

Wickwar Quarry **Extension**

Issues, Consequences and Comments

By Wickwar Residents Action Group and Churchend Residents

A. Contents

This document summarizes the issues and consequences of the Cemex plans to extend the Wickwar Quarry and increase the operational times. Please see:

Planning applications PT07/0573/F, PT07/0577/RVC, PT07/0578/RVC

Also included are the local residents' comments on how these issues should be handled.

The areas covered are:

1. **Traffic,**
2. **Nuisance,**
3. **Breaches to current planning consent,**
4. **Environment,**
5. **Proposed Area, and**
6. **Background.**

Further details can be found at www.wraq.org.uk , or email, ManageTheQuarry@epsol.co.uk

B. Executive Summary

As representative members of the community, and on behalf of Wickwar and Charfield, this document gives our collective objections to all of the above Planning applications.

The Cemex planning applications currently under consideration have an expected life of 20 years. However, the effects of the quarrying will remain in our community for generations. We recommend:

- a) Reject the proposed Planning applications,
- b) Enforce the existing Planning restrictions

There are heightened feelings within the community over recent revelations about the Quarry workings and their cavalier attitude and planning breaches. These can be understood by talking to Steve Webb MP, Howard Gawler, Sandra O'Neill, and local Parish Councils. There is a local petition of 393 signatures and approaching 500 formal objections from over 160 local households and organizations against the above mentioned Planning applications.

The evidence provided by Cemex to support the planning applications are flawed and incomplete. Our objections are based on:

i) Local Nuisances

- Noise - Extending the operating hours of noisy machinery and the associated traffic will cause great disturbance to local residents, including in the middle of the night.
- Traffic - The proposed increase in the size and number of quarry lorries operating from the site will inevitably lead to more traffic and noise and potentially more hazardous road conditions.
- Increased amounts of dust affecting all surrounding villages.
- Disturbances caused by blasting.
- Anti-social Operating Hours.
- Detrimental impact on the local natural environment.
- Potential damage to sites of local historical significance.
- Light Pollution.
- Smell.
- Concerns about the long-term impacts on local water courses.

ii) Planning Breaches

Previous Planning permissions have not been adhered to. In the past, South Gloucestershire Council have not, or can not, enforce the restrictions of the planning consent. We have no confidence that these will be enforced in the future.

iii) Unfulfilled promises (i.e. 106's)

None of the promises from the previous quarry planning application have been fulfilled. These new Planning applications duplicate the 106's from previous applications!

iv) Quarry Restoration and Landfill

The current suggestions within the Planning applications are pre proposals and not detailed. They carry no culpability to being implemented.

C. Main Issues

1. Traffic

- The applications only address current traffic volumes and NOT future volumes (e.g. ready mix concrete 5:30 to 22:00).
- The applications only address direct traffic (e.g. quarry lorries) but does NOT address associated movements such as block lorries, inbound tipping etc.
- The applications do not take account of other movements associated with the quarry.
- The applications state the peak hours of business and therefore traffic movements. This coincides directly with rush hour traffic in the vicinity and will exacerbate the current congestion.
- Government statistic/projections show us that general traffic will double within the life of this planning consent period (20 years). This application only deals with the current situation and does NOT deal with the issue throughout the total life of the permissions.
- Gloucestershire roads, and particularly the 'B' classification roads surrounding this plant and villages, simply cannot cope with existing volumes.
- Peak hour's traffic currently queues from the B4509/B4058 junction towards Wotton. The length of this queue has more than doubled in 3 years.
- A pelican crossing has already been installed at the school for safety reasons.
- More traffic at the B4509/B4058 junction will increase this problem through even longer tailbacks.
- A roundabout at the B4509/B4058 junction has been proposed. The supporting materials used to justify this are very old. The installation of a roundabout at this junction will reverse the current traffic priority and therefore make the congestion even worse especially for local residents. This suggestion cannot be considered.

This has future implications for local and passing traffic and, in the past, a number of near accidents have occurred involving the lorries.

A proper plan to address the traffic issues should be formulated before consideration of the planning application, and should include **all** operations at the site and not just the new quarry.

All lorry movements to and from **all** operations on the site should have stated limits and those limits monitored and enforced rigorously.

