

# **Swilland & Witnesham Parish Council Objection**

## **Planning Application SCC/0093/25SC – Proposed Sand and Gravel Quarry at Westerfield (Nicholls Ltd)**

Swilland and Witnesham Parish Council (The Parish Council) objects most strongly to this quarry proposal which will have a profound detrimental impact on the quality of life, safety and health of people living in or passing through our villages and neighbouring Westerfield and Tuddenham and on those who come to enjoy the tranquil and attractive countryside and amenities of the Fynn valley area.

Suffolk County Council is urged to refuse this application as it is fundamentally at odds with planning policy including the National Planning Policy Framework (NPPF), Suffolk Minerals & Waste Local Plan (SMWLP), Suffolk Coastal Local Plan (SCLP), and the Westerfield Neighbourhood Plan. The proposed quarry operation would have a severe and unacceptable adverse impact inflicted on the local communities, road safety, environment and businesses.

The Parish Council asks Suffolk County Council to acknowledge and take full account the massive level of local public knowledge and concern shown in the 1000 plus objections to this proposal. The Parish Council has worked extensively with the Stop the Quarry campaign and fully supports the substantive objection it is making to this proposal and the research behind it.

Suffolk County Council is asked to refuse permission on the following grounds;

### **1. Failure to Engage with the Parish Councils**

The applicant falsely claims there has been pre-application consultation with Parish Councils (Planning Statement paragraph 1.4 and Appendix 3). It is alarming that there has been no attempt to engage whatsoever with parish councils, including a refusal to invite parish council representatives to the pre-exhibition meeting. A poorly advertised, poorly attended one day exhibition was held in February 2025. Pre-application discussions by the applicant with the County Council have been ongoing since 2022. There has been a failure to fulfill the community engagement requirements of the NPPF (paragraph 16c) and to enact the requirements in the Suffolk Minerals and Waste Local Plan (SMWLP) Statement of Community Involvement 2015 to ensure that all members of the general public, interest groups and local communities are engaged in the plan making process at the earliest opportunity. Suffolk County Council needs to acknowledge and address this matter.

### **2. Failure to Show Need for the Quarry and Land Infill**

Suffolk County Council has recently confirmed (Cllr Chambers response to question at Full Council July 2025) that the SMWLP “is still providing a robust framework for the supply of local aggregates as Suffolk has over eight years capacity of supply when the national requirement is seven and sites in the Plan provide for a further 10 years of supply”. The

recently approved (July 2025) Bentley quarry provides a further two years supply, plenty more than enough to meet Suffolk's needs to 2036. There are over 13 years capacity of infill material space.

As an alternative to bringing aggregates from Essex, the applicant has the option to source locally and dispose locally, using approved facilities that already exist.

As there is no public need for this quarry, Suffolk County Council should apply the Mitigation Hierarchy of firstly avoidance, then mitigation and finally compensation and refuse this application.

### **3. The Proposal is not Sustainable Development**

This speculative development should not be considered as "sustainable development" as it fails to meet the requirements of the NPPF paragraphs 7 and 8. Paragraph 7 states "At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs". As there is no public need to be met, the quarry development fails this requirement. It also fails the requirements of NPPF paragraph 8 of securing "net gains across each of the different objectives" as follows;

a) *economic objective*—"ensuring that sufficient land of the right types is available in the right places and at the right time". Suffolk County Council has stated there is already sufficient quarry land allocated for the timeframe of the proposed quarry operation and the site is clearly in the wrong place relative to lorry routes and the impact on local communities and the environment. The limited economic benefits of the proposal, listed in the Planning Statement, paragraph 5.4 of "up to 9 jobs may be created" are outweighed by the risks to the jobs and investment at Fynn Valley Golf Club and other local businesses, and the substantial increased costs of road, level crossing and other infrastructure as a result of the large increase in HGV.

b) *social objective*—"to support strong, vibrant and healthy communities" and "fostering well designed and safe places with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being". The proposal would cause the opposite of this.

c) *environmental objective*—"to protect and enhance our natural, built and historic environment". Again the proposal does the opposite.

The Parish Council asks Suffolk County Council to urgently consider whether this proposal constitutes sustainable development or not.

