

Holton St Mary Parish Council wishes to object to the Brett Vale Golf Club planning application reference **DC/20/05024** for the following reasons:

Material Considerations:

1. Highways Issues
2. Noise and Disturbance
3. Hazardous Materials/Land contamination
4. Trees
5. Nature Conservation
6. Impact on the surrounding area
 - 6.1.AONB
 - 6.2.Leisure Users
 - 6.3.Health and wellbeing of elderly in Villages impacted
7. Inconsistencies in application
8. Lack of adequate oversight or controls over proposed scheme

1. Highways Issues

The Transport Statement states that 79 HGVs carrying 8 cubic metres of “Inert construction waste) will deposit a mix of construction site waste per day. Each lorry will leave empty - so that is 158 lorries per day, 5 (occasionally 6) days a week between 07.00 and 19.00 for two (possible three) years. Based on the density of construction material, and our observation in 2020 of the import of material to landscape the ground around the lodges, each cubic metre weighs in excess of 2 tonnes - necessitating 28 ton 8-wheeler aggregate tipper trucks.

The B1070 is already a busy road with sub-standard junction joining the B1070 to the A12 (proposed route) at Four Sisters Junction. Two lorries meeting on the exit from the A12 northbound in the winter of 2019-20 resulted in one lorry mounting the verge and tipping over, proving there is insufficient width for two HGVs on these slip roads. With the presence of Notley Enterprise Park and Raydon Airfield, and the operation of the 24x7 Transport Recovery business that all use both parts of these junctions regularly, the road is inadequate and the danger significant.

The proposed turning from the B1070 into Noaks Road is too sharp for an 8-wheeler to manage in one turn. This means the proposal if granted will either require a multi-point turn into Noaks Road or the prospect of trucks using Holton St Mary Bacons Green, a single-track road intersected by a **footpath** and both National and Local Cycle Routes (South Suffolk B, National Route 48) - with no grass verge or refuge. Evidence reported to the Parish Council in the summer of 2020 when the earlier phase resulted in the same size of HGV using Bacons Green is that they caused damage to verges and road-way, attempted to adhere to the 60mph speed limit (**also when entering into the 30mph limit**) and caused life-threatening danger to cyclists, horse-riders and pedestrians on this well-used road.

There are three old properties in Holton St Mary on the B1070 that would be directly impacted by the passing of so many 28 ton trucks. Rose Cottage and Old Post Office are on the West-bound side (trucks coming in laden) and The Cottage on the East-bound (unladen leaving) side of Hadleigh Road and with no foundations, would be in danger of experiencing structural damage caused by such high numbers of heavy trucks passing regularly. The risk of structural damage is greatly increased the faster they go. It was clear in summer 2020 that the trucks used as part of the lodge landscaping did not adhere to the speed limit and the Parish Council directly contacted the main lorry contractor to insist he get the drivers to slow down. The vastly increased volumes proposed in this application means no one contractor could support this and removes the “decency” measure the Parish Council has adopted with other road users.

We note that gravel will be removed but there is no reference to this being removed from site. Neither is there any reference to the removal of the trees (**possibly thousands** of 25 year old trees) that will be felled.

We conclude from an evidenced base that the access is dangerous and inadequate and therefore contradicts the NPPF Section 8 (promoting healthy and safe communities)

2. Noise and Disturbance

158 HGV lorries thundering through Holton St Mary will cause considerable noise and disturbance to all properties along the route and in adjacent roads.

We note the dust mitigation measures proposed are to be determined on site and **by eye**, at the discretion of the small number of contractors receiving and managing **these** incoming loads. This **means no such controls apply to incoming trucks travelling towards Raydon until they reach the site**. It also suggests that time and productivity measures are likely to mean this is secondary to the receiving and despatching of lorries so that they are not queued on the roadway.

The noise from the site will cause disruption to all property within a considerable distance of the site (this was evidenced when the lodges were being installed and the consequential landscaping undertaken, impacting on our residents in and around Bacons Green, Sandpits Lane and the NW end of Hadleigh Road. Currently when the wind is in the non-prevailing wind direction the A12 road noise can be heard over a wide area and this proposal would ensure that noise pollution would prevail when the wind is on the opposite range of directions. **The constant noise and vibration of lorries may have a negative impact on residents mental wellbeing as many are retired or working from home.**

If the trees that are to be removed are to be disposed of on-site we presume this will be by burning, resulting in further air contamination.

We conclude that this will cause material detrimental noise and disturbance impact on our residents

3. Hazardous Materials/Contamination

The material that is proposed to be used for burying is construction waste from Greater London and surrounding sites. The description of the composition of this material is untested but described as inert. Table 2.1 in the Dust management Plan describes the typical composition as:

40% soil and stones;
15% mixtures of concrete bricks tiles and ceramics;
5% concrete;
5% bricks;
5% tiles and ceramics;
10% waste gravel and crushed rocks;
20% waste sand and clays

From this we conclude this is coming from brownfield sites, not greenfield with a much greater likelihood of contamination by toxins, heavy metals, asbestos and similar hazardous materials.

