



Proposed Extension to Linhay Hill Quarry

Environmental Statement
Regulation 22 Response #5
Further Information
Water Resources and Land Stability

E&JW Glendinning Ltd

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1. Introduction

- 1.1. This document has been prepared in response to a Request for Further Information under Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (The EIA Regulations) issued by the Dartmoor National Park Authority (DNPA) on 22 February 2020 (Referred to as the 'Regulation 22 Request 2020'). The Request was prepared on behalf of the DNPA by Wood Environment & Infrastructure Solutions UK Limited (referred to as Wood in this document).
- 1.2. This Regulation 22 Response is the fifth tranche of Further Information submitted to the DNPA to supplement the Environmental Statement prepared to accompany the planning application ref 322/16 for the extension of Linhay Hill Quarry, Ashburton. It is therefore referred to as the Regulation 22 Response #5.
- 1.3. Earlier Requests and Responses under Regulation 22 were issued as follows:
- In response to Regulation 22 Request 2016
 - Regulation 22 Response #1 was issued in July 2017 concerning a range of topics;
 - Regulation 22 Response #2 was issued in February 2018 concerning Improvements to Caton Cross;
 - Regulation 22 Response #3 was issued in February 2019 concerning Water Resources and Land Stability;
 - In response to Regulation 22 Request 2018:
 - Regulation 22 Response #4 was issued in February 2019 concerning supplementary questions arising from the applicant's submission of the Regulation 22 Response #1 July 2017.

The EIA Regulations

- 1.4. Regulation 22 of the EIA Regulations relates to 'Further information and evidence respecting environmental statements' and states:

—(1) A relevant planning authority, Secretary of State or inspector dealing with an application or appeal in relation to which the applicant or appellant has submitted an environmental statement, if of the opinion that the statement should contain additional information in order to be an environmental statement, shall notify the applicant or appellant in writing accordingly, and the applicant or appellant shall provide that additional information; and such information provided by the applicant or appellant is referred to in these Regulations as "further information".

- 1.5. The definition of an Environmental Statement is set out in Regulation 2(1) of the EIA Regulations 2011 which states:

"environmental statement" means a statement –
(a) that includes such of the information referred to in Part 1 of Schedule 4 as is reasonably required to assess the environmental effects of the development and which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile, but
(b) that includes at least the information referred to in Part 2 of Schedule 4;

A copy of Schedule 4 of the EIA Regulations 2011 is provided in Appendix 1.1.

National Guidance

- 1.6. The National Planning Policy Guidance (NPPG) provides direction on how a Local Planning Authority should ask for Further Information in respect of planning applications that are

submitted with an Environmental Statement prepared under the EIA Regulations 2011. At Paragraph: 047 Reference ID: 4-047-20140306¹, the NPPG states:

“The local planning authority should check that the submitted Environmental Statement contains all the information specified in Part II of Schedule 4 to the Regulations and the relevant information set out in Part I of that Schedule.

If the local planning authority considers that further information is required, they should ask the applicant to provide it (regulation 22). All information provided must be publicised, and consulted on. Requests for further information should be limited to the “main” or “significant” environmental effects to which a development is likely to give rise and must be on relevant matters set out in Schedule 4. The local planning authority, the Secretary of State or an Inspector may also require an applicant or appellant to produce evidence to verify and/or clarify any information in the Environmental Statement.

Additional information of a substantive nature submitted voluntarily by an applicant must be treated in the same way as information required by the local planning authority (see the definition of “any other information” in regulation 2(1)).

The 16 weeks’ time limit for determination of the Environmental Impact Assessment application continues to run while any correspondence about the adequacy of the information in an Environmental Statement is taking place.”

- 1.7. In preparing and considering the ES and this Regulation 22 Response, it is important to understand that there are limitations in the EIA Regulations and associated guidance on the level of detail required. Planning Practice Guidance advises:

‘Whilst every Environmental Statement should provide a full factual description of the development, the emphasis should be on the “main” or “significant” environmental effects to which a development is likely to give rise. The Environmental Statement should be proportionate and not be any longer than is necessary to assess properly those effects. Where, for example, only one environmental factor is likely to be significantly affected, the assessment should focus on that issue only. Impacts which have little or no significance for the particular development in question will need only very brief treatment to indicate that their possible relevance has been considered’²

- 1.8. The nature of the limitations has been clarified in the courts. Extracts from the judgements in some of the key cases are reproduced below:

In an imperfect world it is an unrealistic counsel of perfection to expect that an applicant’s environmental statement will always contain the ‘full information’ about the environmental impact of a project. The Regulations are not based upon such an unrealistic expectation. They recognise that an environmental statement may well be deficient, and make provision through the publicity and consultation processes for any deficiencies to be identified so that the resulting ‘environmental information’ provides the local planning authority with as full a picture as possible.

R. (Blewett) v Derbyshire CC [2004] Env. L.R. 29 per Sullivan J.

An ES does not need to include “every conceivable scrap of environmental information about a particular project” per Harrison J. in **R v Cornwall County Council ex p Hardy [2001] Env LR 26;**

If the ES did contain everything it would be voluminous and there would be a real danger of the public/local planning authority “losing the wood for the trees”: Sullivan J in **R v. Rochdale Metropolitan Borough Council, ex p. Milne (2000) 81 P & CR 365;**

¹ The online wording of this paragraph of National Planning Guidance (NPG) has since been updated to reflect the coming into force of the EIA Regulations 2017 which occurred after the LHQ application had been submitted. The updating does not alter the substance of the guidance about the way that the EIA Regulations are interpreted. (see NPG Paragraph: 047 Reference ID: 4-047-20170728).

² Paragraph: 035 Reference ID: 4-035-20170728

See also ***Davies v Secretary of State for Communities and Local Government*** [2008] EWHC 2223 (Admin) per Sullivan J. again “ ... *In an ideal world the applicant’s Environmental Statement would be the last word on the environmental impact of a proposal because it would contain the ‘full information’ ... However, the Regulations are not premised upon such a counsel of perfection ...*” (Emphasis added).

- 1.9. Nevertheless, the applicant has striven to provide as full a coverage as is considered reasonable and proportionate, bearing in mind the position that the proposal is for additional mineral working in a National Park. It is relevant and important to remember the wording of Dartmoor National Park Core Strategy Policy COR22, particularly its references to ‘*rigorous examination*’ and with regard to need which ‘*cannot reasonably be met in any other way*’.
- 1.10. The wording of Policy COR22 is set out below, with emphasis added.

