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Your Ref SCC/0095/20SE

The Head of Planning
Strategic Development
Endeavour House
8 Russel Rd
Ipswich
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10th March 2021

Dear Sir

BARNHAM PARISH COUNCIL RESPONSE TO APPLICATION SCC/0095/20SE

Barnham Parish Council wish to strongly object to the approval for operating this quarry for a 12-month period and very strongly object to the transport plan to bring HGVs onto the C633 for routing through Barnham and Thetford.

Note: Any reference to original application refers to 2012 application and subsequent amendments and variations.

Heritage assets

There would appear to be no consideration given to the two grade 2 listed buildings, Carine Cottage and Meadow Cottage. Dr Natalie Gates of Historic England raised concerns at the failure to consider these heritage sites during the Suffolk Minerals and Waste consultation. These sites are now at risk as a result of the quarry workings but more so as a result of the proposed re-routing of the quarry traffic along C633 where they will be susceptible to the vibration and pollution from the increase in heavy goods vehicles. Policy MS2 requires measures to safeguard listed buildings in the vicinity.

Flooding and the Environment

The original application for the quarry failed to accurately investigate the implications of the relatively high water table in the area of the proposed excavations and the land through which the ditches route. This application also seems to fall short of addressing this problem. There is a watercourse to the west of the current site, Hunwell Spring, that starts as an open watercourse and then becomes a piped watercourse before entering the ditches that route to the Little Ouse. These water courses are normally full of water in the winter and occasionally spill over to flood adjacent fields to the north of the C633. The problem of flooding has been exacerbated in recent years due to the poor maintenance of the ditches and especially the culverts that run under C633, the old railway line and the A134. The wheel washing and

gravel preparation process will result in water flowing into this natural drainage system and possibly cause more flooding. Even if percolation into the ground is successful in containing the runoff of water from these processes, it is likely that the water will still find its way into the ditches. All year-round operation of the site could lead to an alteration in the water levels resulting in a raising of the average level and subsequently more frequent and worse flooding to the adjacent fields. This also has implications for the wastewater treatment systems used by private and commercial properties which rely on the porosity of the soil or ditches for their correct functioning.

Dust and Air Pollution

The type of sandy soil in the extraction area raises the risk of a high degree of dust pollution during dry weather. Barnham village is in the direct line of the prevailing winds so any pollution created will find its way towards the village. We do not consider that the measures proposed to control pollution are robust enough to prevent an accidental contamination of the atmosphere and so we do not consider that summer operations from this site should be allowed.

Landscape, Visual Impact and Ecology

This site sits in the centre of a Breckland landscape, an area noted for its gentle contours and pastoral scenes with views that, prior to the erection of a large bund, could be appreciated from the adjacent byways and roads. The siting of the “modest” mineral processing plant (fig1) will hardly be an unobtrusive feature on the landscape. This plant will not be in situ for a short time, as asserted in the application. A permission is sought for 5 years but this site is only part of a larger adjacent area which is also intended for development and the slow destruction of this landscape could take place over a period of 20 years or more.



Fig 1

Due to the possible effect this site may have on protected species including the Stone Curlew, a restriction was placed on the original planning application of a 6 month operating period outside of the Stone Curlew breeding season. This restriction was included in Policy MS2a and is still relevant.

Traffic Plan

The C633 has been used as a temporary southern bypass for Thetford for several years. It was never intended as a long term solution to a traffic problem. Because of the classification of the road, the substructure is unsuitable for the high volume of HGVs that now use it with the result that the roadside edges are crumbling, and the sides of the carriageway are breaking up. The applicant's assessment that the road is in good condition is clearly a sign that there has been only a cursory examination of it.

The traffic plan uses a vehicle survey carried out near the proposed entrance to the site. The use of this survey to assess traffic patterns for the length of the road is flawed in that it may not have registered, during such a short sampling period, for the seasonal increase in traffic, for example, during sugar beet harvesting time. Nor, due to the location of the survey will it have registered the localised large volume of HGVs travelling both ways along the C633 at the eastern end. Although there is a Traffic Regulating Order (TRO) in place to restrict the direction of travel to an easterly direction, it is ineffective in dealing with vehicles associated with the industrial sites on Station Road and Little Heath. The congestion and damage to the roadside edges and verges caused by HGVs routing both ways on C633 have been a concern for the Parish Council for some time. These concerns have been expressed through the various planning applications and directly to the determining authority and some attempt has been made to address this issue by limiting the number of daily vehicles allowed to operate from these sites. However, some of these sites are not yet fully operational so the full effect of the traffic joining the C633 from them has yet to be assessed and certainly would not have been registered in the traffic survey. The Parish Council consider that, under these circumstances it would be very inappropriate to increase the traffic on C633 by allowing more vehicles from the North Farm Quarry. **There is a far more sensible route off-road using the proposal from the original quarry application in 2012, which utilised the internal Elveden Estate Track Network.** This route was suitable for 29T dumper trucks so we see no reason why it would not cope with 19T two axle lorries. The off-road route to B1106 is only about 3.5km and would permit easy access to the A11. Vehicles returning to the site should also use this routing.

