



Rebuttal Proof of Evidence

By

Richard Pigott BA (Hons) MSc MRTPI

**CITY OF BRADFORD METROPOLITAN DISTRICT
COUNCIL**

**TOWN AND COUNTRY PLANNING ACT 1990
SECTION 78 APPEAL**

Horn Crag Quarry, Fishbeck Lane, Silsden

Appeal by Andrew Calvert

Ref: APP/W4705/W/23/3332884

Contents

1	INTRODUCTION	2
2	SCOPE OF REBUTTAL EVIDENCE	2
3	OVERALL SANDSTONE RESERVES IN BRADFORD AND SURROUNDING AREAS.....	2
4	AVAILABILITY OF COARSE-GRAINED MILLSTONE GRIT SANDSTONES	4
5	LIST OF APPENDICES	8

1 INTRODUCTION

1.1 My name is Richard Pigott. My qualifications and experience are set out within my main Proof of Evidence. The evidence within this Rebuttal Proof of Evidence which I have prepared and provide for this appeal is true and has been produced in accordance with the guidance of my professional institution. I confirm that the opinions expressed are true and professional opinions.

2 SCOPE OF REBUTTAL EVIDENCE

2.1 In this Rebuttal Proof of Evidence, I seek to address assertions made by Mr C Heffernan (on behalf of the appellant) in a Proof of Evidence relating to the appeal proposals on Horn Crag Quarry, Fishbeck Lane, Silsden (The Site). It should be noted that I am not seeking to rebut all of this evidence and the fact that I do not rebut all points should not in any way be taken that I accept that the evidence is correct.

2.2 My comments relate solely to Section 8 of the Mr Heffernan's proof and will be categorised under the following two topic headings:

- Overall sandstones reserve in Bradford and surrounding areas; and
- Availability of coarse-grained millstone grit sandstones.

3 OVERALL SANDSTONE RESERVES IN BRADFORD AND SURROUNDING AREAS

3.1 Mr Heffernan states, at paragraph 8.10 of his proof, that *"In summary, without the provision of any data to the contrary (such as an up-to- date building stone survey) but with clear evidence that several of the District's building stone sites have closed or can no longer make a significant contribution to building stone supplies, it is apparent that the District is not currently maintaining reserves of building stone as intended, and cannot demonstrate the level of indigenous building stone supply that it could upon adoption of the Strategy. It follows that*

there are insufficient reserves, and that new reserves will need to be consented, in order to comply with para 215 (formerly 209) of the NPPF.”

- 3.2** The lack of an up-to-date building stone survey is acknowledged. However, the picture in Bradford mirrors the national picture in that many quarries have closed in recent decades, and the number of active quarry sites has significantly reduced; however, several of the remaining quarries have been enlarged, with their activities/ output intensifying.
- 3.3** The 8 quarries referenced in the Core Strategy 2017 consist of the 7 listed in the Minerals Background Report & Evidence Report (2021) [06-04] at ‘Table 4.1: Active Mineral Extraction Sites in Bradford District’ plus Fagley Quarry which was active in 2017 but had closed down by 2021 following the grant of planning permission for a major housing and mixed-use scheme. Appendix A provides a list of active and inactive sandstone quarries in Bradford.
- 3.4** Whilst the appellant has highlighted, correctly, that a number of quarries have closed, this does not necessarily mean that the level of building stone output or the quantity of permitted reserves of sandstone have gone down, for two of reasons.
- 3.5** Firstly, the four quarries that have closed down had little in the way of reserves remaining. Bolton Woods Quarry, the largest quarry at 25 hectares, has been extensively worked and it was accepted by the council that limited economically viable sandstone reserves were remaining before planning permission was granted in 2020 for 700 dwellings. A similar situation is true of Fagley Quarry, albeit this was a significantly smaller quarry. It is unclear why Hainworth Shaw Quarry near Keighley appears to have been mothballed, although aerial images indicate that there has been very little activity for 15 years, suggesting that remaining reserves are limited and/or that further extraction is not economically viable. The only other quarry to have closed, Apperley Lane Quarry (also known as Rawdon Quarry), was very small at only 0.17 hectares.