Core Strategy Policy COR22

*Major mineral development will not be allowed unless, after **rigorous examination**, it can be demonstrated that there is a national need which **cannot reasonably be met in any other way**, and which is sufficient to override the potential damage to the natural beauty, wildlife, cultural heritage or quiet enjoyment of the National Park.*

Layout of Regulation 22 Response #5

- 1.11. The Regulation 22 Request 2020 sought further information in relation to the following aspects:
- Hydrogeological conceptualisation
 - Monitor and mitigate strategy for hydrogeology
 - Land stability
 - EIA
- 1.12. The applicant has commissioned a programme of monitoring and investigation to inform this Regulation 22 Response, the outcome is presented in:
- a revised Chapter 12 on Water Resources, presented in Appendix 2.1 of this Regulation 22 Response;
 - a revised and updated HIA, presented in this Regulation 22 Response as Appendix 12C of the ES;
 - An updated eco-hydrological assessment of the quarry extension proposals presented in Appendix 2.2 of this Regulation 22 Response;
 - a revised chapter 17 on Land Stability, presented in Appendix 4.1 of this Regulation 22 Response;
 - a revised and updated Land Stability Risk Assessment, presented in this Regulation 22 Response as Appendix 17.2 of the ES;
 - an updated Non-Technical Summary incorporating the above, presented in Appendix 1.2 of this Regulation 22 Response.
- 1.13. The revised and updated chapters and Appendices of the Environmental Statement are introduced in chapters 2 to 5 under the topics of the Regulation 22 Request 2020 as listed in para 1.11 above, with comments to clarify their contents where considered helpful. Each chapter starts with a summary of the further information sought in the Regulation 22 Request 2020 under that topic.
- 1.14. As with previous Regulation 22 Responses, changes are made to the wording of the original ES that was submitted in June 2016. In order to clarify the effect of these changes, the ES dated June 2016 is referred to as the ‘original ES’.
- 1.15. Where further alterations are made to the ES text as amended in previous Regulation 22 Responses, the relevant text is referred to according to the corresponding Regulation 22

Response tranche. Chapter 6 of this Regulation 22 Response provides an update to the status of the ES and other application documents, including a table showing how original documents have been updated by subsequent ones. The table is presented in Appendix 6.1 of this Regulation 22 Response, and an updated Errata is provided in Appendix 6.2.

- 1.16. Finally, there is a chapter containing 'Other information provided by the applicant', which includes some important changes to the proposals, plus some commentary on the latest version of Devon's Local Aggregate Assessment, recent publications by the Mineral Products Association and an economic assessment of the role that Linhay Hill Quarry will have in supporting the economic recovery from the coronavirus pandemic.

2. Hydrological conceptualisation

Summary of further information on hydrological conceptualisation sought in Regulation 22 Request 2020 at para 3.1

Paragraph 3.1 of the Regulation 22 Request 2020 sought a “*better understanding of the ‘baseline’ hydrogeological flow regime, as it informs the assessment of the lateral extent and magnitude of future quarrying effects and the form of the future ‘monitor-and-mitigate’ strategy. In particular, there is a need to better determine the degree of hydraulic connectivity present within the aquifer and also between the aquifer and overlying surface water features.*”

The Regulation 22 Request 2020 went on to list suggestions of investigations to inform the “*better understanding*”, whilst confirming it was for the applicant to determine what investigations it adopts to lessen or resolve the identified conceptual uncertainties.

The Regulation 22 Request 2020 specified that a refined hydrogeological conceptual model should be presented in the light of additional data gained from the additional investigations undertaken; and suggested that this might well include a number of conceptual cross-sections (pre- and post-development) and maps delineating baseline and development quarry groundwater catchment areas and associated potential receptors.

Regulation 22 Response on hydrological conceptualisation

- 2.1. The Further Information sought in para 3.1 of the Regulation 22 Request 2020 with respect to hydrological conceptualisation is provided in the Environmental Statement revised chapter 12 and its revised and updated Appendix 12C, the Hydrological Impact Assessment 2020 (HIA 2020).
- 2.2. The revised ES chapter 12 is presented in Appendix 2.1 of this Regulation 22 Response, and the revised and updated HIA 2020 is presented as Appendix 12C of the ES in this Regulation 22 Response.
- 2.3. The updated hydrological conceptualisation has also informed a reappraisal of the ‘Eco-hydrological assessment of the quarry extension proposals’ that was provided in the Regulation 22 Response #3 at Appendix 6.1. This is presented in Appendix 2.2 of this Regulation 22 Response.
- 2.4. As regards the ‘Updated assessment of potential effects on European Sites’ that was presented in Appendix 6.2 of the Regulation 22 Response #3, the ‘Eco-hydrological assessment of the quarry extension proposals’ has not found any material changes to the impact assessment relating to the SACs, and we are not aware of any significant new cumulative effects to consider. Therefore the version presented in the Regulation 22 Response #3 does not need to be updated.
- 2.5. Further details to direct the reader to aspects of the hydrological conceptualisation are provided below:
- 2.6. The additional investigations to support the refined hydrological conceptualisation comprise: installation and monitoring of 12 additional groundwater monitoring boreholes, the completion of two phases of hydraulic signal testing, three phases of tracer testing and a more detailed analysis of geophysical data. These methods of investigation, which are described in sections 4.2 and 4.5.7 of the HIA 2020, are consistent with the field investigation methods for karst described in Environment Agency Guidance ‘Hydrogeological impact appraisal for dewatering abstractions’ Science Report SC040020/SR1. Works completed to date at the site cover almost all of the potential methods of karst investigation listed in the Environment Agency Guidance document.

- 2.7. The refined hydrological conceptualisation is presented in sections 4.7 and 7.2.8 of the HIA 2020. The HIA 2020 includes conceptual cross-sections (pre- and post-development), presented in sections 4.7 and 7.2.8, supported by maps delineating baseline and development quarry groundwater catchment areas and associated potential receptors in sections 4.6, 5, 6.2 and 7.2.8. These key parts of the HIA are reflected in the Revised chapter 12.
- 2.8. Regarding the previously discussed signal test to improve characterisation of flow within the Chercombe Bridge Limestone Formation (CBLF), this has been conducted on the Balland Pit, rather than in an abstraction borehole as implied by the Regulation 22 Request. The limitations of borehole pumping tests in giving representative information in karst systems have been noted by various authors, including the Environment Agency (2007), Ford & Williams (2007), Goldscheider & Drew (2007) and Taylor & Greene (2014)³. The results of the Balland Pit signal test are representative of a much larger volume of the CBLF than could be achieved by pumping from a single borehole of limited diameter and hence are considered more reliable in assessing the combined influence of conduits, fractures and matrix flow within the limestone.
- 2.9. A report of a comparative overview of the information on the water environment and land stability submitted in support of Linhay Hill Quarry and of the equivalent information submitted in support of the ROMP applications for two other large limestone quarries within Devon, Stoneycombe Quarry and Moorcroft Quarry is presented in Appendix 2.3 of this Regulation 22 Response. Both these quarries are also extracting from Devonian limestone deposits with karst characteristics; other reasons why a comparison is considered appropriate are presented in the study report.
- 2.10. The conclusion of this comparative overview is that the amount of information presented in the Hydrogeological Impact Assessment for Linhay Hill Quarry and associated monitoring and mitigation regime is at least as comprehensive as in the Water Environment Impact Assessments for Moorcroft and Stoneycombe Quarries. Whilst some of the records for the latter two quarries commenced earlier than those for Linhay Hill Quarry, the breadth of investigation methods implemented to date at the Linhay Hill Quarry is substantially greater. The data obtained from this wider scope of investigations has led to a substantially more detailed conceptual model for the Linhay Hill Quarry, with a more rigorous assessment of the projected extent of impacts and a more comprehensive approach to ongoing monitoring and mitigation. This includes the design of specific mitigation measures, the proposed approach and timing for testing their effectiveness and a series of measures for identifying and responding to unexpected impacts. These elements are notably absent from the Water Environment Impact Assessment for Stoneycombe Quarry, whilst Atkins has been unable to find a detailed conceptual model or mitigation plan for Moorcroft Quarry.

