



# Addendum Report

## Updated Planning Statement – Brinsham West Quarry Access Road

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## Basis of Report

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## Appendices

- Appendix A** PD01 entitled 'Proposed Haul Road, Chipping Sodbury'  
Drawing AT\_A01 entitled 'Swept Path Analysis – South, Proposed Haul Road'  
Drawing AT\_A02 entitled 'Swept Path Analysis – North, Proposed Haul Road'
- Appendix B** Landscape and Visual Appraisal
- Appendix C** Heritage Statement
- Appendix D** Ecological Appraisal report
- Appendix E** Landscape and Ecology Management Plan (LEMP)
- Appendix F** Construction and Environmental Management Plan (CEMP)



## 1.0 Introduction

This Addendum Report is submitted in support of planning application P22/0219/F, which currently remains undetermined by South Gloucestershire County Council (SGCC).

The application was validated by SGCC on 1 April 2022. A first round of formal consultation with key statutory consultees and other interested parties took place in 2022 and again in 2023.

This Addendum and accompanying appendices are hereby submitted following further consultation with key statutory consultees and other interested parties in 2023.

The description of planning application **P22/02019/F** is as follows:

*“Construction of Temporary Haul Road to link Southfields and Brinsham West Quarries with subsequent restoration.”*

A number of statutory consultees have requested that further information be submitted prior to the determination of the application, therefore this Addendum to the current planning application comprises the following documents:

- Addendum Report;
- Revised Haul Road layout (**Appendix A**).
- Landscape and Visual Appraisal (**Appendix B**);
- Heritage Statement (**Appendix C**);
- Ecological Appraisal Report (**Appendix D**);
- Landscape and Ecology Management Plan (**Appendix E**); and
- Construction and Environmental Management Plan (CEMP) (**Appendix F**)

## 1.1 Background

The Chipping Sodbury Quarry Complex (CSQC) is a long-established and important element of the Applicants' operations in South Gloucestershire and makes a significant contribution to the supply of building materials within the County area and beyond.

As part of the continued supply of high-quality material, the Brinsham West Quarry is the final phase of the permitted Quarry Complex area that has also included Barnhill, Southfields, Hampstead Farm and Brinsham East Quarries.

The existing mineral permission for CSQC was issued by SGCC in 2015 (ref: PK11/0612/MW). The permission includes the movement of extracted material from the permitted Brinsham West Quarry to the Southfields Processing Plant via a circuitous route that also requires the following supporting infrastructure:

- the construction and use of the permitted conveyor and permanent tunnel arrangement;
- the use of the existing haul road network to the east of Wickwar Road to transport material from Brinsham West Quarry to Southfields Processing Plant;
- an additional primary crusher and other ancillary plant within Brinsham West Quarry; and
- the need for an access point to Brinsham West Quarry from the A4060 as required by Condition 13 of permission ref: PK11/0612/MW.

Condition 24 (v) of planning permission PK11/0612/MW requires that prior to the construction of the conveyor tunnel further details be provided to SGCC in relation to:

- the tunnel dimension;
- the invert level below the B4060; and



- the method and anticipated timescale for construction.

Since the grant of the 2011 planning permission, the Applicants have been able to acquire the ownership of the land which is the subject of the current planning application for a proposed temporary haul road, the purpose being to transport existing permitted reserves of material worked from Brinsham West Quarry to the processing plant within Southfields. This, it is considered, is a proposal that, when weighed against the tunnel/conveyor option, is one that would deliver ongoing permitted reserves at the quarry, whilst delivering a scheme that is temporary in nature and importantly a more efficient option which can return the land to its former condition, with some enhancements in the longer term.

## 1.2 Status of the Current Undetermined Planning Application

As indicated above, the original planning application (ref. P22/02019/F) was submitted to SGCC by Tetra Tech Planning in April 2022 on behalf of Hanson Aggregates (now Heidelberg Materials UK Limited). Heidelberg Materials UK Limited will hereafter be referred to in this document as ‘the Applicant’. The application is for the “*Construction of Temporary Haul Road to link Southfields and Brinsham West Quarries with subsequent restoration.*”

The application was validated by SGCC on 1 April 2022. Further information was submitted in 2023, and formal consultation carried out with key statutory consultees and other interested parties.

This Addendum and accompanying appendices is therefore presented to address the latest comments received from key statutory consultees in respect of this application.

## 1.3 Summary of the Planning Application

Planning application reference P22/02019/F proposes the construction, temporary use and restoration of a direct access road that would link Brinsham West Quarry with Southfields Processing Plant.

This proposed temporary haul road is considered to be a less intrusive alternative to the current permitted requirements for an engineered tunnel/conveyor which requires significant construction and engineering works, as set out in paragraph 1.1 above.

The need to forego all of the following operational elements:

- the construction and use of the permitted conveyor and permanent tunnel arrangement;
- the use of the existing haul road network to the east of Wickwar Road to transport material from Brinsham West Quarry to Southfields Processing Plant;
- an additional primary crusher and other ancillary plant within Brinsham West Quarry; and
- the need for an access point to Brinsham West Quarry from the A4060 as required by Condition 13 of permission ref: PK11/0612/MW.

will result in significant operational and environmental benefits whilst material from Brinsham West Quarry is realised, not least the reduction in the distance, time and fuel that each of the Applicants vehicles employed to carry the approximately 11 million tonnes of material from Brinsham West Quarry to Southfields would otherwise expend.

