

Agenda Item 6.1

S19/1244 SUDBROOK QUARRY – RESIDENTS CONCERNS ARISING FROM OPEN REPORT FOR LCC PLANNING & REGULATION COMMITTEE MEETING 5TH OCTOBER 2020

To assist in your preparation for the subject meeting, the undersigned residents of Sudbrook and surrounding villages wish to bring to your attention the following serious concerns we have regarding findings and recommendations within LCC's Open Report produced on behalf of the Executive Director for Place. We would like to draw your attention to some recommendations that have been made by statutory consultees and independent experts that apparently have not been taken into account and list conditions that we would like to see revised or included.

Proposed amendments to Conditions Listed in Appendix A of Open Report

More detailed explanation follows this list:

Subject	Condition Ref Number	Proposed Ammendments
Approved Details	3	Resubmission of all drawings with the exception of Location plan and site boundary to reflect the opinion of the applicant's consultant that the proposed scheme of working is unachievable unless fundamentally modified. The necessary modifications are yet to be incorporated in to the scheme of working.
Extent of mineral extraction	4	As Above. Section 10 of the Environmental Statement is not deliverable using proposed method as confirmed by Touchstone Report.
	7	Max depth shall not exceed 7m unless points 3 and 4 are addressed.
Ecology	10	Request a reptile survey is completed as well as great crested newt.
Water Management & Groundwater Protection	12	To comply with Environment Agency advice and to ensure protection of local water bodies, ground water monitoring should be for 12 months and should include a ground water balance assessment.
Hours of Operation	19	Operations to cease at 18.00
Access and Highways	22	The Highways Conditions do not adequately meet road safety standards and we request further concessions are made eg provision of a footpath and cycle path.
Dust	35	A baseline dust assessment needs to be submitted to the MPA and trigger points for additional suppression measures or cessation of work to be agreed

Hydrology & Flood Risk

The Environment Agency (EA) has made several recommendations for conditions to be included for groundwater monitoring that do not seem to have not been adopted.

The EA has recommended 12 months of pre-operational groundwater and pond water data collection from a suitable number of monitoring bore holes and locations.

The EA also suggested that a detailed water balance assessment is produced.

Proposed **Clause 3 Approved Details** (Page 79) and Planning Condition 12 (Water Management and Groundwater Protection, Page 81) species monitoring for a 3 month period and not 12 months as suggested by the Environment Agency.

We request Groundwater and pondwater control levels should be established by way of a detailed groundwater balance assessment which should, subsequently, be submitted to both the MPA and EA for approval prior to extraction commencing.

A suitable scheme should be submitted to the MPA outlining the actions and mitigation measures that the operator will take should the monitoring of water levels during extraction demonstrate that the operations have caused , or are causing, a change in the water table level specified in the groundwater balance assessment.

Extraction Design & Slope Safety

Residents have raised concerns regarding the viability of quarrying to a depth of 15m when the existing quarry on the same ROMP site is only around 3m deep and Woodland Waters is 5.5m deep. There are related concerns to slope stability and safety.

Touchstone Geological Services submitted a report on behalf of the applicant on 30 July 2020 which concludes that the potential to extract to 15m deep is only achievable at the centre of the site and the slope stability needs to be confirmed by a Geotechnical Assessment. The applicant's report also concludes that excavation would need to commence in the centre parts of the site rather than in the North East corner as stated in the planning conditions.

Conditions 3 and 4 (Approved Details, extent of Mineral Extraction) of the Updated Conditions specifically refer to the phasing and restorations proposals submitted in the EA and Further Information submitted 20 April 2020. These plans do not take account of any proposal to commence quarrying at the centre of the site as is indicated as being necessary by the applicant's consultant in their report dated July 2020. These plans are material considerations and fundamental to the entire planning process because they impact on landscaping, listed buildings, sensitive receptors. An up to date extraction plan must be submitted prior to the approval of modern planning conditions. This plan should be accompanied by a Geotechnical assessment demonstrating the plan is deliverable and that the reserve can be extracted safely.

Dust & Health

We welcome the use of wind data recorded at RAF Cranwell instead of EM Airport. However, while Cranwell is only 4miles away, it's on a flat open airfield while Sudbrook sits at the bottom of a valley. Hence, we request confirmation that the Cranwell data has been applied to topographical modelling to accurately depict wind conditions at the quarry site

The Environmental Health Officer from South Kesteven District Council raised concerns regarding the proximity to residential properties and the impact of dust and residents are concerned that a baseline dust assessment has not been carried out in accordance with guidance of the Institute of Air Quality Management.

