



MINERALS & WASTE DEVELOPMENT FRAMEWORK

Responses to Representations Minerals Specific Site Allocations Submission

October 2008



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1. INTRODUCTION

- 1.1 The Minerals Specific Site Allocations Submission was subject to a six week public consultation period between the 1 August and 12 September 2008.
- 1.2 During the consultation period 43 representations were duly made by 29 different correspondents. This document sets out the representations made in full, together with Suffolk County Council's response.

Responses to Minerals Submission Document September 2008

Ref No:	Respondant	Representation	Soundness	SCC Reponse
General				
1167	GO-East (Maydo Pitt) [6129]	Note the considerable progress made in preparing the document and it is also pleasing to note you have carefully considered our representation made at the Preferred Options stage. Therefore we do not wish to make any formal representations on the submission document.	Justified.	Noted.
1110	East of England Regional Assembly (Deborah Sacks) [6382]	Suffolk County Council's Minerals Specific Site Allocations Submission is in general conformity with the adopted East of England Plan.	Consistent with national policy.	Noted.
1086	Kettleburgh Parish Council (Mr Trevor Jessop) [6372]	We have no adverse comments to make in regard to the soundness of this document.	Justified.	Noted.
1123	Assington Parish Council (Dave Crimmin) [6399]	Assington Parish Council does not have any comments to make on the above but wishes to be involved in future consultations on the subject.	Justified.	Noted.
Excluded Site 7 Kirton				
1102	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	I am writing to you on behalf of Brett Aggregates Ltd and to acknowledge receipt of your letter dated 1st July 2008 reference MDFSSASD in respect of exclusion of Site 7, Kirton from the Minerals Specific Site Allocations Preferred Options Document. Your letter states that 'it is considered that the cumulative effects of working the site at the same time as the existing Bucklesham Quarry operated by Lafarge would be unacceptable and because there is considered to be sufficient sites already identified to meet the sub-regional apportionment for sand and gravel during the period covered by the Minerals Development Framework'. It is accepted that Policy 3 Cumulative Impacts within the Minerals Core Strategy applies in relation to Kirton and Bucklesham and it is noted that this, together with the mention of sufficient sites already identified, is the only reason why Kirton has not been identified. Indeed at earlier stages during the preparation of the Site Allocations Document there were no reasons identified by the Mineral Planning Authority as to why Kirton should not be identified apart from Policy 3 for cumulative working with Bucklesham Quarry. My purpose in writing is therefore to ask for your confirmation that following the cessation of working at the Bucklesham Quarry Site 7, Kirton will be identified as a 'Preferred Site' as soon as possible thereafter.	Unsound as not justified.	Regular review of the plan will provide an opportunity to readdress proposed sites in the light of demand for aggregates and reappraise environmental constraints. It is not considered appropriate to refer to this site as a future working and pre-empt future consideration.
Excluded Site 9 Leavenheath				
1047	Leavenheath Parochial Church Council (Christopher Whybrow) [6250]	I am authorized by Leavenheath Parochial Church Council, whose church " St Matthews " was adversely affected by the Leavenheath site in the initial list of 25 potential sites, to support the exclusion from the final consultation document of the Leavenheath site for the reasons the PCC set out in responses to the earlier rounds of consultation.	Justified.	Noted.

Ref No:	Respondant	Representation	Soundness	SCC Reponse
Excluded Site 11 Barking				
1111	Lafarge Aggregates Ltd (Mr S Anderson) [5190]	<p>We understand that the Council have recently submitted their Minerals Site allocations DPD in accordance with the provisions of the adopted Local Development Scheme (June 2007). This submission is made on behalf of our client, Lafarge Aggregates Limited, to lodge an objection to the document on the basis that the DPD as submitted is unsound. It is considered at present that the proposed allocations do not provide sufficient flexibility to deal with the current market climate. It is considered that the proposals as submitted represent an over-reliance on a single operator to be able to supply approximately 46.5% of the future demand for the County, especially when one of the proposed allocations under control by the same company has already received a setback in planning. Such reliance raises questions on the future effectiveness of the plan over the duration of the plan period. In addition, it is also considered that the proposed allocations at Coddenham and Barham conflict with Policy DC1 and DC2 respectively to such an extent that the working of these sites could compromise the landscape and/or ecological environment respectively. It is therefore submitted that our client's Barking site should be included in the adopted plan. The site was identified as site 11 in the rejected sites of the Preferred Options Report. The site was rejected primarily due to landscape reasons and in addition, the Council identified that there was no overriding need for additional workings in this area despite proposing to allocate resources at Barham less than 2 km away. It is submitted that the rejection on landscape grounds are unjustified, as with appropriate mitigation measures (i.e. advance planting) the landscape impact of operating the site could be greatly reduced (particularly bearing in mind it would comprise extraction activities only), such that the relative impact when compared against other allocated sites (i.e. Coddeham which is located next to a historic parkland) is more favourable.</p> <p>The second reason stated, i.e. no overriding need for additional workings in this area, is not consistent with the Councils own allocation proposals, and we would therefore question the justification behind this decision. This decision is even more questionable given the proximity of the added value operations of Lafarge Aggregates Limited at Barham Railhead, which Barking would supply.</p> <p>In addition to the perceived environmental impact, it should be noted that deposit at Barking has relatively high percentages of gravel when compared against other sites in the county. This provides a greater degree of flexibility of supply to the market in the county.</p> <p>It is proposed that there is a rebalancing of operator sites included in the plan to lessen the over-reliance on a single operator and thus provide greater flexibility. Furthermore it is proposed that our client's site at Barking is included as it can be operated in a sustainable manner as a satellite extension to the consented workings at Gallows Hill Quarry.</p>	Unsound as not justified or effective.	Sites have been selected on their merits and take account of opportunities for mitigation where appropriate. Regular review of the plan will provide an opportunity to reassess proposed sites in the light of demand for aggregates and reappraise environmental constraints.
1111	Lafarge Aggregates Ltd (Mr S Anderson) [5190] cont.	We would wish to put forward our views in the inquiry process to ensure the DPD attains the flexibility and effectiveness demanded by the provisions of PPS 12.	Wishes to participate at oral examination.	continued see above

