Minerals and Waste Local Plan Publication Stage Representation Form

Page 1: Suffolk Minerals and Waste Local Plan Publication Stage Representation

Q1. Please state if you are responding:
As an individual

Q2. Personal Details:

<table>
<thead>
<tr>
<th>Field</th>
<th>Details</th>
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<tbody>
<tr>
<td>Title</td>
<td>N/A</td>
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<tr>
<td>First Name</td>
<td>Clare</td>
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<tr>
<td>Last Name</td>
<td>Watson (received via email)</td>
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<tr>
<td>Address Line 1</td>
<td>N/A</td>
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<td>Address Line 2</td>
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<td>Address Line 3 (if not required, write N/A)</td>
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<td>Address Line 4 (if not required, write N/A)</td>
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<td>Post Code</td>
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<td>Telephone Number</td>
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<tr>
<td>Email address (if not required, write N/A)</td>
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Q3. Agent's Details:

No Response

Q4. To which part of the Local Plan does this representation relate?

<table>
<thead>
<tr>
<th>Type</th>
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<tr>
<td>Paragraph</td>
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<td>Policy</td>
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</tr>
<tr>
<td>Policies Map</td>
<td>Barnham</td>
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</tbody>
</table>

Q5. Do you consider the Local Plan is

No Response

Q6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.
I am writing to state my continued objections to the Minerals and Waste Local Plan 2017. I have objections to the consultation element of the Minerals and Waste Local plan and to the inclusion of the Barnham site in the plan. Although Suffolk County Council has given responses to the Preferred Options I am reiterating my objections to the inclusion of the Barnham Site and highlighting that I find some of the responses to my objections inadequate or absent. My objections to the inclusion of the Barnham site in the MWLP are based on concerns for the impact of the excavations on the sustainability and health of the local community and environment. As a process, I still believe that the Minerals and Waste Local Plan (MWLP) consultation is significantly flawed. It is impossible to make an informed decision during the consultation of sites into the Minerals and Waste Local Plan when there is so much relevant information missing. Suffolk County Council’s Statement of Community Involvement (SCI) states that there is a ‘great emphasis on transparency in planning processes, inclusiveness and commitment’ combined with Appendix 1 of the SCI highlighting an early ‘key milestone’ of ‘produce informal issues/options report’ that outlines how ‘All stakeholders will be consulted with including local communities and liaison groups, industry bodies and ‘hard to reach/marginalised’ groups (including ethnic minority groups, teenagers and the elderly) however I received no such consultation opportunity. The first point at which I heard that the Barnham Site had been put forward for the MWLP was upon receipt of the postal notification detailing the consultation meeting in Barnham Village Hall. As a member of the local community I am furious that I was denied the opportunity to discuss at the earliest stage a report that will impact upon my whole family’s daily life so severely. Paragraph 189 of the National Planning Policy Framework states that “Local planning authorities…should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications” I again ask you to confirm for me whether this was part of the pre-application discussions undertaken with Mick George and Elveden Estate and what their response was. As a family who are tenants of Elveden Estate I am still awaiting any form of communication from them regarding the inclusion of a large area of land that forms part of my family’s tenancy in the Barnham Site. The Rt. Hon Greg Clark MP explains in his ministerial foreword how the National Planning Policy Framework facilitates ‘people and communities back into planning’, yet at the earliest opportunity both myself and the local community have had this possibility denied. No response was given to this query, how can a project of this scale be received with anything but hostility if those who propose it treat the local residents with such contempt. I was troubled to see that the map shown at Barnham Village Hall during the consultation period was significantly out of date, omitting homes that were built in 2002 and one prior to that. I am glad that the maps have been altered and the homes that were omitted are now included on the maps. I hope that the maps included in the plan have now been checked to ensure there are no further significant errors. Thank you for confirming that currently no material has been extracted from the Barnham site to date. I assume that the recent request for an extension to the planning permission beyond March 2019 allows this site on appearances to be more acceptable to its use within the SWMP? The site included in consideration for the SWMP is such a major change of scale in both area and time I would still question whether this can be considered an extension. Thank you for providing a link to the original application and decision, documents that had not escaped my attention previously. As the ‘borrow pit’ was never used for the A11, the inclusion of this site into the SWMP seems to have been the end goal and so playing ‘a long game’ seems to be paying off for Elveden Estate. As the purpose of MWLPs are supposed to ‘secure minerals and waste development that improves economic social and environmental conditions in the area’ what are the projected improvements for the Barnham area if the extraction is to be undertaken for 30 years? Mick George states that 20 jobs will be created. Are these jobs for local residents? If seasonal extraction is the only permissible extraction option to cater for the Stone Curlew breeding and nesting seasons, would these jobs also be seasonal? These questions remain unanswered, I still believe that as local residents will be significantly affected by this development and there have been no attempts to demonstrate how the economic, social and environmental conditions will be anything but damaged. Has thought been given to the potential job losses that will occur due to the selection of this site? It is likely that the current tenants will struggle to farm North Farm if the Barnham site goes ahead as although I believe that they are ‘stakeholders’ they have not been included in discussions in regard to the restoration of the land. There does not seem to be a plan for it to return to agriculture, although contradicting statements were given at the consultation evening. The ‘inert backfill’ being suggested as a suitable replacement for the extracted material which could be farmed, yet Natural England stating that they are happy for it to be returned to natural heathland. I request clarification of this point, MAFF Good Practice guidance explains ‘the need to safeguard agricultural land for the needs of future generations’ is this not considered to be relevant here? This query has not been answered and therefore I request further consideration of this point. Suffolk County Council maintains that this is an issue between the landowner and the tenant. Does Suffolk County Council not have a duty to ensure that aspects of the National Planning Policy Framework and the right for people and communities concerns to be heard as part of the planning process rather than washing their hands of them? MWLP are also supposed to ensure that public amenities experience ‘no potentially significant detrimental impacts upon the enjoyment of residents’ homes or other sensitive land uses from HGVs, noise, dust, odours or visual impact’? The idea voiced by Suffolk County Council at the consultation evening was that residents would not be disturbed by the extraction which I refuse to accept. There will be a huge visual impact to locals who live in the area and use the byways for leisure and recreation from the large bunds that are
Minerals and Waste Local Plan Publication Stage Representation