³ These references are listed in the HIA 2020

3. Monitor and mitigate strategy for hydrogeology

Summary of further information on the monitor and mitigate strategy for hydrogeology sought in Regulation 22 Request 2020 at para 3.2

The Regulation 22 Request 2020 sought a ‘monitor and mitigate’ strategy to address hydrological impacts on receptors identified in a revised HIA, including all those already identified in the ES to date (i.e. up to and including submission of the Regulation 22 Response #3), and others identified in subsequent discussions which are regarded by Wood as potentially needing to be included in the strategy, for example:

- Pridhamsleigh Cavern Site of Scientific Interest (SSSI),
- Water Framework Directive surface and groundwater bodies, and
- The local limestone aquifer itself.

The Regulation 22 Request 2020 advised that the formulation of the strategy would be informed by the results of the revised hydrological conceptualisation sought in para 3.1 of the Request.

Whilst confirming that it was for the applicant to consider the form of its response, some suggestions of the type of further information with respect to the monitoring and mitigation were put forward.

The suggestions with respect to monitoring included identification of the location and form of existing and proposed monitoring structures, the parameters to be monitored, and methods and timing for doing so. The Regulation 22 Request 2020 stated that this information should be extended to cover all receptors.

Suggestions for mitigation related to developing a means of providing compensation flows to various receptor locations, including the consideration and mapping of provisional pipeline routes.

The purpose of the updated ‘monitor and mitigate’ strategy should be to reflect the revised hydrological conceptualisation resulting from the additional investigations sought in para 3.1 of the Regulation 22 Request 2020.

This part of the Regulation 22 Request concluded by suggesting that the Environment Agency be consulted, including about the development of appropriate trigger levels following completion of the extended baseline monitoring. In addition it was confirmed that the monitor and mitigate strategy should be capable of being modified as further information on the hydrological flow regime comes to light.

Regulation 22 Response on the monitor and mitigate strategy for hydrogeology

- 3.1. The further information with respect to the monitor and mitigate strategy for hydrogeology is provided in the Environmental Statement revised chapter 12 and its Appendix 12C, the Hydrological Impact Assessment 2020 (HIA 2020).
- 3.2. The revised ES chapter 12 is presented in Appendix 2.1 of this Regulation 22 Response, and the revised and updated HIA 2020 is presented as Appendix 12C of the ES in this Regulation 22 Response.
- 3.3. As suggested in the Regulation 22 Request, the Environment Agency has been consulted during preparation of the monitoring and mitigation strategy presented in the HIA 2020.

- 3.4. Further details to direct the reader to aspects of the monitor and mitigate strategy are provided below:
- 3.5. The monitor and mitigate strategy is presented in the HIA 2020 in section 7. This provides details on the location and form of existing and proposed monitoring structures, the parameters to be monitored, and the methods and timing for doing so.
- 3.6. The revised conceptual model has been used to identify all receptors with the potential to be impacted by the proposed deepening and extension of the quarry; this assessment is presented in the HIA 2020 section 6. In doing so, some potential receptors within a wider study area have been excluded from further consideration, due to their locations with respect to the quarry's potential zone of influence and the presence of intervening hydraulic boundaries. The proposed monitoring plan in section 7 includes monitoring locations beyond the quarry's projected maximum zone of influence and includes a mechanism for promptly identifying and responding to any lowering of groundwater levels in these areas. As part of this process, lowering of groundwater levels beyond the projected zone of influence would trigger a revised appraisal of potential receptors and the development of an updated monitoring and mitigation plan.
- 3.7. Section 7.2 of the HIA 2020 addresses the mitigation strategy. This includes a figure showing the footprint of proposed mitigation measures and the proposed alignment of pipelines for conveying flow. Data obtained from the most recent investigations and the resulting refinements to the conceptual model have been used to inform the design of these mitigation measures and assess their feasibility. A formal testing period is proposed to ensure the effectiveness of mitigation prior to dewatering beyond the depth limit imposed by the quarry's current planning permission. A series of contingency measures are presented to ensure the mitigation methods achieve their stated performance objectives. A clear mechanism for promptly identifying the need for, and implementing, these contingency measures is also presented.
- 3.8. Some of the proposed monitoring and mitigation features fall outside the application red line, and those that amount to 'development' in planning terms will require planning permission. If planning permission for the quarry extension is granted, the planning applications for the monitoring features will be submitted in the near future in parallel with obtaining the other consents required to implement the application proposals as set out in table 3-1 at the end of chapter 3 of the original ES. The planning application for the balancing pond will be submitted during stage 1.
- 3.9. The planning drawings for stages 2-6 have been updated to include key HIA 2020 mitigation measures and the revised drawings are presented in Appendix 3.1 of this Regulation 22 Response.
- 3.10. The monitoring and mitigation measures for Linhay Hill Quarry are considered alongside those proposed and approved for Stoneycombe and Moorcroft Quarries in the comparative overview presented in Appendix 2.3 of this Regulation 22 Response. As concluded in paragraph 2.10, the monitoring and mitigation measures for Linhay Hill Quarry are based on a more rigorous assessment of the projected extent of impacts and represent a more comprehensive approach to ongoing monitoring and mitigation. This includes the design of specific mitigation measures, the proposed approach and timing for testing their effectiveness and a series of measures for identifying and responding to unexpected impacts.

4. Land stability

Summary of further information on Land Stability sought in Regulation 22 Request 2020 at para 3.3

With regard to land stability, the Regulation 22 Request 2020 set out a requirement to “revisit the LSRA, the assessment of residual land stability effects, and the monitoring and mitigation actions proposed in the Karst Management Plan” in the light of the update to the hydrological conceptualisation sought in para 3.1 of the Request.

Whilst confirming that it was for the applicant to consider the form of its response, some suggestions for topics for consideration were put forward as follows:

- increased frequency of monitoring proposed in LSRA
- comparison of sinkhole development with records of weather conditions
- structural surveys of selected properties to be undertaken prior to commencement of quarrying in the extension.