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Excluded Site 13 Creeting St Peter/St Mary				
1113	Poundfield Products Ltd [6308]	<p>1. Introduction</p> <p>1.1 Suffolk County Council (SCC) has recently published the Minerals Specific Site Allocation DPD which includes the details of the Specific Site Allocation's (SSA) for the inclusion in the County's Mineral Development Plan Documents (DPDs). A total of 12 sites have been proposed by the Mineral Planning Authority (MPA) with in the Specific Site Allocation Plan, but the site at Creeting St Mary (Site No.13) has not been included. This submission is made on behalf of Poundfield Products Ltd who are promoting the land at Grove Farm, referenced, as Site No.13.</p> <p>1.2 The sub-regional apportionment for sand and gravel in Suffolk has been determined as 1.73 million tonnes per annum for the Plan period to 2015 with a 7- year landbank. Provision for minerals for the period to the end of 2021 must therefore be made. The Preferred Sites identified by SCC have identified "saleable" reserves of 11.38 million tonnes, but a requirement for 9.2 million tonnes is necessary to satisfy the sub-regional apportionment.</p> <p>1.3 It is recognised within the Core Strategy however, that the sand and gravel deposits in the County are commonly sandy, as confirmed in paragraph 2.3 of the SSA. This document also confirms that sand and gravel sales within the county are below the sub- regional apportionment, but this could be due to the general poor quality of the reserves currently available in the "local market ".</p> <p>1.4 The Minerals Specific Site Allocation also includes an assessment of the potential for "windfall" sites to come forward, which are deemed likely over the plan period. A potential reserve of 3.85 million tonnes is estimated over the plan period from windfall sites, which have not been included within the sub-regional apportionment.</p> <p>2. Allocated Sites</p> <p>2.1 All but two of the sites allocated within the Specific Site Allocation DPD are extensions to existing operations; however, two sites (Chilton and Timworth) are new sites that will require HGV access arrangements and the construction of plant and site infrastructure. The extension identified at Marstons Quarry is located within the Breckland Special Protection Area, thus the proposed inclusion of the area has to be supported with an ecological report under the "Habitats Regulations" due to its European Designation.</p> <p>2.2 A planning application for the site at Chilton was made, but was refused by Suffolk County Council (in March 2008) on highways grounds. The site has been retained within the DPD however, since it is considered that improved arrangements can be made to allow HGV's to access the new site in a manner that satisfies SCC and the highways authorities. The site at Chilton has an estimated reserve of about 1 million tonnes.</p>	Unsound as not justified.	Sites have been selected on their merits and take account of opportunities for mitigation where appropriate. Regular review of the plan will provide an opportunity to reassess proposed sites in the light of demand for aggregates and reappraise environmental constraints. A planning application for development of this site was withdrawn in the light of officers recommendation for refusal.

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1113	Poundfield Products Ltd [6308] cont.	<p>2.3 The site at Timworth (Site 12) contains approximately a quarter of the County's sub-regional apportionment. It has been included within the previous mineral plan and it is considered that it does not provide any long term certainty of supply in the local market. Since there are a number of constraints to this site and it is noted that the site will not come forward until at least 2014, mineral cannot be produced until the latter parts of the plan period.</p> <p>3. Site 13 (Creeting St. Mary) and the Allocated Sites</p> <p>3.1 The Grove Farm site contains a proven reserve of sand and gravel (0.5 million tonnes) that can be worked in a manner that will not present any environmental effects that are any greater, and in many cases less than those identified as Allocated Sites. This site was not included as an Allocated Site due to a limited number of environmental constraints highlighted within a Planning Application that was submitted (2004) then withdrawn. Since this submission, a revised scheme has been prepared that overcomes all of the environmental concerns associated with this development.</p> <p>3.2 There is certainty that if the Grove Farm site is allocated within the Plan that all of the minerals identified will be extracted, which will provide some 10 years high quality sand and gravel supply to the concrete manufacturing business operated by Poundfield Products Ltd. The element of certainty and the supply of high quality sand and gravel is of major concern to Poundfield Products, as the business continues to source its high quality aggregate materials from Essex and Norfolk. It would like to obtain local, indigenous material in the quantities required, but there has been, and continues to be a shortage of suitable quality material in the Suffolk market.</p> <p>4. Conclusions and Proposed Amendment to Specific Site Allocations</p> <p>4.1 The provision of a single site with almost a quarter of the County's sub-regional apportionment (Site 12) does not appear to provide any long term certainty of supply in the local market. The inclusion of a site with known access issues that has been refused planning permission also provides significant uncertainty to a site with 1 million tonnes of available reserves.</p> <p>4.2 The ability of many of the Allocated Sites to provide high quality concreting aggregate is also questioned, thus the Poundfield Products business will continue to source materials from outside of the County. This is clearly an un-sustainable situation in terms of HGV movements, economic impacts and social impacts and thus this site should be included as an Allocated site.</p>		continued see above
Site 1A Waldringfield				
1095	English Heritage (Miss Katharine Fletcher) [6166]	Sites 1A and 2A, at Waldringfield, are in the vicinity of at least 10 prehistoric burial mounds, some scheduled and some unscheduled. There should be a full archaeological mitigation strategy for any known monuments and, prior to any development decision, these suggested sites should be assessed and evaluated for known monuments and any unknown archaeological sites. The setting safeguards should be clearly explained, i.e. why the buffering boundaries have been located where they are and the de-watering impacts should be considered. We previously advised that this should be done before the sites were considered for submission, and without this information the adequacy of the proposed mitigation is not clear.	Unsound as not justified.	Opportunities for mitigation are feasible and could be addressed at the time the planning application is made.
1051	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of Site 1A in the Minerals Specific Site Allocations Submission Document is supported.	Justified.	Noted.
1082	Mr John Kelso [6366]	New extension work is within 300 mts of AONB which will have a potential effect on the associated wildlife. Extended works area will now come closer to existing residences resulting in potential for noise, dust nuisances and effect on general quality of life. Likewise if new development is to take place similar problems will occur. I have some reservations regarding extension to existing works having a detrimental effect on local residents' quality of life (noise dust and light pollution) and the potential effect on new residents if housing development is allowed on this site under the SCDC LDF.	Unsound as not justified or consistent with national policy	Opportunities for mitigation are feasible and could be addressed at the time the planning application is made.

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1080	Suffolk Coastal District Council (Stephen Brown) [6365]	The proposal is contrary to saved development plan policy AP217 and is likely to prejudice the preparation of a Local Development Framework for the Suffolk Coastal district.	Unsound as not consistent with national policy.	The site is located in a "safeguarding area" where mineral extraction is considered an important prerequisite to development. The proposals for extraction are consistent with the site owners development scheme for this site and no detrimental effect on the Local Development Framework for Suffolk Coastal is anticipated.
1112	Waldringfield Parish Council (Jean Potter) [6391]	"...A heathland habitat is preferred" (para 1.5) "...to provide heathland is preferred" (para 4.3) These statements are not effective, they are too easy to wriggle out of. To be effective a much stronger word than "preferred" is needed.	Unsound as not effective.	Noted, but suitable alternative restoration proposals might be put forward.
Site 2A Waldringfield				
1096	English Heritage (Miss Katharine Fletcher) [6166]	Sites 1A and 2A, at Waldringfield, are in the vicinity of at least 10 prehistoric burial mounds, some scheduled and some unscheduled. There should be a full archaeological mitigation strategy for any known monuments and, prior to any development decision, these suggested sites should be assessed and evaluated for known monuments and any unknown archaeological sites. The setting safeguards should be clearly explained, i.e. why the buffering boundaries have been located where they are and the de-watering impacts should be considered. We previously advised that this should be done before the sites were considered for submission, and without this information the adequacy of the proposed mitigation is not clear.	Unsound as not justified.	Opportunities for mitigation are feasible and could be addressed at the time the planning application is made.
1052	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of Site 2A in the Minerals Specific Site Allocations Submission Document is supported.	Justified.	Noted.
1084	Mr John Kelso [6366]	Extension of new workings too close to ANOB and existing footpaths	Unsound as not consistent with national policy.	Opportunities for mitigation are feasible and could be addressed at the time the planning application is made.

