

Town and Country Planning Act 1990 – Section 78 Town and County
Planning (Development Management Procedure) (England) Order
2015 Town and Country Planning (Inquiries Procedure) (England) Rules 2002

Proof of Evidence of Matt Harthill
for Stop The Quarry Campaign – Rule 6 Party
Concept Restoration

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

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

Application reference: 19/000053/CM
Appellant's name: NRS Aggregates Ltd
Appeal reference: APP/E1855/W/22/331009

31 January 2023

Concept Restoration – Proof of Evidence of Matt Hartill

Documents referred to;

- Planning statement December 2019
- Non-Technical summary Dec 2019
- Environmental Statement 4.6.4
- Reg 25 Response Appendix H
- Phase 1 Working & Restoration KD.LCF.004
- Phase 2 Working & Restoration KD.LCF.005
- Phase 3 Working & Restoration KD.LCF.006
- Phase 4 Working & Restoration KD.LCF.007
- Phase 5 Working & Restoration KD.LCF.008
- Concept Restoration KD.LCF.010
- Concept Restoration 01 -LEACF-inq_011
- Restoration Sections KD.LCF.028

1. Qualification

1.1 My name is Matt Hartill

1.2 I have lived in the village of Cookley for 33 years and I have worked in the refractory industry for the past 25 years as a procurement manager and I have considerable experience in mineral & aggregate sourcing for the manufacture of granular & monolithic refractory products which are used extensively in the steel industry. These materials typically are clays, chamottes, sand, bauxite and reclaimed products. I have responsibility for sourcing these products, which involves visiting the processing and extraction sites in this country and abroad (including some quarries in the UK). I am also Secretary of the Stop The Quarry Committee.

1.3 From my own personal experience the site of the proposed quarry is extremely important to me and my family; it is a unique area of land situated near the communities of Cookley, Wolverley, Broadwaters and the new emerging Lea Castle Village. I am the parent of a young man who suffers with autism and ADHD. People with autism are highly sensitive to external stimulus, traffic, loud noises, vibration etc. During my son's early years when he was particularly sensitive to outside stimulus, we used to specifically seek out tranquil spaces and environments that enabled him to cope in his highly sensitised world. Lea Castle was one of those places from the moment he walked through the castle gate at the top of Castle Road and along the bridleway an air of calmness came over him, the openness of the landscape, crops growing in the fields, the occasional sound of a horse, the farmer's tractor trundling across the fields it was an idyllic place for him; safe, calm and at one with nature and the world.

1.4 This experience is not unique to people with autism and many people from our community enjoy the amenity that this landscape has to offer: dog walkers, Ramblers, cyclists, runners, people in powered wheelchairs and so on.

1.5 During the recent COVID pandemic and lockdowns many of our local communities made use of this open space and found it to be a source of calmness and joy, it played a key role in their mental well-being during those difficult times.

1.6 It is a vital link with nature and the benefits are now being scientifically recognised “being in nature makes us feel good, whether that is reason or not, the past few years have seen an explosion of research finding concrete links between increased exposure to nature and not just improved physical health, but better mental health, too.”(New Scientist 24th March,2021)

1.7 If the quarry came into being then these qualities would be lost for evermore.

2. Introduction

2.1 STQC evidence at this time is concerned with the concept restoration proposal

2.2 STQC will also refer to Policy MLP 26 Efficient use of Resources : Worcestershire Minerals Local Plan 2018 – 2036

A level of technical assessment appropriate to the proposed development will be required to demonstrate that, throughout its lifetime, the proposed development will:

- a) minimise use of water and energy in buildings, plant and transport;
- b) optimise on-site energy generation from renewable and low-carbon sources; and
- c) balance the benefits of maximising extraction with any benefits of allowing sterilisation of some of the resource, taking account of:
 - i. the need for the mineral resource;
 - ii. the ability to deliver the relevant strategic corridor priorities;
 - iii. the ability to provide a stable and appropriate landform for beneficial after-use;
 - iv. the ability to deliver high-quality restoration at the earliest opportunity;
 - v. the appropriateness of importing fill materials on to site, and the likely availability of suitable fill materials;
 - vi. the need to protect and enhance inherent landscape character; and
 - vii. the need to manage or mitigate impacts on the built, historic, natural and water environment and amenity.

3. Current Position

3.1 The proposed quarry site is currently farmland and open countryside accessed by public footpaths and bridleways, these are all well used by the local community and visitors to the area, the site is contained within the wall boundary of the former Lea Castle.

3.2 The area slopes down from the northern boundary of Cookley and gradually flattens out to an open plain at the southern end of the site, a tranquil and open vista unique to the local area. Broom Covert hill is a notable feature. The topography has remained virtually undisturbed for thousands of years.

4. Proposed

4.1 The landowner and NRS Aggregates plan to extract the sand and gravel in 5 distinct stages with a final decommissioning stage over a 10 year period.

4.2 The restoration plan is proposed to be carried out chronologically as each extraction phase is completed, this involves land filling the site with 600,000 cubic metres of inert waste to replace what has been extracted and the creation of pocket parks, and additional rights of way.

