

PLANNING SUSTAINABILITY STATEMENT (PSS)

1 Context and Overview

1.1 In general terms, the proposal seeks to use the existing Seiont quarry (the Site) in connection with the construction of the proposed A487 Caernarfon to Bontnewydd by-pass. There is an existing mineral planning permission on the Site, with a working period approved until 2042.

1.2 The proposal consists of number of inter-related elements, including:

- Temporary activities associated with the by-pass construction: a secure contractor's compound with offices, welfare facilities and car parking for personnel; a fuel store; a building to service plant and a plant washing facility. These would remain on the former brickyard for 2 and 7 years;
- Processing of minerals and mixing of concrete ('batching plant');
- Export of fill from the Site to construct the by-pass, and import of materials excavated from the by-pass. Seiont Quarry has proved to be the best option, significantly as it adjoins the proposed by-pass and will satisfy most of the minerals requirements of the scheme;
- Formation of a new, vehicular access road leading into the quarry from the by-pass construction site, and provision of a temporary weighbridge, located near this road.

2 Purpose and structure of the PSS document

2.1 This Planning Sustainability Statement (PSS) has been prepared to accompany the planning application for the Seiont Quarry project, which is described in detail in the related Environmental Impact Assessment and Design and Access Statement.

2.2 The purpose of this PSS is to identify the main land use sustainability factors and set out how the development is capable of achieving a range of related sustainability objectives.

2.3 The first part of the PSS sets out the main site characteristics. The second part appraises the sustainability of the project.

3 Site characteristics: designations

Flood Risk

3.1 Parts of the site are within a flood zone, as defined by the Welsh Government (WG) Development Advice Maps (DAMs) and the Natural Resources Wales (NRW) flood risk maps. The potential for risk could include floods from Tidal; Surface Water; Groundwater; Sewers and Artificial Sources. Developments which include flood zone are controlled through the planning system.

World Heritage Site or Buffer Zone

- 3.2 The site lies within 1.3 km of the designated Caernarfon Castle World Heritage Site, but is not visible from it.
- 3.3 In relation to the tentative Gwynedd Minerals World Heritage Site, no details are available to confirm the precise extent of relevant boundaries, distances or buffer zones. However, the proposal site is remote from the slate quarrying valleys listed in this tentative designation.

National Landscape Designations

- 3.4 The site lies within 5.7 km of the Snowdonia National Park and is remote from other national landscape designations, for example Areas of Outstanding Natural Beauty.

4 Designated and protected habitats and species

- 4.1 No statutory nature conservation designation lies within or directly adjoins the site.
- 4.2 There are three international sites within 5km of the Seiont Quarry Site (namely Menai Strait and Conwy Bay; Abermenai to Aberffraw Dunes; Glannau Mon: Cors heli / Anglesey Coast Salt marsh) with one additional SAC (Glynllifon) just over 5km from the site. There are five SSSIs within 5km of the Seiont Quarry Site; another (Glynllifon) lies just over 5km from the site.
- 4.3 Local Wildlife Sites are a non – statutory designation. Excluding geological sites, 18 candidate LWS exist within 1km of the Seiont Quarry site.
- 4.4 A large area of mature broadleaved woodland to the south of the Site is an Ancient Woodland, protected by a Tree Preservation Order (TPO) which is identified as 'TPO108 at Schofields Site, Caernarfon', designated on 18th March 1992. The designation description identifies the site as 'A large area of semi – mature, broad leaved trees, comprising of mainly Sycamore and Oak'. Adjoining the site, a large mature oak tree (next to a stone wall in the improved grassland fields to the north of the quarry) is covered by a separate TPO (No.611).
- 4.5 An area on the easterly edge of the quarry void is designated as a Regionally Important Geodiversity Site (RIGS).
- 4.6 The site's combination of pond, woodlands and river corridor provide a mosaic of habitats which have national and locally important biodiversity value.
- 4.7 One known bat roost exists within the site. This is a lesser horseshoe bat hibernation roost with a maximum known count of 23 bats, within the basement of an abandoned old building, to the south of the main brickyard.

5 Topography and land

- 5.1 Paragraph 10.5. in the EIA provides a detailed description for the site. Until the late 20th Century the quarry floor was just above river level, but excavation downwards,

following the clay into the quarry floor, deepened the void to approximately 13 metres below river level.

Best and most versatile Agricultural Land

- 5.2 The EIA confirms that the site lies within Grade 4 of the Agricultural Land Classification for England and Wales. Grade 4 is defined as 'land with severe limitations due to adverse soil, relief or climate, or a combination of these. Adverse soil characteristics include unsuitable texture and structure, wetness, shallow depth, stoniness or low water holding capacity. Relief and climate restrictions may include steep slopes, short growing season, high rainfall or exposure. Land in this grade is generally only suitable for low output enterprises. A high proportion will be under grass, but there may be occasional fields of oats, barley or forage crops.