2. Nuisance	
Noise	<p>Cemex's noise surveys were carried out by different companies, measuring at different locations using different methodologies. These surveys were commissioned by the Quarry who had prior knowledge of when monitoring was being undertaken. No accurate inference can be drawn from the measurements. BS 4142: 1997 Method for Rating industrial noise affecting mixed residential and industrial areas set out how noise measurements should be taken. This application does not follow this procedure and is therefore inadmissible.</p> <p>The basis for measuring noise should be against silent background and not simply measure increases. To do this assumes the current levels are acceptable!</p> <p>ALL Central Government and EU legislation requires reductions in current noise levels. To consider an application where noise increases is contrary to these Legal Requirements. The application only measures the noise directly from the plant. It does not take account of other noise such as the additional HGV vehicles associated with the increased volumes.</p> <p>Due to complaints about noise nuisance, Environmental Health has commissioned an independent sound survey. The initial results from this survey indicate that the noise is of an <u>unacceptable</u> level.</p> <p>Further details can be found in Appendix 2.</p> <p>Noise is a big issue to residents (see Appendix 1). The planning applications do not show an accurate representation of the current noise nuisance of the quarry. Furthermore, they do not show the noise impact analysis of the change of operating hours and extension of the extraction area.</p> <p>Planning permission should not be considered until a thorough, <u>independent</u> noise impact analysis is carried out and the current levels are reduced to an acceptable level and within the current planning restrictions.</p>
Dust	<p>The 'dust ring' around the quarry (caused by dust carrying on the wind) frequently extends over 600 metres from the site perimeter.</p> <p>Dust is a major cause of illnesses such as silicosis. Quarry workers are protected by protective clothing, masks and air filtration. Local residents are not protected. Despite constant sweeping, the roads around the quarry have been consistently dirty. This has been hazardous to traffic.</p> <p>There have been a couple of recent incidents where dust was seen pluming from the buildings (see www.wrag.org.uk). The latter occurrence required Health and Safety intervention before it was addressed.</p> <p>Dust is a big issue to residents (see Appendix 1). The dust on the road and in the air is hazardous to the local population.</p> <p>South Gloucestershire council (SGC) should ensure that this is rigorously monitored and action taken where necessary. Environmental Health should monitor operations on the site more closely.</p>
Blasting	<p>The effects of blasting are felt all over Wickwar (including the local school). Current blasting shakes buildings, causes stress to animals and makes objects fall off shelves. There are concerns of possible structural damage to historic buildings. Cemex staff currently measure blasting through the ground. Measurement through the air is more relevant and can be up to 30 times greater.</p> <p>The proposed planning application would increase the amount of blasting and subsequent effect on animals and local housing.</p> <p>Blasting levels should be <u>independently</u> monitored and enforced.</p>
Other	<p>Light pollution and smell have been raised as issues.</p> <p>Light pollution and smells affect the amenity of the environment and animal habitats.</p> <p>These effects should be <u>independently</u> surveyed and appropriate action taken.</p>

3. Breaches to current planning consent	
Extraction	<p>Cemex are currently extracting 87% above their current planning permission. The clearly defined limits in the existing planning consents have proved difficult for South Gloucestershire Council (SGC) to enforce.</p> <p>This has significantly increased noise, traffic and dust for local residents.</p> <p>There is a strong feeling that Cemex should operate <u>within</u> the current restrictions before any new planning application is considered.</p>
Lorry Movements	<p>Cemex has, by its own admission, breached lorry movement quotas specified in previous planning consents.</p> <p>This has amplified traffic problems between the quarry and the motorway and caused road damage.</p> <p>There is a strong feeling that Cemex should operate within the current planning restrictions before any new planning application is considered.</p>
Operating Times	<p>Cemex operate earlier and much later than permitted by their planning consent. These anti-social hours are during the quietest parts of the day and the noise is intrusive to local residents</p> <p>The current planning consent already encroaches into anti-social hours (7 p.m. to 7 a.m.). To extend permitted operating hours would be totally unacceptable from a noise and traffic perspective.</p> <p>There is a strong feeling that Cemex should operate within the planning consent before any new planning application is considered. It is also considered that the current operating hours of the quarry are unacceptable. There is no reason why these current hours should be carried forward to the new operation.</p>
Commitments	<p>Cemex have not implemented any of the '106s' from previous planning consents. These included road strengthening, roundabouts, slip roads etc.</p> <p>Given this history, we do not believe that any new proposed '106s' associated with these planning applications, will be implemented.</p> <p>There is a strong feeling that Cemex should implement previous '106s' before any new planning application is considered.</p>

