



Somerset Wildlife Trust Position Statement

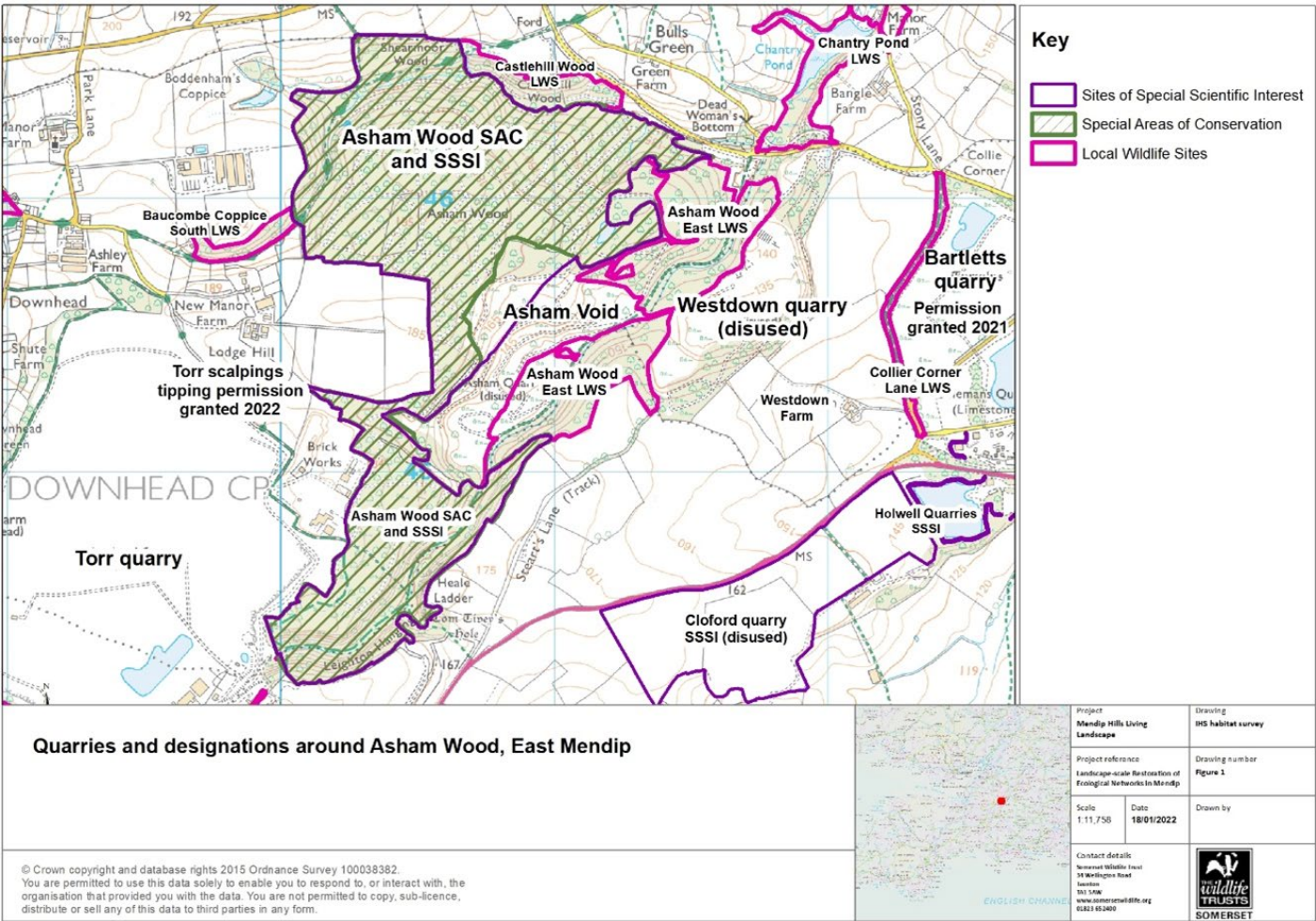
regarding the application to reopen
Westdown Quarry

Somerset Wildlife Trust does not support the application to reopen Westdown Quarry due to the immediate impact on habitats and protected species including on Asham Wood SSSI/SAC. In the context of the ecological and climate emergencies we need to protect and restore nature now, not in decades at the end of quarrying activity. Any decision regarding this application must, in our view, be taken in the context of current policies regarding the environment, the climate and nature, including the Environment Act and Somerset's Climate Emergency Strategy.

Priority species and habitats within/overlapping Westdown Quarry planning proposal area

The proposed reopening of Westdown quarry will have negative impacts on a number of surrounding sites including Asham Wood SAC and SSSI, one of the most critical woodland areas in the Mendip ecological network. The areas marked on the map as Asham Void and Westdown Quarry are, in fact, nature recovery areas that have recovered from previous quarrying, and where a range of species and habitats are now flourishing, providing a vital buffer and dispersal site for Asham Wood and the wider ecological/nature recovery network. (See a description of a first visit here below).