### 1.3.1 Justification for the Proposed Development

As set out in the existing planning application submitted to SGCC, permission exists for the main principle of the development, which is for the extraction of 11 million tonnes of mineral from Brinsham West Quarry. Therefore, the principle of extraction and the need for the mineral are already established.



Application P22/02019/F is simply to secure a more effective and efficient route for the material that will be worked in the permitted Brinsham West Quarry to be transported from its source to the processing plant within Southfields Quarry, thus reducing significantly the permanent environmental impacts that would otherwise be caused through implementing the existing tunnel/conveyor scheme.

The temporary implementation of the proposed haul route will, when considered against what is currently permitted, realise significant environmental and economic advantages by removing the need to:

- construct a tunnel from Brinsham West Quarry underneath Wickwar Road,
- provide a reduction in the construction and operation of processing plant at the Quarry, and
- provide the significant reduction of the distance of haulage required between the operational quarry and the processing plant.

In this respect the current average travel distance for each tonne of the approximately 11 million tonnes to be extracted from Brinsham West will be reduced. This represents a reduction in the distance travelled by haul trucks of almost 150,000 km over the duration of the operational period of Brinsham West Quarry. In terms of the overall footprint, the proposed new scheme reduces operations significantly as illustrated below (Plates 1-3).

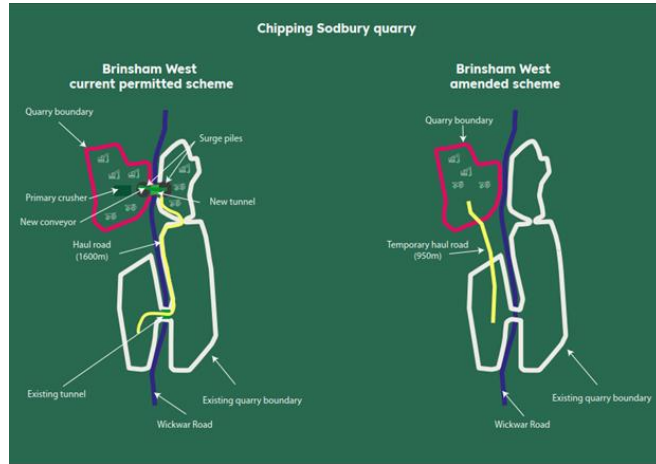
**Plates 1-3** below show the comparison between the permitted Brinsham West scheme (on the left) and the proposed temporary haul road on the right, with the Quarry shown outlined in red. In terms of physical infrastructure:

- the haul road, shown in yellow, for the permitted scheme is 1600m in length and is significantly reduced when compared to the proposed temporary scheme, reducing the length to 950m (a reduction of 30%);
- the reduction in the haul road length will in turn, reduce the distance travelled by haul trucks by almost 150,000 km over the duration of the operational period of Brinsham West Quarry;
- a reduction in distance travelled will further reduce any noise or emission impacts associated with vehicles travelling to and from Brinsham West to Southfields;
- the tunnel and conveyor are shown as light green on the permitted scheme. The construction of the tunnel under Wickwar Road will present significant environmental impacts and would be a permanent feature in the landscape. The impacts of the tunnel construction are likely to be significant (noise/vibration etc) as well as presenting a temporary road closure and diversion of traffic.
- by implementing the proposed temporary haul road scheme, any temporary environmental impacts can be mitigated against (as presented in the accompanying appendices), with full restoration of this area upon completion of Brinsham West;
- the removal of primary crusher and surge piles of limestone shown on the current permitted scheme (in dark green and grey), will represent a significant reduction in any operational activity associated with those activities in Brinsham West, with extracted material travelling directly to the existing and established processing area in Southfields

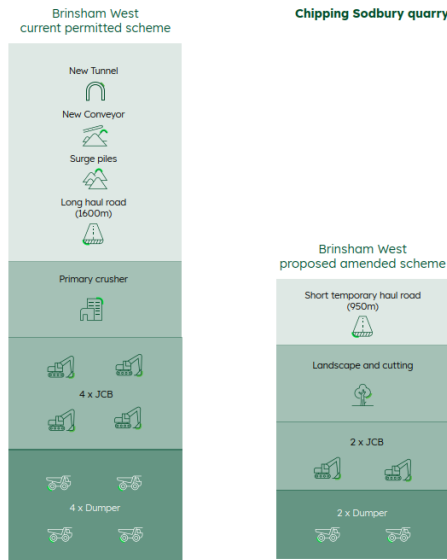


**Plates 1-3 – Comparison diagrams showing the reduction in physical infrastructure between the Brinsham West current permitted scheme and the proposed temporary haul road**

**Plate 1-1**



**Plate 1-2**



**Plate 1-3**

**Chipping Sodbury quarry**

Brinsham West quarry: current permitted scheme in the operational stage



Brinsham West quarry: proposed amended scheme for temporary haul road in the operational stage





Overall, the current scheme, when compared to the proposed temporary haul road, represents a significant reduction in physical infrastructure, disruption and overall distance travelled. It is therefore considered that the benefits of the proposed temporary haul road, when weighed against the viability and environmental impacts of the currently permitted scheme, offer a significant reduction in environmental impacts.

