

Ashton Keynes Parish Council

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NEW planning application for Mineral Extraction by Earthline at Wheatley's Farm: Application No PL/2023/03298. CLOSING DATE FOR OBJECTIONS IS 24th July.

This is a new application by the same developer to develop the same site with a few differences set out below. It is basically the same as the application which was rejected in 2022 by Wiltshire's planners. IT IS VITAL THAT WE RESTATE OUR CONCERNS. PREVIOUS OBJECTION LETTERS WILL NOT COUNT.

The original application was rejected by Wiltshire Planners only 13 months ago. The Planning Officer stated: "The application demonstrates that there is a need" for minerals development and that the site is within an identified Mineral Resource Zone but he went on to state the application "did NOT demonstrate that this is a suitable location within this zone".

NEED FOR THIS SITE: The Minerals Plan identifies other sites to provide Wiltshire's aggregate needs to 2026, including one allocated to Earthline at Blackburr Farm. Why don't they develop that site? In the Minerals Plan Blackburr Farm is for 810,000 tonnes and will add more to Wiltshire's minerals land bank than this site (470,000 tonnes). Blackburr Farm was assessed as suitable by the Planner when they were looking for sites to go into the Minerals Plan. WHEATLEYS FARM WAS NOT.

The need for minerals extraction is understood. But the mineral has to be extracted from SUITABLE sites. Recognition of the fact that this area is a reducing source of minerals appeared in the 2013 Minerals Plan: "Intensive extraction has left a significantly diminished resource ... in Wiltshire and Swindon" para 1.28. Nevertheless para 1.32 stated that "adequate provision can be made by the allocated sites in this Site Allocations Plan..." And according to the Officers Report on the previous application, the latest Wiltshire Local Aggregate Assessment (LAA) 2020 "indicates that there are sufficient sites identified in the MSALP (minerals plan) and residual preferred areas under Saved Policy 35 of the Minerals Local Plan to meet forecast demand over the plan period to 2026..."

So, although granting permission for extraction at Wheatleys farm would add to Wiltshire's land bank IT IS NOT ESSENTIAL. Blackburr Farm would add more.

SIZE OF SITE: As before, the application site is 27.2 hectares, almost the size of the village.

PROXIMITY TO RESIDENTIAL DEVELOPMENT: The site is not in the Wiltshire and Swindon Aggregate minerals site allocation plan - May 2013. It was rejected at time because of "adverse impact on residential amenity and the water environment" and "the poor quality of mineral". Since then, 18 houses have been completed at Wheatleys Farm and 10 are being constructed in Happy Land. To the east, the 18 will have phases 1, 2 and 3 in direct sight (5/6 years) and to the west of them will have the Processing Plant and the silt lagoons in plain sight. However, in all circa 80 houses are very close to the site.

DUST AND NOISE: The whole village will suffer from dust and noise. The prevailing wind is southwest blowing over the village. The 3 -5 metre high

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"bunds" will not stop that, particularly given that the conveyors at the Processing Plant are 7 meters high. The application states that works will be stopped during dry windy periods to avoid dust blowing over the village. Is this realistically going to happen? Pumps to keep the extraction holes dry will be running constantly, day and night, and reversing alarms will be sounding all the time to say nothing of the noise of the HGV's and the processing plant. According to the applicant this noise will be no more than the background noise which exists already in the village. This cannot be correct.

The School is in direct line of the Processing Plant over Derry Fields and the plant is close to the leisure amenities at the corner of High Road and Happy Land.

PERIOD OF EXTRACTION: Despite planning to take out less mineral (470,000 tonnes), extraction is still planned to take 8/9 years. Extraction of around 2.76 million tonnes at Cotswold community took only 3 years - why is 9 years needed? The area will be an industrial work site for at least 9 years (assuming no extensions - see below) affecting people and local wildlife. Even with restoration it will take approximately 20 years to return to its current state. This is the last area of local countryside in AK not damaged by quarrying.

BENEFIT TO VILLAGE: No benefit to the village at all. The original one small lake, that was to be made available to the village, is now not on the plan.