Form

Page 1: Suffolk Minerals and Waste Local Plan Publication Stage Representation

No Response

Q2. Personal Details:

As an individual

Policies Map

Email address (If you do not wish to provide this information, please write N/A)

Last Name

Clare

Watson (received via clarey11@btinternet.co

Chairperson of the local community group at Barnham

is a significant cause of ill health and death. (The Guardian p22 21/06/18).

It is well documented that air pollution, including particulate air pollution is a significant cause of ill health and death. Public Health England states that ‘the increase in mortality risk associated with long-term exposure to particulate air pollution is one of the most important, and best characterised, effects of air pollution on health’ and that ‘current levels of particulate air pollution have a considerable impact on public health. Since writing my original letter, research by Dr Ziyad al-Al of Washington University in St Louis Missouri, published in The Lancet Planetary Health shows ‘a

...
significant link between air pollution and diabetes’ (i p5 30/06/18). In the UK 14,900 new cases of diabetes type 2 a year are caused by air pollution. The inclusion of this site will have significant health impacts on the residents of Barnham and the children and teachers at Elveden School. Measures to reduce levels of particulate air pollution, or to reduce exposure of the population to such pollution, are regarded as an important public health initiative’. Figures provided by Public Health England show currently that 5.4% of deaths in St Edmundsbury are attributable to air pollution. If this is the case, I would like to know the rationale behind exposing not only the local community to increased air pollution, but importantly two primary schools to increased levels of particulate emissions. There are currently 236 children on-roll at these schools, if the Air Quality Sensor in Newmarket is not going to be used to monitor air quality in the locality of the extraction and transport routes, where will a sensor be located? ‘A significant increase in local pollution concentrations is not expected’ is of little comfort to the residents who will be exposed to the dust and fumes six days a week. I believe failure to insist upon accurate air quality monitoring and enforcement throughout the length of the extraction could be regarded as negligence. EPUK Guidance and the Suffolk Air Quality Management Group state in their publication ‘Air Quality Management and New Development 2011 that air quality must be measured where proposals result in new signalling, where proposals result in an increase in vehicle trip generations within the local area, increased congestion, change in average speed by <10kph, a significant alteration to the composition of traffic, particularly vehicles over 3.5 tonnes, proposals in or close to sites with features sensitive to nitrogen deposition such as SPA, SAC, SSSI and RNR. I have not seen any evidence that this will be carried out, or who will pay for this monitoring. Please could you explain what procedures are in place for this to be undertaken and the costs of this for the length of the extraction process. Is this the responsibility of Suffolk County Council? I would also like to see the air quality impact assessment projected forward for the length of the project both with and without the development using an appropriate model, MET data and technical guidance including LAQM T609 to ensure that all relevant emissions sources are included and that all relevant pollutants, including particulates and NO2 are included. This is considered by the Suffolk Local Authorities to be part of ‘three basic steps’. I believe that there have been NO2 monitoring studies completed in Suffolk, does data exist for areas where extraction has been undertaken and what are the noted impacts? The document also explains in paragraph 2.5.1 that ‘an impact assessment should be included for dust and contribution to PM10 levels for developments expected to take one year or more to complete. An impact assessment shall also be undertaken for mineral extraction and waste disposal and recycling sites’. Has this been done? To make an