Ref No:	Respondant	Representation	Soundness	SCC Reponse
1081	Suffolk Coastal District Council (Stephen Brown) [6365]	The proposal is contrary to saved development plan policy AP217 and is likely to prejudice the preparation of a Local Development Framework for the Suffolk Coastal district.	Unsound as not consistent with national policy.	The site is located in a "safeguarding area" where mineral extraction is considered an important prerequisite to development. The proposals for extraction are consistent with the site owners development scheme for this site and no detrimental effect on the Local Development Framework for Suffolk Coastal is anticipated.
Site 3 Coddendam				
1039	Barking Parish Council (Rosemary Cochrane) [6340]	Barking Parish Council supports the proposal that the Coddendam site be one of the 12 selected sites. The proposal appears to comply with the requirements for sustainability and to also meet the required environmental safeguards.	Justified.	Noted.
1097	English Heritage (Miss Katharine Fletcher) [6166]	Site 3, at Coddendam, is contiguous to the boundary of the grade I registered park, Shrublands. Any impact on the setting of the park should, according to PPG15, be a material consideration in your decisions. As a grade I park, Shrublands is in the top 10% of designed landscapes nationally. We would object to any application for planning permission on this site. It is important that the future of the Park is secured and we would advise you to discuss this with the Conservation and Planning team at Mid Suffolk District Council.	Unsound as inconsistent with national policy.	Opportunities for mitigation are feasible and could be addressed at the time the planning application is made. Previous extraction and infilling operations have not been found to be detrimental.
1053	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of Site 3 in the Minerals Specific Site Allocations Submission Document is supported.	Justified.	Noted.
Site 4 Layham				
1054	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of Site 4 in the Minerals Specific Site Allocations Submission Document is supported.	Justified.	Noted.

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Sites 5A and 5B Barham				
1038	Barking Parish Council (Rosemary Cochrane) [6340]	Barking Parish Council supports the proposal that the Barham sites be included in the 12 selected sites. The proposal appears to comply with the requirements for sustainability and to also meet the required environmental safeguards.	Justified.	Noted.
1098	English Heritage (Miss Katharine Fletcher) [6166]	Site 5B, at Barham. Site 5B could increase the impact of the existing quarry on the grade I church to the south. SA Objective 4 refers to the need to preserve or enhance historic buildings as well as archaeological sites, but there is no indication that the setting of this building has yet been given proper consideration.	Unsound as not justified and inconsistent with national policy.	Opportunities for mitigation are feasible and could be addressed at the time the planning application is made. Previous extraction operations have not been found to be detrimental.
1055	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of Sites 5A and 5B in the Minerals Specific Site Allocations Submission Document is supported.	Justified.	Noted.
Site 6 Chilton				
1091	Newton Parish Council (Mr David Crimmin) [6115]	Newton Parish Council has objected to the inclusion of the Chilton site in the Specific Site Submissions process since September 2006. The council considers that to date its views have been shared by key consultees, residents and democratically elected members at all tiers of local government, and this has been demonstrated by the rejection of the first planning application for the site. The council would also question whether there could have been any justifiable reason for including the Chilton site in this submission had there not been the 2 planning applications submitted by Brett Aggregates in the last 12 months. Newton Parish Council would hope that if these applications are refused after their due process that the Chilton site is withdrawn from the Minerals Site Specific Allocations. With Suffolk County Council owning the land for the proposed site at Chilton, Newton Parish Council considers that taking part in the oral examination will give greater transparency to the local community on the DPD process.	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.

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		<p>Paragraph 1.16 Newton Parish Council would argue that it was not only the access arrangement that led to the planning application B/07/00177 being unanimously refused by the Development Control Committee members but also the impact that 20,000 lorries a year would have upon the environment in the road network surrounding the site. It should also be noted that the application was opposed by Babergh District Council's Development Committee, Chilton, Gt Cornard, Gt Waldingfield and Newton Parish Councils, the Police, the local MP and an unprecedented number of residents in the area. Newton Parish Council considers that the Minerals Planning Authority has not taken the views of local community and others having a stake in the area into consideration in relation to the inclusion of this site.</p>		continued see above
		<p>Paragraph 2.1 Whilst this shows a further 8.25mt being required in the period 2016 to 2021, Chapter 3 then identifies 10.53mt being available at the proposed sites. If Chilton was excluded there would still be 9.53mt available. How can Chilton's inclusion be justified when there is a high probability of 9.53mt from the other sites? If phasing between sites is an issue these should be documented.</p> <p>Paragraph 2.2 The paragraph would appear to suggest that the two new sites, which include Chilton, are not consistent with Core Strategy Policy 2.</p>		continued see above
		<p>Newton Parish Council met last evening to review the soundness of the above documents and resolved that Site 6: Chilton whilst being legally compliant is not sound because it is not justified.</p>		continued see above
1042	Mr & D S Jackson [5512]	<p>dear sir we do not support extracting gravel on any of these sites yours mr & mrs d .s jackson</p>	Unsound as Not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.
1043	P & B Sibthorpe [5733]	<p>My Husband and I are not very happy with any Gravel Extraction in and around our area. The site at Wyvales near Valley Road ,is just waiting for an accident to happen,with or without a roundabout. Also with the decline in the construction trade, due to the recession,do we need all the Sand and Gravel pits.</p>	Unsound as Not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.
1044	Angela Rolt [5549]	<p>I am strongly opposed to this scheme going ahead for the following reasons: The A134 in this area is extremely congested and, indeed, dangerous which inevitably is resulting in increased traffic taking the alternative route down Valley Road through Gt Waldingfield. This is what is happening now. If this proposal goes ahead, it can only result in even more traffic taking what us locals call the rat run, which ultimately will lead to more speeding through our small village and more accidents. Trying to enter Valley Road from Bantocks Road is a nightmare at any time; this proposal is going to make the manoeuvre impossible. At Chilton and Gt Waldingfield there is a South Westerly prevailing wind, (hence the direction of the runway on the now disused airfield), therefore any air pollution in the form of cement, aggregate dust will be blown over Gt Waldingfield an area of high residential density of all age groups. This wind will also carry the resultant noise from the machinery in the same manner. The area being considered, is at present, a very pleasant country environment with many trees and interesting wild life to be observed if one takes the public footpath across the very centre of the proposed site. If the scheme does go ahead the trees will need to be felled and the habitat for wildlife destroyed for ever. This surely is not what living in the countryside is all about and amounts to devastating destruction of our beautiful healthy environment.</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.