No change to the 'red line' boundary is proposed as part of this Addendum submission.

## 2.0 Further Information

Following the submission of further information in May 2023, a number of comments have been received in response to the proposed development from key statutory consultees. These have been reviewed and are addressed in the supporting and appended documents. They are summarised below.

### 2.1 Statutory Consultees

This section identifies the response of the Applicant to the latest technical consultee responses received in 2023. These are presented in **Table 2.1** below:

**Table 2-1: Post Submission Outstanding Objections**

Date of consultee response	Consultee	Additional Information Requested/Objection Raised
Undated	Sustainable Transport	<p>Please can the layers on the realigned route plan be checked as it appears to show trees on the existing road alignment? CEMP.</p> <p>Please include the following details.</p> <p>Measures to control the tracking of mud off-site from vehicles.</p> <p>Measures to control dust from construction works.</p> <p>Adequate provision for the delivery and storage of materials.</p> <p>Adequate provision for Contractor parking.</p> <p>A Construction Method Statement ensuring the haul road is constructed out from the quarry sites either side of the proposed crossing points.</p> <p>A lorry routing schedule to exclude access to the site from Brinsham Lane, Gravel Hill Road, Wickwar, the A420 through Yate and any other roads with a weight restriction.</p> <p>Details of Main Contractor including membership of Considerate Constructors scheme or similar.</p> <p>Site Manager contact details.</p> <p>Other conditions being considered.</p> <p>Provision for a temporary or permanent reduction in the speed limits on Gravel Hill Road to 40mph and Brinsham Lane to 30mph.</p> <p>Haul road to only be used during the hours of daylight.</p>



Date of consultee response	Consultee	Additional Information Requested/Objection Raised
		<p>Reinstatement of haul road crossing points to their original condition within one month of cessation of use of the haul road.</p> <p>A S278 Agreement and Section 50 licence will be required for the proposed works.</p>
June 2023	Landscape	<p>Whilst the potential wider quarry operational and restoration benefits of the proposed haulage road are noted and will need to be weighted in the planning balance, it is considered that the proposals are unacceptable in landscape and visual terms. The construction and operational landscape and visual impacts of the scheme will have a duration of some 11-13 years (e.g., Ref. LVS para. 1.2.7) and the establishment of reinstatement woodland take some further 15 years until it is a notable and functioning feature within the local landscape again. Roadside hedgerows will take about 5 years post construction to become effective.</p> <p>Additional analysis information within the revised LVS has not been provided, as requested following March 2022 LVS submission. GA Plan showing proposed landscape restoration has been submitted but does not provide appropriate level of detailed information.</p> <p>If planning permission is granted, the following will be required to be submitted as a condition of planning:</p> <ul style="list-style-type: none"> <li>• Tree/hedgerow protection plan prior to commencement of site works</li> <li>• Vegetation and calcareous soil translocation method statements - as part of enabling works/prior to start of main construction works.</li> <li>• Detailed landscape design and mitigation plans specifying bunding/cutting heights and slope gradients; location, species, stock size, planting centres and quantities of all proposed mitigation planting and grassland areas (to be implemented in the first season following completion of construction works); and details of all proposed boundary treatments.</li> <li>• Detailed landscape restoration plan(s), supported by a landscape and ecological management plan (LEMP) covering a subsequent 20 Year management period, identifying existing and proposed landscape and ecology related site assets, associated management objectives, schedules of annual maintenance work together with longer term management operations.</li> </ul>
June 2023	Tree Officer	<p>Whilst the infrastructure proposals may seem more sympathetic to the biodiversity of the site, the impact on the</p>