informed decision in this consultation process this information should be provided, and this document provides ‘minimum information to be reported in an Air Quality Assessment’ this is so ‘the assessment should provide a transparent account of the modelling undertaken’ has Suffolk County Council requested this information? Suffolk County Council state in the responses that ‘at the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management’. This shows that Suffolk County Council acknowledges that there are concerns around the impact of this development on residents. Who decides that the ‘risk’ is ‘acceptable’? ‘Adequate’ suggests a half hearted ‘good enough.’ I find this response dismissive and as a parent, I feel as though the safety of my children’s health is considered valueless compared to a gravel pit. A detailed report on the Environmental Impact of the proposed site has not been included in the consultation documents. How can the local community make informed decisions without full, easy to access reports? I would also like to know who provides the Environmental Impact Assessments and Ecological Surveys to ensure that they are truly independent and unbiased. I am pleased to see that the text of the plan will now include the Roadside Nature Reserve (RNR) that runs along Elveden Road ‘Barnham (Thetford Heath) Roadside Nature Reserve No.15. This area would be directly impacted upon by the proposed extraction. As Suffolk County Council have highlighted that ‘rare Breckland Plants such as Purple Stemmed Cat’s Tail can be found on Barnham RNR’. Suffolk County Council explain in the document that ‘by careful management of the sites we aim to preserve the species on RNRs, giving future generations the chance to enjoy these remnants of ancient grassland meadows’ has this area been considered as it was not included in the consultation documents and I would like to know how this area will be protected and who will pay for the monitoring of any impact upon this area. This question has not been answered as part of the responses document. I am also apprehensive about the Climate Change Mitigation information submitted as part of the consultation process. There are no specific carbon figures. Is it going to be more or less that the 3.5kg per tonne? Who is going to be accountable for measuring the impact of the extraction? Mick George states the use of ‘Adblue’ and ‘EuroVI engines’ but the VW scandal proves non-compliance and the loophole is unlikely to be closed until 2019 when this consultation period will be closed. I would still like my concerns about this to be noted. Do the 12.5 metre easements on either side of the high-pressure gas main running through the site allow for potential shifting of sediments due to extraction or alteration of the water courses due to extraction? Would a survey of this be completed pre-extraction and risk assessments be carried out and shared with local residents? To conclude, I believe that the consultation process is flawed and that there is not enough information for local residents to make truly informed decisions about the extent of the serious and long term impacts on a local area that includes two primary schools, Breckland SPA, Breckland SAC, Breckland Farmland/Little Heath/Thetford Heaths SSSI, Gorse Grassland CWS, Thetford Heath NNR, European Protected species (Bats and Great Crested Newt), Priority Species,
Other Protected Species, Priority Habitats (Lowland Heath), two listed buildings, a site with known links to WW1, WW2 and the Cold War, the potential for the site to contain heritage assets of sufficient significance to trigger NPPF139 and need preserving in situ and within a Flood Risk Zone 3. I still believe that the inclusion of Barnham in the SWMP fails to consider the long-term, cumulative impact of a development on such a scale on the local community, particularly now that more industrial development and lorry movements have been approved since my original letter. These include an oil depot, plant hire depot and extended warehousing. The residents of Barnham are being subjected to an onslaught of industrial development totally disproportionate to the size and infrastructure of the village.