### **4. Failure to Provide Adequate Impact Assessments**

The Planning Statement and Assessments (Appendix A-L) provided with the application fail to provide comprehensive, consistent accurate information. There is inadequate modelling, incorrect base line data and so many inconsistencies and omissions that it is not possible to provide proper judgement of the proposal. Stop the Quarry investigations of the assessments has identified over one hundred "Errors Omissions and Misrepresentations" which have been presented to the Case Officer. Particularly concerning are the inadequacies of the crucial assessments for Transport, Noise, Public Health and Climate Change. The requirements of the Suffolk County Council Scoping Opinion, (October 2024) have not been met.

There are no assessments of the impact on recreation, including use of public rights of way, or on neighbouring land-use as required in SMWLP GP4, especially as one of the neighbouring land-uses is the Fynn Valley Golf Club where the impact of a quarry on the amenity and

finances is likely to be high. The Parish Council repeats its call for an assessment of the impact of the proposed quarry on local businesses, the rural economy and recreation uses of the area, including the golf club.

## **5. Highway Safety and Failure to Satisfy NPPF Paragraph 116**

NPPF Paragraph 116 requires development to be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios. The proposal causes an unacceptable and severe impact on highway safety and should be refused.

The application forecasts up to 86 HGV (Heavy Goods Vehicles) movements a day along the B1077 and this is an increase of over 150%. It is claimed (N Warwick objection 17/08/2025) that the number of HGV is hugely underestimated and a further 92,000 HGV movements will be required over the life span of the quarry, possibly equating up to 116 HGV movements a day, rather than the 86 HGV. The County Council needs to investigate this.

The applicant's trucks are in the order of 3.0m wide and 44 ton loaded weight and this level of industrial traffic along the B1077 through Witnesham and Westerfield, where the road has limited widths, narrow pavements, sharp bends and steep hills, is wholly unsuitable and creates unjustified safety risks of injurious harm to pedestrians, cyclists and other vehicle users. There is a high safety risk with slow HGV exiting the site onto the B1077 where there is a national speed limit of 60mph.

In Witnesham the road width on the double bend between Fynn Bridge and the war memorial is only 4.9m, with an adjacent pavement width of 0.7m, and is highly dangerous for the passage of HGV and pedestrians. Throughout the village the pavement alongside the B1077 is well used by pedestrians and school children but is narrow, and in places, pram pushing mothers have to step out into the road. A high level of increased HGV traffic would pose a serious safety risk and deter families from walking or cycling which is also very much against government and local plan policy to increase sustainable transport.

The B1077 is our main access road to Ipswich. No assessment seems to have been made of the operational and safety risks associated with the rail level crossing in Westerfield and the increased congestion, air pollution and maintenance costs that will result with the proposed increase in HGV, especially given the increase in rail freight for Sizewell C construction traffic and road side parking. The same applies to the risk to future increased traffic use from the new Ipswich Garden Suburb and school children that will have to use or cross the B1077 to get to school. Increased congestion at the level crossing is already causing extra traffic along Lower Road and Church Lane, Westerfield and the escalation of HGV at the level crossing will increase safety risks on these narrow lanes and their already dangerous junctions with Henley Road and Tuddenham Road. The Transport Assessment fails completely to address these cumulative impacts on road safety.

Scant information is given in the application on HGV routing when the B1077 is closed and it has been closed partially for 26 days and fully for 10 days on average over the last 4 years. There is the suggestion that on such occasions HGV would be routed by minor roads off the B1077. The only roads off the B1077 are Lower Road and Church Road Westerfield, and it would be highly unsafe for HGVs to use these roads. The only other alternative is for all HGV to go north on the B1077 through Witnesham and Swilland to the B1078 and this is completely unsafe and unacceptable.

There is no assessment of the impact of the increased levels of HGV on the A1214 and the safety impact of this on cyclists, school crossings, other road users and road junctions, including the Colchester Road roundabout. No consideration has been given to the increased level of HGV on the B1078 and the safety impact on the dangerous junction of the B1077 and B1078 at Ashbocking, nor increased HGV on the B1078 through Coddenham and Otley Bottom.

The application provides no mitigation measures for the increased safety risk along the B1077 north of the quarry site through Witnesham and only minor measures in Westerfield.

The absence in the Transport Assessment of a detailed HGV Management Plan, including specifics on vehicle types, movement frequency, routing and vehicle tracking diagrams completely fails to assess the safety of the increased level of HGV movements.

