
From: Levine, Cody
Sent: 24 March 2020 23:20
To: Aldridge, Steven; Wood, Laura
Subject: RE: Lea Castle Quarry

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Steve

Thanks for this consultation and apologies for the delayed response.

I'm afraid I'd like to request further information on a number of matters prior to being able to give this scheme my support.

Hydrology and designated sites

The Hydrological and hydrogeological impact statement notes that *"The effect of deposition of inert wastes at the Site will be to introduce a lower permeability horizon, over an area of c.26ha and to an average depth of c.2m, within the uppermost unsaturated zone of the SSG aquifer with the concomitant potential to effect existing local patterns of rainfall recharge to the underlying SSG aquifer... the increase in rainfall recharge to the local section of the SSG aquifer that will occur due to soil stripping in this area will amount, on average, to c.12m per day"*. While the effect of this is thought to be a *"negligible increase"* with *"no discernible effect upon underlying groundwater levels"*. However as I understand that ground water from the site discharges into the Wanerton Brook and that this is the principal water course charging the Podmore and Hurcott SSSI, additional comfort is sought that the hydrological modifications pose no risk of adverse interaction with the surrounding hydrologically sensitive sites.

Secondly, with regards potential for adverse impacts arising from pollution events, a series of mitigation measures (a "fluids handling protocol") have been outlined. Given the hydrological connectivity with designated sites I recommend that the Authority seeks confirmation from expert consultees (such as the Lead Local Flood Authority and Environment Agency, as may be appropriate) that they are content these measures are acceptable, prior to determination of the application.

Ancient woodland and veteran trees

Removal of T3 has been given very limited consideration within the context of Volume 2 of the Environmental Statement. T3 is described as a *"Veteran tree"* in *"poor condition"*. Paragraph 175 of the NPPF is referenced: *"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists"* and an assessment has been undertaken with regards implications of proposed loss of T3 upon roosting bats. I suggest further clarity is sought with regards the *"wholly exceptional reasons"* for the loss of a veteran tree. Additionally, a suitable compensation strategy must be submitted in support of the application. It should also be noted that veteran trees support a remarkable diversity of wildlife; Volume 2 of the ES appears to limit scope of invertebrate consideration to butterflies, noting that the site *"does not contain any rare habitats"*, however veteran trees are an increasingly rare and critically important habitat resource for notable and protected saproxylic invertebrates. The impact of veteran tree loss on protected invertebrate species should be better understood.

Secondly, the site's boundaries have been described as broadleaved woodland; a search for ancient woodland was undertaken using the Multi-Agency Geographical Information for Countryside (MAGIC) website. The Ancient Woodland Inventory within MAGIC is widely understood not to include ancient woodlands smaller in

size than 2 hectares, and while ongoing mapping work undertaken by Natural England seeks to remedy this, the situation remains that much of our remaining ancient woodland assets are simply not listed within the MAGIC website. To this end, in our EIA scoping comments we recommended making use of the Worcestershire Habitat Inventory. Interrogation of the WHI shows that the woodland bordering the northern and western edges of the site have been included in the county Ancient Woodland Catalogue (WNCT, JJ Day, 1983) as “Wolverley Lodge” (reference 87023). With reference to NPPF paragraph 175 and the deterioration of ancient woodland, further clarity is therefore sought as to the mitigation strategies proposed here, and their suitability for protection of ancient woodland habitats in line with current Government advice and Woodland Trust good practice guidance.

Protected species

Volume 2 of the Environmental Statement discounts impacts on otter as there are no suitable habitats identified on site. The site abuts woodland concomitant with a (designated) watercourse, which are habitats likely to offer suitable opportunities for resting or natal otters. In addition, there are records of otter in proximity to this area. Whilst not within the red line boundary of the scheme, the effects of disturbance arising from mineral working upon the woodland habitat may risk adversely impacting otter, should they occur here. For example, Chapter 12 of the ES indicates that adverse dust impacts from sand and gravel extraction can reasonably be predicted within 250m of source. I respectfully request further consideration of offsite impacts upon wildlife including otters. Given the 11 year lifespan of operations, if disturbance is predicted this may have a significant impact on a number of species sensitive to effects of disturbance, such as bats, otters and farmland birds. I would therefore welcome further consideration of specifications for proportional compensation and sustainable long-term enhancement measures for these species.

Restoration

In our previous comments it was highlighted that while the creation of acid grassland would be entirely appropriate given the site’s ecological and historical contexts, proposals including ‘ribbons’ of grassland habitats, for example as field margins, would not be appropriate. Even as a 6m wide corridor, these features do not ‘link’ adjacent unimproved grasslands, will suffer from greater ‘edge effects’ by their linear nature (such as receiving drift from agricultural fertilisers, insecticides etc), will be under agricultural pressure from adjacent farmed habitat and will offer comparatively lower ecological value in comparison to a single, more practically manageable unit of acid grassland. May I therefore respectfully request that greater consideration is given to reconfiguration of acid grassland habitat as a single cohesive block, ideally located on the site’s western aspect to further buffer woodland edge from agricultural land use.

For the mitigation scheme to be effective, acidic grassland will require a suitable soil substrate. This is likely to be different in nature to the topsoil intended for strip and bund storage for use in concurrent restoration work. Clarity is sought that the volumes and quality of soils suitable for establishment of acid grassland have been identified, and will be protected throughout working for restoration of acid grassland habitats.

I also request confirmation that a wide woodland corridor (ideally no less than 30m) will be provided along the site’s western boundary; the Worcestershire Habitat Inventory indicates this area provides a notable north-south linear woodland feature in the local landscape which, as currently partially fragmented, the restoration plan would ideally aim to reinforce this feature in the local landscape. Conversely, scattered woodland planting (as is shown in the north-western corner of the site) should be reconsidered due to increased management requirements or risk of deterioration of acidic grassland through succession of scrub and woodland.

Plan KD.LCF.021 “Plant Site Layout – plan & Elevations” (Oct 2019) shows no tree protection measures implemented in soil storage/screening bund 2. This should be re-examined as the proposed topography means likely contamination into the tree’s drip zone of eroded bund material. The Arboricultural report identifies that trees T4 and T19 are marked for retention and protection but will require that the extraction area is amended to ensure no working takes place within their root protection areas. Confirmation is sought that this is the case.

I appreciate that there are several issues to be worked through here, and I'd very much welcome further discussions with the applicant and their team in due course, however, you'll appreciate that the current situation with regards Covid and school closures limits my availability for meetings hopefully just over the short-term. I'll be checking emails and must apologise in advance if I'm slower in responding to these than normal.

Regards.
Cody.

From: Aldridge, Steven <SAldridge@worcestershire.gov.uk>
Sent: 11 March 2020 08:46
To: Levine, Cody Wood, Laura
Subject: Lea Castle Quarry

Hi Cody and Laura,

In regard to the proposed quarry at Lea Castle Farm. Please find attached comments from Wyre Forest District Council – Countryside and Parks Manager for your information and consideration when you commenting on the application.

Please note I will also be sending on these comments to EA and Natural England from consideration to the impacts upon the SSSI.

Kind regards

Steve

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