

Ms Carole Howarth  
City of Bradford Metropolitan District  
Council  
Development Management  
Britannia House Hall Ings  
Bradford  
Bradford  
BD1 1HX

**Our ref:** RA/2023/145656/01-L01  
**Your ref:** 23/00829/MCF  
**Date:** 24 April 2023

Dear Ms Howarth

**RE-OPENING OF HORN CRAG QUARRY FOR THE PURPOSES OF RELEASING A  
PROVEN LOCALLY DISTINCTIVE BUILDING STONE RESOURCE.  
LAND AT GRID REF 405268 447763 FISHBECK LANE, SILSDEN, KEIGHLEY, BD20  
0NP.**

Thank you for your consultation on the above planning application.

### **Environment Agency position**

We have **no objections** to the proposed development subject to the following **conditions** being imposed on any planning permission granted.

### **Groundwater quality**

From a groundwater quality perspective we have reviewed the documents entitled:

- Planning Application Supporting Statement Horn Crag Quarry A.D. Calvert Architectural Stone Supplies Ltd. Document Reference: 232/5--R2.1- Supporting Statement 07/03/2023.
- Horn Crag Quarry Hydrogeological Assessment Report Reference: 3080/HIA Final January 2021, Hafren Water.

Both of these documents address the issue of the water table beneath the site, with Planning Application Supporting Statement Horn Crag Quarry A.D. Calvert Architectural Stone Supplies Ltd. Document Reference: 232/5--R2.1- Supporting Statement 07/03/2023, Section 3.8.4. stating that:

*"The maximum depth of extraction would be at least 1m above the water table. A Hydrogeological Impact Assessment (HIA) has been carried out (Chapter 8 of this application) which surmised that "impacts to the existing groundwater flow regime or groundwater levels are not predicted" provided that extractions stay above the water*

Cont/d..

table."

and Horn Crag Quarry Hydrogeological Assessment Report Reference: 3080/HIA Final January 2021, Hafren Water, Section 5.1 stating that:

*"All mineral extraction will be undertaken above the watertable. Consequently, impacts to the existing groundwater flow regime or groundwater levels are not predicted. There is consequently not considered to be any potential for impact upon the volume of water received at the spring collector water supply and mitigation measures are not proposed."*

and that:

*"Data on groundwater levels is limited to measurements made in the summer of 2019 and the scale of natural seasonal variation is unknown. Higher winter water levels are possible."*

Therefore, we are recommending the following pre-commencement condition, in order to properly establish the level of the workable base of the quarry, taking into account water levels during times of highest recharge:

**Condition:** The development hereby permitted may not commence until such time as a scheme for the monitoring of water levels and establishment of the highest anticipated water level has been submitted to, and approved in writing by, the local planning authority.

**Reason:** To ensure that the proposed mineral extraction, does not harm the water environment in line with Position Statement N7 of the 'The Environment Agency's approach to groundwater protection':

And the following condition:

**Condition:** The base and sides of the quarry shall be a minimum of 1 metre above the highest anticipated annual groundwater level.

**Reason:** To protect the quality of controlled waters in the local area, in line with Position Statement N7 of the 'The Environment Agency's approach to groundwater protection':

#### **Informative - Mining waste permit**

Redeposit of mineral (extractive) waste within the void would need a mining waste permit from the Environment Agency. There is a standard rules option available for inert extractive waste, which might be applicable.

#### **Advice to LPA and applicant – Groundwater quality**

For reference:

'The Environment Agency's approach to groundwater protection'

*N7: Developers proposing schemes that present a hazard to groundwater resources, quality or abstractions must provide an acceptable hydrogeological risk assessment (HRA) to the Environment Agency and the planning authority. Any activities that can adversely affect groundwater must be considered, including physical disturbance of the aquifer. If the HRA identifies unacceptable risks then the developer must provide appropriate mitigation. If this is not done or is not possible the Environment Agency will*

*recommend that the planning permission is conditioned, or it will object to the proposal.*

We welcome the statement in

Planning Application Supporting Statement Horn Crag Quarry A.D. Calvert Architectural Stone Supplies Ltd. Document Reference: 232/5--R2.1- Supporting Statement 07/03/2023 Section 3.2.9. that:

*"A restoration scheme has been included in this application in Chapter 7 and is represented on Drawing ref 232/5 - 7, however, a detailed restoration and aftercare scheme would be required by planning condition. **The restoration of The Site would not involve the importation of waste**, instead the restoration 3 The Mineral Planning Group Ltd. 01274 884 599 232/5 Horn Crag Planning Application Supporting Statement scheme would utilise mineral 'waste' 1 and retained soils from The Site. The restoration scheme would restore The Site to an upland heathland environment whilst avoiding single species / landform dominance and providing a long-term net-gain in biodiversity."*

#### **Advice to LPA and applicant - Waste**

It is recommended that the agreed CBI Extractive Materials Management Statement (EMMS) methodology is used to identify site specific amounts, of mineral overburden/interburden -certain to be used to reinstate the void (non -waste) and mineral waste.

#### **Final Comments**

Once again, thank you for contacting us. Our comments are based on our available records and the information as submitted to us.

Please quote our reference number in any future correspondence.

If you have any queries please contact me.

Yours sincerely

**Miss Michelle Kidd**  
**Technical Specialist**

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cc The Mineral Planning Group Ltd