The proximity of the site to both residential and AONB means this risk is totally unacceptable and has the potential to contaminate multiple communities.

Incoming vehicles will emit diesel particulates into the air, materially contaminating the environment for residents. This will be from both the fuel and the material attached to the vehicles.

We note that oversight of the truck contents lies with the agent and landowner, both of whom have a potential financial conflict of interest to get the material in and done, without taking into consideration the potential implications in the longer term. We could not find any plan to control this in the planning proposition.

Without adequate oversight or controls the risks are high and the potential for future clean-up liabilities are considerable.

4. Trees

We note that all of the landscaping that was a condition of the original golf club planning approval is to be removed along with all of the semi-mature and approaching maturity trees. **Almost** the whole area is to be flattened to allow the burial of construction site waste. It would take another 27 years (assumes the shorter 2-year development window, not 3-year, mentioned in some documents) for any new landscaping at the end of the window to recover to the current state.

We note that this information is not prominent in the environment report and no proper arboricultural report is contained in the proposal.

The proximity to the AONB at the boundary of the site means that the visual amenity of the undulating landscape and trees will be denuded of all vegetation to the detriment of all who live locally or use the amenity.

5. Nature Conservation

There is no nature conservation. The **stripping** of a large area removes the wildlife habitat across 23 hectares of landscaped environment, destroying habitat and reducing biodiversity.

6. Impact on surrounding area

6.1 AONB

The impacted area is immediately adjacent to the AONB and therefore contradicts the NPPF paragraph 172 which outlines the importance of AONB. **The protection of AONBs is not just the land within the designation but also its setting.**

6.2 Leisure Users

- A number of public footpaths intersect the proposed site (OS map references 20, 30, 40 and 50 all require walking on the golf course).
- Users of the Dedham Vale AONB are often visitors, relying on maps (printed or online) that make no provision for diversions (and none is included in the planning application)
- Horse riders will not be able to safely ride in the area
- Cyclists using National Cycle Route 48 (that uses Noaks Road), South Suffolk Cycle Route B and various clubs using the B1070 will all be directly impacted **by this** proposal

6.3 Health and Wellbeing of elderly residents, *Young Children and their Families*

There are a large number of elderly residents in all of the surrounding villages that remain active by walking around within their communities and using footpaths and roadways to maintain their health and wellbeing. **The Village also has a number of families with young children who also use the footpaths for exercise.** This proposal, if approved, would materially impact their environment, for example our assessment of vulnerable residents has identified approximately 40% of households in Holton St Mary. Nine of these in Rose Acre need to cross the B1070 to walk to the Village Hall, a well used village resource that supports organised exercise and the lunch club (registered food business). It is dark by 4pm currently - with three more hours of 28 ton lorries (cab height 2.9m) thundering through the Village.

The risk of the increased presence of particulates which will be caused by the lorries passing through Holton St Mary is not compatible with the newly published Climate Change Action Plan by Suffolk County Council; the carbon emissions may also have an adverse effect on any residents that already have asthma or Chronic Obstructive Pulmonary Disease or may increase the prevalence of these diseases among local residents.

The risk and danger from the additional traffic will directly impact on residents willingness to walk, even on the footway. The increased presence of carbon particulates may cause a negative impact on residents health.

7. Inconsistencies in Application

- We note references to both three and two year durations for the works to be undertaken
- We note inconsistent references to the composition of the construction site waste to be imported
- We note that the tree report suggests no trees of consequence but no site-based assessment has been undertaken
- We note the environmental report lacks information about the impact of levelling 23 hectares (approx 56 acres) of landscaped natural habitat
- The Transport Statement says that no material will be removed from site but the proposal includes the quarrying of gravel. We believe a quarry licence is required for this volume of material to be dug out.

We conclude that the presentation of the importation of construction site waste in the transport proposal and not up-front in the planning application, was to attempt to bury it so that local communities perhaps missed this in the lead up to Christmas.

We additionally report that despite the huge impact this proposal would have on our community there has been no advance discussion with this Parish, and our comments are therefore based on the application as presented.

8. Lack of adequate oversight or controls over proposed scheme

There is no plan to ensure the construction site waste is clean and not harmful

There is no oversight of the lorries that will be travelling to and from site

There are no safeguards for the local community should the owner declare his business no longer viable (after 2/3 3 years of offering only 13 holes) and wind up the business

There is no potential contamination mitigation plan and no financial assurances to underpin this

In light of this we can only oppose this application.

As a wider point Holton St Mary welcomes the development of the business to improve leisure facilities and visual amenity, create jobs locally and support local communities but it seems this proposal is not primarily based on this. The scheme is more about importation of construction industry waste; the core business of London Rock (whose name underpins several documents) is to find disposal sites for London building site waste, which is highly lucrative.