Regulation 22 Response on Land stability

- 4.1. In general terms the further information with respect to land stability is provided in the revised Environmental Statement chapter 17 and its revised Appendix 17C, the Land Stability Risk Assessment 2020 (LSRA 2020).
- 4.2. The revised ES chapter 17 is presented in Appendix 4.1 of this Regulation 22 Response, and the revised and updated LSRA 2020 is presented as Appendix 17.2 of the ES.
- 4.3. Further details to direct the reader to aspects of the further information with respect to land stability are provided below:
- 4.4. Revisions have been made to Sections 2,3 and 4 of LSRA 2020 to reflect the contents of the revised HIA 2020. The monitoring and mitigation actions proposed in the Karst Management Plan have been updated as presented in section 5. Residual land stability effects are reassessed in Section 6 of the LSRA 2020.
- 4.5. The frequency of monitoring is addressed in the revised Karst Management Plan, which also includes consideration of weather conditions (both responsive and pre-active) and structural surveys of selected properties as requested in the Regulation 22 Request 2020
- 4.6. These changes are reflected in the revised chapter 17 Land Stability.

5. EIA

Summary of further information on EIA sought in Regulation 22 Request 2020 para 3.4

Paragraph 3.4 of the Regulation 22 Request 2020 focussed on aspects of the Environmental Impact Assessment (EIA) citing the following ‘*previously identified problems*’:

- The inclusion of some receptors not included in submissions to date needs to be reconsidered.
- The ES importance criteria utilised in ES chapter 12, saying that the DoT guidance used is not considered sufficiently rigorous and recommending a robust set of importance criteria more relevant to mineral excavation be identified and implemented.
- Aspects of the assessments on receptor importance and ‘residual’ effects, seeking better explanation in the light of the revised hydrogeological conceptualisation sought in para 3.1 of the Regulation 22 Request 2020.

The Regulation 22 Request pointed out that this will have implications for the ‘monitor and manage’ strategy.

Regulation 22 Response on EIA

- 5.1. In general terms the further information sought with respect to EIA is provided in the Environmental Statement revised chapter 12 and its revised and updated Appendix 12C, the Hydrological Impact Assessment 2020 (HIA 2020).
- 5.2. The revised ES chapter 12 is presented in Appendix 2.1 of this Regulation 22 Response, and the revised and updated HIA 2020 is presented as Appendix 12C of the ES in this Regulation 22 Response.
- 5.3. Further details to direct the reader to aspects of the further information sought with respect to EIA are provided below:
- 5.4. The range of potential receptors in the assessment is addressed in Section 6 of HIA 2020, together with identification of sensitive sites. This is reflected in the revised chapter 12 at paras 12.98 to 12.100 and Table 12-4.
- 5.5. An updated set of importance criteria for the identified receptors is presented in the revised Chapter 12 in Table 12-1. The rationale for the assignment of importance criteria to identified receptors is presented in Table 12-4. The explanation of how the revised hydrogeological conceptualisation has informed the assessment of residual effects is provided in the following sections of the revised Chapter 12 : Potential Hydrogeological Impacts without Mitigation paras 12.103 to 12.145; Mitigation measures paras 12.146 to 12.164 and Residual effects after mitigation paras 12.165 to 12.174, including Table 12-6.
- 5.6. This content of Chapter 12 has been informed by the HIA 2020, in particular by Section 6 and table 6-2 and by Section 7.

6. Status of the Environmental Statement and other documents

Introduction

- 6.1. This chapter contains an update on the status of the ES and other application documents taking account of changes brought about by Regulation 22 Responses #1 to #5 and the Other Information Documents #1 and #2.
- 6.2. It includes reference to a table showing how original ES documents have been updated by subsequent ones.
- 6.3. The documents comprising the ES are:
- The original ES submitted in June 2016
 - The Regulation 22 Response #1 dated July 2017 (Responding to questions raised by the DNPA in Regulation 22 Request 2016 and including other information provided by the applicant)
 - The Regulation 22 Response #2 dated February 2018 (Responding to questions raised by the DNPA in Regulation 22 Request 2016 concerning Improvements to Caton Cross)
 - Update to Regulation 22 Response #2 dated November 2018 re Revisions to the Caton Cross Improvements Scheme and its ES. This document updated the ES for Caton Cross which was presented in Regulation 22 Response #2
 - The Regulation 22 Response #3 dated February 2019 (Responding to questions raised by the DNPA in a Regulation 22 Request 2016 concerning Water Resources and Land Stability)
 - The Regulation 22 Response #4 dated February 2019 (Responding to questions raised by the DNPA in a Regulation 22 Request 2018 and including other information provided by the applicant)
 - The 'Other Information' document dated July 2019 – now denoted as Other Information document #1.
 - The 'Other Information' document dated October 2019 - denoted as Other Information document #2.
 - This Regulation 22 Response, denoted as Regulation 22 Response #5.
- 6.4. Some parts of the original ES are revised in the Regulation 22 Responses, in the Other Information Documents and in a cumulative Errata. The Regulation 22 Responses and Other Information Documents also contain additional drawings and update the other application documents, notably the Planning Statement and the Habitats Regulation Assessment.

Table showing status of application documents

- 6.5. A table setting out the current status of the text in the chapters and appendices of the ES is presented in Appendix 6.1 of this document. This shows whether each chapter of the ES has been changed from the original version submitted in 2016, in subsequent Regulation 22 Responses (including this one), and in Other Information Documents, and if so, where the changes are set out. Equivalent status updates are given for the ES Appendices, but grouping together the appendices that have not been changed and only listing individually the appendices that have been changed.
- 6.6. The table also shows where changes made to the Regulation 22 Responses themselves are presented, including changes to the Appendices, together with an update on the submitted drawings and on the Planning Statement.
- 6.7. It is important to note that the Regulation 22 Responses contained other Further Information apart from changes to the original ES, as well as clarifications and answers to planning questions,

commentary on consultation responses and 'other information' provided by the applicant. This other content remains as such as presented in the Responses.

- 6.8. Other documents in the application are also covered in the table in Appendix 1 of this document noting changes to the Planning Statement and the Habitats Regulation Assessment.
- 6.9. An updated cumulative Errata is provided in Appendix 6.2 of this document.

7. Other information provided by the applicant

Introduction

7.1. Some of the content of this document falls within the definition of ‘any other information’ which is defined in Regulation 2 of the EIA Regulations 2011 as:

‘any other substantive information relating to the environmental statement and provided by the applicant or the appellant as the case may be’;

7.2. Planning Policy Guidance states

‘Additional information of a substantive nature submitted voluntarily by an applicant must be treated in the same way as information required by the local planning authority (see the definition of “any other information” in regulation2(1))’⁴

7.3. This chapter contains the following:

- important changes to the proposals,
- commentary on the latest version of Devon’s Local Aggregate Assessment, and
- Commentary on the Mineral Product Association’s Annual Planning Survey and a policy paper called ‘Planning for the Future’.
- An economic assessment of the role that Linhay Hill Quarry will have to support the economic recovery from the coronavirus pandemic.