Date of consultee response	Consultee	Additional Information Requested/Objection Raised
		<p>area remains the same in terms of destruction of wildlife habitat and canopy cover.</p> <p>There is still no reasonable justification for relocating the route from that already approved.</p>
June 2023	Conservation Officer	<p>Revised and additional plans have been received which endeavour to address the concerns raised by the original submission. The width of the haulage route has been reduced aside from two passing bays, the length of hedgerow removal has been reduced and a restoration plan proposed which would see the original landform and grassland reinstated, woodland reinstated and the hedgerows reinstated. Although there is reference to native trees being used in conjunction with the bund, I have not yet found a detailed planting plan showing the proposals, only the restoration principles plan which illustrates a cluster of 4 trees in the southeast corner of the site – is this the extent of landscaping as part of the bund creation? Details of the bund also appear to remain indicative at this time – SK0001 Rev E notes “Approximate Extents of Current Earth Bund (to be confirmed by others)”. The heritage assessment in Section 6 of the Updated Planning Statement notes that the bund and planting will provide mitigation to the setting effects arising from the visual change in rural landscape setting and from noise which may be the case, but in the absence of a detailed bund and planting plan that forms part of the submitted plans it is difficult to be certain. The line of the hollow way is identified as being significantly altered and enlarged but that, through the proposed restoration, the route and general appearance of the landscape would be restored to something approaching its original appearance. For the duration of the route/bund construction, the operational period of the proposed route and until completion of the restoration phase, the setting of Little Brinsham Farm will still be impacted by the works and there will be a demonstrable change to its rural landscape setting resulting from the physical changes to the application site and the visual and noise intrusion, dust, and other general environmental changes over this period. While the reduction in land-take, greater retention of hedgerows and anticipated planting in conjunction with the bund will provide some mitigation, it will not negate all harm to the setting of the listed building during the construction and operation stages of the haulage route. There will, therefore, remain a degree of harm to the setting of the listed building for the duration of the permission until completion of the restoration phase. Taking into account the proposed mitigation, this will still be less than substantial harm but towards the middle of the spectrum rather than the upper end as originally envisaged. It is also acknowledged that this assessment of harm to the setting of the listed building would drop to neutral upon restoration of the landforms and reinstatement of the hedgerows and</p>



Date of consultee response	Consultee	Additional Information Requested/Objection Raised
		<p>woodland. You will, therefore, need to weigh this ‘time-limited’ harm against the public benefits of the proposal, taking into account the great weight afforded to the asset’s conservation (irrespective of whether the harm amounts to substantial or less than substantial) in line with paragraphs 199 and 202 of the Framework.</p> <p>As noted in the report, loss of ancient hedgerows cannot be mitigated against, but the proposed restoration will, over time, ensure that the historic landscape context of the farmhouse remains legible. Archaeological recording across the site may also provide mitigation for the loss of the original earthworks but I defer to the council’s archaeologist on this matter. As the consultants have noted, exact restoration is never possible following development so there will be a low level of residual harm remaining following restoration due to the loss of the integrity of the historic landscape and the components that contribute to its overall interest and significance. It is accepted that these are of low, i.e. local, significance, but they should be taken into account when determining the application in line with paragraph 203 of the Framework. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of this non-designated heritage asset.</p> <p>In terms of further possible mitigation, it is noted that the western passing point is to the south of the haulage route which necessitates a considerable amount of regrading and reprofiling of the earthworks. Providing the length and arrangement of the passing place does not change, could it be repositioned to the north side? As this is a single-track road, it would not have to cross an opposing ‘carriageway’, but it would obviously be contrary to a natural left-hand bay for the direction of travel. If it is permissible in guidance/regulations, could this further reduce the impact on the landforms at the Brinsham Lane end given the point previously made in respect of the line of the haulage route not following the lowest levels of the hollow way? There has been no discussion or explanation as to why the route itself cannot be realigned to follow the lower levels – has this been ruled out completely as a way of mitigating the cutting on the south side?</p>
June 2023	Ecology	<ul style="list-style-type: none"> <li>• A CEMP has been recommended, usually this would be conditioned, however based on the sensitivity of the site and the habitats it will be impacting this will be required prior to determination to assess the avoidance measures and mitigation is appropriate. The CEMP (Biodiversity) shall be written in accordance with BS42020, including mitigation</li> </ul>



Date of consultee response	Consultee	Additional Information Requested/Objection Raised
		<p>details on bats, birds, great crested newt, reptiles, dormice and badger, as well as any pollution prevention measures. The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority. (PSP21)</p> <ul style="list-style-type: none"> <li>• As above due to the sensitivity of the site a Landscape and Ecological Management Plan (LEMP) will be required prior to determination. The LEMP shall be written in accordance with BS42020. The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The minimum of the management should be for the length of the temporary road. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details. The LEMP is also to include ecological enhancement plan detailing location and specification of the ecological enhancements detailed within the Ecological Appraisal (Tetra Tech, March 2022) and Protected Species Report (Tetra Tech, March 2022) (PSP21)</li> <li>• The report outlines that the site is suitable for badgers, however it does not detail if any evidence of badgers were recorded and a pre-commencement survey has been recommended three months prior to works commencing. A pre-commencement check is to be undertaken closer to the works commencing as badgers can excavate sett holes in a short period of time. Details of what if any evidence was found for badgers is to be confirmed.</li> </ul>
June 2023	Lead Local Flood Authority	<p>Infiltration, percolation, and groundwater testing results which specifically represent this site should have been included within the submitted Flood Risk Assessment (FRA) / Rev. - / Dated February 2023. This is in line with the requirements of Building Regulations, South Gloucestershire Council (SGC) SuDS Supplementary Planning Document June 2021, West of England Sustainable Developer Guide Section 1 March 2015, and the surface water discharge hierarchy, the industry accepted best practice guide.</p> <p>Awaiting the submission of an addendum to the aforementioned FRA, which provides confirmation and clarity, before further comment.</p> <p>Infiltration testing costs have been proved under separate cover</p>



