

Bentley Parish Council response to re-determination of application SCC/0105/22B

Extraction, processing and sale of sand and gravel, processing of inert waste materials with associated plant and related sales, access works, phased restoration using inert recovered materials and aftercare plan.

Bentley Parish Council requests rejection of this application on the grounds that it remains contrary to National Planning Policy Framework 2023 Para 180a and Babergh and Mid-Suffolk LP18 and Policies BEN 3 and BEN 11 in Bentley Neighbourhood Plan.

Valued Landscape

It objects to the placement of an industrial waste processing plant in the most sensitive part of the site in terms of landscape and heritage value.

- This application is identical to the previous application subject to the Judicial Review which quashed permission originally granted by SCC due to their admitted failure to consider the the Valued Landscape status of the application site.
- In their response to the Judicial Review, the applicants have produced a consultant's report (Addendum to LVIA) which attempts to denigrate the value of this landscape and indeed that it should even be part of the Additional Project Area.
- Bentley Parish Council commissioned Alison Farmer Associates, who have been involved in the assessment of the Additional Project Area, to review the planned site, and the applicants' LVIA responses. Alison Farmer's submitted report **Brockley Wood - Review of APA and LVIA** (sent separately), rehearses and revalidates the history and status of the site's assessments and the qualities that make it a valued landscape.

Alison Farmer refutes the assertion that the value of the landscape is compromised by the A12.

She concludes that the 2020 landscape assessment of the Additional Project Area confirmed it as a valued landscape in NPPF terms and sets out its special qualities.

She concludes that the applicant's LVIA response underestimates the value and qualities of the receiving landscape, and that the positioning of the waste processing plant in the most sensitive part of the site would have the longest sustained effects in visual and operational intrusion in respect of the operation of the site.

She considers that no rationale has been offered for not considering re-locating the weighbridge and waste processing plant, in order to minimise the impact of traffic and industrial operations on the site.

She concludes:

Based on the above analysis I consider that the proposed development does not, in its current form, comprise a good fit with the receiving landscape and does not conserve and enhance the character and valued qualities of the area.

This expert opinion is supported by The National Landscape team in their response to the application.

Neither is saying that mineral workings must not take place on the site, but rather that the proposals simply do not recognise, protect or conserve the special qualities of the receiving landscape adequately, with particular reference to the location of the waste processing and plant site.

SCC must not ignore these views, being expressed by the foremost experts on these issues. Bentley PC asks SCC to insist the applicant addresses these matters properly by modifying its proposals and not to ignore the expert views so clearly expressed.

Alternative Sites

Both Historic England and National Landscapes Team clearly consider there are material harmful impacts associated with this application. The Suffolk Preservation Society confirms 'Bentley Old Hall benefits from a deeply rural and tranquil setting which contributes to its significance. The proposed land use has the potential to give rise to significant negative impacts on how the heritage asset is experienced including noise, light pollution, dust and vibration.'

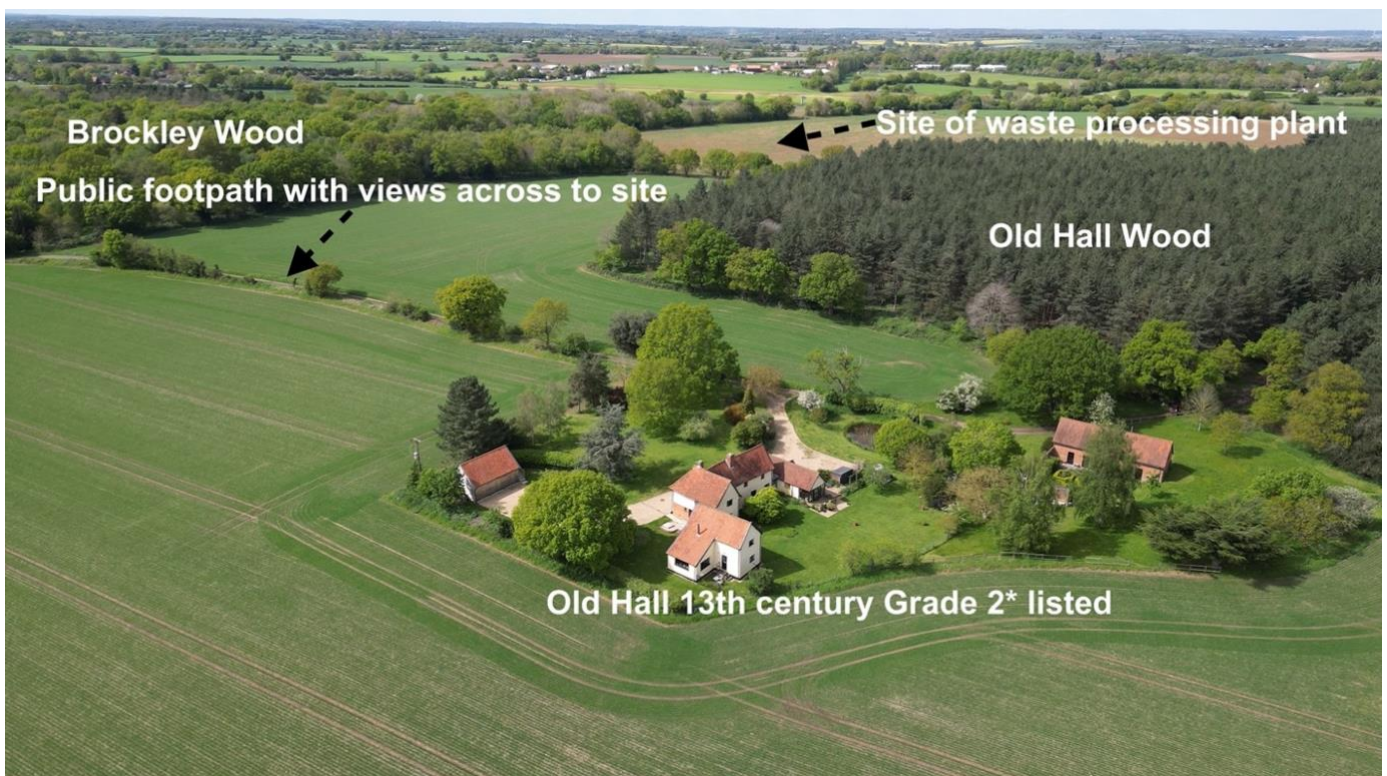
This directly conflicts with policies BEN3 and BEN11 in Bentley NP (as appended).