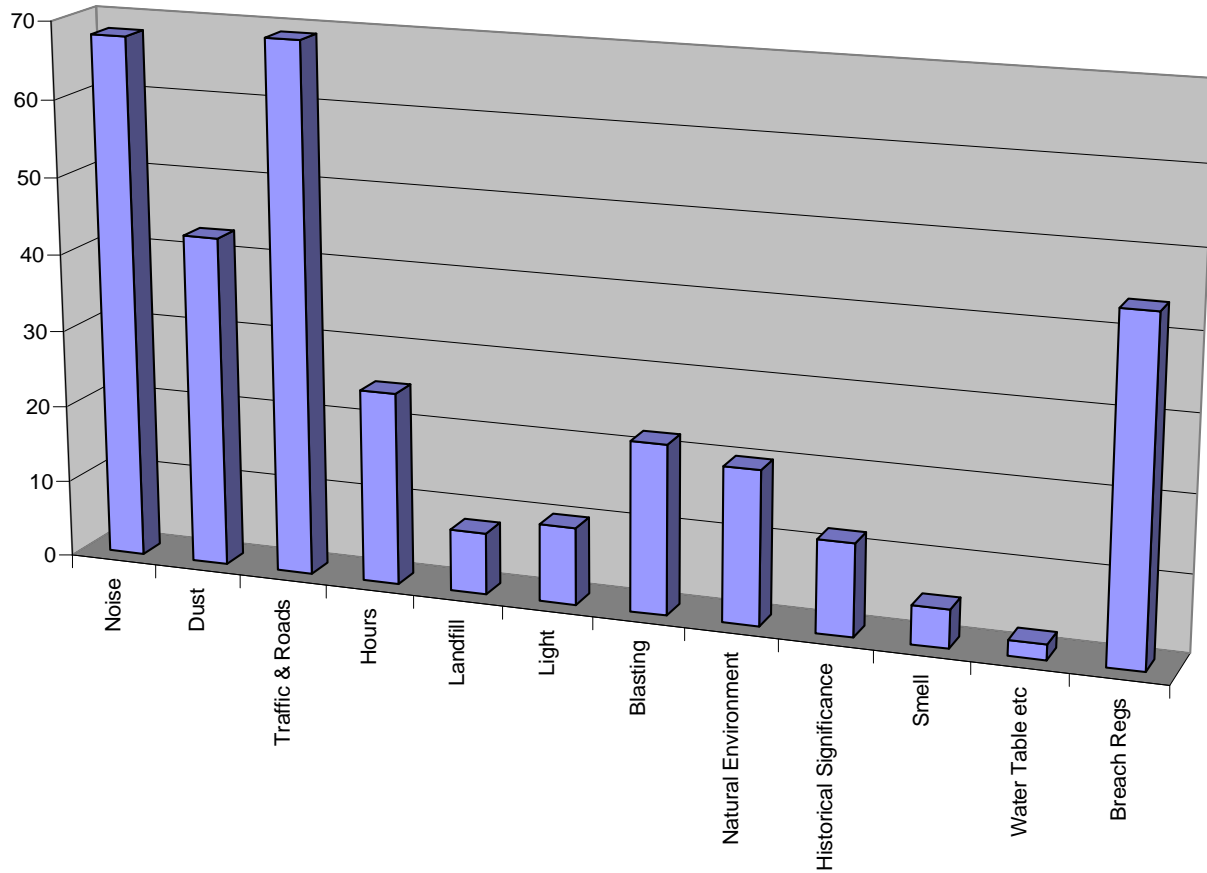
4. Environment	
Restoration	<p>The Planning Applications suggest a water storage facility and Hydro-Electric plant.</p> <ul style="list-style-type: none"> • The proposal is PRE-INVESTIGATION and not a feasibility report! • Cemex are an aggregate and cement company and not a water/power supplier. • There are no commitments to undertake this plan. <p>It would be <u>irresponsible</u> to consider extending the quarry without a well thought out, agreed plan on what the outcome for the site will be when the extraction has finished. A trust fund or bond should be set up to guarantee that the proposed restoration is implemented.</p>
Local Plan	<p>The proposed site is a ridge overlooking and overlooked by the Cotswold escarpment (itself a designated Area of Outstanding Natural Beauty). SGC's Local Plan, states:</p> <ul style="list-style-type: none"> - 'conserve and enhance the countryside' - 'respect the diversity and visual amenity of the landscape'. - protect the countryside 'for its own sake as a biodiversity resource.' <p>This application does not support the basic principles of SGC's adopted plan.</p> <p>The planning applications should be considered in <u>conjunction</u> with the Local Plan.</p>
Natural Environment	<p>The proposed extension of the quarry northwards means:</p> <ul style="list-style-type: none"> - <i>Lasting and irrevocable damage to the character and quality of the environment</i> in and around Churchend. - <i>No character assessment has been done</i> for the proposed development site and its immediate surroundings. - The extension undoubtedly introduces over 16 hectares additional uncharacteristic elements. - <i>No assessment has been undertaken of the structural damage possible to the Grade 1 listed church and grade 2 listed buildings</i> that are built without foundations. - The extension will bring unacceptable and intrusive <i>blasting and vehicle noise, dust pollution and permanent visual scarring</i> to this area. - <i>The proposed extension site supports uncommon and protected wildlife</i> such as greater crested newts (NB protected by European law), bats, badgers and other native species of animals and plants. <p>There has been no objective, comprehensive study of the environmental impact.</p> <p>An <u>independent</u> environmental impact study should be performed before the planning application is considered. Natural England, the agency that advises the government, should be consulted.</p>