No assessment has been provided of the extra costs of maintaining the B1077 and keeping it safe that will result from the large increase in HGV traffic on the B1077. It is claimed (N Warwick Objection 21/08/2025) that the extra costs of maintaining the B1077 over the 16 years operating period of the quarry will be between £1.4 and £1.8 million depending on the number of HGV movements. Costs that would have to be borne by Suffolk County Council and need to be taken into consideration. There would be additional costs for Network Rail in maintaining safety at the Westerfield level crossing and for Anglia Water in maintaining its aged pipe infrastructure along the B1077. Not only is it unsafe for the increase in HGV to use the B1077, it is uneconomic.

The application should be refused, as all the above factors demonstrate that the increased levels of HGV, resulting from the operation of the quarry would, cause a severe and unacceptable level of impact on highway safety on the B1077 and other routes, contrary to NPPF paragraph 116.

## **6. Failure to Comply with the Development Plan**

The proposal does not accord with the Development Plan for the area and there are no directly relevant policies which provide for the quarry proposal. The Development Plan comprises the Suffolk Minerals & Waste Local Plan (SMWLP) 2020, the Suffolk Coastal Local Plan (September 2020) and Westerfield Neighbourhood Plan (2025)

Section 38 (6) of the Planning and Compulsory Purchase Act (PCPA) 2004 requires that a determination made under the planning acts must be made in accordance with the Development Plan unless material considerations indicate otherwise.

Paragraph 12 of the NPPF states “Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plan) that form part of the development plan, permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.” It is considered that the application doesn’t present any material considerations to suggest that the development plan should not be followed.

## **7. Conflict with the Suffolk Minerals and Waste Local Plan ( SWMLP )**

The SMWLP has no policies or references on any extraction or safeguarding for minerals at Westerfield. The site has not been allocated and is not identified as a reserve site for extraction.

*SMWLP Policy GP1* states that where there are no policies relevant to a planning application, determination should take into account whether “any adverse impacts of granting planning

permission would significantly and demonstrably outweigh the benefits". The benefits listed by the applicant (Planning Statement 5.4) mainly accrue to the applicant itself. There is minimal public benefit. Certainly the immense adverse impacts on traffic safety, public health, amenity and the environment demonstrably outweigh any feasible benefit. The application should be refused as it is contrary to SMWP GP1.

*SMWP Policy GP3* relates to the Spatial Strategy for minerals and waste development and is a key policy in demonstrating the proposal doesn't accord with the development plan. It states that preference will be given to sites that meet three tests:

- i) are well related to the Suffolk Lorry Route Network (or rail network or navigation);
- ii) are well related to major centres of population (Ipswich, Lowestoft and Bury St Edmunds)
- iii) avoid significant adverse impacts upon features of environmental importance (natural or man-made) or endanger human health.

The application fails on each of these three tests: i) The site lies nearly 3.0km from the nearest Local Access Lorry Route and nearly 7km from the closest Strategic Lorry Route. Despite what the application says, the B1077 is not a Local Access Lorry Route and is expressly intended to restrict HGV use. ii) The site is nearly 5km north of Ipswich town centre and iii) The proposal impacts on a Grade 11\* and other Listed Buildings and threatens to introduce dust, noise and pollution, risking respiratory and mental health impacts for nearby communities. The application does not meet GP3 spatial and environmental standards and should be refused.

*SMWLP Policy GP4:* Requires proposals to adequately assess significant adverse impacts including cumulative impacts on twenty (a-t) named environmental headings. In addition the Suffolk County Council EIA Scoping Opinion October 2024 required specific assessments.

The application fails to demonstrate that when considering the potential for significant adverse impacts, the hierarchy of firstly avoidance, then mitigation and finally compensation has been followed. The application should be refused because of the lack of adequate assessment and consideration of adverse impacts is contrary to SWMP GP4 and the Suffolk County Council Scoping Opinion October 2024.

## **8. Conflict with Suffolk Coastal Local Plan Policies (SCLP)**

The proposal conflicts with many local plan policies, the main ones being:

*SCLP 3.3:* New development will not be permitted outside the Westerfield Settlement Boundary, as the proposed quarry site is.