Mineral Reserves

- 5.3 The clay quarry has been excavated for many years and the existing permission will allow extraction until 2042. Investigations for the existing minerals permission suggested that the reserves of clay go considerably deeper than the existing levels. One side of the Quarry bowl includes a mound of glacial sand, gravel, pebble and clay placed along the south bank of the River Seiont.
- 5.4 The geotechnical information includes significant evidence of recent and ongoing slope instability, indicated by slumped soils, tension cracks, slips and scarps. The area of instability appears to extend across a face of approximately 160 metres on the north-east side of the quarry bowl. Anecdotal evidence is available that instability was recognised during the 2000 'Review of Old Planning Permissions' (ROMP) submission for the site. The exposed quarrying and overburden faces have weathered and areas of vegetation have established.
- 5.5 Following extraction of the clay required for the by-pass, the quarry would be restored within 5 to 10 years.

6 Built Environment

Sensitive buildings

- 6.1 The ES identifies the location, number and significance of listed buildings, ancient monuments, historic parks, and archaeological sites. 36 heritage sites are noted as within the site or the immediate surrounding area. These include houses, farms and other buildings, gardens, walls, crop marks, a former railway, a former clay pits and other industrial features.
- 6.2 The listed buildings nearest to the site include Bryn Eglwys house and buildings, close to the easterly edge of the quarry site. The nearest Park (Morfa Common) is adjacent to the Caernarfon and Union Work House, which adjoins the River Seiont to the west of the site.

Highways Capacity

- 6.3 The proposal establishes the existing permitted quarry as a baseline for any comparisons. The quarry has the potential to continue to be used for mineral extraction until 2042, with no limits on extraction quantities or the number of vehicles that could use the existing Ffordd Felin Seiont to enter and leave the quarry works.
- 6.4 Ffordd Felin Seiont splits into two separate access routes; one, using the existing small bridge over the River Seiont, directly serves the main Quarry site. The second route, with a locked gate, serves the brick stacking yard to the south of the main Quarry site, and passes a number of residential properties.

7 Appraising the Sustainability of the proposal

Biodiversity

- 7.1 The EIA focuses on a total of nine specific biodiversity sites (primary designations) which are largely related to plants and habitats. As the site is not hydraulically connected to these sites, and is too far away for impacts from dust deposition to affect sensitive plants and bryophytes, further consideration was unnecessary. Those sites that are designated for mobile species (widgeon and lesser horseshoe bat) were considered to lie sufficiently distant from the site and were unlikely to be significantly dependant on or affected by the Site proposals.
- 7.2 Rhyddallt-bach candidate Local Wildlife Site lies partly within the area covered by the EIA. The overlapping area is the former brickyard west of the River Seiont. There will be no excavation within the Root Protection Area of existing trees within the brickyard, and normal good practice protection measures will be implemented. This approach would ensure that the impacts of the development are unlikely to affect significantly the integrity of the cLWS.
- 7.3 Whilst the loss of the quarry sump will change habitats, the proposals for creation of a shallow waterbody in the former brickyard will provide permanent compensation through habitat creation in the restoration phase of the project. Consequently, the changes contribute to the long-term integrity of the site, being replaceable and / or reversible over time.
- 7.4 The lesser horseshoe bat hibernation roost (adjacent to the brickyard) will remain unchanged, and works have been planned and managed to avoid causing disturbance to the hibernating bats. Mitigation measures incorporated into working method statements will lead to no significant impact. No modifications will take place on the river corridor, which will be a key foraging and commuting route. Implementing a lighting strategy will ensure that artificial lighting is kept to a minimum and directed away from habitat features, such as hedgerows and woodland edges, which may be used by bats.
- 7.5 Overall, given the context of the site as an established Quarry with an existing minerals permission, the ES concludes that the ecological impact is limited to a 'low to medium'

impact. Mitigation measures are set out in the ES, with confirms that the proposals would have a minor impact on species and habitats.

Land use

- 7.6 The site includes an existing quarry, and the current proposal limits the permanent change of land use to the new haul road only. The final restoration proposal is intended to provide additional new land uses, for example, an amenity area west of the river, alongside surrounding, existing land uses. Whilst the construction stage will inevitably bring a temporary period of significant change to the site, this is predominantly linked to the construction phase for the planned new bypass.

