



JMJ/C3429/6842

18<sup>th</sup> April 2017

Sedgwick Associates  
PO Box 237  
Bolton  
BL1 9WY

For the attention of Paul Sedgwick

Dear Paul

**Re: Proposed Residential Development off Carrington Road, Adlington**

We are writing on behalf of our client Hollins Strategic Land in relation to their proposals to develop a site off Carrington Road, Adlington with residential units.

BSL has been appointed by Hollins Strategic Land to advise on the environmental acceptability and economic viability of extracting the mineral resource on the site, prior to any residential development taking place based on Lancashire County Councils Guidance Note on Policy M2 Safeguarding Minerals Dated December 2014 which covers the Borough of Chorley.

**Policy Background**

National Planning Policy requires Mineral Planning Authorities to safeguard mineral resources that are or may become of economic importance by including them in a Mineral Safeguarding Area in order to ensure mineral resources are adequately and effectively considered in land use planning decisions, to ensure that they are not needlessly sterilised by non-mineral development.

Based on Lancashire County Councils MARIO interactive mapping website the proposed development site is indicated as being located within a Mineral Safeguarding Area presumably for sand and gravel based on the nearby existing sand and gravel quarry.

“...Within these mineral safeguarding areas planning permission will not be supported for any form of development that is incompatible by reason of scale, proximity and permanence with working the minerals, unless the applicant can demonstrate to the satisfaction of the minerals planning authority that:”

- *The mineral concerned is no longer of any value or has been fully extracted.*
- *The full extent of the mineral can be extracted satisfactorily prior to the incompatible development taking place.*
- *The incompatible development is of a temporary nature and can be completed and can be completed and the site returned to its original condition prior to the minerals being worked.*
- *There is an overarching need for the incompatible development that outweighs the need to avoid the sterilisation of the mineral resource.*

- *That prior extraction of minerals is not feasible due to the depth of the deposit.*
- *Extraction would lead to land stability problems.*
- *In the case of peat deposits that it no longer serves as a carbon trap.*

The purpose of this letter is to provide the evidence to confirm that the proposed residential development will not sterilise any beneficial minerals beneath the site.

### **Site Geology**

Drawing C3429/03, Site Constraints Plan, identifies the known site geology, the details of which have been taken from British Geological Survey maps. Based on available information, it appears that the sand and gravel mineral resource may not actually be present in the proposed residential area. The geological records indicate that the site is underlain by Glacial Till which typically comprises sandy Clay. This is shown on Drawing C3429/04 'Published Site Geology' which contains an extract of the BGS map Wigan Sheet 84 Drift which is appended to this report letter.

The deeper solid geology is indicated to be the Pennine Lower Coal Measures which are Carboniferous in age and typically comprises interbedded mudstone, sandstone and siltstone layers with coal seams. The north west of the site is indicated to be underlain by the Lawrence Rock Sandstone unit. Geological mapping indicates that no coal seams are present beneath the site with coal seams being present to the west and south of the two faults near to the site.

### **Environmental Acceptability**

UK legislation states that *"...mineral operators should look to agree a programme of work with the mineral planning authority which takes account, as far as is practicable, the potential impacts on the local community and local environment (including wildlife), the proximity to occupied properties, and legitimate operational considerations over the expected duration of operations..."*.

As a minimum, a 200m buffer zone should be introduced between any residential receptors and the point of any proposed extraction. However we understand that Chorley Borough Council can allow a 100m buffer zone between residential properties and proposed sand and gravel extraction deposits in certain circumstances which are enacted via particular planning applications. Buffer zones are required to keep operational noise and dust levels from mineral extraction sites down to a minimum thus causing minimal disruption to existing nearby residential properties.

Drawing C3429/03 indicates the 100m buffer zone for the adoption of safe environmental working procedures in this area. Based on the houses surrounding the site to the west and south the 100m buffer zone covers the entire site and as such there is no potential workable area, and this would preclude any mineral extraction at the site. In addition it is worth noting the development of the site would not encroach onto the existing buffer zone set up for the current sand and gravel site to the north of the development site and therefore the proposed development should have no impact on the existing operations.

### **Economic Viability**

Based on desk study information, the superficial soils on the site are glacial tills and not sand and gravel, the bedrock is indicated to be interbedded mudstone, sandstone and siltstone with no viable coal seams indicated to be present. If it is proposed to extract the bedrock and extract the sandstone bedrock in advance of any site development works, it would be necessary to remove the superficial soil (Glacial Till) and temporarily stockpile this on the site for the duration of the mineral extraction phase, which has the potential to cause nuisance from visual intrusion, dust generation and sound nuisance. This operation is considered to be unviable economically based on the relatively small size of the site. In addition the extraction of any bedrock would also fall within the

100m buffer zone and so would not be acceptable from an environmental point of view. It should also be noted that buffer zones for hard rock extraction are often greater than 200m.

