

## Jenny Macken

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**From:** Stowey Sutton Parish Council  
**Sent:** 05 July 2012 10:18  
**To:** Development Control  
**Subject:** Stowey Quarry - 10/05199/EFUL

Dear Sirs,

Thank you for your letter of the 29 May advising us of revised plans/information in respect of the above. In response to the applicants Response to Consultation Comments dated 9 May 2012 we would like to comment as follows:

### Point 3.1.1

The applicant feels that the proposed noise limit of 37db(a) places an unreasonable burden on operations, however the applicants counter proposal of 55db(a) would create an unreasonable burden and blight on neighbouring properties.

### Point 3.1.3

Dismisses the objections of the Stowey Sutton Action Group (SSAG) to the suitability of the approach roads as reactionary, but fails to consider the width and lack of passing places on the final approach road.

### Point 3.2.1

Acknowledges the fact that the West of England Joint Waste Core Strategy (2011) does not identify a need for a disposal facility within the sub region, but goes on to say that the applicant feels that the need does exist, but fails to explain why they have applied for a facility with such a high proportion of the national average volume of these materials requiring disposal.

### Point 3.4.2

Continues to argue the case for regional self sufficiency for disposal of stable non reactive hazardous waste, by quoting from the local plan, whilst it dismisses this plan as no longer applying in 3.3.1, but still fails to justify why they have applied for a facility with such a high proportion of the national average volume of these materials requiring disposal, rather than just meeting the unsubstantiated local requirement that they refer to.

### Points 3.5.1 to 3.5.3

All suggest that the environmental and operating conditions of the site should be a concern only to the Environment Agency, as they are the regulatory authority with jurisdiction, however we believe that these issues remain significant considerations for the planning authority.

### Appendix 1, Addendum to the conceptual site model report

Section 1 para 5 notes that the report only considers areas where "access was possible", this is not sufficient to demonstrate that a thorough survey has yet been conducted.

Section 3 para 2 acknowledges that the groundwater monitoring bore holes prepared in April 2012 fail to monitor the level within the White Lias and further boreholes will be required; it would seem premature to continue to decision without this data.

Section 3 para 4 the dark grey mudstone layer was found to be dry with only minor seepage during bore hole drilling, however it is exactly this kind of "minor seepage" which could lead to contamination and the applicants cavalier attitude to such conditions is a cause of great concern.

Section 4 Surface water features suggests only a single survey visit on the 17th April 2012, and notes the conditions visible on that single day The surface water level can vary considerable depending on the rainfall and this single observation is a grossly inadequate survey, many people will be able to confirm that the surface water and stream described can rise to a significantly higher level on occasions and a more thorough survey is required before this risk factor can be adequately considered.

Section 4 para 6 uses the phrases apparently and presumably, without supporting evidence, but then draws a solid conclusion.

Section 4 para 7 observes that on the day observed the ditch was dry and draws the conclusion that it is never groundwater supported.

Section 5 describing the type of Stable Non Reactive Hazardous Waste (SNRHW)

Para 3 uses phrases like "unlikely to produce significant quantities of leachate", the waste "is likely to contain high proportions of soil and clay", these phrases indicate a lack of control and fail to propose monitoring of the waste as it is deposited, only the level of leaching once it is dumped; this is a cause of considerable concern.

Section 6 Conclusions

Para a says that the conclusions are drawn from a recent walk over the site, this is not an adequate survey over a statistically valid period of time to draw valid conclusions.

para b, 2 says that there is no known groundwater ingress to the site, however this disregards the local oral evidence of significant ingress previously requiring pumping to permit continued working on the site.

para c disregards the Environment Agencies (EA) classification of the secondary A aquifer within the site and claims that based on the (inadequate walkover conducted) that it has little value as a groundwater resource, this attitude to EA classification is a significant concern.

Para d acknowledges the need to monitor via boreholes the level of leaching, however this will simply discover when failure has already occurred, which is an unacceptable response to the risk.

Para f says that the rate of discharge from springs on the site is too small to represent a significant risk to the water in the reservoir, however a significant concern must be from asbestos fibre being carried to the surface in leachate and becoming airborne once released from the water due to evaporation. Surely the asbestos handling regulations would not permit this cavalier approach to potential airborne release of asbestos.

We therefore continue to object to this application most strongly.

Kind regards,

Sue Heathman  
Clerk