3.6 Secondly, there have been additional reserves of building stone (block) added through the granting of planning permissions for extensions to existing quarries at the following sites. Note that a conservative figure of 20% building stone (block) has been used out of the total mineral extraction figure presented for the following sites

- Naylor Hill Quarry extension to existing quarry (18/03635/MAF) = 100,000 tonnes of building stone (block) (Millstone Grit Group)
- Hallas Rough Quarry (21/01149/MAF) = 140,000 tonnes of building stone (block) (Millstone Grit Group)

3.7 In summary, whilst the number of sandstone quarries has indeed reduced, those that have closed had limited reserves remaining and have been supplemented by new consents for Naylor Hill Quarry and Hallas Rough Quarry, both of which are operational. It is therefore incorrect to conclude that the District is not currently maintaining reserves of building stone, as intended by policy EN10.

4 AVAILABILITY OF COARSE-GRAINED MILLSTONE GRIT SANDSTONES

4.1 The following assertions are made in Mr Heffernan's proof on the issue of scarcity:

- paragraph 8.2 - *"both flag stone and building stone (from the north of the district) are identified by the council as being scarce resources."*
- paragraph 8.7 - *"It follows that there are no active mineral sites capable of supplying the, scarce, building stone materials Horn Crag would provide. The highly localised variance in Millstone Grit Units is recognised in the Core Strategy's direction to enable a 'range' of deposits to be selected during the plan period."*

- Paragraph 8.8 – reference is made to Paragraph 3.4.12 in the latest BMDC Minerals Background Paper and Evidence Report prepared in 2021 which notes “The scarcity of supply of coarse grained ‘gritstone’ walling, suitable for use in settlements to the north of the district, and stone slate roofing are particularly highlighted”;
- Paragraph 8.55 – *“The principal benefits of the appeal scheme are the provision of a locally distinctive natural building stone which is needed by the construction industry”*

4.2 In response, I would make the following points. According to the Historic England Publication titled ‘Historic England 2023 West and South Yorkshire. Building Stones of England’ (2023)¹, *“Topographically, the two metropolitan counties of West Yorkshire and South Yorkshire can be divided relatively simply into northern and western areas of high moorland, underlain by the coarse-grained, sandstone-dominated succession of the Millstone Grit Group. A central area of low-lying ground is underlain by the mudstones, finer grained sandstones and coals of the Pennine Coal Measures Group (forming the Yorkshire Coalfield) and, along its eastern margin, a relatively narrow north to south strip of red sandstones, mudstones and pale yellow-coloured dolostones (dolomitic limestones) of Permian and Triassic age.....Buildings within these centres, both domestic and industrial, are still largely characterised by their use of locally quarried building stones.”* It is clear from the document that “the coarse-grained Millstone Grit sandstones” have been used extensively throughout West and South Yorkshire in the construction of some of the most important and historic buildings in the area.

4.3 According to the Stratigraphic Table on page 3 of the document, the Millstone Grit Group is made up of 6 formations and within these formations, around 20-30 different types of building stone are identified. The Silsden formation,

¹ <https://historicengland.org.uk/images-books/publications/building-stones-england-west-south-yorkshire/bse-west-south-yorkshire/>

consisting of Marchup Grit, Red Scar Grit, Nesfield Sandstone and Lower Follifoot Grit, is discussed as follows: *“The Marchup Grit was quarried and used in and around Addingham, whereas the Nesfield Sandstone and Lower Follifoot Grit were quarried and used in and around Silsden. Lower Follifoot Grit sandstone was also quarried at Cockett’s Quarry for extensive use in the construction of Harewood House near Leeds and its associated village buildings in the 17th and 18th centuries. Subsequently, a new quarry in the sandstone at Rawden Hill was opened in the 19th century and it was used extensively in the construction of Leeds Town Hall.”*

4.4 Middleton Grit/Horn Crag stone is absent from the table, although Middleton Grit is mentioned on page 4 where it states that the stone was used in the construction of the Roman Fort at Ilkley.