In the table below we set out a summary of the impacts on species and habitats that will be caused by reopening Westdown quarry.



Sites within/ overlapping boundary of planning proposal	UK Priority habitats present	Impact on habitat and Nature Recovery Network	UK Priority species present in each habitat	Impact on Species
Asham Wood SSSI	Lowland Mixed Deciduous woodland (Ancient)	Loss of connectivity in NRN and loss of neighbouring buffering habitat; impact of dust on habitat	Bat species; Great crested newt; Invertebrate species	Disturbance including noise and dust; loss of neighbouring habitat and connectivity
	Open mosaic habitat	Some loss of habitat	Invertebrate species; Bat species	Loss of habitat; Disturbance
Asham Void/ Quarry	Open mosaic habitat	Significant loss of habitat; significant impact on that habitat in NRN.	Bat species;	Loss of foraging habitat; loss of roost sites on rockface; mortality particularly through burying animals in rockface; disturbance
			Invertebrate species	Loss of habitat; mortality from quarrying operations
Westdown Quarry	Open mosaic habitat	Significant loss of habitat; significant impact on that habitat in NRN.	Great crested newt	Loss of five breeding ponds and the loss of all surrounding supporting terrestrial habitat; mortality through quarry operations Loss of connectivity for bat and invert species

	Lowland calcareous grassland	Loss of established habitat	Invertebrate species	Loss of habitat; mortality from quarry operations; loss of connectivity for species.
Westdown Farm Hedgerows, scrub and woodland habitat	Species-rich hedgerows	Significant loss of habitat; loss of connectivity within the NRN	Hazel dormouse	Loss of well-established species-rich hedgerow and scrub/woodland habitat; loss of habitat connectivity
Westdown Farm buildings		Destruction of buildings	Bat species	Loss of important Lesser horseshoe maternity roost in farmhouse and hibernation roost in outbuilding
Asham Wood East LWS	Lowland Deciduous Woodland		Bat species	Disturbance
	Open mosaic habitat	Some loss of habitat	Invertebrate species	Some loss of habitat
Asham Conveyor Tunnel			Greater horseshoe bat roost	Disturbance; loss of nearby foraging habitat
Fordbury Water Corridor (follows bridleway)	Stream	Potential disturbance; pollution	Otter	Potential disturbance; potential pollution effects
	Lowland Deciduous Woodland	Loss of connectivity and buffering habitat; dust	Bat species	Potential disturbance to habitat corridor (e.g. light, noise, dust)

Impact on Ecological and Nature Recovery Network

Asham Wood and surrounding sites are hugely important parts of the Mendip landscape and Somerset's ecological and nature recovery network. The significance is affirmed by the large number of designated sites within close proximity to the planning application boundary, including: Mendip Woodlands SAC (immediately north of the Site Boundary); Mells Valley SAC (3km northeast of the Site Boundary); Postlebury Wood SSSI (2.3km south); Edford Woods and Meadow SSSI (2.9km northwest); Old Ironstone Works, Mells SSSI (3.1km northeast); St. Dunstons Well Catchment SSSI (4.1km northwest); and Vallis Vale SSSI (4.2km northeast); as well as 18 Local Wildlife Sites within 3km of the site boundary.

The loss and additional disturbance of hedgerow, open mosaic, grassland, and woodland habitat at the heart of this heavily protected landscape will have a resounding impact on the nature recovery network by reducing connectivity and thus the resilience of the wider network. This is at a time when ash dieback disease is already putting the ecological integrity of ancient woodlands in East Mendip under significant pressure.



Material Considerations

The decision to allow quarrying to recommence at Bartlett's quarry taken in July 2021 and approval for scalplings to be tipped on land next to Torr Works and Asham Wood SSSI in January 2022 must be a material consideration in this decision in line with National Planning Policy Framework requirements that state:

"In considering proposals for mineral extraction, minerals planning authorities should: ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;"

The Somerset Minerals Plan, adopted February 2015, sets out how and where minerals will be worked in Somerset until 2030. Since its adoption, all five councils in Somerset adopted Somerset's Climate Emergency Strategy in November 2020, and the UK government passed the Environment Act in November 2021 establishing the need for biodiversity net gain in the planning system.

Somerset County Council acknowledge the Minerals Plan is overdue for review and acknowledge that "Key policy considerations, such as climate change, BNG, etc. are already required to be taken into account and weighed into the balance when assessing the merits of any new mineral working proposal." (Full Statement at end)



Somerset Wildlife Trust Position on the impact of quarrying on Somerset wildlife and landscape

Somerset Wildlife Trust has carefully considered the overall impact of quarrying on habitats and species, and with our Wildlife Trust partners, have a Position Statement on quarrying that recognises both the positive and negative impacts.

