

[REDACTED]

From: Robin Smithyman [REDACTED]
Sent: 23 September 2021 15:02
To: Aldridge, Steven
Subject: Re: 19/000053/CM Lea Castle Farm - Dust Impact Assessment

Follow Up Flag: Follow up
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Dear Steve,

We have reviewed the comments received from the Action Group and have the following comments to make:

In terms of the points raised regarding an under estimation of vehicle movements, see below:

During operations, 30-40 tonne dumpers will be used to transport the extracted sand to the processing plant. Based on the extraction of 300,000 tonnes of sand and gravel per annum to be transported to the processing area in 30 tonne or 40 tonne average payloads of dumpers over 275 working days per annum, an average of 36 loads (30 tonne) or 27 (40 tonne) per day would be required, resulting in 72 or 54 dumper. Vibrock's report (Technical Appendix E) at paragraph 3.7.9 set out dump truck movements per day is anticipated to be in the order of 33 loads (66 movements round trip) to the processing plant, which represents more movements than if a 30 tonne dumper is used but lower than if a 40 tonne dumper is used. In any case the variances between the vehicle movements depending on the size of the dumpers used are minor and would not affect the overall conclusion of the mineral dust impact assessment.

In terms of offsite movements, it is the Air Quality Assessment at Appendix 4 of Technical Appendix E that carried out traffic dispersion modelling and assesses the air quality impact from changes in traffic flows. Traffic data utilised in Appendix 4 was informed by the transport assessment undertaken by The Hurlstone Partnership Limited (Technical Appendix F). It is worthy of note that in the assessment in respect of contaminated land and air quality, Worcestershire Regulatory Services in their response (attached) directly referred to Appendix 4 in terms of traffic impacts from the development on local air quality.

In terms of omitting new and existing housing, see below:

In terms of the assessment locations contained within Vibrock's report, a range of the closest receptors to the site have been identified. These were the receptors with the highest potential for dust impact of which the Vibrock report concluded, it was unlikely that any significant decrease in local air quality will occur due to the proposed development at Lea Castle Farm Quarry. The development at the former Lea Castle Hospital site is at least 570m from the proposed quarry development, which is significantly distanced from site operations than the receptors assessed within the Vibrock report. Extensive research and study at other quarries has shown that the likelihood of dust impacts occurring at distances over 100m from a site is very low as the majority of fugitive dusts are likely to be greater than 30µm in size and will deposit easily within 100m of the source. The Institute of Air Quality Management (IAQM) 'Guidance on the Assessment of Mineral Dust Impacts for Planning', 2016, states that "adverse dust impacts from sand and gravel sites are uncommon beyond 250m. In terms of consideration of other residential developments, Appendix 4 gives consideration of potential impact to housing development on Stourbridge Road.

Therefore, on this basis, we consider that the assessment of air quality impacts has been sufficiently addressed and see no issues in terms of the points raised by the Action Group.

Regards

Robin

From: "Aldridge, Steven" <SAldridge@worcestershire.gov.uk>
Date: Friday, 17 September 2021 at 11:58
To: Robin Smithyman [REDACTED]
Subject: 19/000053/CM Lea Castle Farm - Dust Impact Assessment

Hi Robin,

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

With regard to the above proposal, I have received the comments below from the Action Group in relation to dust impacts. I have attached the documents they reference for ease of reference. I have consulted WRS to see whether this changes their comments in any way.

Kind regards

Steve

Steven Aldridge
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Sent: 07 September 2021 11:27
To: Aldridge, Steven <SAldridge@worcestershire.gov.uk>
Subject: Quarry application 19/000053/CM Lea Castle Farm Dust impact assessment and WRA responses

Dear Steve

Following a public meeting yesterday, the Stop the Quarry Action Group will be writing with a series of further objections to the NRS application 19/000053/CM shortly.

In addition, I write a further objection to the Lea Castle Farm Quarry application on behalf of Action Group in respect of **serious factual inconsistencies** in the Vibrock Dust Assessment report for NRS in their application and the responses on behalf of the County Council by Worcestershire Regulatory Services (WRS). Please will you ask WRS to reconsider their position in the light of my comments below. I also attach a plan to assist

The Vibrock Dust Impact Assessment is Document 11 of the 247 documents within the application and fails on a number of counts including:

- **Omitting new and existing housing**
- **Miscalculation and under estimation of onsite and offsite vehicle movements (by a factor of 5x)**

Omitting housing: On page 29 only 9 residential properties are listed as being potentially affected by dust although on page 32 para 6.3, a distance of 1km from site workings is defined as an area of consideration. There is no mention of Lea Hall Hospital site where development is underway with consultation on additional housing land or the extensive existing housing areas in Cookley and Sion Hill. Vibrock has assessed properties within 50m of the application site only

Under estimation of vehicle movements: The Vibrock study document 11, page 15 para 3.7.15 estimates **10-20 heavy duty vehicles per day** removing material from the site. The Hurlstone Partnership Transport report (Traffic Impact assessment), Document 12 page 9 para 5.13 estimates **77 HGV loads per day (154 HGV movements)**. This is five times as many movements as considered by Vibrock

Vibrock similarly estimates 33 articulated dump truck loads per day (66 movements) using 2 articulated dump trucks. Generally dump trucks carry 8-12 tons of material per load and an HGV 20 tons. This implies that should the correct load numbers be applied, 10 dump trucks would carry **165 loads per day** ie 330 on site dump truck movements **with 5 times the associated dust and noise**.

The Worcestershire Regulatory Services (WRS) have considered and reported to Worcestershire County Council on the applicants representations of contaminated air quality, noise and nuisance a number of times within the application documents. They have failed to address the inconsistencies of the Vibrock Report document 11 and the Transport Report, document 12. The Vibrock Report is not fit for purpose and WRS must undertake due diligence in its assessments and assess the true impact of both on site and off site vehicle movements. The Vibrock maths is incorrect.

In consideration of the homes, schools and number of residents potentially at risk from the pollution from the site proposals at some five times the intensity than the Vibrock report assumes, we suggest you instruct WRS to reconsider their response giving due consideration to the facts. Vibrock has either deliberately misled WRS (and the Council) or their report is not fit for purpose. WRS must reassess all their commentary in the light of the evidence above. Please advise us as to WRS's response.

Yours sincerely

On behalf of Stop the Quarry Action Group