WATER RISK: At the time of assessing which sites should go in the Minerals Plan the Planning Officer rejected this site partly because of "adverse impact on the water environment". The applicant proposes that the excavation holes will be filled with inert waste. So, village loses flood capacity - water can travel through sand and gravel but not through the proposed infill of clay and waste.

It is known that inert waste for infill is not always readily available. As the applicant states each phase will be completed before the next is begun, what will happen if enough waste is not available to complete a phase? Extensions applied for? And what will happen to the processing plant during periods of such inactivity- will processing from third parties be undertaken necessitating more journeys along the B4696 than the 50 estimated by the applicant.

In 2020 a Wiltshire Flood Resilience Officer, Renate Milton, produced a report explaining that ground water level in AK was at ground level for much of the year. The applicant's analysis of water level uses an annual average based on summer and winter levels and therefore their analysis underestimates flood risk. We all know the truth of it.

The applicant proposes new ditches to take away the water. Existing ditches even when well-maintained can't stop the annual flooding. Who is going to be responsible for that maintenance afterwards? The application says that "all rainwater will be directed into the quarry during operations" So therefore they say, no additional surface water risk during operations. But they also say that the water will be continuously pumped out, but to where? They propose a ridge and furrows restoration- this was suggested last time and is basically what the water meadows currently provide. However, the proposed restoration scheme leaves us with much less water meadow.

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CUMULATIVE IMPACT OF QUARRYING ON AK: The village has suffered the impact of almost constant quarrying. Just as the end was in sight with the Dairy Farm quarry due to end in 2025 and Cotswold community ending, we have this proposal for another.

SSSI: Area is now a Site of Special Scientific Interest (SSSI). This is very important for breeding and wintering birds - when the water meadows flood every winter, they are full of birds. National planning policy framework (NPPF) para 180 states that development within or outside a SSSI likely to have an adverse effect on it SHOULD NOT NORMALLY BE PERMITTED unless the benefits CLEARLY "outweigh both its likely impact on the features of the site that make it a SSSI and any broader impacts on the national network of SSSI's". The disturbance of the ecology, particularly on the birds is clearly an adverse impact. Overall, this site area provides a vast range of habitats with minimal agricultural disturbance. During 9 years of operation, even if done in stages as planned, much of these will inevitably be lost and only a third will be restored as the remainder of the site will be put to agricultural use.

The North Meadow SSSI and Clattinger Farm Special Area of Conservation (SAC) The Site was rejected in May 2022 because of the potential to cause negative impacts on these sites due to changes in flooding regime and increase in water pollution and disruption to groundwater flows. The proposed flood mitigation will not reduce this risk.

PROTECTED SPECIES: Area has been found to be a home to a Protected Species - the water vole.

TRAFFIC: Wiltshire planners consider that there is no problem! The new information submitted admits that there will be a maximum of 30 HGV movements a day across the High Road but says that they will not cause a problem because where they cross from east to west and back over the high road on the bend by Wheatleys Farmhouse, passing places will be provided. How? There are ditches on both sides of the road in that area! It's extremely likely that people will not risk being delayed by HGV's leaving the village and instead will exit via the single lane Derry or Gosditch, home to the school. In addition, they say that the addition of an extra 50 HGV's entering and exiting the Processing Plant from the B4696 isn't a problem. The road is already dangerous as we all know. These extra lorries can only cause a problem particularly if the anaerobic digestion plant down the road towards South Cerney is permitted. Also, there is the possibility of third-party waste being processed at the processing plant.

CONCLUSION: as stated above the need for minerals extraction is understood. However, as the planners decided in 2010 and 2022 THIS SITE IS NOT SUITABLE. MDCP DPD Policy MDC2 (managing the impacts of mineral development) states that minerals development will ONLY be permitted where it is demonstrated that the proposal avoids and/or adequately mitigates significant adverse impacts associated with noise, dust, air emissions, lighting and vibration. This application does not avoid or adequately mitigate these things. AK will suffer nearly a decade of these impacts for NO benefit at all. With it taking up to 20 years to recover back to a reduced ecological state - 29 years of disturbance.

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Please visit: **www.wiltshire.gov.uk**

or email submissions to: **developmentmanagement@wiltshire.gov.uk**

or write to:

Development Services Wiltshire Council Monkton Park Chippenham

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