Date of consultee response	Consultee	Additional Information Requested/Objection Raised
	Yate Town Council	<p>Object – see original objection of April 2022. Also:</p> <ul style="list-style-type: none"> <li>• concerns in regard to the impact of the proposed change to the access to Brinsham West Quarry northeast of Yate Rocks from the consented route have not been addressed with the revised proposals and whilst the applicant has made limited reductions in the proposed haul road width, reducing it to 6.5m but with 12m plus passing places that would appear to be the limit of the changes to the proposal</li> <li>• impacts on SNCI</li> <li>• support residents of Yate Rocks</li> <li>• The applicant seeks to mitigate for their works by the provision of a proposed 1.4 hectares of ‘new’ woodland, although there are no details of where that might be accomplished or by when but even that, as the applicants accompanying report notes cannot replace the mature trees and hedgerows being removed as part of such a proposal providing as they do a varied environment within the SNCI when so much is under threat locally and nationally</li> <li>• The rationale for the removal of the same number of trees in spite of a reduction in proposed width of the Haul Route, including a veteran Ash tree providing a diverse nature habitat, is not justified</li> <li>• Conflicts with policy PSp2 and PSP3</li> <li>• Carbon calculations not adequate</li> <li>• Traffic</li> <li>• SUDS/pressure onto the Autumn Brooks section at Ladden Garden Village</li> </ul> <p>Addressed through planning addendum submission and accompanying assessment work</p>

In response to the outstanding queries, a detailed review of the previously submitted assessments have taken place, along with a review of comments received from consultees which has resulted in a further review of the temporary haul road design along with a review of the technical assessment work in relation to landscape, heritage, biodiversity, and matters raised by the Lead Local Flood Authority.

These are considered fully and set out in detail in the accompanying appendices however are summarised in sections 3.0 to 7.0 below.

### 3.0 Amended Haul Road Design

The proposed temporary haul road and its layout is shown on drawing numbers PD01, with the swept path analysis shown for the north and the south shown on drawings AT\_A01 and AT\_A02. These are submitted as **Appendix A**.



A summary of the amendments is set out below:

- Amended the alignment of the haul road through the central field to avoid the Ash Tree and its anticipated root protection zone;
- The haul road arrival point at Brinsham West has been relocated slightly further west, an operational request from the client, however the anticipated ground level, distance from Brinsham Lane and likely gradient will be similar to the previously submitted scheme;
- Haul road layout has been amended to suit Left Hand Drive (LHD) vehicles, laybys and traffic signal design have updated to suit. This was necessary to accommodate existing operational dump trucks at Chipping Sodbury Quarry;
- The northernmost layby has been relocated into the Brinsham West ROMP and traffic signals have been updated to suit;
- Changed the alignment of the haul road on entry to Southfields quarry so that it directly ramps down existing quarry levels, reducing the distance quarry vehicles need to travel, thereby reducing emissions and tyre wear;
- 3D haul road design has not been updated and is to be conditioned, though levels are not anticipated to vary greatly from the previously submitted scheme;
- River crossing structure details have not been updated and is to be conditioned, though size and location are not anticipated to vary significantly from the previously submitted scheme;
- The drainage design has not been updated and is to be conditioned, though type and detail are not anticipated to vary significantly from the previously submitted scheme; and
- Bund design now submitted on separate landscape plan.

The latest design of the haul road has been a key consideration in respect of input from a landscape, heritage and ecological aspect.

## 4.0 Landscape

A Landscape and Visual Appraisal (LVA) is submitted at **Appendix B** and has been produced in response to comments received from the Landscape Officer on the scheme and which reflects the proposed amended haul road design and form part of a collaborative approach with the ecologists, engineers, heritage consultants and the Applicant. At the request of the County Councils Landscape Officer a Landscape and Ecology Management Plan (LEMP) has also been prepared with this submission, but due to the nature of such a document, these are often considered to be 'live working documents' and may require updating over time.

The landform and existing vegetation being the key features within the Site, were main design drivers. The proposals associated with the operational phase of the temporary haul road have been illustrated on Drawing CHR-001- Landscape Strategy during Operation and Drawing CHR-006- Cross Sections.

### 4.1 Haul Road Construction & Operation

The key differences are set out in 3.1 of the LVA however they are also set out below along with the key design objectives:

- Alignment of the haul road has been revised to align with the profile and line of the holloway. Two passing spaces are proposed, which represents a reduction in the haul road footprint. The northern of these has been moved to the east to minimise impacts to the western bank of the holloway.



- Existing vegetation has been retained, as far as possible, and protected during construction. Veteran ash tree retained and protected. Landform modifications have been designed to avoid infringement of RPAs of retained vegetation;
- Landform modifications along the length of the haul road have been designed to minimise the changes to the existing holloway profile, as far as possible, and provide screening in views from the east within the building curtilage. The profile of the road is designed to site within the holloway, creating a 'ha-ha wall' effect, thereby maintaining visual connections from the adjacent development to the land to the west (see Cross Sections CHR-006).

