

West Deeping Parish Council

c/o 11 The Lane,

West Deeping,

Lincolnshire. PE6 9HS

Rob Wood Esq. CEO,
Breedon Group PLC
Pinnacle House,
Breedon Quarry,
Main Street,
Breedon on the Hill
Derby, DE73 8AP

28th July 2023

Dear Mr. Wood,

Ref: MS29- SL : Proposed Mineral Extraction Site, West Deeping and further proposed sites SG-17 (the same site as MS29-SL) and SG-11.

As Chairman of the West Deeping Parish Council, I am writing to you on behalf of all the residents of West Deeping to make you aware of the strength of feeling against your proposed new quarries in our parish. The entire village and community are against your plans and we wish to bring to your attention the reasons for our opposition, as we know that often in these situations, someone in your position, running such a large enterprise may be left unaware of these facts and feelings.

Breedon claims to want to be a good neighbour and that is an admirable aim. Your existing quarry in West Deeping has run for several years with few issues. That said however, we trust that you will listen to our objections and desist in your pursuit of these proposed sites as we consider they are inappropriate for quarrying as they impact so directly on our village, our residents and our amenities.

We know that quarrying and mining can be a divisive issue, and we certainly don't want you to think that we are anti-quarrying. We understand that it is necessary for the construction that goes on around the world. That said however, we are, as a village, as a community and as a parish, strongly opposed to the proposed MS29, SG17 and SG11 sites as prospective quarries. We have lived with quarries on our doorstep very close to the village for over 70 years now and the cumulative impact has taken its toll on our mental wellbeing and village amenity.

The community engagement meeting at which your team presented your plans to the village has only served to strengthen opposition against your plans as the real extent of the proposed destruction, disruption and consequences have come to light.

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Our Objections

For crystal clarity we lay out why we are so opposed to your plans -

1. Your proposed quarry is situated far too close to the village and impacts directly on villagers and their lives.
2. The proposed quarry, its bunds and processing plant sit directly in the currently unspoilt view of over half the houses in the village.
3. It will take away a major village amenity in the footpath which runs alongside the beautiful River Welland where many villagers enjoy some of their last remaining unspoilt local scenery that hasn't already been decimated by quarrying. The footpath brings many customers to our local pub – and their business will thus be damaged.
4. An end was in sight for us for the quarries on our doorstep after 70+ years of continuous quarrying right next to our village and your proposed quarries would potentially extend the activity by 30 more years.
5. The A1175 provided a mental and physical boundary to the quarries and in coming across to the village side of the main road you bring the quarries much closer to many people houses and gardens and directly into our eyelines.
6. It seriously endangers a beautiful river, an amenity enjoyed by many within the community and the ecosystems and which provides a valuable habitat to many species for years to come.
7. This river brings the lifeblood to the historic and cherished Grade II* heritage water mill.
8. Your proposed quarry seriously endangers the viability of an important local wedding, events and holiday business bringing jobs and revenue to the parish, as it sits directly next to and in full view of the wedding and events spaces.
9. This in turn endangers a beautiful and treasured Grade II* listed heritage asset, whose sustainability and care relies on the income from the wedding, events and holiday business.
10. The health and pollution impact on our villagers and our village will be immense and destructive.

You will, of course, claim that you can mitigate for all these things. The definition of mitigation is to make a bad thing slightly better, but what that means it is still worse than before.

You cannot however appropriately mitigate for another 30 years of quarrying nor to the damage you will do for such a long time to a large part of our remaining unspoilt landscape. Nor can you mitigate against destroying the view of half of the village for two generations - ugly bunds simply do not work in Lincolnshire's flat Fenland landscape in mitigating against

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the visual destruction that the quarries cause. Nor can you mitigate against affecting one of the last remaining unspoilt footpaths alongside the river. Nor can you mitigate against the damage your proposed quarry will do to prized local businesses. Nor can you mitigate against what your proposed quarries will do to our beautiful River Welland which is habitat to so many important species. And nor can you mitigate against affecting the important watercourse which is the mill stream to a Grade II* listed water mill.

Cumulative Impact

The NPPF and LCC's policy framework rightly identifies that due to the concentration of quarries in particular areas there may be a cumulative impact on the life and amenity of residents and communities which should understandably be considered when assessing and approving new quarry sites. LCC's MWLP specifically states that account should be taken of "the cumulative impact on the quality of life of local communities from a relatively unbroken sequence of working and restoration."