5. Proposed area	
<p>Preferred Area</p>	<p>The South Gloucester Minerals & Waste Local Plan (SGM&WLP) adopted May 2002, sets out the maximum permitted boundaries for works. The Planning application proposes an area that extends outside of the Preferred Area.</p> <p>Due to the Quarry extension application exceeding these boundaries, this adversely affects residents, the local environment and animal habitats.</p> <p>Cemex need to comply with SGM&WLP:</p> <ul style="list-style-type: none"> - The applications boundaries need to be reduced. - The boundaries need to include ALL works e.g. noise and dust protection (which they don't currently) WITHIN the overall boundary.
<p>Standoffs</p>	<p>There are a number of issues with the current quarry operation (particularly noise and dust pollution). These have been highlighted directly as the result of these Planning applications and historically through complaints.</p> <p>This application increases and exaggerates these noise and dust problems.</p> <p>There needs to be sufficient standoffs built in to the proposed area as outlined in SGM&WLP.</p>

6. Background	
<p>Development control and sanctions</p>	<p>SGC officers analysis states: <i>'The general principle of development within the preferred area is therefore considered to be acceptable, however this is <u>subject to the satisfaction of detailed development control...</u>'</i></p> <p>Despite previous planning consents being granted with the 'detailed development control' being clearly set out, these have been blatantly ignored by Cemex. Also, despite countless complaints from residents and our Local Council, SGC Officers have totally failed in their duty to enforce them (e.g. permitted extraction, traffic/road improvements, noise, operating hours).</p> <p>Local residents will wish to see:</p> <ul style="list-style-type: none"> - The detailed mitigation plans. - The 'detailed development controls' put in place, - To have a clear understanding of exactly how they will be enforced AND - The 'sanctions' that will be imposed upon Cemex for any breaches (e.g. severe financial penalties, withdrawal of the planning consent provided).
<p>Petition and Objections</p>	<p>A local petition within Wickwar has gathered 393 signatures against the Planning applications. The number of direct objections to SGC is approaching 500 formal objections from over 160 local households and organizations. Specific comments identify noise, traffic, dust and breaches as the main issues. See Appendix 1.</p> <p>The large number of objections shows the significant anger amongst local residents against the planning applications.</p> <p>Note should be taken of local residents objections. SGC should:</p> <ul style="list-style-type: none"> c) Reject the proposed planning applications. d) Monitor and enforce the existing Planning consents.

Appendix 1 - Summary of the planning objections

These numbers refer to issues specifically raised by local residents in their objections to the planning applications.



- The above graph shows the breakdown of the formal objections to South Gloucestershire Council. At the time of writing there are approaching 500 formal objections from over 160 local households and organizations.
- There is a petition signed by 393 residents objecting to the three planning applications.

Appendix 2 – Noise Summary

The Noise Surveys in the planning applications are discredited by methodology inconsistencies and measurement discrepancies. In summary:-

- The report does not consider the operation of the coating plant during the night time period. **There is no supporting noise documentation for this.**
- Noise measurements have been made at times when the quarry was operating outside of its permitted hours. **These measurements are invalid.**
- Background noise levels were made whilst the quarry was operating. This is not in accordance with BS 4142: 1997 Method for rating industrial noise affecting mixed residential and industrial areas. **This is incorrect methodology.**
- The noise survey referenced in the planning application carried out in 2004 shows night time noise levels that are excessively high. **There is no explanation for this. The report authors should not use these peculiar results in their calculations.**
- Mineral Policy Statement 2, Paragraph 2.19, states that ‘night time limits should not exceed 42 dB (A) $L_{Aeq}1h$ (free field) at noise sensitive dwellings’. **The early morning period is part of the night time period, the surveyors should not consider the site noise levels for Church Farm, Newhouse Farm, Southwood Farm and The Old Rectory set at 51, 47, 50 and 43 dB(A) $L_{Aeq}1h$ free field respectively.**
- Cemex have tried to show that through two noise surveys that the noise of the quarry has reduced over the last four years. Both these surveys have serious flaws. They were carried out by different companies, measuring at different locations. Both were commissioned by the Quarry who had prior knowledge when monitoring was being undertaken. **No accurate inference can be drawn from the measurements.**

Due to complaints about noise nuisance, Environmental Health has commissioned an independent sound survey. The initial results from this survey indicate that the noise level is of an **unacceptable** level.

In conclusion, the planning applications do not show an accurate representation of the current noise nuisance of the quarry. Furthermore, they do not show the noise impact analysis of the change of operating hours and extension of the extraction area. As noise is the main issue raised by the residents, planning permission cannot be granted until a thorough, independent noise impact analysis is carried out.

Appendix 3 – Media Coverage