Ref No:	Respondant	Representation	Soundness	SCC Reponse
1090	Chilton Parish Council (Mr Peter Clifford) [6380]	<p>Chilton Parish Council opposes the continued inclusion of Site 6, Chilton in the Development Plan Document on the following grounds:</p> <p>1. Introduction:</p> <p>A) The inclusion of this site in the first place has doubtful origins. Its inclusion in the Suffolk Minerals Local Plan (SMLP) which ran out in 2006 should not have happened in the first place. It was originally included in the Local Minerals Plan 1994 -2006 without any detailed survey of the site ("desk top" observations only), the quality of the mineral in it or the extent of the deposit.</p> <p>B) For ten years no company was interested in excavating the site and only recently has it become clear that there is in fact less than 1 million tonnes of material to extract in seams that are below the required 2 metre thickness.</p> <p>C) The only way Brett Aggregate can make this site viable is by more than two thirds of their site activity involving ancillary activities such as concrete manufacture and the crushing, sorting and re-export of demolition waste mainly from the Ipswich area. In this day and age when Suffolk County Council aspires to be the "greenest county in England", the moving of waste backwards and forwards from and to Ipswich and Colchester is not sustainable.</p> <p>D) In the years since 1999 when this site was first identified road traffic has increased considerably in the Sudbury area. The impact of placing a quarry now on this stretch of dangerous road when vehicle usage and numbers are much higher will be detrimental to the safety and health of the local community. The Parish Council has logged vehicle flows of 1100 vehicles per hour at the proposed quarry site during peak periods. Suffolk County Council's logged daily average is currently 1013 per hour.</p> <p>2. With reference to SA Objective 1 we do not see how this site will "maintain or improve air quality". The site is likely to generate large amounts of dust in a generally very dry region and prevailing winds will carry this to Great Waldingfield and Acton, as well as residents living nearby. East winds will carry dust through Chilton to Sudbury, Cornard and beyond. Sudbury which sits in a deep valley and Cornard have high incidence of asthma, particularly in children.</p> <p>3. A) SA Objective 2 to "minimise effects of quarry related traffic on the environment" will be breached in several ways. The proposed site is just 100yards from the A134 (the only possible exit road). Lorries will inevitably therefore deposit wet load run off on the A134 carriageway in both directions, leading to an unsuitable and dangerous surface for other road users. In contrast Brett's Layham quarry is 2.4 miles from the main road and deposits are mainly shed on the side road before they meet substantial traffic.</p> <p>B) The proposed exit point onto the A134 is on a very fast, narrow, dangerous stretch of the A134 with many bends. It is approached by a blind hill and a blind bend from Sudbury and by a blind bend from Newton</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.

Ref No:	Respondant	Representation	Soundness	SCC Reponse
1090	Chilton Parish Council (Mr Peter Clifford) [6380] cont.	<p>Green. Even the inclusion of a roundabout (as Brett currently propose) would lead fast moving vehicles straight onto queues of traffic waiting while lorries negotiate in and out of the site.</p> <p>C) The local Police have described this stretch of road previously as "nearing accident blackspot status" and are currently continuing their objections to the current application with a proposed roundabout (copy letter attached). Yet another collision involving three vehicles took place just twenty yards from the proposed site entrance a few weeks ago resulting in further casualties. The alternative routes in the area are too narrow or weight restricted, so when accidents do occur the road is blocked completely for hours and Police resources are tied up accordingly.</p> <p>D) There is a good chance that if a quarry opens at this site local small, narrow side roads will end up as "rat runs" to avoid quarry traffic and delays. This will be detrimental to the local environment.</p> <p>E) Whilst Brett have indicated that the proposed quarry will involve 20,228 vehicle movements a year, there is no guarantee that this will not increase over the life of the quarry.</p> <p>F) No allowance has been made in Brett's estimates for purchases of sand and gravel by local builders and developers taking away materials in their own vehicles. At Layham this is a constant and frequent practice, increasing overall traffic flow considerably.</p> <p>G) 2.9 miles from the proposed quarry site at Chilton a sign saying "Accident Site Under Investigation" has been erected by the County Council in the last week just beyond the A134/A1071 junction. This indicates that a high number of accidents and/or casualties have occurred. As most of the quarry traffic will use this route, 20 to 30 tonne lorries as used by Brett will only increase this danger, not reduce it.</p> <p>H) On traffic grounds alone and the unsustainable and unsuitable position of the site entrance/exit we believe that Chilton should be excluded from the DPD.</p> <p>4. SA Objective 3 "to maintain or improve water quality". The Parish Council believes that the proposal will have a detrimental effect on the water table in what is usually a very dry area. Brett have failed to identify all the water extraction users in the immediate area. What controls will be in place to prevent ground water pollution from vehicle fuels, machinery oils and other pollutants? These have not been stated.</p> <p>5. SA Objective 5 "to reduce greenhouse gas emissions". The proposed quarry at Chilton will clearly fail to meet this objective at all. Only 27.27% of the quarry activity in the current proposal is directly concerned with the extraction of sand and gravel, the rest, more than two thirds, with a concrete batching plant (for which sand will have to be imported as the Chilton sand is of poor quality), bagging of aggregate (much of which will be imported) and the importation of builders' demolition waste from Ipswich for crushing, sorting and grading and the re-export of that to Ipswich and Colchester. This is completely unsustainable and will add considerably to carbon emissions in the local area. The long term use of industrial lighting, particularly in</p>		continued see above

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1090	Chilton Parish Council (Mr Peter Clifford) [6380] cont.	<p>winter months, will add indirectly to these emissions as well as causing local light pollution.</p> <p>6. SA Objective 7 "to conserve/enhance biodiversity or geodiversity". In the long term there may be some enhancement. In the short term there will be a large impact on ground nesting birds such as Skylarks which use the area to nest in spring and summer. In winter flocks of Golden Plover (as many as a 1000 at one time) and Lapwing (as many as 200 at one time) use these fields to feed. Brett's environmental advisors have failed to identify substantial colonies of Great Crested Newts within 500 metres of the proposed site and smaller number of both Great Crested Newt and Smooth Newt (both protected species) within 250 metres of the site. Give the range of these amphibians from breeding ponds (up to 2 km) they will clearly be affected.</p> <p>7. SA Objective 9 "to maintain/improve soil quality/resources". In their latest application Brett propose to replace sand and gravel removed with imported top soil from the Chilton Woods housing development. Natural England have pointed out that this is not good practice and that topsoil would not be suitable as a lower sub soil. Each load of imported material will have to be checked as a consequence.</p> <p>8. SA Objective 12 "to offer everyone an opportunity for employment". Whilst the site will create some employment, the number will only be 14 maximum and therefore the site's impact as an employer will be minimal. Brett's suggestion that employees will be able to "cycle to work" would be laughable if this road was not so seriously dangerous.</p> <p>9. SA Objective 13 "to minimise production of noise at quarries". As most of the aggregate at Chilton Site 6 has been estimated to be 40 mm in size it will have to be crushed to make it suitable for use in cement and building work. The nearest resident is 175 metres away, others are within 250 metres. We believe that the noise created will be an enormous intrusion and that the bunds and tree planting proposed will be inadequate in mitigating this. In addition, residents will have to put up with the noise of heavy vehicles moving over rough ground and conveyor belts. A team of show dressage horses in a field within 250 metres of the site will also be severely affected.</p> <p>10. SA Objective 14 "to maintain/improve health of the population overall" This proposed quarry is incapable of "promoting healthy lifestyles" as suggested in the notes. For ten years or more (evidence suggests that most quarries continue to operate well beyond their initial contract term) local residents will be subjected to noise, dust, road danger and constant interruption to their enjoyment of this part of the Suffolk countryside. During the proposed operations Brett are suggesting that the footpath which crosses the site will be for part of the time within a 1.5 metre bund on either side. Together with the noise and dust generated nearby this is hardly likely to generate enjoyment of the countryside, improve health or promote healthy lifestyles.</p>		continued see above