MLP 26 Efficient use of Resources : Worcestershire Minerals Local Plan 2018 – 2036
iii. The ability to provide a stable and appropriate landform for beneficial after-use

- 4.3 Drawing KD.LCF.010 details the final concept restoration and drawing KD.LCF.028 shows the final restoration section.
- 4.4 Section A-A (Phase 4 & 5) shows a massive height decrease in the level of the land from 85m at the highest point to 65m at the lowest point, this is between distance markers 825m and 425m.
- 4.5 This results in a height variation of 20m(60ft).
- 4.6 This completely changes the topography of the existing land and leaves what essentially is a massive crater, which will be of no benefit for the landowner, it will be virtually impossible to farm.
- 4.7 The additional PROWS that the applicant is proposing simply skirt around the edge of this crater.
- 4.8 Section C-C also shows a height variation 85m to 60m between distance markers 100m and 425m , so in both directions a height loss of 20m(60ft)
- 4.9 This will completely alter the nature and amenity of the site. This is not an appropriate landform.
- 4.10 NRS promote the operation as a phased restoration implying that the local communities will still be able to access the land whilst the quarrying is in operation. In reality, who will use the site when you have a massive quarrying operation in progress, the noise, dust, vehicle movements, conveyors and processing plant. Surrounded by mountainous bunds of spoil.
- 4.11 It is proposed that each phase is planted and restored after extraction, this is also a misconception fed to the community at public meetings. Restoration takes years if not decades to reach a level of maturity and benefit.
- 4.12 This means that the area will be completely lost to the community for the entire duration of the quarrying operation.
- 4.13 It is very difficult for a general member of the public to grasp the enormity of the quarry project, given that there are 358 documents to look at, please refer to the excerpt from the planning statement below, as far as STQ are aware, we have never been shown any 3D visualisation of the plan by the applicants, at the public meetings there were only 2D drawings on display

05D- Planning Statement (CPA. County Planning Authority)

Landscape and Visual Impact

166. The CPA agrees that landscape and visual matters should be included in the ES.

167. In addition, the CPA recommends that the applicant includes annotated 3D visualisations of the application site in its existing form, the proposed quarry form (including phasing), and the proposed restoration form. Such visualisations would be in line with industry best practice as demonstrated at the 2018 Mineral Products Association/Royal Town Planning Institute Mineral Planning Conference 2018. 3D visualisations would also be invaluable for communicating the above surface impacts of the proposed development to the public and other interested parties.

4.14 The restoration plan is a concept, there is no guarantee within the planning application that will be implemented in accordance with the plans and maintained by the landowner

KD.LCF.004 Phase 1 Working & Restoration Drawing. (Also stated in planning Statement(

- Restored land will be seeded and/or planted in accordance with the Concept Restoration Scheme land uses. All restored land will be placed in aftercare and managed by the operator and landowner for 5 years under the monitoring of Worcestershire County Council and other statutory bodies and a proposed quarry Liaison Group. Post 5 years, the land will be managed by the landowner, under a long term management contract.

4.15 The planning application states that NRS and the Landowner will be responsible for the first 5 years of aftercare and after that it is solely the responsibility of the landowner.

4.16 This is cause for grave concern, The landowner(Resident in Jersey)and his son who lives at Keepers Cottage next to the proposed quarry appears to have some history of not complying with planning regulation or indeed acting with the interests of the local community in mind.

4.17 Evidence of this includes;

Lea Lane Landslide

4.18 In February 2021 a section of Lea Lane was subject to a landslide caused by recent heavy rains, Lea Lane is an essential road from the centre of Cookley travelling parallel to the Worcestershire canal at the lower end and exiting on to the Wolverley Road(B4189) adjacent to The Lock Pub. The Lane has been closed for 3 years

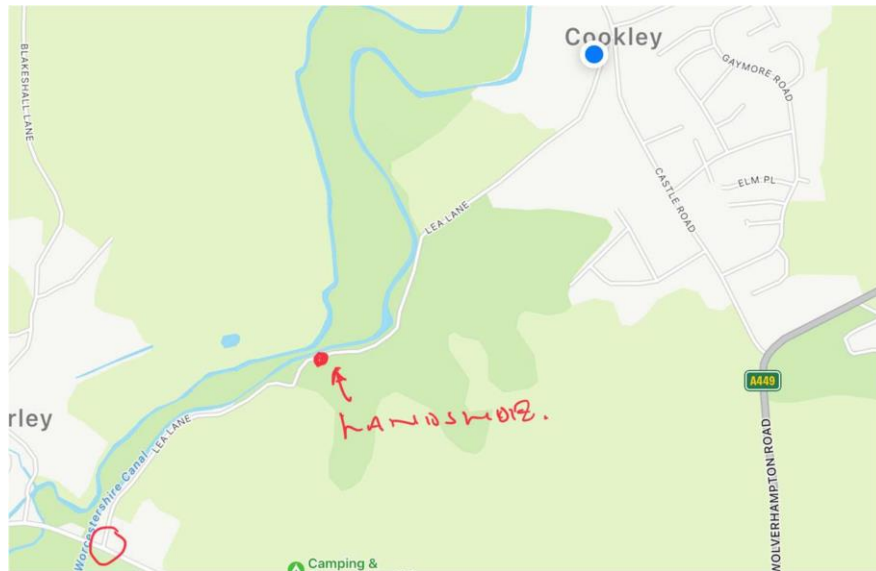
4.19 This vital artery for our village, it has remained closed since 2021 and means that the only easy vehicle access to Wolverley is by exiting Castle Road, Cookley, travelling along the A449 and turning right at the Wolverley lights to access the B4189 Wolverley Road. Lea Lane connects the two communities of Wolverley and Cookley.