There must be consideration of alternative disposition of the waste processing plant such as:

1. To exclude on-site concrete crushing and waste processing (which was never contemplated when the site was allocated) and to require inert restoration materials to be brought to the site pre-processed; or
2. To move the plant site to the phase alongside the A12 behind the proposed bund.

The site was not allocated in the SCC's Minerals & Waste LP for Waste Processing and SCC need to grasp that and act upon it. The unfairness on the receiving community is manifest.

SCC should insist that these alternatives are properly and fully investigated **so that the environmental impacts can be reduced to a level which accords with SCC's Minerals & Waste LP.**



Impact of HGV traffic

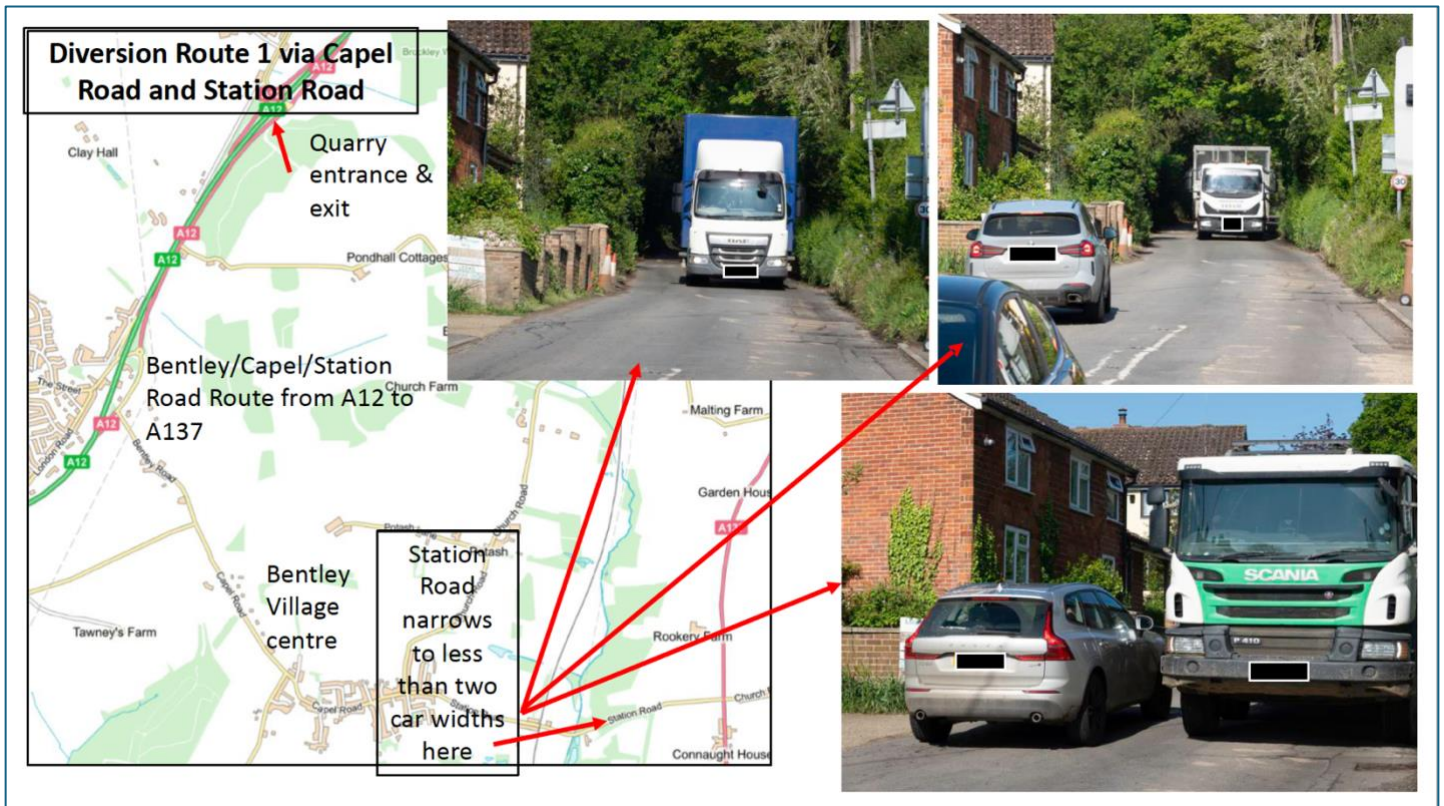
Despite the fact that the site is ostensibly well located to route all movements via the A12/A14, in reality as soon as the A12 becomes congested, as it does on a daily basis, traffic diverts via our village roads to avoid the Copdock Interchange. This has been confirmed by a recent traffic survey carried out by SCC Highways in our village where increase in traffic at peak times through our village directly correlates with queuing traffic on the A12 (data provided by Highways England).