[Our full statement is available here](#) with extracts relevant to this application below.

We are facing two inextricably linked crises – the climate emergency and the alarming decline of nature. We cannot solve one without tackling the other.

With careful planning of location and design, in certain cases it is possible for quarrying to avoid and/or minimise impacts and deliver benefits for wildlife and the wider environment through restoration and/or creation of nature rich habitats in areas where there is limited current wildlife

value. Where possible, we will work with quarry companies to help them to do so.

However, we recognise that quarrying for non-energy mineral/aggregate extraction can negatively impact wildlife through loss and damage to habitat; disturbance from noise, dust and vibration; air and water pollution; and changes to hydrology and hydrogeology, which can affect groundwater quality and quantity.

As with any other type of development Somerset Wildlife Trust will assess the merits of individual proposals for the extraction of non-energy minerals/aggregates on a case-by-case basis, using the best available evidence to inform our judgement.

We expect all proposals to meet the highest planning standards and follow the avoid, minimise, compensate, and net gain hierarchy to ensure that significant natural environment impacts are avoided.

Somerset Wildlife Trust will not support proposals that result in a net loss for biodiversity and that cause direct or indirect damage to: areas of importance for wildlife; priority habitats and species; habitat identified for nature's recovery as part of the local Nature Recovery Network Strategy; or proposals that compromise national or local objectives for these habitats or species, ecological connectivity or function.

We do expect all developments to contribute to nature's recovery by providing a net gain for biodiversity. A condition of any planning permission should be that adequate funds are set aside to achieve this and its management in perpetuity.

Somerset Wildlife Trust's response to Hanson UK's proposals to reopen Westdown quarry

We have considered the plans in the context of our Quarrying and Mineral Extraction Position Statement. Somerset Wildlife Trust does not support the reopening of Westdown quarry on the basis of:

- The importance of the adjacent SSSI and SAC and the significant effect these proposals will have on habitat connectivity through habitat loss and disturbance
- The position of the site in the wider landscape and role within the nature recovery network
- The loss of valuable habitats and impact on species at Asham Quarry and Westdown Quarry
- The timing of the proposals, in the context of ecological and climate emergencies and the devastating impacts of ash dieback on Mendip's woodlands

Creating a robust, resilient, landscape-scale nature recovery network is a vital step in reversing catastrophic declines in biodiversity and helping wildlife and people to adapt to climate change. The nature recovery network is a major commitment in the government's 25 year environment plan and, in its nature recovery network policy paper (Nov 2020) it states an intention to restore 75% of protected sites on land into favourable condition so nature can thrive. The decision to reopen Westdown Quarry should take these policies, along with Somerset's Climate Strategy and the Environment Act, into account as material considerations.

Reopening Westdown Quarry and the associated works at Asham Quarry/Void will impact important habitats and species. Following cessation of quarrying activities 40 years ago, plants and wildlife have recolonised, creating thriving 'nature recovery areas'. These quarries and the adjacent farmland subject to the planning proposal support at least 13 species of bat, 21 species of bird, dormice, great crested newts, otters, badgers and other protected species, as well as five priority habitats: lowland calcareous grassland, open mosaic habitat, hedgerows, semi-natural broadleaved woodland and stream.

Asham Wood SSSI/SAC, neighbouring the expansion site, is the largest and most diverse semi natural ancient woodland in Mendip. Re-initiation of quarrying on the adjacent land would detrimentally impact on this important site, as well as the Mendip Hills Woodland SAC and Mells Valley SAC, and several Local Wildlife Sites nearby. The ecological survey work undertaken to support the planning proposals for Westdown quarry confirms the importance of this landscape for wildlife.

We are very concerned about the immediate negative impacts and loss of habitats and species, and how net gain will be achieved during the life of the quarry, as well as following cessation of quarrying activities. **At this time of the ecological and climate crises and devastating impacts of ash die back, we need more good quality habitats, not less. Nature can't wait.**

We are concerned that the assessment of the effects of proposed development set out in Chapter 11 of the Environmental Statement is overly optimistic for important species such as dormice, great crested newts and bats. Also, there is no guarantee that the replacement habitat created through mitigation will be of high quality or will be used by displaced species. The urgency with which we need to act to reverse the current trends in biodiversity loss require greater gains for biodiversity on a much shorter timescale.

The cumulative effects of habitat loss within the application site including the loss of priority habitats of lowland calcareous grassland, open mosaic habitat, important hedgerows and semi-natural broadleaved woodland are significant. Alongside increased impacts from noise and dust from planned operations, loss of these habitats will detrimentally impact the connectivity, resilience and integrity of neighbouring Asham Wood SSSI/SAC. The habitats lost are not replaceable within decades, and their loss cannot be mitigated.