4.5 With reference to the Historic England ‘Building Stones Database for England map explorer’², a search for ‘Middleton Grit’ returned one quarry where the mineral is found (Cringles Top Quarry). This quarry, a short distance to the north of the appeal site, is understood to have closed at least 20 years ago.

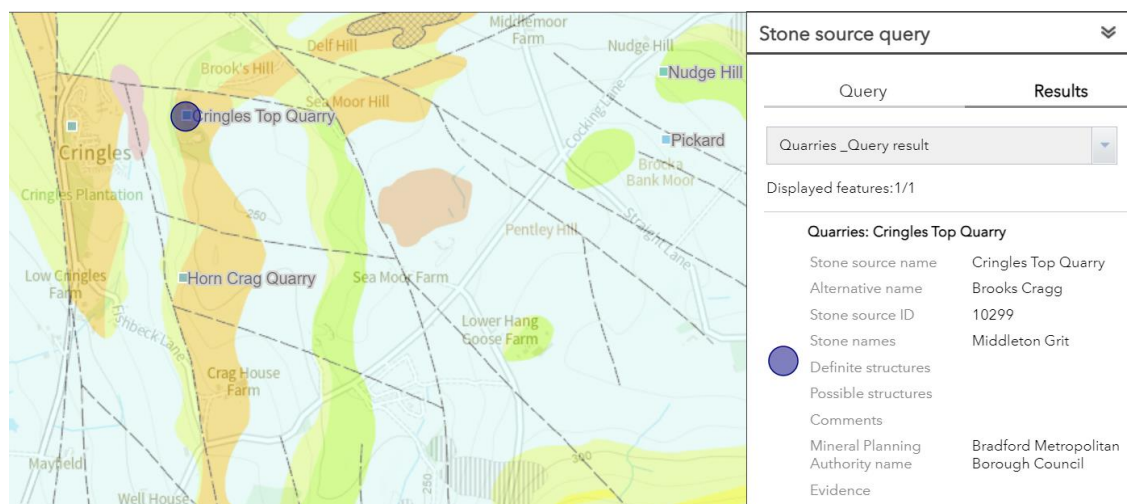


Figure 1 - Screenshot showing search for the stone 'Middleton Grit' on the Historic England Building Stones Database

² <https://historicengland.maps.arcgis.com/apps/webappviewer/index.html?id=3cfbcf7a243044868db25dad9555a50c>

4.6 Similarly, 'Horn Crag Stone' returned one result, Horn Crag Quarry itself, which last yielded stone around 40 years ago.