Following the completion of any mineral extraction on the site, engineered fill would need to be brought onto the site to supplement the superficial soils to infill the resulting void and large scale earthworks would be required to ensure that the resulting ground conditions would support the future construction of residential properties.

### **Conclusion**

Our technical analysis has determined that:

- The sand and gravel deposits known to be present to the north at the existing sand and gravel quarry are not indicated to extend and be present at the proposed development site, which is shown to be underlain by glacial till/clay.
- The site has no indicated viable coal seams present.
- Sandstone extraction from depth is unlikely to be economically viable given the small nature of the site.
- The entire site falls within a 100m environmental buffer zone from the existing houses to the south and west.

Therefore, it has been demonstrated that given the site's constraints and lack of ability to contribute towards the overall provision of minerals in Chorley, we believe there is no reasonable justification to retain this site for minerals extraction when held in the planning balance.

We trust that you are in agreement with the conclusions of this letter however, if you have any queries about any of the issues that have been raised do not hesitate to contact us.

Yours sincerely

**For Brownfield Solutions Limited**



**James Jacob BSc, CGeol, FGS**

**Director**

james@brownfieldsolutions.co.uk

Enc Drawing C3429/03 Plan showing site constraints.  
Drawing C3429/04 Plan showing published site geology.



Site Boundary



Sand  
Quarry

100m buffer zone from  
existing residential  
houses



**BROWNFIELD  
SOLUTIONS LTD**  
CEO-ENVIRONMENTAL ENGINEERING EXCELLENCE

**HOLLINS STRATEGIC  
LAND**

Carrington Road,  
Adlington

Site Constraints Plan

Drawing Number C3429/03

Scale: NTS

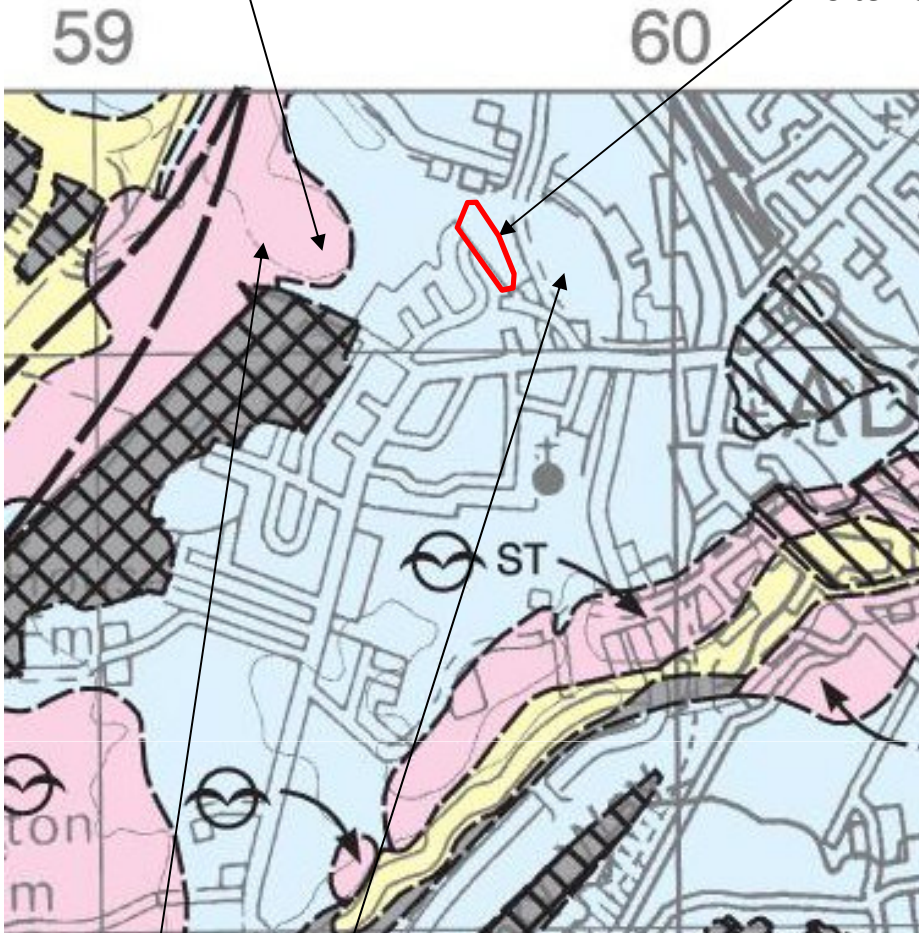
Drawn By: JMJ

Checked By: AJH



Area of Existing Sand Quarry

Site Boundary



Sand and Gravel  
shown as pink

Glacial Till  
shown as  
blue



**BROWNFIELD  
SOLUTIONS LTD**  
GEO-ENVIRONMENTAL ENGINEERING EXCELLENCE

**HOLLINS STRATEGIC  
LAND**

Carrington Road,  
Adlington

Published Site Geology

Drawing Number C3429/04

Scale: NTS

Drawn By: JMJ

Checked By: AJH