unsuitable, although some with no regard for the area have used these as an access point to remove surface materials and then dump and bury hazardous waste. Nickson's Lane and Gaulters Lane are also extremely narrow. These roads are totally unsuitable for the size/amount of vehicles proposed.

The traffic will also have to come from out of area to access the proposed site - whichever direction is used is not suitable for the volume of traffic involved. Coming from the east the traffic would need to navigate Fold House Corner at Pilling and coming from the west it would need to navigate the junction of Burned House Lane and Hallgate Lane. Both corners have blind bends, are extremely narrow and have been the sites of multiple accidents.

6.1.4 Transport acknowledges the potential effect of transport and refers to an assessment being made in respect of vehicle numbers/ movements. It also refers to a traffic safety audit.

The council wishes to emphasise the need for such assessments and audits. As can be seen from the information above and at 3.2 the local roads were not designed for this volume/size of traffic.

3.2 HGV traffic

Taking the figures mentioned in the application, the following is a realistic assessment of the traffic implications over the years.

Removal of minerals: 460,000 tonnes at a rate of 25 tonnes payload/vehicle equates to 18,400 outbound journeys loaded, together with 18,400 inbound, totalling 36,000 movements.

Backfill of voids with inert waste: 300,000 cu.m at 1 tonne/cu.m at 25 tonne payload equates to 12,000 inbound loaded journeys and a further 12,000 outbound empty, totalling 24,000 movements.

If the installation of an access road goes ahead, there is an estimated 200 movements for delivery and removal of equipment. This gives an overall total of 61,000 vehicle movements.

Averaging this over five days a week for 48 weeks a year equates to 240 days each year for five years, a total of 1,200 days. Therefore 61,000 movements divided by 1,200 days is 51 movements each day. Based on an eight-hour working day, this equates to one vehicle every 10 minutes.

Clearly this poses a substantial increase in the amount of traffic which also has the potential to directly impact the parishes of Hambleton, Stalmine, and Pilling along with those further afield.

4. PUBLIC FOOTPATHS AND BRIDLEWAYS

It is acknowledged that consideration has been given to the location of the footpaths and bridleways, yet there is little evidence that consideration has been given to these regarding their importance to the local community and the need to be able to use them safely.

A network of bridleways, which must remain open at all times, runs across the site. Nos. 9C and 9D from Out Rawcliffe and Stalmine all converge on to No. 29 in Preesall and then cross the A588 on to No. 2B and No. 21 on Bourbles Lane for riders to have safe access to the beach.

6.1.4 Recreational Uses states that there is 'Limited Potential effect – The site and its local setting are currently not known for or used as a significant recreational resource.' The council disputes this statement and is of the opinion that the type of use made of this area is from those who enjoy quiet rural pursuits such as walking, fishing, horse riding and bird watching. All these will, by the nature of the proposed quarrying be detrimentally affected.

The council would like to see greater evidence of how it is proposed these amenities will be maintained throughout the duration of the quarrying and multiple heavy vehicle journeys.

5. HABITATS

A water vole survey needs to be carried out.

The land functionality is linked to the Morecambe Bay and Duddon Estuary Special Protection Area (SPA) in the area to the east of Bourbles Pits. There should be no danger of any potential run-off both above and below ground level impacting this

area. Nor should there be disturbance to protected wildlife. Pink-footed geese, hooper swans, egrets and other migratory birds can be found in significant numbers on these fields.

The data used only includes information up to 4 January 2021 and does not include the up-to-date 2022 details. Since that survey there have been an additional 81 records of SPA cited species within 1km of Bourbles, the most significant of which is one of 3,000 pink footed geese on pasture between Green Dicks and Tongues Lane. This extends the functionally linked land even further towards the proposed quarry site.

Lancashire Environmental Record Network indicates the site is the home of key species in Lancashire (LKS), a collective term for species with recognised status (ie they are protected).

6.1.4 is dismissive of the impact the proposed quarrying would have, stating 'There are no impacts (direct or indirect) anticipated from the proposed quarry scheme or restoration proposals.'

The council is of the opinion that there is potential for significant impact and disputes, as evidenced above the statement that 'There are no foreseeable impacts on habitats of 'principal importance' as listed within Section 41 of the NERC Act 2006.' The council would wish to see evidence of detailed environmental studies undertaken throughout the year which show how wildlife corridors would be impacted by the proposed works and the risks to key species and migratory birds.

6. NEED FOR ENVIRONMENTAL IMPACT ASSESSMENT

The potential impact on health is significant, with a potential higher level of respiratory disease such as asthma, COPD and nasal infections being found in those living near quarries. There would be a need to keep doors and windows closed to minimise risk of toxic dust entering properties.

The potential for immune system disorders, lung cancer, silicosis, kidney disease and chronic obstructive pulmonary disease as a consequence of exposure to silica dust is also recognised as a risk from quarrying.

Even after vehicle wheel washing, there is potential for significant additional dust created by HGVs entering and exiting.

Noise pollution also brings increased stress for neighbours from vehicle movements.

Imported inert waste would come from all over Lancashire. This is non-biodegradable, thus contradicting the biodiversity improvements claimed. The vehicles would also increase CO₂ emissions, something that Wyre Council is aiming to reduce as part of the climate emergency initiative.

Preesall Fleetwood Charity School is a forest school with an extensive outdoor curriculum and extracurricular activities. Although Huckleberry's Nursery and Carter's Charity School – a beach school - aren't within the 1km radius they are directly north of the proposed quarry. This area is subject to strong winds which

would easily carry sand and dust particles in their direction. The council would wish this to be factored into the assessments.

Traffic data shows traffic is increasing year on year and further housing development is proposed for Preesall. This would come into daily contact with the proposed vehicles on roads not designed for such traffic. The wear and tear on roads would increase substantially and the need for continuous repair would increase significantly, compounded by the heavy weight of vehicles concerned.

As already mentioned, 6.1.4 states the applicant believes there to be no harm to the local residents from the proposed works. This is untrue as the scoping study alone has and is causing severe stress to a number of residents. The proposed works would have a detrimental impact on those living in the vicinity, whether that be from noise, vibrations, dust, increased vehicular traffic or general loss of amenity. The council is disappointed that none of this has been recognised and that the human element impact of the proposal has not been addressed.

7. CONCLUSION

Preesall town councillors voted to object to the proposals put forward in the scoping study on the grounds that on balance the detrimental impact to residents, businesses, wildlife and the whole ecological environment would be severe. It is disappointed with the assessments made in 6.1.4 which appear not to recognise the harm that the proposal would have on the area of the planned extraction site and the wider community. It also believes that the scoping study should have acknowledged the full issues posed by the proposal rather than trying to dismiss them as being unimportant/negligible and that suggested solutions/means to mitigate impact should have at least been considered. This makes the document appear somewhat disingenuous.

At a time when we should be looking to reduce our carbon footprint and protect the natural environment the council, on the evidence available, believes this proposal would do the opposite and the council would be derelict in its duty to its residents, neighbouring parishes and the environment if it did not oppose the proposals as presented, in the strongest terms.

The council would like to ask that it is copied into any documentation regarding this scoping study.

Your sincerely,

Preesall Town Council

Please address all correspondence to: clerk@preesalltowncouncil.org