Q7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

No Response

Q8. SCC Response

No Response

Q9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No Response

Q10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

No Response

Q11. Your details:

Name   Clare Watson
Date   06 July 2018
Dear Mr Gunby,

I am writing to state my continued objections to the Minerals and Waste Local Plan 2017. I have objections to the consultation element of the Minerals and Waste Local plan and to the inclusion of the Barnham site in the plan. Although Suffolk County Council has given responses to the Preferred Options I am reiterating my objections to the inclusion of the Barnham Site and highlighting that I find some of the responses to my objections inadequate or absent. My objections to the inclusion of the Barnham site in the MWLP are based on concerns for the impact of the excavations on the sustainability and health of the local community and environment.

As a process, I still believe that the Minerals and Waste Local Plan(MWLP) consultation is significantly flawed. It is impossible to make an informed decision during the consultation of sites into the Minerals and Waste Local Plan when there is so much relevant information missing.

Suffolk County Council’s Statement of Community Involvement (SCI) states that there is a ‘great emphasis on transparency in planning processes, inclusiveness and commitment’ combined with Appendix 1 of the SCI highlighting an early ‘key milestone’ of ‘produce informal issues/options report’ that outlines how ‘All stakeholders will be consulted with including local communities and liaison groups, industry bodies and ‘hard to reach/marginalised’ groups (including ethnic minority groups, teenagers and the elderly’ however I received no such consultation opportunity. The first point at which I heard that the Barnham Site had been put forward for the MWLP was upon receipt of the postal notification detailing the consultation meeting in Barnham Village Hall. As a member of the local community I am furious that I was denied the opportunity to discuss at the earliest stage a report that will impact upon my whole family’s daily life so severely.

Paragraph 189 of the National Planning Policy Framework states that “Local planning authorities...should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications” I again ask you to confirm for me whether this was part of the pre-application discussions undertaken with Mick George and Elveden Estate and what their response was. As a family who are tenants of Elveden Estate I am still awaiting any form of communication from them regarding the inclusion of a large area of land that forms part of my family’s tenancy in the Barnham Site. The Rt. Hon Greg Clark MP explains in his ministerial foreword how the National Planning Policy Framework facilitates ‘people and communities back into planning’, yet at the earliest opportunity both myself and the local community have had this possibility denied. No response was given to this query, how can a project of this scale be received with anything but hostility if those who propose it treat the local residents with such contempt.

I was troubled to see that the map shown at Barnham Village Hall during the consultation period was significantly out of date, omitting homes that were built in 2002 and one prior to that. I am glad that the maps have been altered and the homes that were omitted are now included on the maps. I hope that the maps included in the plan have now been checked to ensure there are no further significant errors.
Thank you for confirming that currently no material has been extracted from the Barnham site to date. I assume that the recent request for an extension to the planning permission beyond March 2019 allows this site on appearances to be more acceptable to its use within the SWMP?