4.20 This forces everyone to leave Cookley through the Castle Road/A449 junction, extremely dangerous during commuting times, there have been many accidents and at least one death in the past 3 years.

4.21 Lea Lane is also the main route for children from Cookley take when they walk/cycle to Wolverley CE Secondary School & Sixth Form. The headmaster and Worcestershire County Council have been concerned about safe walking routes and have issued the following letter:

5. Previous Land Owner Planning History

- 5.1 The reason the Lane remains closed is because agreement cannot be reached between the three parties involved, Worcestershire County Council, British Waterways and the landowner who owns the small tract of land where the landslide has occurred.
- 5.2 WCC and British Waterways cannot move forward with the restoration of the embankment and repair of the road because the landowner will not communicate with them, permission cannot be obtained to access his land and the repair cannot be carried out.
- 5.3 It has now got to the stage, whereby the WCC are considering the issuing a compulsory purchase order against the landowner to rest ownership from him(Stated by Mr Ian Hardiman, Cookley & Wolverley Parish (Chairman of Planning and Regulatory Committee, Worcestershire County Council) at Wolverley & Cookley Parish Council meeting on 3rd January 2023 , they will then eventually be able carry out the repair and open Lea Lane, which will be a great relief to many residents in Cookley and Wolverley. See email confirmation in Appendix.







Court Farm Quarry

- 5.4 The Landowner is also the owner of the now defunct Court Farm Quarry on the opposite side of the B4189 only a few hundred metres from the proposed site.
- 5.5 When this quarrying operation ended, it was just left to the forces of nature by the owner and now its only purpose is to function as a Motocross Track which is rented out to motorcycle clubs from outside the area, the noise from the motorbikes is very loud and can even be heard in Cookley.
- 5.6 There have been many complaints over the years on social media, and to the local authority about the motorbike and other events

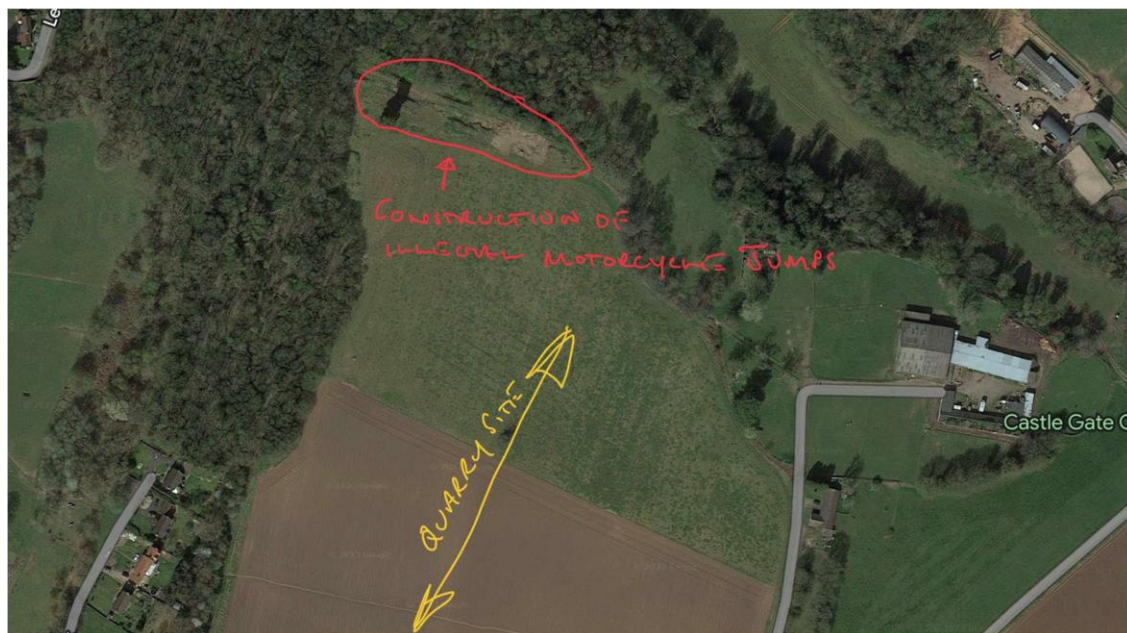




Kidderminster Shuttle October 2012

Construction of motorcycle jumps and holding all day motorcycle meetings.

- 5.7 The landowner was subject to instruction from the local council to remove these jumps from the proposed new quarry site, he has demolished some but a few remain. No formal planning matters were initiated.
- 5.8 The photograph below shows the motorcycle jumps, this phase one of the quarry.



Upgrading of Public footpath to Bridleway

- 5.9 In October 2000, a member of the public made an application for the public footpath through the quarry site to be added to the definitive rights of way map as a bridleway.
- 5.10 These were public footpaths WC25 and WC626.
6. The landowner objected to this, despite there being overwhelming case evidence to support this dating back to 1890 and the present day. The paths had always been used as a bridleway.