Ref No:	Respondant	Representation	Soundness	SCC Reponse
1090	Chilton Parish Council (Mr Peter Clifford) [6380] cont.	<p>11. SA Objective 15 "to improve the quality of where people live (within 400m of the site)" Frankly, the inclusion of Chilton Site 6 in these proposals will do everything not to improve the quality of where people live both within 400 metres and further afield. Most of the points above will testify to that and for many local people it will becoming a living nightmare from which they cannot escape because the value and saleability of their property will drop precisely because the quarry is being located in their immediate vicinity.</p> <p>12. SA Objective 18 "to promote efficient movement patterns in the county (rail or water where possible)". The current proposals will complete fail to meet this objective especially in regard "to encourage a decrease in road dependency"; in fact the quarry operations will be entirely road based. While the A134 is on a lorry route, this particular section is narrow, sinuous, fast moving and dangerous and therefore unsuitable for additional HGV traffic.</p> <p>13. Conclusion: In conclusion, Chilton Parish Council would respectfully suggest that Chilton Site 6 be removed from the Suffolk Site Specific Site Allocation Development Plan Document (DPD) as it clearly fails to properly meet many of the Sustainability Criteria. The site is poor in quality and quantity with the required importation of base materials and other activities to make it viable. Development of the site will have a detrimental impact on the local environment and population and put their enjoyment of everyday life in jeopardy. On road and traffic grounds alone we believe that it is unsuitable for this site to be developed. The site is too near the road, exits on to a dangerous narrow stretch of the A134 and will become a local road hazard increasing casualties and fatalities. Lastly, all the local Parish Councils, Babergh District Council and Suffolk County Council's own Development Committee rejected Brett planning application B07/0177/CMA earlier this year, mainly on road, traffic and environmental grounds. We confidently expect them to do the same with Brett's planning application B/08/01182/CMA which is currently being determined, Sudbury Town Council, local Parish Councils and the Police (having objected to both applications) having already rejected it. At the very least we feel that Chilton Site 6 should be suspended from consideration in the present consultation until the current applications and appeals have been determined. Should those fail then we believe that it should be removed completely from consideration as a suitable site. The Parish Council would welcome an opportunity to give oral evidence at the Inspector's review.</p>		continued see above

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1103	Cornard Tye Residents Association (Mr M G Evans) [6237]	<p>The SMLP is now out of date having expired in 2006 and the site-specific document is subject to various objections. We need to examine these objections in detail and as certain if the site should remain in the draft. This is the basis of the appeal ref.APPN35001AI08/20799921NWF with the Planning Inspectorate.</p> <p>We concede that the site has to remain pro tem in the Minerals Specific Document, in order to allow this appeal and the further application by the appellants ref.B07/0177/CMA. If it were to be removed then the appeal and application must in consequence fail but, therefore no decision should be made either way beforehand as this would prejudice both the appeal and the new planning application outcomes.</p> <p>I request that the Inspector delays any examination on this site until the outcome of the current appeal referred to above is known. An expert geological witness will be called to give evidence of the quality of the mineral deposit at the appeal.</p> <p>We maintain that this site is substandard and should not have been selected in the first place. Certain assurances were given to the Inspector, which should not have been made, and the Inspector therefore made certain assumptions on incorrect evidence, which led him to the wrong conclusions. The site is the only one in the SMLP which is not operational and therefore it has failed its one and only objective in being included, namely to produce gravel.</p> <p>This site, formally site P14, was put into the Local Minerals Plan for the period 1994-2006. It was originally proposed without ANY detailed knowledge of the mineral quality or extent of deposit. It was nominated 'A Preferred Area' to avoid the cost and trouble of a survey.</p> <p>After mu+C25ch pressure from objectors, a survey was undertaken but its details kept secret. After further pressure details were reluctantly released, just prior to the Inquiry. It turned out that the reserves were about 1 million tonnes less than thought and the average seam thickness less than the required 2 metres. It was clear that the site failed to meet the expectations of officers and should have been excluded on many grounds but that would have meant redrafting the plan and the council foregoing potentially millions of pounds in royalties. Instead the criteria were fudged and assurances accepted unwisely, which allowed the site to remain in the Minerals Local Plan.</p> <p>For more than ten years none of the major firms wished to go near this site, in spite of it being energetically hawked around. There were no takers - hardly surprising!</p> <p>Eventually, a company with a background in waste recycling has come up with a scheme to stuff the site with profitable ancillary activities to subsidise an uneconomic and highly marginal gravel deposit. These ancillary activities comprise a bagging plant, concrete batching plant and waste recycling plant.</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.

Ref No:	Respondant	Representation	Soundness	SCC Reponse
1103	Cornard Tye Residents Association (Mr M G Evans) [6237] cont.	<p>The Mineral Deposit</p> <p>From the Inspector's report he acknowledged that the deposit was not straightforward with the main deposit varying across the site and with depth. The stone content is mainly over size and requires crushing. The deposits are considered to be dirty that is they are clay bound. There is some concern over the amount of clay and other material, which will have to be washed out. The thickness of the main deposit under the northern end is less than 1.5m, which may be unattractive in commercial terms. The main deposit is 1.9m thick to which the MPA advises should be added the underlying basal sands and hence it is reasonable to assume the average thickness of the workable deposit is above the minimum 2.0m specified in the SMLP. However in the absence of alternative, detailed geological or commercial evidence from objectors 1 accept the evidence given on behalf of the MPA that the site contains a workable, commercially viable deposit of just under 1.0 million tonnes. The main deposit is just less than 1m tonnes with an average thickness of 1.9m. This is the deposit referred to in the current application and there is no reference to mining the lower sand deposit underneath the boulder clay, uneconomical to do. Therefore the mineable deposit is less than the stipulated 2m.thick. This together with the other drawbacks explains why operators were reluctant to come forward without suitable incentives.</p> <p>General Environmental Traffic Issues</p> <p>Since approval of this site about 10 years ago, there has been a marked increase in traffic generally. New developments have sprung up all around Sudbury and the road infrastructure is under pressure. Slow moving HGVs entering and leaving the site will inhibit the general flow of traffic, will cause congestion at times and encourage the use of local 'rat runs' We calculate that with seasonal and daily peaks HGV movements could be every 3 minutes or less. This would be disastrous and cause untold environmental damage i.e. congestion, air pollution, noise, accidents and rat run traffic.</p> <p>The local road infrastructure is already under pressure and cannot cope with the additional problems this development and the ancillary operations would bring, which the inadequate traffic assessment fails to identify.</p>		continued see above
1103	Cornard Tye Residents Association (Mr M G Evans) [6237] cont.	<p>The Site</p> <p>The site because of its position needs extensive bunding and to be landscaped with trees. The access arrangements will need to be rethought and will be very expensive. The mineral deposit is marginal in size, complex, noisy and messy to quarry. The site is seriously substandard, it failed to meet the required criteria set by the MPA and continuing to try to find ways to subsidise its development is misguided and senseless. Thus the site is uneconomical on its own and should be removed from the specific site document.</p> <p>Conclusion</p> <p>Any ancillary activities are badly sited at this quarry; they would add to environmental traffic damage and should not be allowed to prop up a poorly sited uneconomic quarry The access will cause additional accidents and was inappropriately included in the Local Plan. Any new access will have to be rethought completely and will be expensive. The local road infrastructure is already under pressure and cannot cope with the additional problems this development and any ancillary operations would bring The site is seriously substandard, it failed to meet the required criteria set by the MPA and continuing to try to find y to subsidise its development is misguided and senseless.</p>		continued see above