'Sketch' models were prepared to inform the profile of the screening 'bund' landform along the south-eastern edge of the site, to minimise the extent of bunding, and to ensure it is aligned in with the existing landform profile. The profile informed by the modelling extends as shallow slope in the north-south direction. As illustrated in **Figure 3-1** of the LVA, the haul road and associated vehicular movement is largely screened by landform, with the vehicular movement glimpsed along the southern edge of the haul road where it meets Gravel Hill.

Therefore, the screening bund landform along the southeastern edge of the Site, which has been significantly reduced from the previous scheme.

- New native scrub planting has been proposed along the south-eastern edge of the Site, along the screening 'bund' to provide additional screening for the visible section of the haul road and associated activities. The planting has been undertaken to align with the existing landscape pattern. The vegetation is a native mix and confined to a short area at the southern end of the Site, which would naturalise and form part of the wider landscape context, as illustrated in **Figure 3-2** of the LVA.

Other planting proposals to include reseeding of modified landform areas and native species rich hedgerow mix planting to infill gaps around proposals where vegetation was lost as a result of the construction activities.

- New stone retaining wall (built as vernacular stone wall), no higher than 1.5m (in a small section of the wall), has been proposed along the periphery of the root protection area of the veteran tree to ensure any reprofiling to the bank here can be minimised and avoids infringement of Root Protection Area of retained tree;

## 4.2 Restoration

For the restoration phase, the design intent is that the landscape is reinstated back to its baseline condition. The proposals, as outlined below, are set out on Drawing CHR-002 and show:

- Modified landform profile associated with restoration process, regrading of the holloway to its existing profile. The retaining wall will be retained taking into account an established habitat around the wall, over the operational period of the haul road;
- The mitigation proposals implemented at the start of the operational phase, lasting about 11-12 years, would be mature and naturalised at this stage. Therefore, this vegetation would be coppiced and then translocated to reinstate gaps in existing hedgerows/vegetation after removal of the haul road to provide potential for immediate reinstatement of baseline condition, where possible; and
- Planting proposals to include reseeding of modified landform areas, new species-rich hedgerow mix and native woodland including wet woodland tree planting to reinstate any additional gaps in planting.





#### 4.2.1 Landscape Effects

The LVA concludes that the landscape effects resulting from the temporary haul road would be highly localised. Further it concludes:

*“The effects would be largely Moderate negative during construction, Moderate and Moderate/Minor negative during the operational phase of the Site and reduce to Moderate/Minor and Minor neutral post restoration. Overall, the effects would be less than significant. It is accepted that any built development in a greenfield site will result in negative effects. Landscape effects would be localised, and focused in the area within and in the immediate vicinity of the Site, and reversible, with the Site returned to baseline condition post restoration.*

*Also, the location of the Site within the wider context on the edge of a working landscape associated with the quarrying activities and development within the northern edge of Yate also means that the wider baseline landscape context is influenced by development.”*

#### 4.2.2 Visual Effects

The LVA found that negative visual effects would be localised and limited to the Site’s immediate context as the landform, vegetation and development associated with Little Brinsham Farm helps to provide a well-defined visual enclosure to the proposed development. Further it concludes:

*“At most, visual effects would be largely Moderate and negative, during the construction and operational phase, for receptors at the entrances to the Site (Viewpoint 1,2,4 and 5). These effects quickly reduce as the receptors moves away from the entrance to the Site along these routes and are anticipated to Moderate/Minor and Minor and negative in nature (Viewpoint 3, 10 and 6), illustrating the localised nature of the effects, limited to the immediate context of the Site.*

*Post restoration, the effects are Minor and Negligible, negative in nature, to begin with and becoming neutral as the landscape returns back to baseline condition.”*

A Landscape and Ecology Management Plan (LEMP) is also included in **Appendix E**.



## 5.0 Cultural Heritage

A response to the 2022 revised submission was received from the Conservation Officer on 5 June 2023 and are summarised in **Table 2-1** above. In response to the latest comments, a Heritage Statement is presented at **Appendix C**, which seeks to address any outstanding concerns in relation to the proposed temporary haul road.

The short to medium term impacts of the proposed development has been assessed in line with the requirements of the NPPF (2023) and development plan policy, with full regard to the scheme's anticipated residual impacts.

In respect of impacts of the temporary development it is concluded that the scheme results in a temporary (short to medium term) impact upon the significance of Little Brinsham Farmhouse as a Grade II Listed Building, and upon the holloway and local historic landscape as non-designated heritage assets of low significance. The impact upon the farmhouse would constitute less than substantial harm at the lowest end of the scale, allowing for mitigation measures.

Two sections of 'important' hedgerow, bounding Gravel Hill Road, would also be impacted.

No impacts are anticipated in relation to the residual ridge and furrow earthworks within the Site area.

### 5.1 Archaeology

Should any archaeological remains be encountered during the construction of the haul road, their significance will likely be lost or otherwise reduced, though the potential for significant remains of all dates is low. The probability of encountering archaeological remains of national importance, such as would preclude the development, is negligible.

### 5.2 Restoration

Following restoration, any impacts upon the significance of Little Brinsham Farmhouse, hedgerows and the historic landscape would revert to nil. Some residual harm to the holloway would remain, owing to its reprofiling and loss of 'authenticity', though its contributions to landscape character and the significance of Little Brinsham Farmhouse would be restored.

