

Saxongate residents group wish to object to this application subject to consideration of the following points and possible planning conditions / mitigations: -

1) Operating hours - 07:00-17:00 Monday to Friday. Residents would like any operations that may generate noise dust and odour restricted to 08:00-17:00, and 08:00-12:00 on Saturdays. These works are due to run at least 7 years and Residents have suffered historically and have ongoing issues with noise and dust from operations on this site, including the phase 1 of these works. The EA and CCC have also raised issues with complaints regarding phase 1 (dust cloud issues and lack of promised wheel washing as examples). Residents also want no work on Sundays and bank holidays and would prefer no Saturday work.

2) Source material – It is stated that all material will be imported inert waste. There is no mention of recycled material such as IBAA. CCC previously indicated the IBAA could be used in a screening opinion = F-YR23-2001-CCC. Resident would like clarification there is no intention to use recycled IBAA, which would require an EA permit and should be listed in this application if still under consideration as a material.

3) Transport – The applicant acknowledges an existing no right turn / no HGV traffic via Whittlesey town rule and notes that material would most likely come from the west anyway. Residents hope planners will add a condition to this effect, preventing or at least severely limiting any HGV movement via the town.

4) Dust – The dust assessment appears flawed. It has only considered receptors along the A605. Most residents' complaints have typically come from the Priors and Snoots Road areas and the wind often blows towards the East in their direction carrying dust a significant distance. The treeline along the Eastern buttress has also been degraded by the phase 1 works. The report also appears to ignore the proposed stockpile area and hardstanding near the lagoon as a source of noise and dust, this is closer the potential receptors on Snoots and Priors + Park Lane Infants school. In contrast the noise assessment with this application does identify them as significant receptors. The planning statement 8.61 says the stockpile area is in excess of 250m from those houses. We think this is incorrect depending on the measuring points and size of the stockpile area. The report uses Defra estimates for dust, but for the referenced Phase 1 planning, The applicant's PLANNING_STATEMENT_FINAL-60968 (7.29) states that an air quality monitor was installed in Saxon pit linked to the phase 1 planning application. To our knowledge no information was ever provided to the EA or FDC EH. Unless the operator shares data to agencies what is the benefit of this device. Access to this was promised at the Eastern Buttress planning meeting CCC/22/092/VAR, direct recorded quote from the agent Stephen Rice "These results will be shared with the local authorities and the environment agency". The meeting was on the 25/01/23 so there should now be a significant amount of data available from Mr Rice and the consultant Ricardo. The new dust assessment predicates a small impact – **but crucially only with mitigation**. In reality Residents have suffered historically and have ongoing issues with noise and dust from operations on this site, including phase 1 of these works. The EA and CCC have also raised issues with complaints regarding phase 1 (dust cloud issues and lack of promised mitigations and /mandated wheel washing for example). The EA have also highlighted that common, shared roads need to be included for dust control and mitigation. The lack of tarmacked roads and the lack of ownership or responsibility from previous planning applications for common access roads between existing operations leads to a lot of dust. There should be a clear responsibility for dust suppression on shared access roads to prevent this issue in any new approvals. There is a small-scale array air quality sensor funded by FDC near Park Lane School. Could this be made permanent and could additional sensors be fitted to give residents long-term peace of mind around air quality risks for the town (including the A605). In addition, could some form of modern automated dust monitoring be set as a condition to detect issues from Saxon pit. Ad-hoc Investigations around dust are often long-winded, unproductive and disruptive for residents without access to modern site based dust monitoring data or CCTV records.

5) Noise – Residents have reported significant noise issues with the phase 1 works, particularly in relation to the Dozer which is rated at 107dba. The new noise impact assessment states that periodic noise monitoring will be a planning condition. How often will this take place and how will planners ensure the measurements are taken when works which have potential to generate the most disturbance are actually in operation to give a true indication of the situation? There needs to be clarity on this point. Residents would also like some form of site based automated noise monitoring to be included in the permission. Ad-hoc investigations are often long-winded, unproductive and disruptive for residents. The original planning for the phase 1 had noise limits. We think these should now be aligned with the lower levels in the submitted NIA and permitted Johnsons Aggregates noise limits = (34db LAeq / 1hr), to help give uniform targets for the site. Aside from measured sound levels any persistent / constant noises (whines, hums droning) should also be identified and eliminated, as these have also caused significant distress in the past, clanging from HGV tailgates has also been an issue. After 21 years of restoration operations, it is frustrating that blue-sky desk-top theoretical calculations are still used, when real time empirical data must be available (for example taking the actual measured average noise from the operational dozer at 10m).