The site included in consideration for the SWMP is such a major change of scale in both area and time I would still question whether this can be considered an extension. Thank you for providing a link to the original application and decision, documents that had not escaped my attention previously. As the ‘borrow pit’ was never used for the A11, the inclusion of this site into the SWMP seems to have been the end goal and so playing ‘a long game’ seems to be paying off for Elveden Estate.

As the purpose of MWLPs are supposed to ‘secure minerals and waste development that improves economic social and environmental conditions in the area’ what are the projected improvements for the Barnham area if the extraction is to be undertaken for 30 years? Mick George states that 20 jobs will be created. Are these jobs for local residents? If seasonal extraction is the only permissible extraction option to cater for the Stone Curlew breeding and nesting seasons, would these jobs also be seasonal? These questions remain unanswered, I still believe that as local residents will be significantly affected by this development and there have been no attempts to demonstrate how the economic, social and environmental conditions will be anything but damaged.

Has thought been given to the potential job losses that will occur due to the selection of this site? It is likely that the current tenants will struggle to farm North Farm if the Barnham site goes ahead as although I believe that they are ‘stakeholders’ they have not been included in discussions in regard to the restoration of the land. There does not seem to be a plan for it to return to agriculture, although contradicting statements were given at the consultation evening. The ‘inert backfill’ being suggested as a suitable replacement for the extracted material which could be farmed, yet Natural England stating that they are happy for it to be returned to natural heathland. I request clarification of this point, MAFF Good Practice guidance explains ‘the need to safeguard agricultural land for the needs of future generations’ is this not considered to be relevant here? This query has not been answered and therefore I request further consideration of this point.

Suffolk County Council maintains that this is an issue between the landowner and the tenant. Does Suffolk County Council not have a duty to ensure that aspects of the National Planning Policy Framework and the right for people and communities concerns to be heard as part of the planning process rather than washing their hands of them?

MWLP are also supposed to ensure that public amenities experience ‘no potentially significant detrimental impacts upon the enjoyment of residents’ homes or other sensitive land uses from HGVs, noise, dust, odours or visual impact’? The idea voiced by Suffolk County Council at the consultation evening was that residents would not be disturbed by the extraction which I refuse to accept. There will be a huge visual impact to locals who live in the area and use the byways for leisure and recreation from the large bunds that are proposed. Natural England produced an Access to Evidence Information note EIN018 in July 2016 which summarises ‘poor mental health represents the largest cause of disability in the
UK and rates are on the increase ... there is a growing body of evidence which tends to demonstrate a positive association between a) population level exposure to natural environments and b) individual use of natural environments, and a variety of positive mental health outcomes’ and that ‘the weight of evidence suggests that future policy and decision making should take account of the potential for good quality natural spaces in and around the living environment to promote better mental health.’ Has the mental health impact of the extraction, relating transport movements and loss of views when using the byways on the local community been analysed? The idea that large vegetated bunds will replace views of open farmland are ridiculous. They will be oppressive. If Suffolk County Council reserve the right to move public rights of way, might these be moved on to the tenant farmer’s land reducing the area they can farm even further? I request clarification of this point.

The consultation documents also document that additional mitigation will be required as the noise created by the extraction would still fall above the nationally allowed figures, therefore having a detrimental impact on the ability of residents to enjoy their homes. The proposed workings of the site are from 7am - 7 pm Monday to Friday then 7am -2pm on Saturdays. How could this not have an impact on the local area? What form would this additional mitigation take? Would residents be consulted on these as well? Who exactly decides what noise is ‘acceptable’ for 12 hours a day five days a week and 7 hours per day on the sixth? This level of noise will have a damaging effect on the physical and mental health of the residents.