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1088	Dawn Bridge [6374]	<p>Plans for a quarry on this site have been overwhelmingly rejected by Sudbury Town Council, Barbergh District Council, Suffolk County Council, by Tim Yeo, the Member of Parliament for this area, by the Parish Councils of all local villages, by the residents living in the vicinity, and by the police, who consider this section of the A134 to be approaching Accident Black Spot status.</p> <p>Heavy traffic and congestion present permanent and serious hazards on the A134, which provides only one narrow lane in each direction, and practically no pavements. When accidents occur, which they do frequently, the road is often closed and there are only two country lanes in the area, both of which are totally unsuitable for lorries, into which traffic can be diverted. Moreover, an operation of this nature, which would be a mere 100 yards from the road, and the huge increase in the amount of slow-moving heavy lorries and other traffic it would generate, would present a very real danger to other road users, and create a serious impediment to all forms of public transport - and, more importantly, to the vital emergency services.</p> <p>Insofar as the impact a quarry would have on the villages in this area of Suffolk, all would be adversely affected, but Newton would suffer most severely. Newton is a country village, dissected by the already vastly overloaded A134.</p> <p>Pavements line only part of the road through the village, and are, in the main, extremely narrow, and restricted to one side of the road only. Many homes are only yards from the road, and when lorries pass, pedestrians are in very real peril of being dragged along in their wake, and wing mirrors whisk inches above their heads. An onslaught of further heavy lorries and the associated vehicles that a quarry would produce, would serve only to exacerbate the ever-present dangers.</p> <p>Furthermore, Suffolk County Council prides itself on its 'Green' commitment, and therefore consideration must also be given to the impact that an operation of this nature would have on the environment. Not only would the dirt, dust and noise generated from a quarry, its associated traffic, and its crushing plant, inflict unacceptable living conditions upon anyone residing within the vicinity, it would also destroy the habitat of an abundance of wildlife, not least, the Great Crested Newt, a protected species, and consequently, this must be afforded high priority. To sum up, I would reiterate that all public bodies involved, including the police, have, for very valid reasons, rejected plans for the installation of a quarry at Chilton, and common sense must prevail. A quarry here would impact severely and negatively upon all local roads, it would have a detrimental and damaging effect on the lives of the populace, and it would destroy the environment irreversibly. Quite clearly this area is not a viable option for an operation of this nature, and I would therefore urge you to remove Site 6 Chilton completely and permanently from the list of potential sites under consideration.</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.
1056	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of Site 6 in the Minerals Specific Site Allocations Submission Document is supported.	Justified.	Noted.
1037	Mr Andrew Hill [6346]	<p>As recognised in the rejection of planning permission, the Chiltern proposal does not take into account the local traffic flows.</p> <p>The proposal to extract 1mt of aggregates would require such a volume of heavy lorries that would overwhelm the local road network. The local roads are narrow and twisting and the addition of a large volume of heavy, slow moving lorries would make it dangerous beyond reason.</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.

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1046	Mr David R J Rolt [5547]	<p>I am strongly opposed to this scheme going ahead for the following reasons: Our rural roads are already very congested and experience shows that severe accidents are much more likely to occur on country roads than more major roads. The increased traffic generated as a result of this scheme can only exacerbate the problem. Indeed, only last week there was a major accident on this road involving three casualties.</p> <p>In addition the heavy load laden vehicles will slow all traffic not only causing tail backs and entry/exit from valley road even more difficult than it already is but there will always be some impatient driver who will try and overtake with possible very serious consequences.</p> <p>At Chilton and Gt Waldingfield there is a South Westerly prevailing wind, (hence the direction of the runway on the now disused airfield), therefore any air pollution in the form of cement, aggregate dust will be blown over Gt Waldingfield an area of high residential density of all age groups. This wind will also carry the resultant noise from the machinery in the same manner.</p> <p>The B1115 road seems to be a route option for lorries that are required to go in the Lavenham or Lt Waldingfield direction. There have been several accidents on this road, at least two fatal, on the bends past the airfield in recent years. Although this road has a 40 MPH speed limit it is often abused, drivers that do keep within the limit are often tailgated or overtaken some using this stretch as a racetrack. Thus a slow moving Ballast lorry provides such an opportunity.</p> <p>The area being considered, is at present, a very pleasant country environment with many trees and interesting wild life to be observed if one takes the public footpath across the very centre of the proposed site. If the scheme does go ahead the trees will need to be felled and the habitat for wildlife destroyed forever. This surely is not what living in the countryside is all about and amounts to devastating destruction of our beautiful healthy environment.</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.
1045	Mr E A Noakes [5545]	<p>I would like to voice my objections to the proposed gravel pits.</p> <p>This section of road has seen numerous accidents over the past few years, some of which have been fatal. Increased traffic generated by this plan can only exacerbate the problem, resulting in more accidents.</p> <p>Our local road, Valley Road, a narrow undulating road, is known locally as the Rat Run; drivers not wishing to continue along the A134 divert along this route, through Gt Waldingfield and Acton. Increased traffic on the main road can only increase the traffic through these villages. It can only be a matter of time before fatal accidents happen, especially at the junction of Bantocks Road and Valley Road.</p> <p>The south westerly wind prevailing from the proposed site will lead to air pollution in the form of cement and aggregate dust descending over the whole of Gt Waldingfield. This cannot be healthy for any of us, particularly the aged and young.</p> <p>The area being considered, is at present, a very pleasant country environment with many trees and interesting wild life to be observed if one takes the public footpath across the very centre of the proposed site. If the scheme does go ahead the trees will need to be felled and the habitat for wildlife destroyed for ever. This surely is not what living in the countryside is all about and amounts to devastating destruction of our beautiful healthy environment.</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.