*SCLP 7.1* For Sustainable Transport, where new development should; reduce conflict between users of the transport network, including pedestrians, cyclists, users of mobility vehicles and drivers; protect and enhance the existing pedestrian routes and public rights of way; not reduce road safety; is proportionate in scale to the existing transport network; and where the cumulative impact of new development will not create severe impacts on the existing transport network. The application fails on all these counts

*SCLP 8.1; 8.2;* Stress the importance of community facilities, open space and sports and recreational areas, to encourage active lifestyles. Fynn Valley Golf club lies adjacent to the quarry site and this recreation facility, which is an open style golf club with a par 3 course much used by youngsters and beginners would suffer significant loss of amenity from noise, vibration and dust.

*SCLP10.3 Environmental Quality;* Development proposals will be expected to protect the quality of the environment in relation to the impact on air quality, loss of agricultural land, water quality, light and noise pollution.

*SCLP 10.4* Landscape Character; Development should be sympathetic to the special qualities and features as in the Suffolk Coastal Landscape Character Assessment (2018) and that development is expected to demonstrate that their location, form design and materials protect and enhance the quality and features of the area.

*SCLP 10.5;* Development of undeveloped land will only be permitted where it does not lead to the coalescence of settlements, reduction in openness and urbanising effects.

## **9. Conflict with the Westerfield Neighbourhood Plan 2025**

The proposal directly conflicts with the plan's primary aim to "preserve the rural feel of Westerfield". The plan stresses the importance of open green fields around the village and the aim to create an apparent "green ring" around the settlement boundary. The proposals are contrary to the findings of the plan's Landscape Appraisal which states "any changes that could harm the described qualities of the landscape should be avoided, instead the aim must be to conserve and protect the qualities identified". It recommends "The openness of the farmland that provides setting to these assets (Westerfield Hall) must be protected. Future development should not be directed to this part of the village fringe and any land use change which reduces the undeveloped gap to the village edge should be resisted. In any case, extending the village up beyond the 42m contour is not characteristic of Westerfield and is not appropriate."

The proposal also conflicts with the aim to "ensure residents can safely walk and cycle in and around Westerfield to enjoy the village and surrounding countryside, as well as providing access to local amenities". The proposal is contrary to this element of the development plan and should be refused

## **10. Noise Levels; Public Health Risks and Disturbance**

There are serious concerns about the levels of noise, dust and vibration generated by the proposed quarry operation on the quality of life, health and mental well being of local people and also the general disturbance and loss of amenity to the area to the many people who use it for recreation.

Attention has been drawn to the objection against the application made by R Ward, (Objection 28/8/25) that the noise modeling as given in Assessment G is based on flawed assumptions and misused standards. As such it is not possible for the County Council to make an objective assessment of the application meeting or failing NPPF paragraph 187,198 and 223 requirements to prevent developments from contributing to unacceptable levels of noise pollution, impact on living conditions and on human health and the environment.

Insufficient assessment with receptors, has been made of the impact of noise, dust and vibration on the 15 Fairways residences at Fynn Valley, on the Fynn Valley Golf Club activity and the 900 golfers who play up to three times a week on the golf course. These residents are the closest to the quarry operation (250-300m) and down wind from the prevailing winds. The par 3 course, much used by young people, runs adjacent to the haul road and on the main golf course, the nearest point is only 10m from the quarry and most of the course is downwind of it. There is no escaping that noise levels from the quarry will cause major disturbance and loss of amenity to these residences, golf club users and the wider area.

No account has been made of the impact wind levels and the local topography have on noise travel. The quarry site is on the cusp of the Fynn valley and it is well known that sounds echo across and down the valley and accepted evidence from the Sinks Pit operation shows that the quarry pit itself can amplify noise levels.

Quarry dust (PM<sub>10</sub> and PM<sub>2.5</sub>) will pose health hazards to these residents and golfers, especially children, the elderly, and those with respiratory/cardiovascular conditions. No site-specific health impact assessment or engagement with health authorities has been provided. This is particularly required for residences and for golfers.

Sustained industrial noise, dust, and visual intrusion threaten community mental wellbeing, increasing anxiety and depression. The Parish Council is well aware of these difficulties being experienced by those people living near the TRU Sinks Pit quarry operation, Little Bealings and the impact on their health and wellbeing. (Sinks Pit Case Study, Little Bealings Parish Council June 2025) These must be avoided in Witnesham. The application should be refused as the application puts public health at risk and fails to meet NPPF requirements.