Important changes to the proposals

7.4. The range of proposals included in the application has been reviewed in the light of a recent case that was heard in the Supreme Court referred to as **Wright v Resilient Energy Severndale Ltd and Forest of Dean Council**. The case report is available via

<https://www.supremecourt.uk/cases/uksc-2018-0007.html>

7.5. The case concerned planning permission for a wind turbine which was approved by the Local Planning Authority subject a condition to that the operators should contribute to a community fund with proceeds of the turbine. The decision was challenged by judicial review based on the principle that planning permission cannot be bought or sold. The judgement quashed the planning permission because, in making the decision to approve, the planning authority had treated the contribution as a material consideration, and had issued the permission subject to a condition requiring the contributions to be made.

7.6. It was held that the promise of an annual contribution to a local community fund was an immaterial consideration in planning terms because it was unconnected to the use of the land in question.

7.7. This is relevant for the planning application for the extension of Linhay Hill Quarry because, at the suggestion of the DNPA, the original submission includes the setting up of a community fund to be financed at a rate of 2p per tonne of future sales of limestone. The DNPA made this suggestion in the pre-application stage as a formalisation of Glendinning’s existing practice of making contributions to local community projects on a voluntary basis. This proposal is described in para 5.76 of the original Environmental Statement, which states:

⁴ Paragraph: 047 Reference ID: 4-047-20140306

“In response to a request from the Dartmoor National Park, the company is willing to formalise this commitment by creating a special Community Fund for future contributions. The fund will be modelled on equivalent arrangements made elsewhere in the UK, whereby contributions are based on a formula relating to the level of sales (2p per tonne) and a mechanism set up for the fund to be governed, managed and administered. This arrangement will be included in the Heads of Terms to be incorporated into a S106 Agreement attached to the planning permission for the proposed extension.”

- 7.8. As will be clear from paras 5.70 to 5.75 of the original ES, Glendinning has a long history of making contributions to local community projects throughout all its operations in the South West Peninsula. As the level of contribution suggested by the DNPA was within the range of past contributions and did not inhibit the Company’s ability to make higher contributions if it wanted to, Glendinning agreed to include formalising its commitment to make future contributions as part of the original planning application. The description of the development as set out on the application form includes the wording:
- *“Formalisation of the Company’s current ad-hoc arrangements for making contributions in cash or kind for community projects”.*
- 7.9. However, in the light of the Wright case, Glendinning has reviewed this aspect of the application proposals, in consultation with the DNPA. To avoid the risk of a judicial review on equivalent grounds to those in the Wright case, and with the agreement of the DNPA, Glendinning has decided to delete all references to the 2p per tonne community fund.
- 7.10. Glendinning would like to make it clear that this does not mean that it will cease supporting local community projects. This will continue as Company policy as before. The level of contributions, and how they are governed and administered will remain under the control of the Company.
- 7.11. All references to the fund are therefore removed from the application documents. The changes to the wording of the ES, NTS and Planning Statement and other submitted documents are set out below:
- 7.12. Changes to Application Form:
- In the description of development, delete the words *“Formalisation of the Company’s current ad-hoc arrangements for making contributions in cash or kind for community projects”.*
- 7.13. Changes to ES (Parts 1 to 3):
- Para 1.20 delete the wording *“formalisation of the Company’s current contributions to community projects”*; Delete bullet point 8 of para 3.21; Para 5.58 delete bullet point 3; Page 5-9 delete heading ***‘Formalisation of the Company’s current contributions to community projects’*** and delete para 5.76; Move paras 5.70 to 5.75 to after para 2.39; para 5.139, delete last sentence of bullet point 8 - *“Glendinning is also willing to formalise its ongoing contribution to local community projects”*; Para 19.10 delete bullet point 3 and row 3 of Table 18-2.
- 7.14. Changes to NTS (these changes are incorporated in the updated version of the NTS presented in Appendix 1.2 of this Regulation 22 Response):
- Para 2.13 under heading ‘Community benefits’ delete first bullet point; para 3.2; delete last sentence of bullet point 5 – *“Glendinning’s ongoing support for local good causes will be formalised into a Community Fund”.*
- 7.15. Change to Regulation 22 Response #1 covering document:
- Para 4.29, delete bullet point 4.
- 7.16. Changes to Planning Statement:
- Delete bullet point 8 of para 1.4; Para 1.25 delete the wording *“formalisation of the Company’s current contributions to community projects”*; Para 3.35, delete bullet point 8; Para 4.10, delete first

bullet point; Para 6.11, bullet point 8, delete last sentence - - *“Glendinning is also willing to formalise its ongoing contribution to local community projects”*. Table 19.1, row 12 (at top of page 107) change Commentary from *“The proposals include a commitment to formalise the Company’s ongoing support for local community projects”* to *“The Company has been part of the local economy for more than 50 years and has made significant contributions to local community projects throughout its operation”*.

7.17. Changes to Suggested Heads of Terms for S106 Agreement:

Under heading ‘**Community benefits**’ delete point 1.

Commentary on other aspects of the application proposals

7.18. In parallel with the above, the following other community benefits sought by the DNPA in the pre-application stage of the application are identified as not being ‘material to the main development’ and not ‘necessary to make the development acceptable in planning terms’;

- The dedication of the walled garden for public access
- The provision of a quarry viewing point and associated parking
- Provision of new accesses to the school car park at Place House
- Alteration of the school coach turning circle.

7.19. Also, the proposal to widen the full length of the narrow part of Balland Lane between the lower quarry access and the proposed new junction with Waye Lane is ‘disproportionate’ to the amount of additional traffic that will be diverted there as a result of closure of Alston Lane and construction of Waye Lane. Two passing places would be sufficient as stated in para 3.39 of the original ES.

7.20. Whilst it would be open to Glendinning to withdraw these proposals from the application, the decision has been made to leave them in, but to agree that they **should not** be taken into account by the DNPA in the determination of the application. The Committee Report to inform the determination of the application should make this clear, and any planning permission should not include a condition referencing them, nor should they be included in a S106 Agreement.

7.21. If permission for the quarry extension is granted, Glendinning will implement the proposals in phase with the development as part of its ongoing commitment to the local community.

Commentary on the latest version of Devon’s Local Aggregate Assessment

7.22. The latest version of Devon’s Local Aggregate Assessment (LAA) is the 8th version, published in May 2020. This brings the LAA up to date to the end of 2018.

7.23. Although the level of **sales** of both crushed rock and sand & gravel in 2018 was less than in 2017, nevertheless, the 3 year average of sales remains more than the 10 year average, indicating that the overall trend in sales continues upwards (see Executive Summary and para 2.2.4).

7.24. Crushed rock remains the dominant contributor to all aggregate sales – 82% as reported in para 2.2.5. In addition, limestone continues to provide the **significant proportion** of all crushed rock sales – ranging between 84% and 88%, as described in para 2.2.6 and illustrated in Figure 4 of the LAA.

7.25. The other points of interest in the 8th Devon LAA are the **Landbank, Limestone Reserves**, and comments about **competition**.

