

## Response on borrowpits from South Cambridgeshire District Council

Of the mineral sites the majority of them are related to the construction needs when the A14 is upgraded. The Highway Authority (HA) has proposed a number of borrowpits. A borrowpit is a source of aggregate in the immediate area to a major proposal such as a road improvement. Permitting a borrowpit can mean that the need for transporting minerals is reduced, reducing traffic on public roads. The MWDP Core Strategy included a Preferred Option CS9 – Sand and Gravel Borrowpits, which specified a number of sites that would be used as borrowpits only for the improvements to the A14 (Ellington to Fen Ditton). The sites listed at this stage were located outside of South Cambs District but mention was made that further sites would be put forward after negotiation with the Highway Authority. South Cambridgeshire District Council supports in principle the use of borrowpits, especially as the use of local borrowpits will help to minimise disruption in the District caused by road construction.

Costain Skanska and Lafarge, who are both working with the HA, have proposed 13 clay-general fill borrow pits, which are located either adjacent to or very close to the route of the current or proposed line of the upgraded A14. The Council welcomes the opportunity to comment on the sites, which would have a short-term life whilst the A14 was upgraded. There is however a limited amount of information provided concerning each site other than that provided by the stakeholder. There is no indication of whether the sites are supported by the County.

In the information provided by the stakeholders in the policy summary for each borrowpit it mentions “ the local district councils are content with the provision of extra water bodies for amenity purposes”. This Council was informally approached by telephone for its opinions on locating borrowpits along the A14 and it was suggested that when the borrowpits were no longer needed that some could be restored as wetland reserves with public access. In principle the Council supports this.

There is no indication from the Highway Authority as to what quantities of minerals will be required by the A14 works. In order to ascertain which borrowpits will be needed it is vital that this information is provided otherwise the sites needed to provide the correct quantities may not have permission in the necessary timescale. There is no indication as to whether all these borrowpits submitted by Costain will be required for the A14 because if there is a surplus then there are a number within the Green Belt or close to settlements which South Cambs would not support if other locations were available.

The timetable for the completion of the MWDP would appear to not coincide with that proposed by the HA to upgrade the A14. The borrowpits will be needed for use before they have gained approval through the plan-making process of the MWDP. The borrowpits will need to have gained planning permission before the MWDP is adopted if the construction of the A14 is not to be delayed otherwise there will be the need for the clay to be transported greater distances for the construction works. This option would not be acceptable. Planning applications for the extraction of clay from the borrowpits for a short-term period should therefore be submitted and not be delayed by being included in the MWDP, which generally provides for longer-term mineral and waste proposals.

Air Quality issues - If all 16 mineral sites and in particular the A14 borrow pits were operating at the same time close to the A14, there may be a significant negative / detrimental impact on SCDC's designated Air Quality Management Area (AQMA

currently along the A14 corridor). Environmental Health officers in considering the sites are concerned about this impact. This is at a time when there is a statutory duty to consider air quality action plans to reduce HGV traffic and bring down pollutant concentrations in the AQMA, effectively plans to maintain and improve the quality of ambient air. However the borrowpits will only be in use for a short time when the A14 construction works are taking place so their impact on the AQMA will only be over a limited period.

Mineral operations on and off site can have a negative impact on the local air quality in the area due an increase particulate matter (PM), associated vehicle emissions and dust deposition on local property ultimately affecting the quality of life of local communities. If particulate matter from a minerals extraction process results in levels of PM10 being higher in sensitive locations than the prescribed objectives, the LA is required to set out in its Action Plan what steps it intends to take in pursuit of the achievement of the objectives.

The collective impact of the A14 borrowpit proposals may have a detrimental short-term impact on local air quality and SCDC's AQMA. Insufficient information is provided to fully evaluate the proposals and whether there will be significant cumulative impact / effect. The cumulative impact on air quality of simultaneous and/or successive working of a number of sites in a wider area requires careful consideration. Matters that need to be explored further include:

- How many sites are actually required?
- How many vehicle movements are expected?
- Where will the extracted sands and gravels be taken to from the sites?
- Will Costain Skanska be carrying out an assessment of HGV traffic impact on local air quality if significant movements of vehicles are identified?
- The duration and phasing / sequencing of operations?
- The existing dust climate at the sensitive receptors and the need for and scope of a dust assessment study to be conducted by the operator prior to detailed proposals
- Need for air quality assessments / modelling to determine if breaches of Air Quality Objectives are likely?
- The proposed methods of mitigation and control of dust-generating activities and vehicle emissions?

The impact of the borrowpits will be over a limited timescale and the advantages of having them close to the construction works could outweigh the dis-benefits highlighted by Environmental Health. The detailed matters of concern being raised by Environmental Health will need to be fully taken into account when planning applications are submitted for the borrowpits.

### **Summary**

**The County Council should review whether the Minerals and Waste Development Plan is the appropriate vehicle for providing borrowpits for the A14 upgrade and consider how the borrowpits should be restored after the A14 work has been completed.**