Water Quality and resources

- 7.7 Foul water disposal will be via the existing sewer links, using the same connection as the previous brickworks factory on the site. Surface water from the car parking area and temporary buildings will be discharged via natural infiltration along the fringes of the concrete yard. The batching plant will stand within a bunded area and wash-out water will be contained and recycled. Plant storage and the plant maintenance shed will drain into the existing quarry sump or the existing attenuation basin on the south-western edge of the concrete paved yard. The fuel storage and re-fuelling facility will be fully bunded and will drain via a fuel interceptor.
- 7.8 Groundwater will not be affected, due the existing impervious surfacing and measures to contain silt and any spilled hydrocarbons.
- 7.9 The proposal will include suitable mitigation measures to remove and terminate sources of pollution and pathways for potential water pollution. These measures will include settling lagoons for turbid surface water; bunding of fuel storage; use of modern, well-maintained construction plant and careful handling of ground materials from made ground and imported fill.

Waste management

- 7.10 The proposal considers waste management.
- 7.11 In line with the national Waste Hierarchy approach, and more recent legislation and guidance, options for surplus and used materials have been considered in sequence. The proposal contributes to the recycling and re-use of materials derived from the adjacent by-pass construction, from mineral stockpiles and from brick stockpiles at the site. Some material can be made suitable for use in the by-pass project, other material will be used in the engineering operation to fill the quarry sump. A minimal quantity of material will be disposed in licensed landfills.
- 7.12 These proposals, in-conjunction with the bypass construction works, will lead to minimal waste production. All waste will be managed under a site waste management plan which is to be produced.

Resources and raw materials

- 7.13 The proposal is limited to the use of an existing clay quarry containing permitted reserves.
- 7.14 Aggregates for the concrete production could be sourced directly from Seiont quarry, or delivered to the Seiont Quarry from an alternative site. Suitable minerals available at Seiont will be processed and used as sand and aggregate in the concrete batching plant.

Population and human health

- 7.15 During the initial establishment and extraction phase in the quarry, and the commencement of by-pass construction, an increase in site personnel and associated deliveries to the site compound will occur. It is understood that the construction staff will be drawn predominantly from North Wales. Construction Health and Safety is the primary priority of the project, and so the effect on existing health service provision will be negligible.
- 7.16 The proposal will comply with all related legislation and consents in order to safeguard and protect the setting, adjacent householders and commercial properties. The accompanying EIA sets out the relevant guidelines covering noise, dust, emission and traffic impacts. For example, one of the key recommendations, in relation to limiting the noise potential, is the use of noise attenuation bunds in two areas within the existing Quarry site. This is detailed in the accompanying plans.

Equality

- 7.17 The majority of the works forming the proposal are mineral, excavation and engineering works within an existing, consented quarry site. As described in the ES and DAS, all structures, buildings and plants are temporary measures linked to the construction of the by-pass only. Consequently, the proposal is unlikely to raise any of the equality concerns which are normally connected with permanent changes of use of land and construction of buildings and structures. However, the DAS highlights that every opportunity will be taken to ensure that where public / visitor access is appropriate, access and facilities will be designed for use by all members of the community.
- 7.18 The remainder of the site, including the haul road, will remain as restricted access for safety, and will be designed for construction staff use only. No public footpath diversions are suggested as part of this proposal and so no equality effects will arise. Public footpaths which require diversions as a consequence of a bypass route will normally be considered as part of the relevant Inquiry consents process.

Economy

- 7.19 Although this proposal is related to the proposed by-pass which has its own economic effects, the scope of works within the proposal is considered unlikely to stimulate significant, economic benefits. Any potential economic advantages would be limited

to a temporary increase /demand for local and ancillary services, such as food and catering; overnight accommodation for meetings connected with the site. Long term site restoration measures could provide a local attraction and economic benefits.

Air Quality

- 7.20 The ES confirms that the air quality in the vicinity of the quarry is generally very good.
- 7.21 Occurrences of dust in the quarry will be limited and of short duration and will be minimised by implementation of dust control measures. Increased HGV and plant exhaust emissions in the quarry would not increase air pollution above Air Quality Objective annual daily average thresholds. The proposed operations in the quarry would be completed by the time traffic uses the proposed by-pass.