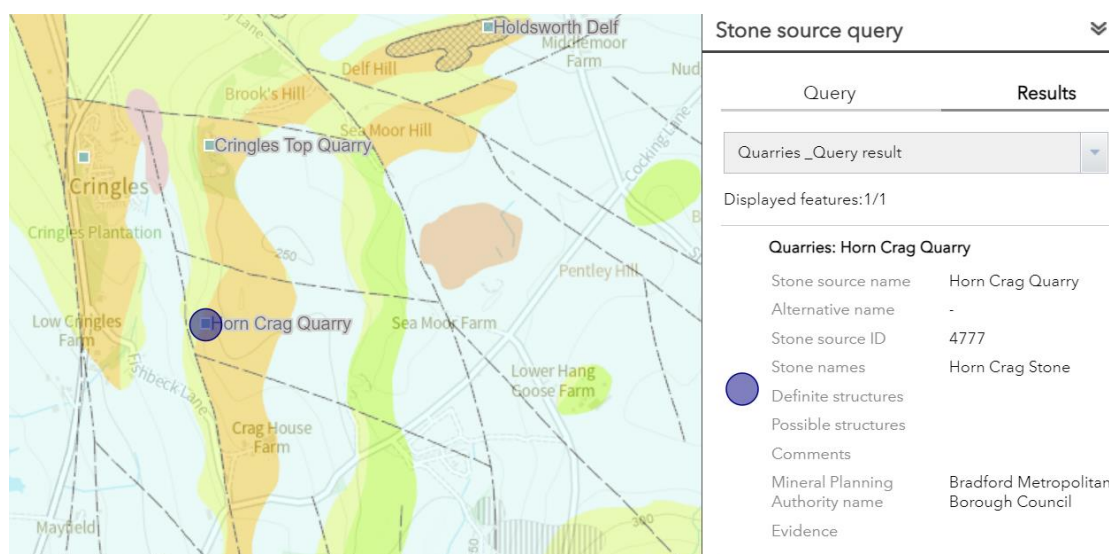


Figure 2 - Screenshot showing search for the stone 'Horn Crag Stone' on the Historic England Building Stones Database

4.7 A search for 'Millstone Grit', on the other hand, returned 168 quarries. In addition to those in the Bradford district which remain open (Bank Top Quarry, Branshaw Quarry, Naylor Hill Quarry and Hallas Rough Quarry), a number of quarries extracting Millstone Grit remain open in neighbouring Yorkshire authorities, as set out in Appendix B 'List of existing Operational Sites in West Yorkshire for Millstone Grit building stone'.

4.8 This demonstrates that Millstone Grit is readily available within a reasonable distance of the appeal site. Whilst the subtle variations in colour referenced by Mr Heffernan are noted, I have caused enquiries to be made of a number of quarry operators/ stone vendors about whether it was possible to purchase Middleton Grit. None of them were aware of the Middleton Grit type of stone. Notes of the specific conversations are included at Appendix C.

4.9 From this I conclude that there is no pressing or demonstrable need for the Middleton Grit/Horn Crag Stone sub-type of stone. This is further reinforced by

the fact that Middleton Grit/Horn Crag stone has not been quarried for at least 20 years (at Cringles Top Quarry), without any evidence of a supply problem.

4.10 Whilst the local extraction of this type of stone would be preferable, it should not be permitted at any cost given the environmental harm the council have identified. It is also noteworthy that, as part of the appeal proposal, all processing of dimension stone would take place off-site at the appellant's processing yard in Leyburn, North Yorkshire which is a journey of at least 40 miles by road (or around 60 miles if predominantly A roads are used). The stone will then, it would appear, be brought back to the Silsden area for use in construction projects.

4.11 With reference to paragraph 8.8 of Mr Heffernan's proof, my reading of paragraph 3.4.12 of the Minerals Background Report & Evidence Report (2021) is that there is a shortage of quarries in the district supplying coarse grained 'gritstone' walling. In other words, it would be preferable if these stones came from local quarries. However, there is not a particular scarcity of supply of Millstone Grit and although the report notes concerns about importing stone from outside the district it has in practice been possible to find suitable stone.

5 LIST OF APPENDICES

- Appendix A – Active and inactive sandstone quarries in Bradford

- Appendix B – List of existing Operational Sites in West Yorkshire for Millstone Grit building stone

- Appendix C – Notes of enquiries made to a number of quarry operators and stone vendors about Middleton Grit