## 6.0 Biodiversity

At the request of statutory consultees, further information is provided in the form of an updated Ecological Appraisal (EcA) and is submitted as Appendix D of this submission. A detailed summary of the County Councils Ecology Officer comments is set out above and in **Table 1-1**<sup>1</sup> of the EcA.

The appraisal has been carried out principally to assess any potential ecological impacts on the application site, as a result of the proposed development for the temporary haul road.

To address any outstanding matters in relation to the most recent response received from the County Councils Ecologist (received in June 2023), the updated EcA report has been produced to address the following points:

- establish **baseline conditions** and determine the importance of ecological features present (or those that could be present), as far as is possible;

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<sup>1</sup> See Table 1-1, page 2 of the EcA



- identify **potential ecological constraints** to the proposed development and make initial recommendations to avoid potentially significant effects on important ecological features, where possible;
- identify **potential requirements for mitigation**, where possible, including mitigation measures that will be required and those that may be required (depending on results of further surveys or final scheme design);
- establish **any requirements for more detailed surveys**; and
- identify **opportunities for biodiversity enhancements** as part of the project.

## 6.1 Baseline conditions

Results of the desk and field surveys carried out since the original planning application submission are presented in **Table 3-1** of the EcA and describe the baseline conditions of the site and the surrounding area including designated sites (Statutory and Non-Statutory), Priority Habitats, Habitats and Species. A summary of Ecological Features is included at Table 4-1 of the EcA which sets out the ecological features, their importance and identifies those which can be scoped in or out of further detailed assessment.

### 6.1.1 Conclusions and Recommendations of the EcA

A desk study, habitat survey and protected species assessment has been undertaken of the proposed temporary haul road and the surrounding 30m. The Site supports locally and nationally common and protected habitats and is not considered critical for populations of any species of fauna or nature conservation importance.

The EcA has identified the Ladden Brook and Brinsham Bridge SNCI, deciduous woodland, wet woodland, hedgerows a veteran ash tree, bluebells, reptiles, nesting birds, otters, water vole, badgers and bats, to be important ecological features with the potential to be indirectly impacted by the proposed development.

In summary, approved and recommended mitigations include the following:

- To mitigate for the loss of the deciduous woodland it is recommended that other areas of woodland surrounding the Site are enhanced by improving the condition of the woodland currently present.
- To mitigate for the loss of the wet woodland it is recommended that an additional area adjacent to Ladden Brook is identified within the landholding of the quarry and enhanced into wet woodland or existing wet woodland is enhanced through appropriate management or additional planting.
- To mitigate for the loss of the hedgerow it is recommended that new species rich hedgerow planting is installed within the Site. To mitigate for the loss of SNCI habitat within the ROMP boundary, compensation planting is proposed approximately 0.6 km west of the access road and adjacent to Ladden Brook, with appropriate native tree and shrub species that have been recorded within SNCI. Conservation management of the wider Ladden Brook and Brinsham Bridge SNCI is recommended to restore habitats to a higher conservation value. As part of the proposals, the Habitat Management Plan for the period 2015- 2025 agreed to as part of the ROMP Condition 46 will need to be reviewed and updated to reflect current conditions on the Site and any future development proposals.
- A Root Protection Area (RPA) should be established around the woodland boundary, retained trees and veteran ash tree, as per standard BS:5837<sup>2</sup>. The RPAs should be

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<sup>2</sup> BS 5837 – Trees in Relation to Design, Demolition and Construction (2012)



free of large, heavy vehicle movements, particularly vehicles with tracks, and no excavation should be undertaken.

- Spill kits should be always present on site, and any spillages of fuel or chemicals should be cleaned up immediately to prevent accidental discharge and subsequent pollution of the Ladden Brook. Ladden Brook should also be placed into the 10m buffer which excludes all vehicles and machinery to prevent oil and fuel being washed into the Ladden Brook.
- Prior to construction an updated water vole survey should be undertaken which could include camera traps in order to confirm the presence of water vole. If the burrow is confirmed and will be impacted by the installation of the culvert then an mitigation licence from Natural England will be applied for and the water voles trapped and removed from the culvert footprint.
- The installation of the U-shaped culvert to allow the continued use of Ladden Brook by otters and water voles.
- Pre works check of trees for new roosting sites for bats. Installation on 10 tree mounted bat boxes.
- Vegetation removal should be undertaken outside of the bird nesting season (March-end August), or under the supervision of an ECoW. Buffer zones to be established around any nests found until birds have fledged.
- No lighting should be used for construction activities.
- The haul road will run during the daytime only 8:00-18:00, however in the winter months this will happen when otters and badgers could be active. The haul road has no associated lighting and a speed limit will be implemented which is 10mph which will minimise the risk of otters, and baggers being killed by vehicle movements.
- Native blue bells plants will be translocated into the surrounding woodland if within the footprint of works.
- Two phased cut of the grassland in order to remove reptiles from the works footprint.
- Any deep trenches will have escape ramps for mammals included into the design of the trench to allow the escape of any trapped mammals from the trench and specified within the Construction and Environmental Management Plan (CEMP) for the Project.