The landowner employed a barrister and other experts to represent his case, however he was unsuccessful in preventing the upgrading of the public footpath to a bridleway. This is the main PROW through the current site. This as Definitive Map Modification Order M222.

- 6.1 All of these actions bring into question the character and responsibility of the applicant, how can you trust the applicant to follow through and deliver a "High Quality Parkland" and maintain it going forward when he has clearly shown a disregard for his responsibility as a landowner and contempt for our community in which the Landowner does not live himself,
- 6.2 The danger here is that once all the minerals have been extracted from the site and NRS Aggregates and the Landowner have made all their money, this quarry will become another Court Farm and a barren piece of green belt land gone forever.
- 6.3 The inspector should question whether the applicant has the responsibility, funds and inclination to sustain the restoration after the initial 5 year joint management.
- 6.4 STQC fear that once the 5 year joint management plan has expired the landowner will wash his hand of any responsibility and any amenity will be lost for future generations. The will become so dilapidated and will leave it open to other development options,

7. MLP26 V. The appropriateness of importing fill materials on to the site, and the likely availability of suitable infill.

- 7.1 NRS Aggregates propose to replace the 1.7million cubic metres of sand and Gravel extracted with 0.6million cubic metres of inert waste.
- 7.2 It is highly questionable whether NRS Aggregates will be able to find this amount of inert landfill; usually by definition this is construction and demolition waste.
- 7.3 The world has moved on and the key to sustainability is to stop stripping the earth of virgin materials and recycle/reprocess what we already have, inert materials are highly prized in most industries these days as key raw materials.
- 7.4 In the refractory industry that I work in, material that would previously have gone to landfill is almost entirely recycled- it is inert because it has already been fired or calcined and is also cheaper to process and can be crushed and graded repeatedly. Minimal quantities now go to landfill.
- 7.5 The amount of inert material available for landfill is reducing exponentially both for commercial/Industrial waste and building and construction waste, year on year.
- 7.6 Document : Reg 25 Response Appendix H : Information in Respect of the Availability of Suitable Fill materials and Likely Sources of Inert Material for the Site's Restoration.

- 7.7 In this document sections 1.2.2 to 1.2.7 NRS try to justify the need for landfill and imply that there is a capacity gap for inert landfill until at least the end of 2026. Notwithstanding that this assumption was made in 2019 and it is all subjective and not based on factual current information.
- 7.8 According to Waste Indicator W23b, copied from WCC Waste Indicators web page
 “There was no capacity gap and there is enough capacity for the lifetime of the plan, until 2027, the gap will last longer than this because the amount of unrecyclable waste is reducing year on year.”
- 7.9 Government policy on waste is changing

“Waste Indicator W23b. Maintain equivalent self-sufficiency in disposal and landfill capacity for inert waste

- Target: No capacity gap for disposal and landfill
 2020 Performance: No capacity gap for disposal and landfill
 Trend:
- 2019: No capacity gap for disposal and landfill
- 2018: No capacity gap for disposal and landfill

Explanation: The amount of inert waste landfilled in Worcestershire was 197,256 tonnes in 2018, 236,308 tonnes in 2019, and 180,951 tonnes in 2020, leading to a cumulative 1,660,191 tonnes of non-inert waste landfilled in the county since 2009. This is 38% above the projections made in the Waste Core Strategy. However, with a current void space of 1,966,292 tonnes across the county, this is believed to be sufficient to meet this extra demand over the lifetime of the Waste Core Strategy. This means that there is sufficient inert landfill capacity remaining at this stage in the Waste Core Strategy. Therefore, there is no capacity gap for disposal and landfill for inert waste.

Recovery Rate from non hazardous construction waste, England 2022
 Low availability from construction of inert wast

Year	Generation	Recovery	
		Recovery	rate
2010	54	49	92.20%
2011	55	51	92.50%
2012	50	46	92.00%
2013	52	48	92.00%
2014	56	52	92.40%
2015	58	53	92.30%
2016	60	55	92.10%
2017	62	58	93.10%
2018	61	58	93.80%
2019	62	58	93.60%
2020	54	50	93.20%

Million tonnes and percentage rate

Sandy Lane Quarry, Wildmoor, Worcestershire July 21

- 8.1. This is a sand quarrying operation approved by WCC. Site with 6 year operation for the extraction of 245,000 tonnes of sand to fully restore the site by importing 975,000 cubic metres of inert waste. Contrast this to the proposed Lea Castle Quarry 3,000,000 tonnes of sand and only 600,000 cubic metres of imported waste (39% less than Wildmore).
- 8.2. The Lea Castle Quarry is proposed to generate 2,755,000 tonnes more sand and gravel than Wildmoor quarry (1125% more) but NRS are only importing 600,000 cubic metres of waste. The difference is staggering.
- 8.3. Is the reason for this incredible difference in levels of imported waste for restoration because of the lack of availability of suitable waste material.
- 8.4. This only serves to highlight the massive void that will be left after the extraction has finished at Lea Castle. With this restoration plan, the landowner and NRS Aggregates are only window dressing the destruction and devastation after they have had their revenue.
- 8.5. There is clearly not sufficient inert waste available to fully restore the site
- 8.6. Detailed in the Planning Statement and in this document 1.2.9 NRS state:

Major Projects

1.2.9 As set out in the submitted Planning Statement, the site is ideally suited to help support growth in respect of the provision of minerals and the importation of inert waste associated with the permitted 600 houses at the old Lea Castle Hospital Site within the Lea Castle village, with proposals for the number to rise to 1400. Wyre Forest District Council Local Plan Review (2016-2036) also proposes preferred residential and support schools and commercial growth at the site's boundary to the east of Kidderminster including Lea Castle Village, Lea Castle Hospital Extension and the Kidderminster Eastern Extension. Large quantities of inert waste will arise from these large scale schemes and the potential transport to and use of this material in the Lea Castle development restoration scheme, aligns with the ethos of achieving sustainable development.