It is very apparent to see that the threshold for cumulative impact in West Deeping has been reached and surpassed. Between Lafarge, Cemex, Breedon and many previous quarry operators, the majority of the parish of West Deeping has been subject to mines and quarries. Your current proposals are to start a new 250-acre, 30-year quarry immediately behind our community's gardens and to take away some of the only remaining amenities, footpaths and unspoilt views that the village enjoys, destroying the majority of the last remaining untouched land in the parish.

Up until now, all the quarry companies and their quarries in West Deeping have attracted very little opposition and yet these new proposals have generated an avalanche of objections. There can be no surer sign that the cumulative impact threshold has been surpassed.

Our Watercourses

A major river flows through the centre of the new proposed site and a second forms its southern boundary. The water in these rivers is for most of the year crystal clear and teeming with wildlife. The damage to the ecology of this land and these watercourses, you will of course try and mitigate, however we all know that vital habitats will be lost for over 30 years.

The new proposed quarry destroys all the unspoilt farmland between the village of West Deeping and one of its major Grade II* heritage assets - Molecey Mill and the Granary which sits on the parish's eastern boundary. The mill stream of the River Welland which provides the lifeblood to this historic water mill will be forever affected by the proposed quarry. No indication has so far been made as to what you propose to do with the water that you will

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need to continually pump out to enable your dry excavation to take place. Nor has any indication been made as to where you will discharge the water you use to wash the sand and gravel and the impact this will have on a currently pristine water environment and its clarity, quality, and flow. Nor has any indication been made of how the water table will be affected by your proposed mining to 7-8m below ground level and 5-6m below the water table on either side of a main river. In this instance mitigation simply isn't acceptable and we need categorical guarantees that the main rivers will be unaffected in any way by your proposed actions – can you confirm this? You again claim on your website that you wish to 'responsibly manage water discharges'. This is one of our areas of most concern.

Our Heritage Assets

As indicated above, your proposed quarry sits immediately adjacent to Grade II* Molecey's Mill & The Granary and is also immediately adjacent to the gardens of West Deeping Manor, another prized Grade II* listed heritage asset, and further sits extremely close to the West Deeping Conservation Area and the 20 other listed buildings contained therein, including our Grade I listed church. The proposed quarry is also immediately adjacent to Maxey Mill another Grade II* listed heritage asset.

Please can you explain why, when LCC's policy on the Historic Environment suggests that mines and quarries shouldn't be situated immediately adjacent to listed buildings, you are pursuing these sites for potential mineral extraction?

LCC suggests that alternative sites should be explored in the first instance and that the quarry should only be given permission if the harmful aspects can be satisfactorily mitigated (which they can't in this instance) or if there are exceptional overriding reasons which outweigh the need to safeguard the significance of the heritage asset. May we ask what 'exceptional overriding reasons' Breedon consider this quarry to have which outweigh the need to safeguard significant heritage assets?

South Lincolnshire's Area of Search cover some 85 square kilometres of land, of which around 10 km sq has already been mined. Are Breedon seriously going to try and suggest that within the remaining 75 sq kilometres of land there aren't alternative potential mineral extraction sites that don't sit immediately next to our villages, our prized heritage assets and our precious watercourses?

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Breedon's stated corporate policies and goals

We would like to further question why Breedon's actions and tactics here seem to sit in direct contrast to their stated corporate policies and goals.

Breedon's published corporate policies state that you wish 'to have a positive impact on the communities in which you operate' and your published claims that you 'care about local communities' – why then do you consider that these sites are suitable for future mineral extraction considering the unanimous local opposition to them?

On your website, great claim is made of how you wish to 'develop community engagement plans in all relevant locations, to help us understand and address local concerns and take responsibility for the potential impact of our activities' and yet there has been no heed of our concerns nor any attempt to work with the community. Working with communities involves more than simply telling them what is going on. It involves listening and reacting to their feelings and concerns.

You also claim that you 'want to be a good neighbour to our neighbouring communities.'