6) Trade effluent pumping into Kings Dyke – The Geotechnical assessment 3.3.1 says there is a consented discharge point for water and trade effluent being pumped from Saxon Pit. The pit is in effect a sealed clay lined bath tub and will flood unless pumped out into the Kings Dyke watercourse. The EA have made it clear there is currently no permission or consent in place for this to happen, so the statement in the Geotechnical assessment is incorrect. The application form also states that there is no need for trade effluent discharge, yet several documents in the applications state that water will be used for dust mitigation (including a water bowser). All water in the pit runs to the lagoon which must then be pumped out, so we feel this statement in the application form is incorrect. Trade effluent pumping is fundamental to all operations in the pit and should have a valid permit in place and be regulated by the EA. Point 3.4 in the Geotechnical assessment notes there is **no appropriate edge protection** for the stockpiles near the aforementioned lagoon. Residents are also concerned that the proposal has materials being delivered and stored so close to a lagoon which is then pumped unfiltered and without the relevant permit into the Kings Dyke watercourse, so there is a risk of contamination from any materials stored, especially as there is no edge protection and no filtration in place. Residents hope enforcement agencies note this reported current lack of edge protection from the applicants own technical consultants' submission.

7) Overall site management – The site is increasingly complex with multiple operations, planning permissions and permits which have common emissions risks (noise, dust and odour) and share access roads and drainage etc. Could the landlord be encouraged to consider installing an overall site manager / technically competent person to run the shared resources and encourage best practices. For this specific application are two permanent staff sufficient to run all the necessary plant and monitor the incoming vehicles + carry out and monitor all the promised ad-hoc dust and noise monitoring and mitigations listed in the application, which have been seen to fail for the phase 1 work, causing significant distress and loss of amenity to residents + complaints requiring investigation by the EA and FDC.

8) Project plan and milestone dates– There is no overall project plan with milestone dates but it is stated this phase 2 project will take 7 years. A top-level key-stage plan would enable progress to be tracked and highlight if the project is slipping. Phase 1 (original planning granted in 2003 / F/02026/2/CW) is still on going after 21 years. Local residents will have endured nearly 30 years of disturbance for a basic quarry restoration scheme which could be completed in a few months. The current Kings Dyke nature reserve land slip stabilisation restoration by Forterra is set to be completed in 12 months as a comparison, with 121k tons of inert material being placed by them in only 2 months. Why is 325k tons taking 7 years for this project and why is there no project plan with the submission, what will stop another 21-year overrun as we have seen for the first phase? Some residents' entire retirements will have been spent suffering noise and dust 6 days a week from 7am as a result of these never-ending restoration works.

9) Minerals and Waste plan 2021– The Cambridgeshire and Peterborough local policy makes significant mention of **amenity consideration**, Proposals must ensure that the development proposed can be integrated effectively with neighbouring development. **New development must not result in unacceptable adverse impacts on the on the amenity of existing occupiers of any land or property**, including:

(a) risk of harm to human health or safety, (c) noise and/or vibration levels resulting in disturbance, (f) air quality from odour, fumes, dust, smoke or other sources, (g) light pollution from artificial light or glare, (i) increase in flies, vermin and birds. Where there is the potential for any of the above impacts to occur, an assessment appropriate to the nature of that potential impact should be carried out, and submitted as part of the proposal, in order **to establish, where appropriate, the need for, and deliverability of, any mitigation**. Local residents feel the impact of the totality of operations at Saxon pit on their amenity has been ignored and the fractured nature of the management, monitoring and enforcement as well as an over reliance on desk top modelling without real world validation, along with a failure to implement best practice mitigation has meant an on-going significant loss of amenity, negative impact on well-being and created a risk to health over several years.