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1087	Mr Harry Taylor [6373]	<p>The decision to allow this quarry application to proceed is subject to development procedures, public comment and protest and is of course a separate issue to your departments discussions. The intention of all local residents in this area is to get the quarry application and any subsequent appeal rejected.</p> <p>My objections to this site being retained within the minerals plan are as follows:</p> <ol style="list-style-type: none"> 1. The proposal to retain this quarry site within the plan will be to continue the threat of disruptive, damaging and permanent loss to the rural environment. 2. The site has been proved to be in serious shortfall of predicted output and volumes excavated, therefore highlighting the unviability of a quarry in this area. 3. Industrialisation of the area with manufacturing processes will be the only means to ensure the viability of the site and this is not within the "Extraction of sand and gravel" remit. 4. This area as a source of material was rejected during WW2 whilst the construction of Gt Waldingfield airfield was under construction only 50metres from the proposed site boundary. This based upon the sand and gravel in the seam being unsatisfactory for construction use. <p>The site proposed is not sustainable, viable or acceptable in the area designated and should be removed from the minerals plan in its entirety.</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.
1101	Mrs D G M Judd [6381]	<p>I am writing to oppose the continued inclusion of Site 6, Chilton in the Development Plan Document and ask that my objection be presented to the relevant authority. My grounds are as follows:</p> <p>The assessment of the site prior to its inclusion in the 1994-2006 site was inadequate. As a result this site was included despite the fact that the sand and gravel is of poor quality and contains less than 1 million tonnes of usable material and the seams are below the required 2 metres thick. As a result the site is not financially viable without also undertaking industrial activity on the site.</p> <p>The site is located in close proximity to the villages of Chilton, Great Waldingfield and Newton Green. Any activity on the site would cause noise and dust pollution, and would have a detrimental effect on neighbouring residents which cannot be justified in the name of financial profit, or any other motive. The people and environment of this county should be the highest priority for the County Council; neither is served by the continued inclusion of this site in the Mineral Plan.</p> <p>Vehicle traffic from such a site would have to travel on the A134, either towards Sudbury or through Newton Green to Ipswich and Colchester. This road is approaching accident black spot status and any quarry on this site has been opposed by the Police.</p> <p>In view of the above, the site should be removed from the Mineral Plan once and for all. If it is not, the result will be that Suffolk County Council who own the land will waste our money as council tax payers by periodically resurrecting this dreadful proposal. The involvement of Suffolk County Council, as land owner, in a matter of great concern. If Suffolk County Council seek a use for this land that will benefit the local community, may I suggest that it be offered to the local parishes for Community Woodland use in perpetuity. This will improve the County Councils 'green credentials' and for once demonstrate that it is touch with the wishes of those it serves.</p> <p>This inclusion of this site breaches many of the SA Objectives:</p> <p>SA Objective 1 - "maintain or improve air quality". The site is in close proximity to a number of villages. The site would generate large amounts of dust which would be carried towards Great Waldingfield and Acton by prevailing winds. The inclusion therefore fails on this count.</p> <p>SA Objective 2 - "minimise effects of quarry-related traffic on the environment". The site is adjacent to the A134. Lorries exiting this site will deposit debris on this road in both directions. The Layham quarry is 2.4 miles from the main road and material is still deposited on the main road. The Chilton site would result in a dangerous road surface for other road users. In addition, the addition of a large number of heavy vehicles on this road would be highly damaging for the environment, especially as most of the lorry movements would be to and from Ipswich, travelling past Layham quarry. This is environmentally unsustainable. The</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.

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1101	Mrs D G M Judd [6381] cont.	<p>local Police have stated that this stretch of the A134 is nearing accident blackspot status and have objected to the current application for a quarry on the site, even with a roundabout.</p> <p>SA Objective 3 - "to maintain or improve water quality". A quarry on this site will not maintain or improve water quality. As someone who has 3 wells on their land I am very concerned that the proposal for a quarry on this site will have a detrimental effect on the water table. The current application does not identify all the water extraction users in the immediate area. In addition, it does not state what controls will be in place to prevent ground water pollution from vehicle fuels, machinery oils and other pollutants. A quarry on this site therefore fails to meet this SA.</p> <p>SA Objective 5 - "to reduce greenhouse gas emissions". The inclusion of the Chilton site on the Mineral Plan will fail to meet this objective. Since the site is of poor quality, the only way that it can be made commercially viable is to establish large scale industrial activity on this site, using the establishment of a quarry as an excuse. This would then result in over 2/3 of vehicle traffic being associated with this other industrial activity putting thousands of lorries on our local roads undertaking journeys which are not necessary. Additional sand and gravel would be transported from Layham and material transported back to the Ipswich area. In addition, builders' demolition waste would be imported from Ipswich for crushing, sorting and grading and the re-export of that to Ipswich and Colchester. This is completely unsustainable and will add considerably to carbon emissions in the local area. In addition, the site would be lit, especially during the winter months, in order to carry out this additional industrial activity, again adding to the carbon footprint of this site.</p> <p>SA Objective 7 - "to conserve/enhance biodiversity or geodiversity". The long term benefits are debatable, especially since the current situation (i.e. with no quarry) has resulted in ground nesting birds such as Skylarks which use the area to nest in spring and summer. In winter flocks of Golden Plover (as many as a 1000 at one time) and Lapwing (as many as 200 at one time) use these fields to feed. Brett's environmental advisors have failed to identify substantial colonies of Great Crested Newts within 500 metres of the proposed site and smaller number of both Great Crested Newt and Smooth Newt (both protected species) within 250 metres of the site. Give the range of these amphibians from breeding ponds (up to 2 km) they will clearly be affected.</p> <p>The short term damage to the environment would be immense and has not been taken into consideration by the inclusion of this site in the Mineral Plan.</p> <p>SA Objective 9 - "to maintain/improve soil quality/resources". In their latest application Brett propose to replace sand and gravel removed with imported top soil from the Chilton Woods</p>		continued see above
1101	Mrs D G M Judd [6381] cont.	<p>housing development. Natural England have pointed out that this is not good practice and that topsoil would not be suitable as a lower sub soil. Each load of imported material would have to be checked as a consequence. The site therefore fails to meet this SA.</p> <p>SA Objective 12 - "to offer everyone an opportunity for employment". This site would only create about 14 staff positions, and there is no guarantee that the employees would be from the local area.</p> <p>SA Objective 13 - "to minimise production of noise at quarries". Most of the aggregate at Chilton Site 6 has been estimated to be 40 mm in size it will have to be crushed to make it suitable for use in cement and building work, plus noise will be generated by heavy vehicles on the site.</p> <p>The proximity of the site to nearby villages on other more isolated residents means that this site will have a devastating effect on the lives and wellbeing of those who live here. Bunds and tree planting will have little impact on the noise level as it will be carried by the prevailing wind towards Great Waldingfield and Acton. In addition, a team of show dressage horses located only 250 metres of the site will also be severely affected.</p> <p>SA Objective 14 "to maintain/improve health of the population overall" The proposed quarry has no capability of "promoting healthy lifestyles" and it is difficult to take this statement seriously. Given the proximity to local villages, the proposed quarry would significantly damage the health and wellbeing of a considerable number of people. Local people will be subjected to noise, dust, road danger and constant interruption to their enjoyment of this part of the Suffolk countryside. Plus, Brett propose that the footpath which crosses the site will be for part of the time within a 1.5 metre bund on either side. All these factors mean that there is no way a quarry on this site can generate enjoyment of the countryside, improve health or promote healthy lifestyles.</p> <p>SA Objective 18 - "to promote efficient movement patterns in the county (rail or water where possible)". The proposal completely fails to meet this objective especially in regard "to encourage a decrease in road dependency"; in fact the quarry operations would do the opposite and significantly add large numbers of HGVs to the dangerous A134.</p> <p>In consideration of all these issues Chilton Site 6 should be removed from the Mineral Plan as otherwise it will waste tax payers money by periodic resurrections of applications that are unsustainable and detrimental to the people of Suffolk.</p>		continued see above