Landscape, townscape and visual impact

- 7.22 The ES landscape assessment covers indirect and direct landscape impacts, and the potential effects of lighting features.
- 7.23 Whilst the EIA assessment concludes that there are no direct or significant indirect impacts on designated landscapes, some limited changes in landscape impact would take place in areas located within the non- designated landscape areas. These are generally limited to the Local Character Areas (LCAs) identified as LCA 5.10 Afon Seiont Lowland Valley, LCA 5.11 Caeathro Rolling Lowland, LCA 5.6 Caernarfon 19th Century Settlement and LCA 5.8 Caernarfon Modern Settlement. LCA 5.8, identified as an area of high landscape sensitivity, would experience a significant adverse impact.
- 7.24 The EIA states that some of the residential properties with existing views of the quarry are likely to experience some adverse impacts during the construction phase. In the long term, landscape restoration works mean no significant visual impacts for residents.
- 7.25 No significant visual impacts from lighting are predicted.
- 7.26 Taken together, the proposal with the proposed bypass would not contribute towards a significant cumulative detriment at the LCA level; the proposed by-pass would generate a significantly-different impact, in particular to scattered dwellings in the Caeathro, Llanbeblig and eastern fringes of Caernarfon. It is understood that mitigation works for the by-pass would screen and integrate the views from Caeathro; and the proposal, together with the quarry restoration measures, would lessen the impacts.

Archaeology and cultural heritage

- 7.27 The ES confirms that the majority of archaeological sites will experience no change in conditions. There is a possibility of minor alteration to one or more characteristics such as the setting, with none experiencing significant impacts. Suitable mitigation, for example landscape planting and restoration of the quarry, will address the

potential adverse impacts on setting. An Archaeological Watching Brief and recording would be maintained in the critical areas during excavation.

Soil and geology

- 7.28 Paragraph 10.4 of the ES provides a description of the existing site, confirming that the overburden is made of glacial sediments. Beneath the overburden lie deep reserves of Ordovician clays which made up the hill. This clay has been quarried to a depth of around 50 metres, but investigations suggest that the reserves of clay go considerably deeper.
- 7.29 The Quaternary sediments in the best condition are those in the south-western corner of the quarry and these have been designated as a Regionally Important Geodiversity Site (RIGS)ⁱ. However, the advice from experts is that the geological interest has been substantially destroyed by previous quarrying activity.

Noise

- 7.30 The existing mineral's consent includes noise limits (relative to measured background noise at the closest sensitive receptors) which are applicable to current site operations. The sensitive receptors are private residential properties, and the Ysbyty Eryri hospital (and adjacent care home) which is located to the west of the site.
- 7.31 The EIA states that the worst-case noise generated by operations during all anticipated phases of the development are predicted to be at or below the adopted noise limits at all identified receptor locations.
- 7.32 Features incorporated into the design of the site, and a number of good site practices, will aid in the mitigation of noise.
- 7.33 It is therefore concluded that noise should not pose a significant constraint for the proposed development.

Traffic and transport

- 7.34 The ES concludes that the proposal would provide the by-pass project with the required fill and deposition of surplus materials with only a negligible increase in HGV traffic on the A487. It would avoid a significant (172%) increase in the average daily movement of HGV traffic on the A487 in 2017 and 2018. In some months the increase avoided would be much higher.
- 7.35 The compound and the A487 at Pont Seiont roundabout would increase, but the total for the duration of the bypass construction would be comparable with the numbers that might be expected if the quarry was brought back into full-time use for brick manufacture or other mineral extraction.
- 7.36 Parking outside the site boundary should not be affected given that overall number of parking spaces and accompanying layout takes account of the expected number of site personnel.

Flood risk

- 7.37 The accompanying Flood Consequences Assessment (FCA) identifies that the brickyard (in the south-west), the quarry void and an isolated low point in the north-western corner of the site, are shown to flood with depths exceeding the TAN15 guidelines. Excavation will restore floodplain capacity, and no new development is proposed within the brickyard or the isolated low point.
- 7.38 The quarry void at the time of the planning application submission is currently flooded and does not perform a flood storage function. Consequently, any development with the quarry void will not affect flood risk elsewhere.
- 7.39 The proposed development is not considered to be within the functional floodplain and will therefore not increase the risk of fluvial flooding elsewhere.
- 7.40 Appropriate mitigation measures at all stages of development will ensure that the development is compliant with TAN 15 and related consents.

8 Conclusions

- 8.1 In line with the relevant policies, technical advice and guidelines, the conclusions of the following work:

- a Flood Consequences Assessment
- a detailed waste minimisation exercise
- minimal approach to additional land use
- additional biodiversity measures within the future restoration plan

significantly contribute towards a robust understanding and delivery of a comprehensive and sustainable proposal. The proposal takes into consideration the relevant climate change and adaptation factors.

Additional measures

- 8.2 An appropriate legal agreement(s) to surrender the existing minerals planning permission which gives an operational lifetime until 2042, could secure additional benefits for the site and locality by limiting the quarrying works and period for restoration. Such a legal agreement would be linked to the release of a new specific planning permission for the proposal.
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