We suggest that –

- A good neighbour wouldn't take away one of the last enjoyable village's amenities.
- A good neighbour would understand that the community of West Deeping has endured quarries on its doorstep for over 70 years now and would understand the cumulative impact that this has had on our quality of lives and our mental and physical health and instead would look at alternative sites.
- A good neighbour wouldn't destroy the view of half the houses in the village.
- A good neighbour wouldn't destroy a valued and prized local business.
- A good neighbour wouldn't endanger a beautiful grade II* listed heritage asset.

Your website claims that you 'endeavour to integrate social responsibility considerations into our business decisions' and if this is indeed the case, then we ask that you desist from pursuing these sites which if permitted would go against your social responsibility to all the residents of West Deeping, the community in which you wish to operate.

Aside from the presentation of your plans to the village at the 'engagement' meeting, there has been no considered effort by Breedon to see if any common ground could be reached through compromise and there has been no attempt by Breedon to engage and listen to the local community's concerns. All that has happened is your team's arrogant no compromise approach which is contrary to all your published policies and corporate goals.

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Compliant, Transparent, Ethical, Integrity...

On your website you further claim that you want 'to demonstrate that we are responsible, compliant, ethical.'

We, as a community, are extremely concerned by Breedon's approach to trying to secure permission for this NEW 30-year, 250-acre quarry next to the village. The tactics that you are using are in direct contrast to your stated claims that you strive to operate 'compliantly, transparently and with integrity' and that you 'care about' and wish 'to be a good neighbour to our neighbouring communities'.

For clarity let us explain - In September 2022, during LCC's most recent call for sites exercise, and upon Breedon's submission of their proposed future plans for the land around West Deeping, LCC advised Maria Cotton, your Planning and Estates Manager that your new proposals constituted 'a significant change in circumstances' for the MS29- SL site. They explained that this is because the construction of a new processing plant on the site meant that it was a new quarry and not the extension to the existing quarry under which MS29-SL was assessed and eventually allocated. LCC suggested that not only should the MS29-SL site be resubmitted for proper scrutiny during the new 'Updating the MWLP' exercise, but that as you are proposing to mine both the SG17 and SG11 sites that it would be appropriate to submit them as one site. (A copy of LCC's email is attached for your reference.)

Yet despite the advice of LCC, the sites SG17 and SG11 have been submitted independently of each other by Breedon. It is left to conjecture as to why you have ignored LCC's advice in this instance, but we suggest that one explanation is that in separating the sites, Breedon thought that they would appear as less of a threat.

Further Breedon have stated that it is their intention to submit a planning application for the allocated MS29-SL site later this year with a new processing plant on the site. This is contrary to LCC's advice and again the question arises as to why Breedon have taken this approach? Is it because you know that in bringing the new processing plant to the south side of the A1175 and adjacent to the village, you would be much less likely to have the sites allocated under these circumstances, and therefore it would be unwise to wait for the sites to go through proper scrutiny in the new draft MWLP?

Once again, it thus appears that you are trying to secure permission for this NEW 250-acre 30-year quarry by stealth and subterfuge and by using the allocation of the site for an extension to the existing quarry in the first instance before expanding the site to a much larger area. All while pretending it is an extension and not a new site.

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This strikes us as an underhand and stealthy approach which is in complete contrast to your stated claims as a company to operate in a 'compliant, transparent and ethical' way and with integrity.

Please correct us if we are wrong or explain why Breedon are ignoring LCC's advice and direction in this matter?

Alternative sites

Within the arbitrary 85 km sq 'Area of Search' imposed on our area of South Lincolnshire by LCC, there are many, many more appropriate sites that should be considered by the quarry companies ahead of these ones proposed by Breedon. Alternative sites which do not sit so close to people's homes, which do not impact so directly and intrusively on people's lives, views, amenities and businesses. Sites which do not threaten major rivers and heritage assets.

Why then are Breedon pursuing these particular sites which threaten our local community?

We suggest that when you claim on your website that your 'purpose is to make a material difference to the lives of our colleagues, customers and communities', and that you aim to make a 'Positive impact on the communities in which we operate', that neither of these hold true here unless you wish to make a negative material difference and a negative impact - because that is what these proposed quarries will do to us.

You also make claim that you 'will always go out of our way to find a solution to a problem'. In this instance it is your proposed quarries and their locations which are causing the problem and it is within your scope to find the solution by looking at alternative sites and ceasing to pursue these sites next to the village.

Sustainability

You acknowledge on your website that 'climate change is one of the greatest challenges of our time'.