Ref No:	Respondant	Representation	Soundness	SCC Reponse
1105	Ms Stephanie Souch [5542]	<p>As you will be aware the above referenced planning application was refused at the start of this year on the grounds that the proposal: Would be detrimental to the free flow and safety of traffic that uses the A134 The proposal would have an adverse environmental impact on the existing road network. I was disappointed that the refusal completely failed to mention the adverse impact on the homes and lives of those people who live in the area nearby the proposed quarry, but as the plan had been refused, and I assumed that our homes and local environment would be safe I did not take it any further. However, I understand that the company, Brett Aggregates have appealed against the decision to refuse planning. I must therefore again object in the strongest possible terms about this planning application, on the grounds that it would cause an unacceptable amount of heavy traffic on roads and have a detrimental affect on the local environment. I have heard that Brett Aggregates have proposed to install a roundabout onto the A134 to ease access to and from the site. As you are surely aware, the A134 is already a busy and dangerous route, the addition of a roundabout would be totally inadequate and would do little to decrease the overall congestion cause by the number of lorries that will have to use local roads to service the proposed quarry. I also object on the grounds that the quarry (and concrete batching plant) would cause noise and light pollution, would result in airborne pollutants and dirt and have an immense negative effect on the local environment, homes and lives of those who live in the area. I am also concerned that Suffolk County Council may not be totally unbiased in this matter, as the Council owns the site and I believe they stand to make money from the material extracted from the site. This seems a conflict of interest and a matter that the council seems reluctant to comment on. I trust that you will give my objections consideration, and hope that the council will once again, refuse the planning application.</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.
1089	Safer Neighbourhoods (Mr Paul Crick) [6376]	<p>I am the Neighbourhood Policing Inspector for the Sudbury area of Suffolk, which covers Chilton parish where the quarry is proposed. I write to express my concerns regarding the proposal in terms of: 1. Increased HGV traffic on relatively minor country roads, which are already struggling with peak time volume. 2. Increased risk by volume to road traffic accidents 3. Interruption of traffic flow in and out of Sudbury either by numbers of heavy goods vehicles entering the site or indeed by roundabout. Over the past twelve months there have been 38 road traffic accidents on the A1071 (main road to the proposed site from Ipswich), one of which was a fatality. There were 13 accidents on the A134 between Chilton and the A1071 junction, again one of which was sadly a fatality. It is difficult to attribute accidents to any one factor because many things play a part, the only common denominator being vehicles themselves. The two main roads providing access to the proposed site are not dueled nor likely to be and indeed a long stretch of the A134 is a 30mph limit through small villages. The very nature of these roads means, that inevitably accidents do occur, and when this happens the road often becomes completely closed. This in turn necessitates officers being tied up for long periods of time managing both accidents and indeed diversions through villages, which are even less able to cope with volume. Both the A1071 and, in particular, the A134, albeit not dueled or particularly wide are major commuter routes between Sudbury, Colchester and Ipswich. As such at peak times they are congested with long tailbacks into Sudbury and onto the A134 from the A1071. It is my opinion that the proposed increase in lorries will further congest both areas and impede traffic flow even further as well as increase the risk of accidents. I consider this to be true, whether or not a new roundabout is put in place. In closing, as a representative of Suffolk Police I tender my opposition to the application on the above grounds.</p>	Unsound as not justified.	This site is identified in the existing Minerals Local Plan and is currently the subject of a planning application and a planning appeal. The previous planning application was refused on highways grounds.

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Sites 12 and 12A Timworth				
1099	English Heritage (Miss Katharine Fletcher) [6166]	Site 12A, at Timworth, has the grade II* Church of St Andrew to the north west. We previously asked that the setting of this listed building be given careful consideration prior to any determination, but there is no evidence to suggest that this has yet been taken into account, and the information presented does not explain why inclusion of the site is justified.	Unsound as not justified or consistent with national policy.	Opportunities for mitigation are feasible and could be addressed at the time planning application is made.
1079	St Edmundsbury Borough Council (Mr Ian Poole) [6132]	The Council feel a lorry management plan should be put in place restricting movements on the minor roads around Timworth. The SA highlights the possibility of a negative impact on the neighbouring SCC Wildlife Site, and on the ability to conserve/enhance quality/local distinctiveness or landscape. These concerns are not reflected in the Submission document and the Council consider that any development be subject to a full environmental assessment of the sites, their surroundings and, in particular, the SCC Wildlife site. The Borough Council should have constructive involvement in all decisions regarding the restoration and potential future use of the site.	Unsound as not justified.	Opportunities for mitigation are feasible and could be addressed at the time the planning application is made. Other aspects such as after-use can also be considered at this time.
Site 16 Homersfield/Flixton				
1100	English Heritage (Miss Katharine Fletcher) [6166]	Site 16, at Homersfield and Flixton, could impact on the setting of the grade II* church on the opposite side of the lake. Again, this should be carefully considered, in accordance with PPG15 and SA objective 4, before any decision is taken on the suitability of this site.	Unsound as not justified or consistent with national policy.	Opportunities for mitigation are feasible and could be addressed at the time the planning application is made.

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Site 23 Land west of Cavenham Quarry				
1044	Environment Agency (Mr Andrew Hunter) [4911]	<p>Both the submission document and sustainability appraisal indicate that the proposed minerals extraction at site 23 would have adverse impacts on breeding and foraging habitat areas. This is supported by the Regulation 48 Appropriate Assessment. On a second view it appears that no economic justification has been provided that outweighs the potential ecological loss. Furthermore, no evidence has been presented that demonstrates the mitigation scheme would be effective. In the absence of evidence and reasoning, the Authority has not justified this site. Heathland (as well as acid grassland) is an important environmental asset and in view of the losses to date over many decades, it is considered that strong justification must be provided if further losses are to be allowed.</p> <p>The site lies within Breckland Farmland SSSI and is afforded a high degree of protection under PPS9. However, little weight has been given to this high degree of protection and as such the allocation does not accord with national policy.</p>	Unsound as not justified or consistent with national policy.	Opportunities for mitigation are feasible and could be addressed at the time the planning application is made. Previous minerals extraction operations have not be found to be detrimental and have been fully supported by Natural England.