Although this site is to be "wet worked", the potential to create dust remains particularly throughout the top 3m until ground water is reached, haul roads and movement of stockpiles for loading or screening.

The applicant states that "the purpose of EIA is not to produce the most comprehensive report possible in a variety of ways and on each and every matters." However, the IAQM also quotes NPPF " local authorities should ensure, in granting planning permission for mineral development, that there are no unacceptable adverse impacts on the natural and historic environment, human health".

Without a baseline assessment we fail to see how the MPA can possibly have ensured what the impacts are or could be. It cannot be stressed enough how close residential properties are to the site.

Although in an email to Marc Willis dated 30 July the applicant states "As an aside WYG is also currently undertaking site monitoring works to assess background PM10 and dust levels in anticipation of these potentially forming part of the Dust Management Plan for the Site. This data will be made available in due course.", the obligation to provide the findings to the MPA needs to be confirmed.

Condition 35 (Dust, Page 85) requires a Dust management Plan to be submitted for approval by the MPA.

We request that trigger levels to be determined for sensitive receptors so that it is clear when operations should cease or other mitigation measure should be employed. An ongoing monitoring scheme should be approved by the MPA

A photo that emphasises the amount of sand dust currently generated around the site is attached for information.

Hours of Operation

Proposed Clause 19

We request that mineral extraction, processing and soil stripping should be limited to 1800 due to the close proximity to residential properties in order to protect their quality of life.

Highways

The Open Report's conclusions do not meet the requirements of NPPF Para 110 (not referred to in the Report) and CSDMP DM14 for the following reasons:

1. Not all pedestrians are afforded priority (only school children at certain times on school days and they still have to contend with other vehicular traffic).
2. Cyclists and people with disabilities and reduced mobility are not considered. The DfT Cycle Infrastructure Design document of 2020 (LTN1/20) shows that a cycle requirement of 2m (3m is desirable) is needed for lorries to safely pass. This requires the road width to be a minimum of 4.89m (desirable 5.89m) carriageway width as vehicles will be 2.89m. This does not take account of separation distance for safety/variable geometry. Clearly the road – improved or not – cannot accommodate heavy traffic and cyclists safely where it is no more than 3.8m to 4.8m wide.
3. The current plan for using Rookery Lane for HGV traffic does not “minimise the scope for conflicts between pedestrians, cyclists and vehicles”.
4. Rookery Lane is a primary access route to Sudbrook for the emergency services. The current plan is highly likely to impede emergency vehicles during the HGVs' operating times.
5. Insufficient consideration has been given to the provision of footways and street lighting as the feasibility of the Highway Authority (HA) supporting these essential measures is not discussed.
6. While it is stated that the HA has raised no objections to the proposals, the HA has only publicly commented on vehicular aspects. It is far from clear whether the HA has been specifically requested to address the other considerations required of NPPF Para 110.
7. There is no clear line of site to the North when exiting the quarry on to Rookery Lane which has a 60mph speed limit. The Transport Statement shows vehicles approaching the road at an angle, however, if they do this, they cannot see to the left as this line of sight is obscured by the hedge so they cannot exit safely. The only way to see a clear view to the left is to approach the road at 90degrees and advance on to the road by 1m. At this point the road is only 4m wide and the turning circle of the lorry is approx. 11m, this will mean that the lorries will overrun on the opposite verge. No measurements have been provided by the applicant to demonstrate a safe exit.
8. The currently proposed HGV exception times do not cover the required periods. the school bus arrangements from/to Rookery Lane are factually incorrect as the proposal is based solely on school children using Centrebus No 27 for journeys to both Sleaford and Grantham. However, as raised via an online objection on 19 May 2020, Sleafordian Coaches' S156S is the school service actually used between Sudbrook and Grantham. Consequently, the correct depart/drop off times are: Sleaford 0756/1632, Grantham 0801/1616.

Overall, as the Report's Highways section stands, we strongly believe that there are sufficient grounds for preventing or refusing development in accordance with NPPF Para 109.

Ecology

Protected species have not been properly considered. The species surveys did not record any evidence of any reptiles. These species are protected in the UK under the Wildlife and Countryside Act, 1981 and identified as Priority Species under the UK Post-2010 Biodiversity Framework and it is illegal to injure or kill them. Grass snakes and lizards are regularly seen around the quarry and in particular on the concrete at the quarry entrance (please see attached photos), so it is surprising that none were recorded and we request that a further study is conducted in advance of any ground works associated with the quarry to ensure their protection under the Act.

Yours sincerely,









This page is intentionally left blank