- 8.7. This Statement is completely out of date and untrue.
- 8.8. The Lea Castle Village site has already been stripped of all non-hazardous waste and the first phase of housing construction is well underway with a large number of the houses already occupied.
- 8.9. Phase 2 of Lea Castle Village will be built entirely on green belt agricultural land and will not generate any inert waste.
- 8.10. So the statement,
- 8.11. "Large quantities of inert waste will arise from these large scale schemes and the potential for transport to use this material in the Lea Castle development restoration scheme, aligns with the ethos of achieving a sustainable development.

8.12. Is completely untrue and has not based on factual information.

1.2.10 Notwithstanding the above, the site is ideally geographically located to support growth/development in north Worcestershire and the west Midlands. 20 different construction projects have been planned for the West Midlands region of the UK, costing a total of approximately £10bn and will require the deposition of significant volumes of inert waste. Notwithstanding HS2, some of the construction works include the redevelopment of land across new stations created for HS2. The prospectus also includes office, retail, and residential buildings – to be located near the new Birmingham International and Birmingham city centre train stations. There are also plans for Wolverhampton’s city centre, with the canal side to be redeveloped, a new manufacturing facility will be built in Nuneaton and a manufacturing park that houses Jaguar Land Rover is to be extending.

8.13. This statement again is completely untrue and out of date, they are making unfounded assumptions that construction projects will use product from Lea Castle quarry.

8.14. It is hardly sustainable to have large lorries full of sand travelling back and forth along the heavily congested A449 to Wolverhampton City centre, HS2 has will have finished construction of the west midland section by the time any quarrying would have started, all these construction projects mentioned have sand & gravel sources nearer to the construction site than Lea Castle.

8.15. It is then set out in the conclusions:

Conclusions

1.2.11 For the reasons set out above, there is an inert waste capacity gap in Worcestershire, placing ever increasing need for sites, such as Lea Caste Farm, which would be appropriately engineered, deliverable and accessed sustainably, to meet this increasing need. Furthermore, there is an anticipated increase in inert waste likely to be generated from large infrastructure projects in north Worcestershire and the West Midlands over the next 10 years.

1.2.12 The applicant is confident that market demand, growth projects in the area, increased housing demand will support the need for inert void at Lea Castle Farm over and above that permitted for the life of the site. Given the above, the deliverability of the restoration scheme at Lea castle Farm with the importation of 60,000m³ per annum is considered achievable.

8.16. The conclusion statement as previously stated is not factually evidenced and is merely an out of date subjective assumption by NRS Aggregates Ltd

8.17. There is no inert waste capacity gap in Worcestershire, so the applicant cannot use this statement as justification for quarry application to be approved.

- 8.18. They cannot say that there is an anticipated increase in inert waste LIKELY to be generated from large infrastructure projects over the next 10 years. The indications are that the arisings of inert waste are reducing every year, all new construction sites have to be sustainable and be accountable for their waste generation, the majority of this waste will be recycled.
- 8.19. 1.7m cube out, 0.6m cube in.
- 8.20. NRS cannot prove a case for depositing large volumes of inert waste in what was a green field site, global warming, international and national environmental policy all promote sustainability, recycling and preservation of our open spaces.

This restoration scheme is catastrophically flawed, the proposed levels of imported materials are no where near the the levels to restore the landscape to anything like the original topography

There is a real concern that once the quarrying operation ceased quarrying, the landowner will have no interest in maintaining the site and will not act in the interest of the local communities. There are no conditions, bond, securities or penalties attached to this restoration plan. If there were any enforcement issues, the landowner would only communicate through his legal representatives, which has proven to be difficult(Lea Lane landslip).

The qualities of the the site that have drawn our communities to use the site will be lost once the quarrying has commenced and will never return even after the inadequate resoration

Addendum: Revised drawings July 2024

Drawings Referred to:

330 CD15.14 Drawing Nos. E2370-SGA-001 and 002 - Original and Revised Plant Layout

332 CD15.16 Drawing No. 01-LEACF-INQ_004 - Initial Works

333 CD15.17 Drawing No. 01-LEACF-INQ_005 - Phase 1 - Working & Restoration

334 CD15.18 Drawing No. 01-LEACF-INQ_006 - Phase 2 - Working & Restoration

335 CD15.19 Drawing No. 01-LEACF-INQ_007 - Phase 3 - Working & Restoration

336 CD15.20 Drawing No. 01-LEACF-INQ_008 - Phase 4 - Working & Restoration

337 CD15.21 Drawing No. 01-LEACF-INQ_009 - Phase 5 - Working & Restoration

339 CD15.23 Drawing No. 01-LEACF-INQ_011 Concept Restoration - July 2024

1. Drawing Ref: E2370-SGA.002 REVISED PLANT LAYOUT

Original Revised

2. Length	3. 64m	4. 41m
5. Width	6. 43m	7. 11m
8. Footprint	9. 2752sqm	10. 457sqm

11. Height reduction of 6m
12. This is an 83% reduction in size of processing plant footprint
13. How is it possible to process 330,000 tonnes of sand & gravel per year with plant that is only a fraction of the size of the original plant drawing?
14. Noise level at 10m reduced by 8.3% with new plant layout.
15. Where is the evidence/modelling to prove that the revised plant layout and noise levels are achievable.
16. The comment at the bottom of the drawing states ; "PLEASE NOTE THIS IS A PRE-SALES DRAWING AND SHOULD BE USED FOR DISCUSSION/QUOTATION PURPOSES ONLY"
17. The noise levels stated can only regarded as an estimation for quotation purposes, it doesn't mean they are achievable, and I suspect, given the reduced size of the plant with the same throughput, the levels will be much greater.
18. Nobody can be really certain what the noise levels will be when until the plant is operational.
19. The operation of this plant of this plant will represent an exponential increase in continual background noise
20. Let us also put this in context during the daily operation of the quarry
21. If the quarry goes ahead this will become an industrialised area, the openness of the great belt will disappear and the tranquil qualities that make this land a desirable space for the local populations to enjoy will be gone.
22. There will be the constant machinery noise from the crushing and processing plant.

23. Noise from the excavators and tipper trucks constantly moving freshly dug sand and gravel to the processing plant, they will also be transporting inert waste for the infill(let's not forget their vehicle reversing alarms as well).
24. Lorries transporting the sand and gravel from site and importing waste infill
25. The whole site will be a constant discordant cacophony of noise which will make the area unusable for anyone but the quarrying company.
26. All amenity for people to enjoy the site will be lost.
27. I am a resident of Cookley, I live next door to the village school, noise carries a considerable distance, I can hear Mr Strong on his tractor in my garden, one tractor, if the quarry was in operation, it would be heard in Cookley, Lea Castle, Broadwaters, Wolverley and everywhere in between, at those distances it might be well be regarded as acceptable levels, but it will be a constant back ground noise for 10 years or longer, a continual daily drone, day after day, year after year.
28. This does nothing to protect and enhance the surrounding environment, it is a sudden and permanent degradation, there is almost a paradox going on here, we are building thousands of homes within 200m of the site, encouraging families to settle in the area, yet at the same time we are on the brink of allowing a massive quarrying operation within the vicinity, how can they be considered to be mutually acceptable concepts.
29. County and local authorities have all rejected the plan.

30. Drawing 01-LEACF-INQ_004. INITIAL WORKS

31. Whilst digging the hole for the quarry plant site and soil stripping it will make the route from point A to the entrance of Lea Castle Equestrian centre particularly unpleasant, especially as Bund 4 is being created, this bund will be a permanent fixture for the duration of the quarry at 3m high it completely shuts down the open aspect of the site, this bund turns the corner and runs into Bund 3, which is again 3m high and in place for the duration of the quarry.
32. Effectively there is a 3m(9 ft) barrier around the middle of the site which cuts the landscape in two.
33. NRS are keen to present the PROW's(additional 2km) , following on from Bund 3, part of the new PROW takes you between South Lodges and the quarry plant site, again there is Bund 1, 3m(9ft) in place, again for the duration of the quarrying operation, the plant driveway also cuts through the middle of Bund 1and Bund 2, 3m(9ft), it hardly makes this part of the new PROW a desirable place to pass through, a 3m high

barrier and a very busy quarry driveway to cross, this area so close to the machinery and lorries must be particularly dirty and dusty.

34. The PROW then extends along the perimeter of the historic Lea Castle wall, immediately adjacent to the ~Wolverley Road B4189 and following the Wolverhampton Road A449 back up to Castle Barns, both these roads are very busy especially at peak times, the PROWS are that close to these Roads, you might as well use the pavement, they are not suitable for horses or young children.
35. Part of the PROW that extends to the left of South Lodges to point B is also close to the Wolverley Road and unsuitable for horses and young children.

36. DRAWING : 01-LEACF-INQ_005 PHASE 1 WORKING RESTORATION

37. Phase 1 increases the number of bunds being constructed (Bunds 7-10)
38. Bund 7 is to be built exactly opposite the bungalow at Lea Castle Equestrian Centre, this will be 4m(12ft) high, this has been reduced from 6m in height to 3m in height. This reduction in height will not reduce the overall visual impact of this bund, another large object with a detrimental affect on the equestrian centre.
39. Bund 8 will be 5m(15ft) tall! Present for 3.5 years, A dominant presence in stark contrast to the surrounding landscape
40. Bunds 9 and 10, both 3m(9ft) high, bund 9 is next to the temporary diverted PROW and bund 10 joins it at 90deg to run along the main Lea Castle driveway.
41. The visual impact of this will be dramatic, as you approach from South Lodges, you will see bund 1 on the right at 3m tall and as you proceed a little bit further along the driveway you will be met with the towering presence of bund 3, running into now what would be a corridor (trench) between 3m high bunds on the left and right(bund 3 created at initial works stage)
42. At the same point you are sandwiched between the field hopper and the processing site, whilst traversing the underground conveyor.
43. There will be no openness, it will be the exact opposite of the definition, horses will terrified to traverse that part of the driveway because of the proximity to machinery and the confinement of the bunds, people will certainly not want be anywhere near it.

44. DRAWING 01-LEACF-INQ_006 – Phase 2 – WORKING AND RESTORATION

45. This involves the placement of straw bails around the phase 2 area, these bails also also fill the gap between bunds 12 & 13, no height is given on the drawing, so presumably these will be 3m tall. This now completes the enclosed corridor between the phase 2 site and the quarry plant site.

46. This phase also includes, the footpath being reverted to its original position and will run adjacent to bund 12, again 3m high blocking the openness of the field, with the scarred and infilled phase 1 area the other side.

47. DRAWING :01-LEACF-INQ_007. PHASE 3. WORKING RESTORATION

48. Bunds 13,14,15,16 are 3m(9ft) in height, some have been reduced in height by 1m, which is completely insignificant.

49. Bund 14 is constructed behind south lodges, so has an immediate impact as you enter the driveway, there are existing bunds on the right at 9m tall.

50. There appears to be a between the bunds 13-14 which doesn't show any barrier between the driveway and phase 3 extraction area.

51. Bund 15 is along the southern side of phase 3, and part of the proposed right of way follows alongside this bund, between the bund and the Wolverley road, creating an enclosed aspect, again not a desirable place to be.

52. The proposed right of way follows the contour of Bund 16 again creating a narrow corridor between the bund and adjacent woodland, not an open aspect.

53. DRAWING: 01-LEACF-INQ_008: PHASE 4 WORKING & RESTORATION.

54. Bunds 17 & 19 are built during phase 4 both at 3m high, again narrowing down the openness of the area, bund 17 will also be visible from the A449, changing the natural view from the road and as you travel down from Park Gate Road. A change in the open view from outside the quarry site.

55. DRAWING : 01-LEACF-INQ_009 : PHASE 5 – WORKING & RESTORATION.

56. At this point phase 4 and phase 5 areas are almost completely surrounded by bunds 3m tall and from a visual point of view completely shut off. All you will see is a continual line of embankment as you descend along the path from Cookley, until at the junction with the equestrian centre you see the supposedly restored and radically altered phases 1,2 & 3. The remaining bunds still remain along the east side of the driveway and hide the view looking east.

57. DRAWING ; 01-LEACF-INQ_011 CONCEPT RESTORATION

58. Previous evidence is still relevant

59. This is supposed to be of benefit to the local communities after 10/11 years of massive industrialised processing of sand and gravel, during which time the amenity will have had extremely restricted use.

60. A radically altered landscape that is nothing like what was there before, half of the site will be a hollow 5-15m below previous ground levels
61. Large sections of additional footpaths are adjacent to very busy main roads and are not a pleasant place to be, particularly unsuitable for horse riders.
62. As previously stated, we have grave concerns that the landowner will not maintain/manage the restoration appropriately, especially after responsibility transfers to him after 5 years, given his history of lack of engagement with the local communities and failure to engage with local authorities regarding issues with his land. This will further devalue the land and will exist only as a disused quarry.
63. The purpose of a green belt is to help prevent urban sprawl, protect native wildlife, and retain the character of rural communities. By quarrying this site and devaluing the land, leaves the area extremely vulnerable to urban sprawl and development.
64. The application for a further 800 homes has been submitted on green belt land on the opposite side A449 Wolverhampton Road, next to the already built Lea Castle hospital estate. It makes no sense to allow this application given its location to existing housing, new housing, and local schools.

Pocket Parks

Concept Restoration Drawing – 01-LEACF-INQ_011

Pocket parks have been promoted as a core part of the the final concept restoration plan.

Pocket parks are usually provided in urban areas to give people access to green spaces, for transforming unused or derelict (I think this tells us something about why pocket parks have been included in the restoration plan) land into inviting spaces for relaxation, exercise, socialising and play.

The five pocket parks are detailed on the concept restoration plan, I can only describe these as very small candles on top of an absolutely disgusting cake.

They are so small, they are irrelevant and will serve no purpose. Their size severely limits the range of activities and amenities they can offer.

As I have mentioned previously, after the five year post quarrying maintenance contract has expired the current landowner is then responsible for its upkeep they will not manage and maintain the pocket parks to any agreeable standard, they will become overgrown and unusable, eventually being lost. Maintenance costs money.

Given that the area is already a large open space which many people use for that reason, the parks would only be used infrequently, people are generally walking through the site as part of a circular route thought to Cookley and Wolverley.

The pocket park on the east side of **phase 1** is accessed by a proposed permissive bridle way is very small and it is a dead end and because if this would see little use.

The absolute minimum size for a pocket court is the size of a tennis court, they are usually bigger

The pocket park on the edge of **phase 3** is located adjacent to the Wolverley rd with all the inherent traffic noise , hardly a suitable place for a park, the proposed bridleway, leading to it is also next to the main road, totally unsuitable for horses.

There are two further pocket parks proposed along the main Lea Castle driveway , again limited in purpose because of their size, this is also a road for vehicles. The pocket park is cut through the

middle by the driveway.

Finally there is a pocket park on the north side, again I'm not sure what purpose if any this will serve.

The whole site is being promoted as an Agriculturally managed parkland, parkland implies that people will have access to the entire site, but the reality is access is limited to the periphery of the site , with a few sweeteners added in the form of very small pocket parks and additional low quality footpaths/bridleways.

The way the restoration is phased and promoted leads to the perception that as each phase is extracted it will be restored and usable by the community almost immediately, this is not the reality, it will take many years to grow and mature, including the pocket parks. Whilst quarrying is in operation on the site none of the restored phases will be usable or desirable places to be.

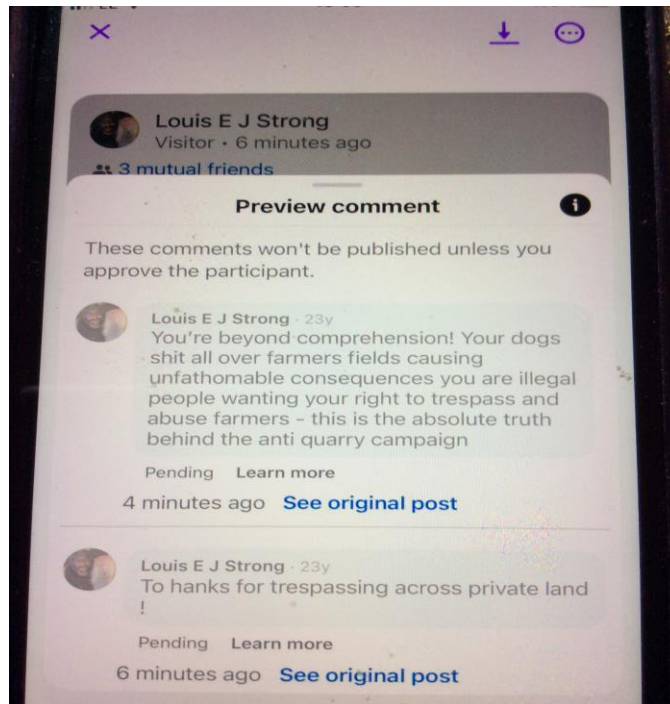
This will be a barren site and will eventually fall into complete dereliction, exposed for future exploitation.

We will have gone from grade one farming land to agricultural parkland, totally unsuitable for farming and just planted to make it look pretty.

The nett gain to all the local communities is zero

Appendix.

Recent post that the landowner's son tried to post on our Facebook group, the night of our recent public meeting(23/9/24). Relevant to management of restoration



From: Ian Hardiman <Ian.Hardiman@wyreforestdc.gov.uk>
Sent: Friday, January 27, 2023 8:09 pm
To: Matt Hartill <mattwh14@outlook.com>; Adrian Carloss <cookleyagainstthequarry@gmail.com>;
Lisa Jones <Lisa.Jones@wyreforestdc.gov.uk>
Cc: Marcus Hart <Marcus.Hart@wyreforestdc.gov.uk>
Subject: RE: Landslip Lane

Dear Mr Hartill,

Thank you for your email.

You are correct in believing that the landowner of the bank between the highway and the canal is choosing not to engage with the other parties who want to see this matter resolved; and correct in your thoughts that he is the applicant for the Quarry.

A new supporting wall and reconstruction of the roadway is required to allow re-opening to traffic of this lane. As the Parish Council are aware, I have frequently been chasing WCC for resolution and have in fact asked WCC's legal officers to consider Compulsorily Purchasing the area of land in question which they are presently doing.

This subject has been delayed unreasonably for the villages of Cookley and Wolverley; I assure you I will persist in my efforts to achieve resolution. I do agree with your points made in the latter section of your email.

Kind regards,

Ian H County Cllr.

Cllr. Ian Hardiman
Wyre Forest District Council,
Wyre Forest Rural Ward./
County Cllr. Cookley, Wolverley, Wribbenhall Division
01562 631139 / 07804 915327



Please don't print this email unless you need to.

From: Matt Hartill <mattwh14@outlook.com>
Sent: 26 January 2023 11:09
To: Ian Hardiman <Ian.Hardiman@wyreforestdc.gov.uk>; Adrian Carloss
<cookleyagainstthequarry@gmail.com>; Lisa Jones <Lisa.Jones@wyreforestdc.gov.uk>
Subject: External Email : Landslip Lane

This email originated from outside of the organisation

STOP : Were you expecting this email? Does it look genuine?

THINK : Before you CLICK on any links or OPEN any attachments.

Dear Mr Hardiman,

As resident of Lea Lane, please can you let me know the current progress of the repair.

My understanding is that the repair is being held up by the failure of the landowner to engage with the other parties involved.

Is the landowner the same landowner who is the applicant for Lea Castle quarry?

As you are aware Cookley Surgery is currently being extended, the pressure from traffic and parking will only increase.

The opening of Lea Lane make life a lot easier for all users concerned.

Regards

Matt Hartill

Sent from [Outlook for iOS](#)