## **11. Harm to Heritage Assets and Valued Landscape**

The site forms part of the setting for several nationally designated heritage assets: Westerfield Hall (Grade 11\*), Westerfield Hall Barns Complex (Grade II) and Swan's Nest (Grade II). The applicant's own Cultural Heritage Assessment acknowledges that the development would harm the significance of these listed buildings. There has been no assessment of how noise, dust, and vehicle movements could erode these exceptional historic assets and their landscape setting. There has been no assessment of the views afforded to the public of Westerfield Hall across the present open fields from the public footpaths.

Historic England considers that the application does not meet the requirements of NPPF paragraphs 7, 8, 212, 213, 215, and 219 that protection and enhancement of the historic environment is an overarching objective and great weight should be given to the conservation of listed buildings irrespective of the level of harm caused and that harm should be weighed against public benefit. The applicant lists the benefits of the development in the Planning Statement paragraph 5.14 which are mostly benefits to the applicant. The lack of public benefit is outweighed by the harm caused to the Heritage assets and as such the proposal has not satisfied the requirements of paragraph 215 of the NPPF, SMWLP Policy GP4 and SCLP Policy 11.4, and should be refused.

## **12. Adverse Impact on Local Business and Rural Economy**

The proposed quarry threatens the viability of various local enterprises dependent on the Fynn Valley area's peaceful and attractive environment. Cafés, pubs, visitor accommodation, wedding venues, glamping sites, and other rural businesses rely on the area's character to attract visitors, especially in the summer when many of these enterprises have outside facilities.

This applies especially to the Fynn Valley Golf Club which is a major employer and leisure hub, with around 30 present full and part-time employees. These would be at risk from the loss of amenity and attractiveness caused by quarry noise, dust, and additional HGV traffic causing downturn on golf club membership, chalet accommodation and the venue for weddings, conferences and tournaments. In addition the Golf Club has planning approval for a £2million pound investment in 10 new chalets, a new restaurant and a two storey driving range, all now at risk with the potential loss of 12-15 new jobs, because of the quarry.

The application states that "up to 9 new jobs may be created". It is inferred that some of these jobs will be re-locating from Sinks Pit. There needs to be a clear assessment of jobs created by the proposal and an objective assessment of the economic impact of the proposal on local businesses as was called for by this Parish Council in September 2024. With the information

presently available, there would be a net adverse economic impact on local businesses contrary to NPPF 85, 87 and SCLP 3.1, which are aimed at building economic growth.

**13. Hydrology:** The application provides insufficient information on how much water is required for the quarry operation, whether this is to come from the public supply or an existing or new borehole and what impact this may have on local supplies. The site is within a Groundwater Source Protection Zone and excavation risks altering local hydrology, affecting water supply drainage, flooding, and soil stability. The application lacks a detailed hydrogeological risk assessment to demonstrate that harm to groundwater would not be caused or that it could be mitigated. Infilling of the quarry will be under Environment Agency permit but the Parish Council believes the planning authority, indeed the public also require this information at the application stage and to be informed on the probability of landfill contamination and pollution control

#### **14. Ecological Loss**

The applicant's provision of habitat gain is insufficient to replace the existing, fully functional ecological networks comprising hedgerows, field margins, and bat corridors critical to the area's biodiversity. There is no guarantee of long term Biodiversity Net Gain after the thirty year management agreement

#### **Conclusion**

This application should be refused as;

- There is no public need for this quarry and it;
- Fails NPPF 7 and 8 and should not be considered as a sustainable development
- Fails to satisfy NPPF116 in causing an unacceptable and severe impact on road safety.
- Fails to meet the requirements of the SMWLP particularly GP3, GP4 and GP1.
- Conflicts with the development plan, SCLP and Westerfield Neighbourhood Plan.
- Poses serious risk to public health and local businesses.
- Causes unacceptable harm to heritage assets and the wider the environment.
- Causes serious disturbance and loss of amenity to local communities and the area.
- Failed to engage with Parish Councils.
- Fails to provide adequate impact assessments.

Swilland and Witnesham Parish Council urges Suffolk County Council to refuse this application and protect the well being of our local community, heritage, environment and businesses against this unnecessary and unsafe speculative development.