A Construction and Environmental Management Plan (CEMP) is included in **Appendix F**.

## 7.0 Lead Local Flood Authority (LLFA)

In respect of the comments received from the LLFA in June 2023, the following provides the reasoning and evidence for the request to defer the infiltration testing for the proposed development until the construction phase.

### 7.1 Infiltration testing

The alignment of the new road involves earthworks. The location of the southern proposed tank is within the embankment cutting, therefore is 6 -7m below EGL. An excavation to the base of the infiltration tank in accordance with the requirements of the BRE365 would not be practicably possible at this stage.

Please note, the intention is to carry out infiltration testing in the early construction stage therefore the imposition of a drainage condition can include infiltration testing but would be limited to after the start of the earthworks due to the depths.



The storage for the northern section of the road is provided in an existing pond. Sufficient infiltration is unlikely given the pond is wet throughout the year.

Water hydrometric assessment has been carried out for the parcel of land that is to be accessed. The ground water is reported as approx. 85mAOD. Whilst groundwater is likely to be lower, given the invert level of the receiving watercourse, it is unlikely to provide the sufficient 1m clear dry ground all year round to achieve a suitable infiltration design. The Hydrometric report has been provided in the previously submitted Flood Risk Assessment document.

## 7.2 Discharge Rates

The request is for the site to be restricted to greenfield rates. The calculated greenfield rate is 0.22 L/s as shown in the Wallingford Greenfield Calculations output provided in the Drainage Strategy. Typically, we prefer to restrict to nothing less than 2 L/s per hydrobrake. This is based on minimum orifice sizes and increased blockage risk. Anything smaller will block regularly increasing maintenance and use the overflow more.

As such a 1 L/s discharge rate from each hydrobrakes to reduce the rate is proposed. Blockage risk would then be mitigated by installing an overflow pipe in the chamber to ensure any blockage does not cause an 'out of system' flood event.

### 7.2.1 Conclusion

Given the complexity of obtaining correct BRE365 infiltration testing, it is proposed that these are carried out in the initial phase of the earthworks to ensure safe testing regime. The Drainage Strategy intends that infiltration will be used if deemed suitable, however a discharge at an agreed rate is provided as a safe option, should the infiltration be proved impossible.

## 8.0 Other

A Carbon Life Cycle Assessment has been prepared and submitted previously by Tetra Tech as part of the current planning application and remains a current document as part of the planning application submission.

It remains the view of the Applicant that The Carbon Lifecycle Analysis demonstrates that the carbon savings from the proposed scheme will amount to a reduction of some 30% from those proposed by means of the permitted scheme.

The principle for extraction at Brinsham West is an established one and since the latest grant of planning permission in PK11/0612/MW, the Applicant has had to consider the operational and environmental aspects of transporting material for processing in a way that is both viable to the business as well as to consider the environmental impacts associated with this.

SGCC have not requested any further information in relation to this assessment and in the absence of local plan policy support it is not considered necessary to re-rehearse the findings set out in the planning application submission.

There are no adopted policies in the development plan for the area that expressly require a carbon audit or carbon offset plan. However, it is noted that there is a local ambition to be a net zero carbon county and to achieve a reduction in carbon emissions of 80% by 2030. In addition, paragraph 157 of the National Planning Policy Framework (NPPF) states that the planning system should support the transition to a low carbon future in a changing climate.



## 9.0 Summary

In summary, the Applicant has received a number of responses from key statutory consultees to the current planning application, which have been passed along via the planning officer at SGCC or obtained via the County Councils website.

As part of the second round of the consultation process for this planning application, responses from statutory consultees at South Gloucestershire County Council including from Landscape, Conservation and Heritage, Ecology, have been the subject of a very detailed review and which has resulted in a further revision to the design of the haul road.

The principle behind the proposed development is to make provision for the transportation of extracted material from Brinsham West Quarry to the processing plant in Southfields. Whilst the principle for mineral extraction remains and is not questioned, the mechanism for transporting the material in the most sustainable and efficient way, has been given careful consideration.

Planning permission PK11/0612/MW requires the provision of significant infrastructure, most notably the construction of a primary crushed and conveyors together with a tunnel, which would represent a permanent feature in the local landscape and is complex to deliver, from viability, risk and environmental perspectives. Hence the proposal for a temporary haul road would not only mitigate the above considerations in form of a more efficient operation, yet also reduce any associated impacts on the host community together with a fully restored landscape following extraction at West Brinsham Quarry.

The Applicant has therefore again sought to address the matters raised by key consultees and subsequently those objections received from local interested parties in relation to the temporary haul road and has, where appropriate, sought to incorporate amendments to the design, operations and mitigation associated with the proposed scheme.





# Appendix A Haul Road Design Plans



# **Appendix B    Landscape and Visual Appraisal**





# Appendix C Heritage Statement



# **Appendix D   Ecological Appraisal Report**



**Appendix E Landscape and Ecology Management Plan (LEMP)**



**Appendix F Construction and  
Environmental  
Management Plan  
(CEMP)**