For example, the removal of large quantities of established priority hedgerow would represent a substantial loss of important habitat for bats and a range of other wildlife, including one of very few known populations of dormice in East Mendip. This is likely to have a major impact on an important population of a rapidly declining protected species, which prefers tall, wide, established hedgerows to forage and breed.

As well as supporting important invertebrate and botanical communities, extensive bat survey work (Billington 2000) has also demonstrated the importance of these former quarries as foraging sites and functionally linked land for the greater horseshoe bat, a key feature of the Mells Valley Bat SAC. We have concerns about how this valuable foraging habitat will be replaced in the current mitigation plans. We concur with Natural England that the proposed phased programme would result in a degradation and loss of habitats used by greater horseshoe bats over at least 15 years and that not enough consideration has been given to the impact on bats and the Mendip woodland SAC during the phasing period.



We also agree with the response from Somerset Bat Group in highlighting various areas of concern:

- Lack of adequate radiotracking of greater horseshoe bats to establish the significance of the site for foraging
- Impacts on niches, crevices and caves in rockfaces that currently provide roosting sites and potential impacts on bat populations – needs to be assessed and mitigated
- Proximity of the proposed quarry area to an important greater horseshoe bat roosting site with impacts on the network of foraging and flight routes
- Impact of loss of Westdown Farm lesser horseshoe bat maternity roosting site

The cumulative effects of recent quarry proposals around Asham Wood SSSI/SAC must also be considered. The planned reopening of Westdown quarry alongside recent planning permissions granted for Bartletts quarry, and the piling of scalplings from Torr quarry to the west of Asham Wood, will put mounting pressure on the ecological resilience of Asham Wood. This comes at a time when ash dieback disease is already taking a heavy toll on the integrity of the woodland.

Conclusion

Somerset Wildlife Trust believe that mitigation and restoration work at some quarrying sites can provide a net gain to biodiversity and be of genuine benefit to the local community. However, in this case the negative impacts on Asham Wood SAC and SSSI, Asham Quarry/Void, Westdown Quarry and nationally important bat populations and other protected species cannot in our opinion be justified. This application must also be considered in the context of other quarry planning applications and future plans. The combined impact of these on the ecological network/nature recovery network, together with implications of climate change and the devastating impact of Ash dieback on habitats in Mendip must also be a vital consideration.

APPENDIX

Full statement from Somerset County Council on The Somerset Minerals Plan

The Somerset Mineral Plan (SMP) was adopted in 2015 and should be reviewed at least every 5 years. There has been a delay in SCC undertaking the review, primarily due to staff resources within the planning policy team, which I am pleased to say have been resolved since I was brought into post in March 2020.

Since March 2020, work on supporting documents that will enable the review to take place, have been commissioned and are underway (and nearing completion). These include (but are not limited to) the Local Aggregate Assessment, Authority Monitoring Report and Waste Needs Assessment.

The Local Aggregate Assessment (LAA), which is usually published annually by SCC, provides an assessment of the demand for and supply of aggregates and we are currently consulting statutory bodies on a 'catch up' LAA covering 2017-2019. The 2020 LAA has been delayed as a result of Covid-19 making the capture of data challenging during the first lockdown when many staff were furloughed. The 2017-2019 LAA, along with the Authority Monitoring Report, will be published once formally approved, and are key monitoring reports required in order for us to review the SMP and ascertain what (if any) updates are required.

Climate Change is clearly a very important issue that shall be assessed as part of the review of the SMP. The Policy team will need to review all of the relevant policy documents that have been published since the SMP was adopted, to inform the review and to identify areas of the plan that may need updating, including any new policies that may be required.

It is acknowledged that the SCC Climate Strategy and the NPPF contain chapters/sections on

Climate change, however, the NPPF also recognises the great importance of mineral supply in order to provide the infrastructure, buildings, energy and goods that the country needs. In particular, in determining planning applications, the NPPF states that 'great weight should be given to benefits of mineral extraction, including to the economy'. It is anticipated that a review of the NPPF will take place in the near future, and that the Government is likely to strengthen the policies and guidance in order to tackle climate change, which we will of course be mindful of.

Key policy considerations, such as climate change, BNG, etc. are already required to be taken into account and weighed into the balance when assessing the merits of any new mineral working proposal. It is of course also worth noting that the Policy with regard to Peat is that there should be no new permissions, however we will await the final versions of Government guidance documents, so that they can be taken into account as part of the review (depending on timing).

[National Planning Policy Framework \(\[publishing.service.gov.uk\]\(https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/666666/nppf-2019.pdf\)\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/666666/nppf-2019.pdf)