

## **Suffolk Minerals and Waste Development Framework**

### **Minerals Specific Site Allocations Hearing 2009**

#### **SUMMARY**

**Evidence on behalf of Lafarge Aggregates Limited**

**Objection to the omission of Preferred Options Site 11 Barking, Needham Market**

**Site allocations reference: Site 11 Barking**

**HDA reference: 2.402**

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## 1 INTRODUCTION

- 1.1 This evidence relates to landscape aspects of Lafarge Aggregate's objection to the omission of Preferred Options Site 11 ('Darmsden') Barking (*Location at Plan HDA1*). It addresses the MPA's reason for not including this site, and demonstrates that the site can be worked with minimal landscape effects, consistent with policy objectives.

## 2 THE LANDSCAPE OF THE LOCAL AREA

- 2.1 **Topography:** (*Plan HDA2*): Most of central Suffolk is formed of rolling hills forming broad plateaux cut by the river valleys. The site lies in the River Gipping valley. The western valley side is complex, with a series of dry valleys and intervening spurs forming a strongly undulating landform. One of the spurs extends north-east from Darmsden and ends at Gallows Hill, cut through by the B1113. The Objection Site lies on the eastern flank of this spur.

- 2.2 **Context and Land-use:** (*Plan HDA1*): The most extensive land use in the area is arable agriculture, with some areas of pasture. Other land uses include extensive woods and mineral workings. