



Resubmission Addendum  
Horn Crag Quarry  
A.D. Calvert Architectural Stone Supplies Ltd.

Document Reference: 232/5--R1.1 Resubmission Addendum



Minerals  
Waste  
Environment

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## Resubmission Addendum

### 1.0. Introduction

- 1.1. *The Mineral Planning Group Ltd. (MPG)* have been commissioned by *A. D. Calvert Architectural Stone Supplies Ltd. (Calverts)* to prepare a Planning Application and accompanying supporting statement for the re-opening of a dimension stone quarry at Horn Crag Quarry ('The Site'), near Silsden. The Site is a historic quarry, last worked in the 1980s. Quarrying has been recorded at The Site since at least 1853<sup>1</sup>.
- 1.2. A planning application was submitted to Bradford Metropolitan District Council (BMDC) in March 2022. Some Consultee comments requested additional studies be carried out and officers advised that they would move to determine the application before these studies could be completed. Therefore, the application was withdrawn on June 10<sup>th</sup> 2022 to allow enough time for the winter ecological studies that were requested by the Council to take place.
- 1.3. The following document is a brief summary of the additional information that has been prepared since withdrawing the original submission.

### 2.0. Ecological Studies

- 2.1. The Council's ecologist requested that additional surveys should be carried out including a detailed botanical survey during the growing season, a bat hibernation survey, a breeding and passage bird survey between March and September and a full badger survey. An Ecological Impact Assessment was also requested and has been included in Chapter 24 of the application.
- 2.2. These additional surveys did not change the conclusions drawn in the initial surveys carried out. The Ecological Impact Assessment (EclA) was produced after all ecological surveys had been carried out. The EclA recommended mitigation measures to be put in place before, during and after mineral extraction. The EclA concluded "*Given the implementation of the mitigations*

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<sup>1</sup> As shown on historic OS maps

[recommended] [...] *it is anticipated that the proposals will comply with the relevant policy and legislation relating to wildlife and ecology [and] will be able to address most significant effects resulting from the development*". The EclA reiterated the net-gain in biodiversity expected from the proposals.

- 2.3. The EclA recommends the production of a Biodiversity Management Plan and a Construction Environmental Management Plan which would be required by planning condition.

### 3.0. Biodiversity Net-Gain

- 3.1. The Council's biodiversity team requested an updated Biodiversity Net-Gain Calculation which would prioritise the retention and early creation, enhancement and protection of BAP habitats.

- 3.2. The biodiversity net-gain achieved through the proposed phased restoration and aftercare schemes is demonstrated in Chapter 21 of this Supporting Statement. In accordance with emerging guidance on applying Defra's biodiversity metric to minerals development, a 'snapshot' approach has been taken to calculate the change in biodiversity units throughout the duration of the proposed development. In August 2022 Defra published a document inviting "*Technical consultation on the biodiversity metric*", section 2.4 of which stated:

*"We are aware of the difficulties faced by minerals projects in accurately measuring biodiversity net gain. This is due to the nature of their phased approaches, unusual substrates, and long timescales. We are planning to add specific guidance in the metric user guide to help accommodate these. **This will allow for multiple stages of metric submissions for minerals developments. It could also provide greater scope for deciding appropriate multipliers with the local planning authority's agreement.**"* [Our bolding]

- 3.3. Whilst this mineral specific guidance has not yet been published, we have sought guidance from BSG Ecology, the ecologists liaising with DEFRA (through the Minerals Planning Association) on the snapshot approach, on how to apply the snapshot method to The Sites biodiversity net-gain calculation. The snapshot

approach takes into account the restoration phasing at The Site as well as the aftercare period. Applying the snapshot approach, the proposals result in a +21.42% net-gain in biodiversity upon the completion of aftercare.

#### **4.0. Highways**

- 4.1. The Council's highways officer requested a speed survey, taking into account wet weather speeds and demonstrating that the visibility spays proposed are appropriate for these speeds. The Transport Statement was updated subsequent to the speed survey and concluded that the proposals would be accommodated by the public road networks in the area.
- 4.2. The routing agreement has not been amended and HGVs would still not be allowed to pass through Silsden.

#### **5.0. Groundwater**

- 5.1. Environmental Health raised concern about the proposals impact on groundwater and local drinking water sources and directed the applicant to historic comments that were made on applications submitted in the 1980's. The historic comments made in the 1980's about quarrying at The Site were concerned about blasting and that the proposed scheme of working at the time went below the water table and would, therefore, impact the local groundwater regime. One of the recommendations the historic comments also made was that an alternative drinking water source should be provided to those whose drinking water source is the chamber in the west of The Site.
- 5.2. The proposals in this resubmitted planning application do not include blasting at The Site and the base of extraction would remain a minimum of 1m above the water table.
- 5.3. Prior to being privy to the historic comments made on old planning applications, The Applicant had offered alternative drinking water sources to the households supplied from the chamber in the west of The Site. The Applicant offered to pay for connecting them to the mains water supply as well as offering to drill an independent borehole. These offers have been declined. This offer was made

without prejudice to the hydrogeological assessments which demonstrate there would be no impact upon the existing water supply if the quarry were re-opened.

5.4. Consequently, it remains clear that the proposals have taken account of, and sufficiently addressed Environmental Health's comments on the planning applications submitted in the 1980's.

## 6.0. Landscape

6.1. The Council's landscape architect requested that two further views of The Site from the Cringles Caravan Park should be considered. The additional viewpoints were visited by the applicant's landscape architect in December 2022 when there was little to no leaves on the trees to ensure that the worst-case scenario was assessed.

6.2. The updated Landscape and Visual Appraisal concluded that whilst the proposals would result in a temporary adverse impact for close range views of The Site, overall it is concluded that the wider landscape would be able to successfully accommodate the proposals, in landscape and visual terms, without having an unacceptable effect or loss of landscape character or visual amenity.

## 7.0. Noise

7.1. Some concern was raised in regard to noise impact on the residential caravan park near to The Site as a result of the proposals. A noise impact assessment (NIA) was carried out to accompany the original planning application and has not been updated for resubmission. The NIA assessed a worst-case scenario that, realistically would not occur for prolonged periods. The worst-case scenario modelled would involve all five types of equipment all operating constantly at the same time. In reality, it is unlikely that more than one or two pieces of plant would be operational concurrently. Notably, the NIA included the operation of the crusher and screener which would only be required for a short period of time during the initial preparation of The Site.

7.2. **Any blasting has been removed from the proposals**, which addresses one of Environmental Health's noise consultee comment.

7.3. In regard to the concerns about the noise impact changing as the quarrying operations more northwards towards the caravan site, as outlined above, only one or two pieces of equipment and machinery would be operational at a time at this later stage. When quarrying operations are at their most northerly point, the highest noise impact on the caravan park is anticipated to be the brief period of soil stripping and initial quarrying, where equipment is at the top of the quarry face. However, the resultant noise impact of one or two pieces of machinery would be significantly less than what has been modelled in the NIA. Once quarrying on a phase has begun, the majority of the time equipment would be used below the original ground level, with the quarry face itself acting as a noise mitigation feature.

7.4. Consequently, should the proposals have a noise impact on sensitive receptors outside the worst-case scenario modelled in the NIA, it would be “not significant”.

#### **8.0. Dust Risk Assessment**

8.1. The Clean Air Team at Bradford asked for a site-specific dust assessment and a review of the dust management plan which have been carried out. However, in principle, the Clean Air Team had no objection to the proposals.

#### **9.0. Statement of Community Involvement**

9.1. Public consultation was carried out extensively for the withdrawn application, the results of which have been used to inform the preparation of this planning application.

#### **10.0. Conclusion**

10.1. This planning application is for a sandstone quarry at Horn Crag Quarry to the north of Silsden. This planning application is the re-submission of an application previously withdrawn on 10<sup>th</sup> June 2022. The withdrawal of the previous application allowed for winter ecological surveys to be carried out that had been requested by the Council.

10.2. Any reference to blasting has been removed.

- 10.3. The additional ecological studies requested by the Council were carried out and were used to inform the production of the EclA. The EclA concluded that “...*it is anticipated that the proposals will comply with the relevant policy and legislation relating to wildlife and ecology*”.
- 10.4. The Biodiversity Net-Gain calculation has been re-run using Defra’s metric 3.0 and takes into account emerging DEFRA guidance specific to minerals sites. This new metric calculation concludes that the proposals would result in a net-gain in biodiversity of +21.42% upon the completion of aftercare.
- 10.5. Updates to the Transport Statement and Landscape and Visual Appraisal were also carried out upon request of the Council. The Transport Statement concluded that the proposals would not have an unacceptable impact on the public highway network. The Landscape and Visual Appraisal concluded that whilst the proposals would have a temporary adverse impact on close ranging views of The Site, the proposed development would not have an unacceptable effect or loss of the wider landscape character or visual amenity.
- 10.6. The removal of blasting from the proposals along with the minimum standoff from groundwater of 1m and the Hydrogeological Assessment addresses all of the concerns raised with regards to the 1980’s environmental health comments.
- 10.7. The Noise Impact Assessment concluded that the impact of the proposals on sensitive receptors would be not significant even in the unlikely scenario where every piece of plant and equipment was operational at the same time.
- 10.8. As requested by the Council, a site-specific dust assessment and a subsequent review of the proposed dust management plan have been carried out.