**Planning Ref: SCC/0063/20F Proposal: Minor extension to Cavenham Quarry for the extraction, processing, sale and distribution of sand and gravel and subsequent restoration using inert materials together with the use of the existing access. Location: Cavenham Quarry, Cavenham Road, Tuddenham, Bury St. Edmunds, IP28 6SE**

**Planning Ref: SCC/0064/20F Proposal: Planning application for a minor western extension to Cavenham Quarry for the extraction, processing, sale and distribution of sand and gravel and subsequent restoration using inert materials together with the establishment of a replacement recycling facility with the continued use of the existing processing plant, ancillary infrastructure and access. Also, to allow for an alternative restoration scheme for the existing quarry using inert materials on land at Cavenham Quarry. Location: Cavenham Quarry, Allen Newport Ltd, Cavenham Road, Tuddenham, Bury St. Edmunds IP28 6SE**

**6th November 2020**

**Please see below Tuddenham Parish Council’s response and Objections to plans to SCC/0063/20F and SCC/0064/20F. We strongly object with the following concerns;**

Air Quality: An inert waste recycling plant will lead to an increase in dust emissions. HSE.gov.uk recognises dust as a health and safety concern with inert waste crushing, stating: “Dust and fumes can cause long-term health problems such as asthma and chronic obstructive pulmonary disease (COPD)”.  There is also the impact on the Breckland Farmland SSSI and Breckland SPA, as the Stone Curlews habitat and ability to forage can be affected by dust settling. The application states that there is slight but negligible risk, but this is once mitigation is in place, without mitigation the risk is actually moderate to slight.

Increased HGV movements associated with the import of inert waste will also lead to increased localised air pollution, as has been submitted at every proposal for expansion of the quarry and its associated works. Residents in Tuddenham are already suffering localised air pollution along the main road through the village, due to HGVs and rush hour traffic, as although the road is classed as a C road, its use is actually more in-line with an A B Road, as HGV’s and other road users primarily use the Tuddenham High Street as a cut through to the A14. An increase in HGVs will compound this problem, and has not been satisfactorily addressed. To say there will be no increase in vehicle movements seems highly unlikely, as the current quarry activities does not allow for inert waste to be brought onto site, therefore, there is bound to be increased vehicle movements into the site, thus impacting on the local roads.

Noise Pollution: An inert waste recycling plant will lead to an increase in noise pollution.  Recycling inert waste involves crushing/screening and associated loading shovel/360 excavator use. Residents in Tuddenham and Cavenham already endure the noise pollution from the quarry – the recycling plant will significantly increase this noise.

The likelihood of increased HGV movements associated with the import of inert waste will also lead to an increase in HGV traffic generated vehicle noise. This is not simply noise, but is also vibration from the HGVs passing buildings that are set close to the road, and are suffering substantial structural damage from the HGV traffic. Not to mention the damage to the road surfacing and kerbsides along the High Street in Tuddenham, which is already a significant problem.

Ground Water:  the importation of inert waste should not be allowed in a groundwater source protection zone. The proximity of the site to the river Lark and the Roberts Bridge pumping station (BNG map reference TL7728 2808) and the Secret Fen unit of the Cavenham-Icklingham Heaths SSSI, presents a major risk of groundwater pollution. The risk of contamination of inert waste (construction waste) with hazardous materials is high as source separation is frequently inadequate. The NPPF Paragraphs 109, 120 & 121 protect pollution of the water table. We would also request that if the applicant plans abstraction of more than 20 cubic metres per day, have they applied for an Abstraction Licence from the Environment Agency, which came into effect on 1st January 2018.

Can the applicant prove they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, ‘uncontaminated soil and other naturally occurring material excavated in the course of construction activities. If not, will they be seeking an application for a Waste Permit or Exclusion from the Environment Agency?

Transport Routes: Despite assurances that inert waste imports will mostly consist of backloads, there will be an inevitable increase in HGV movements as it is very unlikely that all imports will be backloads and if there is any intention of exporting recycled crush from the site, this will again lead to an increase in HGV traffic. As mentioned earlier in our comments, the C Class road through Tuddenham, is actually quite a narrow road, with residential properties, leisure facilities, church and a Bus Stop (used for school bus pick up/drop off) directly along the kerbside route, with narrow or non-existent footpaths. Residents already struggle with the noise, vibration and air quality of this route being used regularly by HGV’s as a cut through to the A14. The road is also well documented as a trouble spot for speeding, and has a very sharp left bend coming from Cavenham to Higham Road, which HGV’s have difficulty manoeuvring, meaning they have to go up onto the kerb/footpath in order to make the turn, sometimes at the risk of hitting oncoming traffic.

In conclusion the overall effect of noise pollution, air quality being affected at any level, HGV causing vibrations and damaging buildings and road surfaces, as well as the safety implications of more HGV movements travelling through the village, on what is already an inadequate road, should be seriously considered and a full independent transport survey should be carried out by the Planning Authority, before any decision on approval is taken. We would ask the planning authority to come and meet with members of the Parish Council, at peak times suggested by us, to see for themselves the frequency, noise, pollution and safety implications associated with the quarry traffic using the village roads. It has been raised on many previous occasions the need and want for a relief road, to relive the HGV pressure on the villages of Tuddenham and Cavenham and we would ask the planning authority and applicant to seriously consider this suggestion.