From:
Sent: 12 March 2020 15:27
To: Aldridge, Steven
Cc: Paul Round
Subject: FW: Seeking Comments - Proposed Quarry at Land at Lea Castle Farm - Ref: 19/000053/CM

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Steve,

I have reviewed the information submitted for application 19/000053/CM - Proposed sand and gravel quarry with progressive restoration using site derived and imported inert material to agricultural parkland, public access and nature enhancement at Land at Lea Castle Farm, Wolverley Road, Broadwaters, Kidderminster, Worcestershire

The submitted information includes a Flood Risk Assessment and Drainage Strategy (BCL Consultant Hydrogeologists Limited, Oct 2019). I believe that the site is not at risk from any type of flooding and therefore I have focused my response upon the interaction with the surrounding areas (including the water dependent SSSIs).

The site is located within the catchments of the Stour and the Blakedown Brook, which is a tributary of the Stour. The site does not contain an abundance of natural or manmade surface water drainage features, which suggests that the area is currently predominantly drained by vertical percolation to underlying strata. Infiltrated water slowly recharges the wetland SSSIs that are present in the valleys to the west (Stour: Puxton and Stourvale Marsh) and to the east (Blakedown Brook: Hurcott and Podmore Pools).

The lowest planned sections of mineral extraction (and thus subsequent infilling) are between 16 to 24 m above the level of the water table. The submitted information sets out that during the operational phase rainfall will be drained naturally through the floors of the mineral extraction, mimicking the present situation. There will be no dewatering and no other pumped or overland gravity discharges of rainfall runoff will be made from the site during the operational phase.

Following the quarrying phase the site will be infilled with inert waste materials and then covered in approximately 1.2 m of topsoil. It is stated that the covering with topsoil will ensure that the water logging of soils above the restoration infill is unlikely. The infill material will be of significantly lower permeability than the current aquifer materials (that will be quarried) and therefore it is likely that following infilling more water will runoff, and less water will percolate into the underlying strata. The additional volume of runoff that will be generated has been estimated as 550 m3 for a 1:100-year storm + 40% climate change allowance. The proposal is that a network of buried land drains will be installed, falling out to a number of landscaped soakaway ponds situated at the margins of the infill material (total surface area: c.2,160m2). Following abatement of storm conditions the temporarily retained runoff (causing a temporary 0.25m increase of pond levels in a 1:100-year storm + 40% climate change allowance) would drain to underlying strata over a period of hours to days. The idea is that drainage of rainfall runoff within the restored site will, as at present, be made via percolation to underlying strata (via the soakaway ponds), and that there will be no overland gravity discharges of rainfall runoff from the site.

Conclusion

I believe that the site is not at risk from any type of flooding and therefore I have focused my response upon the interaction with the surrounding areas (including the water dependent SSSIs). The submitted information sets out a strategy that aims to ensure that the amount of percolation to the underlying strata, that recharges the water dependent SSSI, will remain unaltered with new land drains and soakaway ponds compensating for the lower permeability of the infill materials. I believe it should be made clear who will maintain these features following restoration; land drainage is not something that is enforceable under the Land Drainage Act 1991.

In addition, I wonder whether the use of aboveground SuDS features rather than buried land drains could be explored.

I also believe that it need to be made clear when in the phasing the land drains soakaway ponds will be installed.

Reviewing the cross sections it seems to me that any excess water would not be able to leave the site as the restored site appears to be lower than the surrounding land. I am not sure whether I interpret this correctly. I believe that an assessment should be made of any changes in 'exceedance' overland flow routes leaving the site following the development (this represents a worst case scenario in which the soil become water logged and/or the newly installed land drainage does not function). I believe this assessment is required to ensure the development will not increase the flood risk to others.

I would welcome a response to these queries as part of the current application. If you are however minded to approve this application prior to this, then I would request that a detailed surface water drainage condition will get attached:
"No infilling works shall take place until a site drainage plan for the proposed development has been submitted to, and approved in writing by the Local Planning Authority. The plan shall include details of land and surface water drainage measures and shall conform with the principles set out in the Flood Risk Assessment and Drainage Strategy submitted with the application (BCL Consultant Hydrogeologists Limited, Oct 2019). It shall include an assessment of the use of sustainable drainage systems (SuDS). It shall detail the strategy that will be followed to facilitate the optimal functionality and performance of the drainage scheme throughout its lifetime. The development shall be implemented in accordance with the approved drainage plan and thereafter maintained."

Best wishes,

Kirsten

Kirsten Huizer
Senior Water Management Officer
Wyre Forest District Council
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Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

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Our vision is to reduce flood risk while protecting and enhancing the water environment and encouraging sustainable water management

From: Development Control team [mailto:DevControlTeam@worcestershire.gov.uk]
Sent: 06 February 2020 10:03
To: North Worcestershire Water Management Enquiries
Cc: LLFAconsultee
Subject: External Email : Seeking Comments - Proposed Quarry at Land at Lea Castle Farm - Ref: 19/000053/CM

Dear Sir/Madam,

Consultation on a Planning Application (County Matter)
Town & Country Planning Act 1990

The Town & Country Planning (Environmental Impact Assessment) Regulations 2017

Application Ref: 19/000053/CM **Grid Ref:** (E) 383959, (N) 278992

Applicant: NRS Aggregates Ltd

Proposal: Proposed sand and gravel quarry with progressive restoration using site derived and imported inert material to agricultural parkland, public access and nature enhancement

Location: Land at Lea Castle Farm, Wolverley Road, Broadwaters, Kidderminster, Worcestershire

NRS Aggregates Ltd is applying to Worcestershire County Council for planning permission for the above proposal. The planning application is accompanied by an Environmental Statement.

The applicant is seeking planning permission to extract approximately 3 million tonnes of sand and gravel over a total of 6 phases. The land would be progressively restored using site derived and imported inert material to agricultural parkland, public access and nature enhancement. The applicant estimates the development would take approximately 11 years to complete.

The planning application, the plans, the Environmental Statement, Non-Technical Summary and relevant documents are available to view on http://e-planning.worcestershire.gov.uk using application reference: 19/000053/CM. When searching by application reference, please ensure that the full application reference number, including the suffix are entered into the search field.

I would be grateful for any comments you may have on the above application by **19 March 2020**. If this is not possible please let me know.

Please do not hesitate to contact me if you have any queries.

Kind regards

Steve

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