At the hearing for the Suffolk Minerals and Waste Plan the examining Inspector conditioned the North Farm site to have a traffic management plan that would avoid traffic routing through local villages including Barnham. The village extends to the west along C633 and north along the A134. There was no suggestion that this restriction only applied to the centre of the village. The Inspector was already aware of the presence of a vehicle restriction on the centre of the village when making his deliberation so there would have been no need to condition this site unless it was meant to include the 20 properties that line the C633 and A134 and are part of Barnham village. The number of HGVs already travelling along this route are a blight on the lives of the residents whose homes border these roads and a further increase in HGVs must not be allowed. The noise, vibration and pollution are a cause of concern for health issues and mental welfare.

When the permission was granted for the A11 improvement there was a condition imposed on the site which denied the operator the use of the access onto the C633 for transportation of quarry material. The reason given was “*In the interest of highway safety of the users of C633 and to minimise disturbance to the Stone Curlews*”

This restriction is more relevant today than it was in 2012 due to the large increase in traffic and particularly the 2 way movement of HGVs along this road.

Bearing in mind the Inspector’s directive included in Policy MS2, the restrictions imposed on the initial application and the option of a more sensible and previously approved and acceptable alternative, Barnham Parish Council request that this transport plan is rejected, and if the quarry approval is given then the alternative off-road route is adopted. We also request that a condition be placed on any approval to prevent quarry traffic from routing along C633 at any time including the return journey to the quarry.

Responses from External Agencies

There were several objections to this site during previous applications of the plan which appear to be still relevant to this application.

1. **Norfolk Wildlife Trust** has expressed serious concerns due to the extended timescale of any quarrying. Limiting the timescale was one of the factors that were considered necessary for the original approval and removal of the topsoil has already disturbed the landscape.
2. **Historic England** finds the inclusion of this site as unsound due to the archaeological potential.
3. **The Environment Agency** has expressed concerns about water table contamination and flooding. In fact, flooding did occur to neighbouring fields as a result of the excavation of the bund.
4. **RSPB** considers that quarrying in this area will have a significant adverse effect on the integrity of the Special Protection Area.
5. **West Suffolk District Council** have significant concerns about the effect on ecology and landscape.
6. **Suffolk Wildlife Trust** states that such sites should not be permitted if the result is an adverse impact on designated protection sites.

Summary

1. Barnham Parish Council wish to object to this application on the grounds of visual amenity, the impact on listed buildings, flooding risk, damage to the ecology and environment.
2. Barnham Parish Council wish to object to the quarry operating all year round due to dust and air pollution and the effect on protected areas and species and possible effects for flooding of land away from the site but connected by the common drainage system.

3. Barnham Parish Council wish to object most strongly to the proposed transport plan due to noise, pollution and human welfare and a contravention of Policy MS2q. If approval is given to the site, then an off-road route to the B1106 should be the preferred option with conditions to prevent quarry traffic using C633. The original plan submitted to the SMWLP review was for 100 movements a day onto this road and we suspect that this will be the aim of the quarry operator.
4. If it is deemed appropriate to approve this application, including the Transport Plan then Barnham Parish Council request that the following conditions are applied and **implemented** before any vehicle movements or operations are allowed from the quarry.
 - That the 40mph speed limit along C633 and A134 is reduced to 30mph under a s106 funding
 - That the C633 is comprehensively repaired, strengthened and widened to reduce noise generated by the uneven surface and to prevent gullies forming at the edges which present a safety issue to motorists. The cost for this should be borne by the quarry operator.
 - That the operating times of the site are restricted, and no HGV movements or quarry operations should take place before 0700hrs Mon – Sat and cease all operations by 1800hrs Mon-Fri and by 1300 Sat. No operations on Sun or Bank Holiday. This working timeframe should apply irrespective of the level of approval given to the site.
 - That the TRO is revised to prevent HGVs routing in a westerly direction.
 - That roadside marker posts are installed to protect the roadside conservation areas.
5. Finally, there appears to be an attempt in the application to seek an overruling of Policy MS2 Barnham and various other recommendations and conditions from previous reviews of this site, and, consequently, there is a concern by the Parish Council that the regulating authority may have been complicit in failing to address these issues at the Scoping Opinion stage.

Yours faithfully



C. Dowson (Mrs.)
Barnham Parish Council Clerk
(on behalf of Barnham Parish Council)