Addingham Civic Society – Statement of Case for Horn Crag Planning Appeal APP\W4705\W\23\3332884

Addingham Civic Society (ACS) is a registered charity with 380 paid-up members and subgroups covering heritage, planning and the environment. It strongly objects to the proposal to re-activate Horn Crag Quarry on numerous grounds, already set out in 3 submissions made in the earlier stages of this planning process.

Of the many issues raised, impact on the hydrogeology (protection of local potable groundwater supplies) and the local and regional ecology are considered crucial. The appellant has not provided sufficient quality data as to the water table elevation beneath the site, nor the impact of accelerating "climate change". Measures to address these issues are covered in the accompanying 'Suggested Conditions" document.

Professor Rick Battarbee (<u>r.battarbee@ucl.ac.uk</u>), who leads ACS's 300 strong Environment Group https://addinghamenvironmentgroup.org.uk/). He is a Professor of Environmental Change at University College London, now retired, with Emeritus Status, living in Addingham. He will be submitting a further environmental proof of evidence accompanied by a summary map and will be representing ACS at the forthcoming Appeal.

The Environment Group has a very keen interest in protecting the local environment not just within Addingham Parish, but also in adjacent parishes. It is committed to tackling global problems of climate change and biodiversity loss, by raising awareness and by taking local action. Since its inception in 2016 it has built up a strong local knowledge base relevant to Horn Crag Quarry. It has completed 6 years of bird recording and four years of bird and butterfly recording using the expert input of over 30 local volunteers. It has also created mini wildflower meadows, planted over 3000 trees, received grants from many local organisations, including the Yorkshire Dales Rivers Trust, Yorkshire Dales Millennium Trust and Natural England, totalling almost £50,000.

The grant from Natural England called "Moorside Connections" was funded under its National Nature Recovery Network (NRN) Programme. It was directly concerned with nature protection on Addingham Moorside and involved a programme of training farmers and landowners to identify and record wildlife on land adjacent to Horn Crag Quarry.

The Group vigorously opposes the re-opening of Horn Crag Quarry on three environmental grounds:

1. The site lies within the "2.5 km Buffer Zone" of the internationally important South Pennine SPA, designated to protect ground nesting birds. We have special concern for curlew populations. This iconic bird, featuring in the logo of our local Golf Club and Wharfedale Naturalists Society, is a threatened species, with populations plummeting globally. It nests and forages on the moor and in the fields between Horn Crag Quarry and the moor. In the last four years alone, we have seen two nesting sites lost, one in the village itself and another in a field only one km away from the Quarry. In both cases the loss was due to a change in local land management and the subsequent disturbance.

- 2. The Horn Crag Quarry site is a "biodiversity hotspot", home to a range of protected species including badgers and amber-listed bird populations. It contains a mosaic of habitats that have developed naturally through re-wilding over the last 40 years. Brownfield sites such as this are of the utmost importance locally. They support a much richer biodiversity than surrounding agricultural land in the Green Belt. For example, a former school site in Addingham Village is the most important wildlife location in the locality and like Horn Crag, is a brownfield site that has rewilded over a 20 year period. The Group's monthly monitoring over the last four years, reveals that it supports the highest number of butterfly and bird species in the Village.
- 3. Habitats that have rewilded over decades cannot be quickly replaced by the creation of new wildlife areas, either on or off site, to create a "biodiversity net gain". The process of rewilding involves the slow generation of soils, micro-organisms and invertebrates plus progressive colonisation of these evolving habitats by plants and animals, where organisms by definition "live and grow in the right places". Net gain at Horn Crag cannot be attained until at least 40 years after the quarry operation ceases. Addressing our local, national and global biodiversity crisis cannot wait until the end of the century. Many species will be lost well before any gain can theoretically accrue at Horn Crag!

Addingham Civic Society – Suggested Panning Conditions & Limitations for Horn Crag Planning Appeal APP\W4705\W\23\3332884

Horn Crag is a dormant quarry which was worked and shut down decades ago, under an old mineral consent and which has undergone significant rewilding. Quarrying of building materials has moved on immeasurably since those days, with much greater emphasis placed on all on aspects of mineral working / restoration and its impact. Addingham Civic Society (ACS) believes that if this site was a greenfield proposal, it would stand little or no chance of receiving planning consent. Apart from containing potential dimension stone, it is located in a rural location, remote from a suitable road network, in a sensitive ecological, landscape and hydrological setting. Should the Inspector be mindful to grant this Appeal ACS would wish to see strict conditions and limitations imposed reflecting this situation.

- 1. Hours of working taking full regard to the quiet rural location.
- 2. Likewise, appropriate conditions with respect to noise, dust, road vehicle wheel cleaning, traffic movements etc.
- 3. Restrictions on open area and the range of products to be sold from site.
- 4. Given the close proximity of a potable groundwater water supply, the installation of a more comprehensive water monitoring regime with piezometers installed outside the proposed working area to facilitate water table monitoring throughout working, restoration and beyond. Frequency of monitoring to be agreed with the Environment Agency (EA).
- 5. One borehole to house a continuous water level data recorder to provide a much better handle on the relationship between precipitation and ground water level. Also, to monitor the increasing impact of "Climate Change" and its potential impact on the maximum depth of working. Following installation of the monitoring network a period of water monitoring should be agreed with the EA before the commencement of working.