Appendix A - Active and inactive sandstone quarries in Bradford

Site	Grid Ref	Mineral	Geological Formation	Site Area (ha)	Status	Comments
Bank Top Quarry, Bingley	SE091374	Sandstone	Millstone Grit - Rough Rock (Yeadonian)	13	Active	
Bolton Woods Quarry, Bradford	SE162364	Sandstone	Coal Measures - Elland Flag (Langsettian)	25	Inactive for building stone	Outline planning permission granted for 700 dwellings in 2020. Flag stones only now
Branshaw Quarry	SE032401	Sandstone	Millstone Grit - Woodhouse Grit (Marsdenian)	5.8	Active	
Fagley Quarry	SE187352	Sandstone	Coal Measures - Elland Flag (Langsettian)	4	Inactive	Quarry closed due to residential redevelopment (some 600 units)
Hainworth Shaw Quarry, Keighley	SE067389	Sandstone	Millstone Grit - Rough Rock Flags (Yeadonian)	7.9	Inactive	Appears to be closed
Naylor Hill Quarry	SE040364	Sandstone	Millstone Grit - Woodhouse Grit (Marsdenian)	6.1	Active	Significant extension granted for 100,000 tonnes of building stone (block) (ref. 18/03635/MAF)
Ten Yard Lane Quarry	SE081340	Sandstone	Coal Measures - Elland Flag (Langsettian)	5.6	Active	
Apperley Lane Quarry (also known as Rawdon Quarry)	SE198391	Sandstone	Millstone Grit - Rough Rock Flags (Yeadonian)	0.17	Inactive	Apparently closed
Hallas Rough Quarry	SE056357	Sandstone	Millstone Grit - Rough Rock Flags (Yeadonian)	2.6	Active	Planning permission granted (ref (21/01149/MAF) to extract remaining 140,000 tonnes of building stone (block). Extraction has now restarted

Appendix B – List of existing Operational Sites in West Yorkshire for Millstone Grit building stone

Leeds City Council

Existing Operational Sites producing Millstone Grit building stone

Quarry	Stone
Hawksworth Quarry - off Odda Lane, Hawksworth, Guiseley, Leeds LS20 8NZ	Rough Rock Flags
Blackhill Quarry - off Kings Road, Bramhope, Leeds LS16 8BG	Midgley Grit
Moor Top Quarry - off Moor Top / Moor Lane, Guiseley, Leeds LS20 9NU	Guiseley Grit

Calderdale Council

Existing Operational Sites producing Millstone Grit building stone

Quarry	Stone
Rock End Moor Delph, Higher Eastwood	Lower Kinderscout Grit

Kirklees Council

Existing Operational Sites producing Millstone Grit building stone

Quarry	Stone
Crosland Hill Quarry, Crosland Hill, Huddersfield, West Yorkshire, HD4 7AB	Rough Rock
Moselden Quarry, Saddleworth Road Moselden Heights	Midgley Grit
Hillhouse Edge Quarry, Cartworth Moor Road, Holmfirth	Huddersfield White Rock
Windy Ridge Quarry, Cartwoth Moor Road, Holmfirth	Huddersfield White Rock

Appendix C – Notes of enquiries made to a number of quarry operators and stone vendors about Middleton Grit

The following is a record of conversations in early February 2024 about whether it was possible to purchase Middleton Grit.

Visit to Blackhill Quarry, off Kings Road, Bramhope, Leeds LS16 8BG: Friday 2nd February 2024

Called into Blackhill Quarry operated by Mone Brothers and spoke to Kevin Mone. He said he has been in the business for 35 years but has never heard of Middleton Grit stone. He told me that they quarry millstone grit at Blackhill Quarry but they don't cut it to shape there, that is done by another company at Wetherby. I spoke to the Wetherby outfit (Ericulis Stone Sales - Richard) and he advised that he could match any grit stone if he could see the stone in question. He also wasn't aware of a sub category of stone called Middleton Grit stone though he has been in the business for 40 years. He said it might be reference to stone from a particular quarry.

Telephone enquiries made about Middleton Grit stone ("MGS"): Monday 5th February 2024

Northern Stone Sales 01274 722000

Spoke to Tony 40 years in the business and never heard of MGS

GLM Yorkshire 01484 663766

Spoke to Evette 30 years in the business they don't do grit stone but never heard of MGS

Whitehall Stone Sales 01274 684440

Spoke to Melvin 30 years in the business who has never heard of MGS

Abacus Stone Sales 07711 997026

Spoke to Rachel who had Alan alongside her (Alan been in business for 30 years plus). They don't do grit stone but never heard of MGS

R G Stone Sales 01943 873409

Spoke to Rebecca said she has heard of it but they don't do it and doesn't know who does.

Jowett Stone 01422 247300

Spoke to Kerry, who spoke to Tom who been 30 years in the business thinks the name MGS probably refers to a quarry with Middleton in its name. Said there was such a quarry near Wakefield with Middleton in its name but now closed.