Landbank

7.26. The landbank is calculated by dividing the total tonnage reported in reserves by the 10 year average of sales. Separate landbanks are calculated for crushed rock and for sand and gravel. The

crushed rock landbank is also sub-divided to show separate landbanks for limestone, sandstone and igneous/metamorphic rock.

- 7.27. The landbank is a best estimate and changes year to year depending on demand and annual re-evaluations of reserves in quarries, which in turn reflects their geology.
- 7.28. Table 5-1 of the ES set out information for both the crushed landbank and the limestone landbank up to the end of 2014. This was updated up to the end of 2016 in the Regulation 22 Response #1 at para 15.72, and commentary on the 7th Devon LAA to the end of 2017 was provided in the Regulation 22 Response #4. Table 5-1 as updated to the end of 2018 is provided below:

Updated ES Table 5-1 Devon Crushed Rock and Limestone reserves and landbank (2005-2018)

Year end	Crushed Rock Reserves (mt)	Crushed Rock Landbank (years)	Limestone Reserves (mt)	Limestone Landbank (years)
2005	194.33	67.9	114.39	
2006	191.731	67.5	112.519	
2007	189.379	67.6	110.702	
2008	181.522	66.2	130.269	
2009	185.23	70.3	125.3	
2010	149.8	58.2	91.186	51.4
2011	147.691	64.5	88.63	51.4
2012	144.975	63.9	87.21	49.7
2013	139.306	58.5	82.25	46.5
2014	118.886	49.7	79.805	43.5
2015	114.99	48.9	77.164	40.7
2016	114.111	48.2	74.805	38.5
2017	109.356	45.5	72.435	36.3
2018	106.524	43.9	70.107	34.7

Bold = updated information since the original ES

- 7.29. This table clearly shows that the amount of remaining crushed rock reserves has reduced each year, reflecting the fact that no new planning permissions for extraction of crushed rock have been granted in Devon for many years to meet ongoing demand as existing reserves are consumed; the last being the extension to Moorcroft in the mid 1990s. Nationally the low rate of replenishment of aggregate reserves by new permissions is a matter of increasing concern, which applies equally to Devon and the South West.
- 7.30. It is also important to note that in Devon the limestone landbank is consistently at least 6 years less than the overall crushed rock landbank. In 2016 it was 9.8 years less, and in both 2017 and 2018 it was 9.2 years less. This is important because limestone constitutes such a high proportion of total crushed rock sales (ranging between 84% and 88%). So the limestone landbank of **34.7 years** as at the end of 2018 is a more relevant figure in assessing the county’s ability to ensure a ‘steady and adequate supply’ of limestone aggregate, rather than the overall crushed rock landbank figure of **43.9 years**.
- 7.31. Furthermore, this figure should be strongly qualified by the important observation from Table 5-1 above that as each year passes, the landbank falls by more than a year. The rate of decline in the crushed rock landbank is nearly twice the passage of the years, demonstrated by the fact that in the 13 years since 2005 the crushed rock landbank has fallen by 24.9 years. This means that the

crushed rock landbank may well not actually last for a further **43.9 years**: if the rate of decline continues it could be exhausted in **23 years**.

7.32. The rate of decline in the limestone landbank is even more pronounced. The rate of decline in the limestone landbank was discussed in the Regulation 22 Response #1 at para 15.73 onwards, pointing out that in any recent three year period the rate of decline in the landbank is consistently more than twice the passage of the years and in one instance three times. The Regulation 22 Response #1 included a table setting out the relevant figures at Table 5-3 on page 120. The table is updated below:

Updated Table 5-3 of Regulation 22 Response #1: Recent changes in limestone reserve and landbank

Period	Change in limestone reserves (mt)	Change in limestone reserves %	Change in limestone landbank (years)	Change in limestone landbank %
2011 to 2014	-8.825	-9.96%	-7.9	-15.4%
2012 to 2015	-10.046	-11.52%	-9	-18.1%
2013 to 2016	-7.445	-9.05%	-8	-17.2%
2014 to 2017	-7.37	-9.24%	-7.2	-16.6%
2015 to 2018	-7.057	-9.15%	-5.6	-13.8%
Total change 2011 to 2018	-18.523	-20.90%	-16.3	-31.7%

7.33. This table shows the change in the amount of limestone reserves for each 3 year period between 2011 and 2018. This shows that in the 7 years between 2011 and 2018, the limestone landbank fell by more than 16 years, a fall of **more than 30%**.

7.34. Thus the limestone landbank may well not actually last for 34.7 years: if the recent rate of decline continues it could be exhausted in **14.5 years**.

Limestone Reserves

7.35. Another important point to make from the figures provided in the Devon LAA is to draw attention to the position that the proportion of limestone reserves as a proportion of all crushed rock reserves is significantly less than the relative proportion of sales. The statistics in tables 3 and 4 of the 8th Devon LAA have been combined in Table 7.1 below. They show that whilst limestone contributes 83.3% of the ten year average of crushed rock sales, the reserves are only 65.8% of the total crushed rock reserves.

Table 7.1. Comparison of proportions of crushed rock sales (10 yr averages) to reserves.

Crushed Rock Resource	10 yr Average sales	Proportion of 10 year sales of all Crushed Rock	Crushed Rock reserves Mt	Proportion of reserves of all Crushed Rock
Limestone	2.019	83.3%	70.107	65.8%
Sandstone	0.356	14.7%	15.544	14.6%
Igneous/ Metamorphic	0.049	2.0%	20.873	19.6%
TOTALS	2.424	100.0%	106.524	100.0%

- 7.36. The above analysis of the crushed rock and limestone landbank and reserves emphasises the importance of not regarding the crushed rock landbank as a headline figure suggesting that no decisions need to be made about securing a steady and adequate supply of aggregates for the construction industry for many years to come. The picture for individual types of crushed rock is very different. This is particularly true for limestone, which provides such a high proportion of all Devon's aggregates, yet has a significantly shorter landbank, which is shortening fast.
- 7.37. These points are made even more acute and relevant when taking account of the increased rate of housebuilding contained in adopted development plans throughout the county.

Competition

- 7.38. Finally, we draw attention to para 2.4.3 of the LAA which sets out comments on the position regarding competition. Having referred to the planning application for the extension of Linhay Hill Quarry in para 2.4.2, the next paragraph states:

“2.4.3 Paragraph 207 of the NPPF states that “Mineral planning authorities should plan for a steady and adequate supply of aggregates by...ensuring that large landbanks bound up in very few sites do not stifle competition”. While the crushed rock landbank as a whole comprises quarries managed by a range of major and smaller operators, the limestone landbank has a more concentrated pattern of management, with three of Devon’s four limestone quarries operated by one company. If the life of Linhay Hill Quarry were not to be extended through the application referred to in 2.4.2, then Devon would face a position whereby the remaining limestone supply from within Devon would be controlled by one company with no effective competition other than through importation of limestone from outside the county.”