Brockley Wood Venture’s Lorry Route Management Plan is totally inadequate – it can advise but does not control movements outside of the site and places an unreasonable burden on local communities to monitor HGV movements, report registration numbers and follow through complaints.

Bentley PC is not saying that HGV flows per se are a reason to refuse planning permission, but must require SCC to put up **defences to protect the local communities *IN ADVANCE*** of a completely foreseeable and predictable influx of daily HGV movements **which will have intolerable impacts for local people**. Our roads are just not capable of absorbing this type of HGV traffic. **See images below.**

If this application is considered, SCC **must** implement signage/TROs or other controls to keep HGV movements **on the A12** and **off our village lanes**.

Images showing routes through Bentley



Images showing routes through Bentley

Diversion Route 1 via Capel Road and Station Road

Quarry entrance & exit

Capel/Station Road Route from A12 to A137 via the village centre

Dangerous blind bend here

Bentley Village centre

Village primary school

Capel Road junction – blind bend turning right - frequent near misses here

Houses close to road

Narrow footways

Capel Road Walking route to village primary school and shop. Riders use this road to access bridleways

Diversion Route 2 via single track designated Quiet Lanes, Bentley Hall Road and Church Road

Quarry entrance/exit

Bentley Hall Road and Church Road connection from A12 to A137

1

2

3

4

5

6

7

For 2 miles

Quiet Lane

Church Road off C 426 towards Churches, School and Village

Noise

This has largely been addressed by acoustic experts acting for the residents of Bentley Old Hall and Old Hall Barn. Bentley PC wish to highlight these significant points to SCC on behalf of its parishioners:

1. The SCC now has a long series of new noise readings which do not support Brockley Wood Ventures' contentions. SCC should get out and look at these matters itself if it is in any doubt as to the correct characterization of the noise environment at Bentley Old Hall; ***the default should not be to accept the position of Brockley Wood Ventures;***
2. SCC should not be adopting an assessment metric for the noise from a concrete crushing plant which assumes that it is an essential part of a minerals operation. ***Quite patently it is not. All the concrete being crushed is being imported into the site and the crushing could obviously take place at the site of origin or at an authorized waste processing plant.***

Bentley PC consider that by including concrete crushing and waste processing at its proposed location, this would materially harm the amenity of nearby residents by reason of noise, vibration, vehicle activity and don't consider there is adequate mitigation implemented to avoid this harm. This would be in direct conflict with Policy BEN 3 AND BEN 11 of Bentley Neighbourhood Plan.

Bentley Neighbourhood Plan - extract

Policy BEN 3 - proposals will be supported where they:

- a) maintain and enhance the quiet and tranquil character of the village and its setting;
- b) do not materially harm the amenities nearby residents by reason of noise, smell, vibration, overshadowing, loss of light and outlook, other pollution (including light pollution), or volume or type of vehicular activity generated, and/or residential amenity unless adequate and appropriate mitigation can be implemented;
- c) produce designs that respect and address the character, scale, height and density of the locality;
- d) reflect the qualities and character of the setting of the village within a high quality rural landscape, as identified in the Bentley Landscape Appraisal;
- e) ensure that there is no detrimental impact on the key features of important views identified on the Policies Map;

Policy BEN 11

To ensure the conservation and enhancement of the Village's designated heritage assets, proposals must:

- a. preserve or enhance the significance of designated heritage assets of the Village, their setting, and the wider built environment;
- c. be of an appropriate scale, form, height, massing, alignment, and detailed design which respects the area's character, appearance, and its setting;
- d. demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits, alongside an assessment of the potential impact of the development on the heritage asset and its context;