

Dear Alison

Re response to possible gravel working at Ellenbrook additional questions from the Inspector

We are in receipt of the request from the inspector to give greater background justification to a number of particular final points that he needs to provide clear guidance onto the secretary of state

The items that are referred to Mr Jackson for consideration are those below

- Working hours
- Structural survey
- Compliance with codes of practice at each phase
- Bore hole for each new phased adjoining Popefield
- No rights of way across land inside the bunds

Our approach to requests at the Inquiry was to propose conditions that to us and we hoped others were straight forward common sense to avoid difficult situations in the future and to make sure that the gravel extraction process is undertaken in a manner with respect to the many residences and businesses that adjoin the site and will be adversely impacted by it.

We trust that the suggestions will be taken in the context of “good neighbour” solutions that should be accepted by any reasonable extraction company. If the quarrying is given the green light that we still earnestly trust does not happen these proposals will be helpful conditions to alleviate potential conflict. Regarding the position of Popefield Farm geographically in relation to the extraction, we do believe this does make it a listed site meriting special attention.

Working Hours

The Ellenbrook site is now surrounded by homes that in many cases did not exist 20 years ago. Popefield is now home to several families and is as we know very close to the site over 30 plus years.

Typically working hours are reduced on a Saturday to start at 7 or 8 and close at 12 or 1 pm

We are asking for the developer to respect all those who will be affected by the workings to show some empathy with the Saturday working hours. 7 am is early for a Saturday morning and whilst we are accepting the later closing time of 1 pm we do request on the basis of common decency that they move the start if the noise on a Saturday to 8am they will still have a working period of 5 hours. We are not seeking a reduction from 1pm to 12 as some developments do.

My view - Common sense proposal reducing working hours by only 1.6% per week to show respect for the local population on a Saturday morning.

Structural Survey

Throughout we gave proposed an initial survey of Popefield given its heritage status ancient foundations and timber frame

We base this request on good practice to avoid uncertainly and unnecessary conflict in the future Gravel extraction can introduce ground vibration, dust, noise, and changes in earthworks, which can harm sensitive historical structures. Planning frameworks aim to protect these assets—by requiring upfront surveys and safeguards to minimise adverse effects.

When a gravel extraction or similar development is proposed next to or likely to affect a listed building, planning authorities will typically require:

- A Heritage Statement identifying affected heritage assets and assessing potential impacts.
- A detailed structural survey prepared by a qualified structural engineer, covering foundations, walls, roofs, dampness, timber, etc.
- A method statement outlining how existing structural issues will be addressed and mitigated during development.
- Photographic documentation to record current conditions.
- Approval of these reports before any development work starts, enforced via planning

My view - Basic common sense to include a condition to give absolute clarity and avoid future argument and uncertainty

- **Compliance with codes of practice at each phase.**

This relates to the much-discussed point at the Inquiry of issues of air pollution to the properties and population around the quarry site.

There was no doubt that there **is** clear evidence that airborne dust from gravel extraction/quarrying—especially respirable crystalline silica (RCS)—poses real health risks, and the UK government along with regulators has taken several measures to monitor and control it.

What is quite clear from research here and elsewhere in the world is that the understanding and level of risks are still being fully understood and increased action, guidance and legislation is being introduced.

I understand that each phase will be submitted for approval by the County Council and their Barrister stated that on each occasion the phase would have to operate to the legislative regime at that time.

They said this point was already covered but their attempts to clearly say how left us feeling a straight forward statement was needed.

Given the amount of parliamentary concern expressed recently and the desire to encourage Parliament to follow the WHO guidelines it is very probable that restrictions will require different boundary's and working practices over the 30-year life of the quarry.

All our amendment is seeking to do is to make it absolutely clear that the applicant must comply with such legislation at the time of the review of each phase.

My view – it is purely good business practice to comply with best and most recent silica and air pollution legislation throughout the lifetime of the quarry

- **Bore hole for each new phased adjoining Popefield**

This request is a natural extension to the structural survey point above. It is important to protect Popefield ancient foundations and therefore structural integrity.

It was established at the Inquiry that the underlying water table will be altered by the different phases of the work that abut Popefield. These are of course **Phases**. We proposed logically that a bore hole is positioned between the workings and Popefield as each phase is commenced

My View – A clear logical step to support the prevention of damage to Popefield historic structure minimising risks for all parties and protecting the occupier's homes

- **No rights of way across land inside the bunds**

At a meeting prior to the Inquiry, we met Brett's Senior Planner Richard Ford on site. As Brett's senior development surveyor, we assumed he knew what he was talking about when he showed us a plan that did indeed incorporate footpaths on the Popefield side of the bunds which he said were their response to local footpath action groups requests.

The Inquiry later emphasised that he was wrong and the plan was not one included in the proposals.

It did however prove to us that confusion can occur and mistakes can be made. All we therefore ask for is the clarity in the conditions that states in straight language that "no rights of access will be created or allowed across the land on the Popefield side of the bunds" This is important for the security of Popefield and the peace of mind of its residents.

My view – the applicant says they have no intention of allowing access so setting clearly in a condition is to everyone's benefit

I trust that the points set out above give clear and unambiguous reasoning why we believe that it is in all parties' interest to include the highlighted conditions. I trust that this will assist the secretary Of State should they give consent and seek to adopt the conditions.

My view along with many other objectors however is that this application is fundamentally flawed and should for the third time be refused for what I hope would unequivocally be for the last time.

Yours Sincerely

David Jackson