Commentary on MPA's Annual Planning Survey

- 7.39. The Minerals Products Association (MPA) publishes an Annual Planning Survey, based on information from member operators. This is a useful snapshot of aggregate related issues, which includes some commentary that is relevant to the whole of the aggregate sector in general and to the planning application for the extension to Linhay Hill Quarry in particular. The latest survey report can be viewed via the link below

https://mineralproducts.org/documents/8th_AMPS_Report_2019.pdf

- 7.40. Attention is drawn to the following:

- The report highlights on pages 2,3,8 and 9 that the low replenishment rate of new planning permissions against sales continues, and is becoming more acute as the length of time that Mineral Planning Authorities typically take to process planning applications increases. The report reflects the high level of concern about Mineral Planning Authorities' ability to maintain a 'steady and adequate' supply of aggregates in the long term, particularly in the light of increasing demand, such as generated by the need for more housing across the UK.

In Devon this is reflected in the figures in table 7-1 above, where the level of limestone reserves in the crushed rock landbank is significantly lower than the contribution to 10 year sales made by limestone, and hence emphasises the need for the extension to Linhay Hill Quarry.

- Page 13 sets out the average amount of time taken to obtain a planning permission for a crushed rock extraction. This has increased in 2018 to 35 months (including pre-app and after determination to issue of decision notice). This is considered too long by most industry commentators, including the Mineral Products Association and the British Aggregates Association.

For reference and comparison, as at June 2020, the planning application for the extension of Linhay Hill Quarry has been under consideration for 48 months from submission. The pre-

application process started in May 2014, which is a full 24 months before submission. Therefore the total comparable period is now 72 months, more than twice the average of MPA members. This, together with the diminishing reserves of limestone in the quarry makes determination of the application now urgent.

- Page 14 shows that no new quarries have opened since 2009. This emphasises the point made in the Regulation 22 Response #1 that new quarries are considerably more difficult and costly to open than extensions to existing quarries.

This finding reinforces the arguments that the extension of Linhay Hill Quarry meets the requirements of the Major Development Test in terms of ‘the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way’.

- Page 14 also reports that crushed rock quarries typically yield 287 tonnes per ha (tpa), compared with 45 tpa for new sand and gravel quarries and 35 tpa for extensions to sand and gravel quarries.

This reinforces the justification for an extension to a crushed rock quarry as an efficient means of contributing to the future aggregates market, whether by providing sales or by providing competition. The planning application to extend Linhay Hill Quarry does both.

7.41. Other interesting points in the MPA Annual Planning Survey report are:

- more planning permissions for mineral extraction were granted on unallocated sites than on allocated sites (Figure 14 on page 14) – as is the case with the Linhay Hill extension site.
- The vast majority of applications for land-won aggregates were approved. (Page 15, Figures 15 and 16). Thus, approval of the Linhay Hill Quarry application would not be illogical or unprecedented.

Commentary on the MPA’s paper - Planning for the Future

- 7.1. In June 2020 the Mineral Products Association (MPA) published a policy paper calling for reform of the mineral planning system to ensure future supply of minerals to support housing and infrastructure construction, manufacturing and other key strategic sectors of the economy. The paper can be viewed via this link:
https://mineralproducts.org/documents/MPA_Planning_for_the_future_Jun2020.pdf
- 7.2. The MPA paper highlights the essential role of mineral products and the fundamental importance of the planning system for ensuring supply as the economy recovers. Published in advance of the Government’s anticipated Planning White Paper, the MPA calls for specific, deliverable measures to reinforce the essentiality of mineral products and improve delivery of the Government’s planning ambitions, supporting the recovery of construction and the wider economy.
- 7.3. The paper draws attention to the low replenishment rate highlighted in the Annual Planning Surveys and commented on above, pointing out how over a 10-year period, consumption of land-won aggregates outstrips new reserves that are permitted: with only 75% of crushed rock reserves and just 63% of sand and gravel reserves replaced between 2009 and 2018.
- 7.4. The paper recognises that the Planning White Paper will be an important step to support economic growth and recovery. It provides an opportunity to reinforce the link between delivery of housing, commercial development and infrastructure and the critical need for a steady and adequate supply of essential mineral products for construction and manufacturing.
- 7.5. A number of key reforms are proposed, both general to the whole system and specifically for mineral planning. General reforms include:
- Better resourcing planning functions by ring fencing fees to address the chronic under-resourcing of local planning departments;

- Tackle slow plan-making and decision-making by streamlining the plan-making process, focussing on simpler plans supported by a template approach to general and development management policies that are common across the country; and
- Resist the increasing number of superfluous information demands during plan-making and development control by ensuring information requirements are material, reasonable and genuinely necessary.

7.6. Reforms that are specific to mineral planning include:

- National statements of need for minerals and mineral products, including new National and sub-national guidelines for aggregates provision should provide a more consistent ‘forecast of future demand’ to support the development of local plans;
- Continued monitoring at both national and local scales to support function and delivery of the Managed Aggregate Supply System;
- Major construction projects should be required to produce “resource assessments and material supply audits” as part of their development processes to provide greater visibility around future needs, and ensure the right materials are available in the right place and at the right time;
- Establishing regional ‘centres of excellence’ for mineral planning delivery, pooling resources to deliver mineral planning services across authorities to address the lack of specialist minerals planning skills and experience within planning departments;
- Establishing the primacy of the planning permission as the main “licence to operate” to reduce the duplication with other regulatory regimes.

7.7. The paper concludes by pointing out the key role the planning system has in ensuring that the right minerals are made available in the right place and at the right time to maintain the continuity of supply.

Economic Assessment of the role of Linhay Hill Quarry in the local economy post Covid-19 pandemic

7.8. The Covid-19 pandemic and subsequent economic crisis has affected all sectors of the economy, including quarrying and construction – the natural downstream industry of Linhay Hill Quarry. Economic projections suggest that it will take some time for the economy to get back on its feet, with a recovery to 2019 levels projected for 2021 to 2023 depending on actions taken.⁵

7.9. But the nature of Linhay Hill Quarry activities and its linkages to the local economy leads to think that it will significantly contribute to the economic recovery of the local area. Three reasons support this:

1. The construction sector is likely to be one of the fastest to bounce back.

7.10. The limestone extracted from Linhay Hill Quarry is typically used to supply material used in road and highway maintenance, local housebuilding and agriculture in Devon, meaning that the way these industries bounce back in the aftermath of the covid-19 economic crisis will be critical to the economic plan of the quarry.

7.11. Construction, as other industries, has been significantly affected since the beginning of the pandemic. 86% of UK building companies reported a drop in their business activity between March and April.⁶

⁵ McKinsey & Company, *Covid-19, Briefing materials* (updated: March 25 2020).