Increased noise in the local area from either extraction or increased lorry movements will also have a long-term impact on the current and future students at both Barnham Primary and Elveden Primary schools. Shield and Dockrell explain in their 2003 article that in the past 30 years there have been many investigations examining the relationship between noise exposure of school children and their performance in various cognitive tasks. It is generally accepted that noise has a detrimental effect upon the learning and attainments of primary school children, with children with Special Educational needs being a double vulnerability group.

Exposure of young children to chronic road noise has ‘a particularly detrimental effect upon their reading ability, attention and long term recall’. Department for Education information reveals that Suffolk primary schools still remain below the national average in reading, maths, writing and science despite the Raising the Bar programme. I believe that the omission of any information about the noise impact of the extraction and resulting lorry movements of all types is unacceptable. When this was raised during the consultation evening at Barnham it was dismissed as ‘Elveden School has been there for over 100yrs so this will still be better than when the A11 ran past’ however, the children in Yr 4 and below at the time of writing will never have experienced the A11 running past the school. So I do not believe that this is a responsible or adequate response and is typical of the insensitive, intransigent and one might say cavalier attitude adopted during the whole of this consultation. WHO guidelines (1999) are that maximum noise levels are 35dB $L_{Aeq}$ inside classrooms and 55dB $L_{Aeq}$ in outdoor playgrounds. Could you confirm whether noise monitoring will be required as part of the proposal? If so, who will enforce this and pay for it for the 30 year lifetime of the extraction? This was not answered as part of the response
process. I do not believe that lorry restrictions at drop off and pick up times are sufficient
for safeguarding children’s health and educational opportunities.

Thank you for clarifying that the number of lorries is currently given as being 36 per day ‘however, it is possible that more lorries would be required for backfilling’. How many
more? Would they be capped and have restrictions placed upon them too? Have these
been included in calculations for air and noise pollution?

What route will those lorries take? Are they too going to be passing through Elveden village
and past Elveden School? As this village and school is outside of the 250m area that Suffolk
County Council is supposed to consult – are these residents and parents even aware of the
proposals that will impact so greatly upon them? This question was not answered as part of
the responses so I would still like an answer for this question.

I was not made aware of the predicted transport routes of the sold extracted material so am
also concerned that additional lorries will be travelling eastbound along the C633 to the
cross roads at Barnham to travel southbound to Bury St Edmunds. The phrases in the
response from Suffolk County Council of ‘should not travel down the C633 as sand and
gravel lorries would likely exceed this weight’ does not fill me with any degree of confidence
that this will not be the case. ‘Should not’ does not mean ‘will not’ and ‘likely’ suggests little
monitoring of load weight.

As this road does not have a pavement, there is additional risk to pedestrians and children
who walk to school, use Barnham Village Hall, or public transport. The crossroads already
struggle with car and lorry volumes at peak times. Increased traffic and standing traffic will
only cause more damage to the local air quality. Test results released on Clean Air Day 2018
suggest that children walking to school along busy roads are exposed to a third more
pollution than adults, as their shorter height places them close to passing car exhausts.

How are these impacts to be mitigated and monitored? Prof Jonathan Grigg, at Queen
Mary University of London states ‘my research has shown exposure of young children to
higher amounts of air pollution from traffic has a major impact on their lungs. The UK
government must take further steps to reduce toxic emissions’ (The Guardian p22
21/06/18).

It is well documented that air pollution, including particulate air pollution is a significant
cause of ill health and death. Public Health England states that ‘the increase in mortality
risk associated with long-term exposure to particulate air pollution is one of the most
important, and best characterised, effects of air pollution on health’ and that ‘current levels
of particulate air pollution have a considerable impact on public health. Since writing my
original letter, research by Dr Ziyad al-Aly of Washington University in St Louis Missouri,
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by air pollution. The inclusion of this site will have significant health impacts on the
residents of Barnham and the children and teachers at Elveden School.