To enable the dry excavation of the minerals from these proposed quarry sites you will need to continually run pumps to de-water the proposed sites. Both sites sit immediately adjacent to main rivers. The water table sits very close to the land surface in this area. Your proposed depth of mineral extraction is some 5-6m below the water table and 8 m below the surface.

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In the existing West Deeping Quarry which you operate across the road, there is a diesel pump running 24/7 for eternity to maintain the lower water levels and to try to stop the area flooding. How can this be sustainable? How can this be environmentally friendly?

The same situation will arise in your proposed quarry sites. By excavating down so far, so close to main rivers and upstream of some of the houses in the parish, you massively increase the risk of future flooding in the area. You will have to run a pumping system in perpetuity to try and protect those houses. This cannot be environmentally sustainable.

How can these sites therefore be appropriate for mining considering your own policies?

Health

We have very grave concerns over the long and short term threats that your proposed quarries, which are situated so very close to our homes and village, pose to our villagers. Lincolnshire is by its very nature a windy place, and the existing roads and hedgerows adjacent to your existing quarries are coated in sand and gravel dust. There are very many studies highlighting the toxicity of this and its threat to human health.

Your efforts to mitigate these are once again only making a bad situation slightly better and your quarries therefore still pose a grave threat to the health of our villagers and the children and adults who live here.

One of the major reasons for the NPPF guidelines and Council policies on cumulative impact is the effect that so many quarries operating over such a long period of time has on the mental health and wellbeing of nearby residents. Your proposed quarries threaten to add another 30 years to the existing tally of over 70 years of having quarries on our doorstep. People's mental health is already suffering with this threat and will only get worse. We ask that you desist from harming our residents in this way by ceasing to proceed with the proposed applications so that we might be expectant of the end of the quarries which we have had to put up with for so long. It would be the correct and right course of action for Breedon to take to desist and make this intention clear so that we can return to live our lives free from this threat and free from the fear of the further damage that it will do to our already quarry-plagued lives.

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Concerns

In summary, please may you answer these questions and concerns that we have –

1. Why are you continuing to pursue these sites, which sit far too close to the village and would have such a direct impact on our lives, despite unanimous local opposition - bringing the noise, dust, traffic, disruption and catastrophic consequences to all who live here?
2. Why are you ignoring LCC's advice that the proposal to move the processing plant from the existing King Street site to the new proposed MS29 site represents a fundamental change in the allocated site's criteria and that Breedon should wait until the new proposed quarry has been through the proper scrutiny?
3. Why do Breedon consider that the cumulative impact of this massive proposed new quarry in addition to the 70 plus years of quarries on our doorstep isn't too much of an intrusion on our lives?
4. Why do Breedon consider it acceptable to remove some of the last remaining amenities from our community which has endured quarrying on its doorstep for over 70 years? Is this how to repay us for being good neighbours?
5. Why do Breedon consider it acceptable to endanger valued local businesses and the benefits to the community in jobs and in enjoyment that these businesses bring?
6. Why do Breedon pay so little heed to the significant heritage assets that these prospective quarries will directly affect?
7. Why are Breedon not considering alternative sites in the Area of Search that would be more suitable than this one?
8. Why are Breedon not following their own policies and corporate goals here as outlined above?
9. What possible positive effects can these proposed new quarries have for the community of West Deeping? Having lived with the quarries for 70 years we are well aware of the negative effects.
10. Why are you persisting with these quarries which threaten the health and wellbeing of our community?

We would very much like your personal response on behalf on Breedon rather than passing this down your organisation, with the damage that your proposed quarries will do to our village and our lives, we think it only fair that you explain why Breedon are pursuing these sites knowing the strength of feeling against them and knowing the damage and destruction they will cause. It is after all the responsibility of the board of Breedon Group (as stated on your website) to oversee the 'social responsibility policy performance' of the Group. Perhaps you could be so kind as to respond within the next two weeks as every day that passes puts more mental strain and anguish on our long-suffering village.

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You do, after all, claim that *'We take our business personally and try to live by the principle that nothing is too much trouble. We show we care about our customers, our suppliers, our shareholders, our communities – and each other.'* We do trust that this is actually the case, and if it is, why don't you use this as an example of how you are good to your words by finding alternative sites?

Yours sincerely,

Glenn Fuller

Chairman, West Deeping Parish Council

For and on behalf of the community of West Deeping