⁶ Palash Ghosh, Coronavirus Economy: UK Construction Industry Suffered Historic collapse in April, *International Business Times* (6th May 2020). Retrieved at: <https://www.ibtimes.com/coronavirus-economy-uk-construction-industry-suffered-historic-collapse-april-2971454>

- 7.12. Yet housebuilding companies are already re-opening their sites gradually, supported by announcements and guidelines from the Government and industry representatives, such as the Construction Leadership Council, BuildUK and the Home Builders Federation.⁷
- 7.13. On 10 June 2020, the Secretary of State for Housing, Communities and Local Government published a letter sent to all Mayors and Local Enterprise Partnership chairs and asking for details of capital projects in their local growth programmes with a view to understanding how an acceleration of Departmental funds could serve as a stimulus to the economy as the nation comes out of lockdown. The following construction-related proposals are amongst the types of capital project considered likely to drive up economic growth and jobs and support green recovery:
- town and city centre modernisation through targeted infrastructure investments unleashing their longer-term economic potential;
 - investment in physical connectivity to improve the functioning of the local economy;
 - investment in innovation ecosystem including through improvements to research and development facilities driving up business productivity;
- 7.14. Mayors and Local Enterprise chairs were asked to submit details of capital projects as candidates for funding under the following themes: Business Support, Flood Management, Housing, Regeneration, Skills, Tourism, Transport, Employment, Digital/Internet Infrastructure, Enterprise, Innovation, Health and Wellbeing, Cultural Sector, Public Realm, Enabling Works, Clean Energy/Resource Efficiency.
- 7.15. Government strong support can be explained by the fact that construction will play a major role in the economic recovery of the country. In 2018, 1.3 million people worked in this sector, accounting for 5% of the workforce, but a 2013 Government report suggested that the wider sector (that is, including related activities such as civil engineering, quantity surveying, wholesale of hardware and other equipment, construction products, to name a few) covered 2.9 million jobs (10% of employment) and contributed almost £90 billion in the UK economy (6.7%).⁸ As such, construction and related activities represent a vital sector to the UK economy, and one of the largest construction markets in Europe.
- 7.16. Most experts predict that the residential construction industry could recover quickly.⁹ One reason for this is that supply of housing is still lower than demand, meaning that there is still a high need for new homes. It is reported that the number of planning approvals have recovered considerably since last year. In addition, the big house building firms still have strong pipelines of delivery over the coming months.¹⁰ On the longer term, housing market's recovery will depend on the rate of growth post-lockdown, with consumers' confidence likely to be affected. That said, the construction sector has shown good resilience in the face of economic uncertainty before: during the global financial crisis, it is reported that people still moved home and investors still bought property, despite a general slowdown of activities.¹¹

2. Construction is an important sector in Teignbridge and Devon

- 7.17. In 2018, about 4,500 people worked in the construction sector in Teignbridge, accounting for 9% of the employed workforce. This is significantly higher than the British average of 5% of the workforce for this sector.
- 7.18. Construction also accounted for 13% of Teignbridge GVA (or £2.3 billion) in 2018, while the sector accounts for 6% of the UK GVA. Construction is also an important sector of Devon, where it accounted for 8% of the GVA (£17.7 billion).

⁷ <https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2020/04/CLC-letter-to-PM-01-April-2020.pdf>, <https://builduk.org/coronavirus/>, <https://www.hbf.co.uk/policy/coronavirus/charter-safe-working-practice-covid-19/>

⁸ Department for Business, Innovation & Skills, *UK construction, an economic analysis of the sector* (July 2013)

⁹ Liz Murphy, A timeline: the future of the UK's housing market & construction industry post lockdown, *House Beautiful*, retrieved from: <https://www.housebeautiful.com/uk/lifestyle/property/a32446524/coronavirus-lockdown-uk-housing-market-construction/>

¹⁰ *ibid*

¹¹ *ibid*

- 7.19. These figures only capture economic activity related to construction in its narrower sense, but when accounting for related industries upstream and downstream the value chain, a significant share of the local economy is likely to be reliant on construction.
- 7.20. These figures are illustrated in the graph below.



Source: ONS, BRES (2019); ONS, Regional Gross Value Added (balanced) (2019).

Note: Construction is expressed as a share of the UK GVA and GB employment, due to data availability

- 7.21. Projections were for continued growth 2020-21, supported by the National Infrastructure Strategy and March 2020 budget which placed importance and funding to housing and infrastructure delivery, with needs identified in urban regeneration, connectivity and climate resilience. In January 2020, the 'Back the South West' coalition of South West businesses, education leaders and local authorities published its prospectus to work in partnership with the Government as a growth alliance aiming to deliver £45 billion of economic benefit and 190,000 new jobs over the next 15 years. on the south west region. See WMN article in Appendix 7.1.

3. Linhay Hill Quarry has strong local linkages

- 7.22. Linhay Hill Quarry plays an important role in the local economy of Devon, both in terms of upstream/downstream linkages and employment. On the upstream side, 42% of company total purchase value comes from local suppliers, such that the quarry's activities positively support local businesses.
- 7.23. For the downstream contribution, in 2016 key customers included approximately 1,800 small building firms, local authorities (Devon County Council, Torbay Council, Plymouth and Exeter City Councils), major contractors (Balfour Beatty, Kier Group, etc.), house builders (Midas, Cavanna, Linden Homes, Steve Hoskin Construction Ltd, etc.), builders' merchants (Jewson, Travis Perkins, RGB Building Supplies, Inter-Line Building Supplies and others) and agricultural merchants. The company also supplies around £600,000 worth of stone and products within Dartmoor National Park annually.
- 7.24. The quarry is also recognised as an important large employer in the area, as mentioned in the adopted Dartmoor National Park Core Strategy. As of 2016, the company had 240 employees, 136 of which based in Ashburton.
- 7.25. This means that, as construction activities resume, the purchases, products and jobs that Linhay Hill Quarry operations provide will be very important locally, as this will reverberate on the activities of local suppliers, customers and employees.

Conclusion

- 7.26. Linhay Hill Quarry is likely to significantly contribute to the recovery of Teignbridge and Devon's local economy through and after the Covid-19 pandemic. This is because the quarry's activities are very interlinked with the local economy, which considerably relies on construction, a sector that is expected to show resilience throughout the crisis.

Appendices

Appendix 1.1 Schedule 4 of the EIA Regulations 2011

Appendix 1.2 Updated Non Technical Summary

Appendix 2.1 Revised ES Chapter 12 on Water Resources,

Appendix 2.2 Revised eco-hydrological assessment of the quarry extension proposals

Appendix 2.3 Comparative Overview of Information Submitted in Support of Planning Applications for
Three Operating Limestone Quarries in Devon: Stoneycombe Quarry, Moorcroft
Quarry and Linhay Hill Quarry

Appendix 3.1 Revised planning drawings for Stages 2, 3, 4, 5 and 6

Appendix 4.1 Revised ES Chapter 17 on Land Stability

Appendix 6.1 Table to clarify the status of the ES and other application documents

Appendix 6.2 Updated Errata

Changes to ES Appendices and Figures

New ES Appendix 12C Hydrogeological Impact Assessment 2020

New ES Appendix 17.2 Land Stability Risk Assessment 2020

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