Measures to reduce levels of particulate air pollution, or to reduce exposure of the
population to such pollution, are regarded as an important public health initiative’. Figures
provided by Public Health England show currently that 5.4% of deaths in St Edmundsbury
are attributable to air pollution. If this is the case, I would like to know the rationale behind exposing not only the local community to increased air pollution, but importantly two primary schools to increased levels of particulate emissions. There are currently 236 children on-roll at these schools, if the Air Quality Sensor in Newmarket is not going to be used to monitor air quality in the locality of the extraction and transport routes, where will a sensor be located? ‘A significant increase in local pollution concentrations is not expected’ is of little comfort to the residents who will be exposed to the dust and fumes six days a week. I believe failure to insist upon accurate air quality monitoring and enforcement throughout the length of the extraction could be regarded as negligence.

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I would also like to see the air quality impact assessment projected forward for the length of the project both with and without the development using an appropriate model, MET data and technical guidance including LAQM T609 to ensure that all relevant emissions sources are included and that all relevant pollutants, including particulates and NO₂ are included. This is considered by the Suffolk Local Authorities to be part of ‘three basic steps’. I believe that there have been NO₂ monitoring studies completed in Suffolk, does data exist for areas where extraction has been undertaken and what are the noted impacts? The document also explains in paragraph 2.5.1 that ‘an impact assessment should be included for dust and contribution to PM₁₀ levels for developments expected to take one year or more to complete. An impact assessment shall also be undertaken for mineral extraction and waste disposal and recycling sites’. Has this been done? To make an informed decision in this consultation process this information should be provided, and this document provides ‘minimum information to be reported in an Air Quality Assessment’ this is so ‘the assessment should provide a transparent account of the modelling undertaken’ has Suffolk County Council requested this information?

Suffolk County Council state in the responses that ‘at the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management’. This shows that Suffolk County Council acknowledges that there are concerns around the impact of this development on residents. Who decides that the ‘risk’ is ‘acceptable’? ‘Adequate’ suggests a half hearted ‘good enough.’ I find this response dismissive and as a parent, I feel as though the safety of my children’s health is considered valueless compared to a gravel pit.
A detailed report on the Environmental Impact of the proposed site has not been included in the consultation documents. How can the local community make informed decisions without full, easy to access reports? I would also like to know who provides the Environmental Impact Assessments and Ecological Surveys to ensure that they are truly independent and unbiased.

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I am also apprehensive about the Climate Change Mitigation information submitted as part of the consultation process. There are no specific carbon figures. Is it going to be more or less that the 3.5kg per tonne? Who is going to be accountable for measuring the impact of the extraction? Mick George states the use of ‘Adblue’ and ‘EuroVI engines’ but the VW scandal proves non-compliance and the loophole is unlikely to be closed until 2019 when this consultation period will be closed. I would still like my concerns about this to be noted.

Do the 12.5 metre easements on either side of the high-pressure gas main running through the site allow for potential shifting of sediments due to extraction or alteration of the water courses due to extraction? Would a survey of this be completed pre-extraction and risk assessments be carried out and shared with local residents?

To conclude, I believe that the consultation process is flawed and that there is not enough information for local residents to make truly informed decisions about the extent of the serious and long term impacts on a local area that includes two primary schools, Breckland SPA, Breckland SAC, Breckland Farmland/Little Heath/Thetford Heaths SSSI, Gorse Grassland CWS, Thetford Heath NNR, European Protected species (Bats and Great Crested Newt), Priority Species, Other Protected Species, Priority Habitats (Lowland Heath), two listed buildings, a site with known links to WW1, WW2 and the Cold War, the potential for the site to contain heritage assets of significant importance to trigger NPPF139 and need preserving in situ and within a Flood Risk Zone 3. I still believe that the inclusion of Barnham in the SWMP fails to consider the long-term, cumulative impact of a development on such a scale on the local community, particularly now that more industrial development and lorry movements have been approved since my original letter. These include an oil depot, plant hire depot and extended warehousing. The residents of Barnham are being subjected to an onslaught of industrial development totally disproportionate to the size and infrastructure of the village.

Clare Watson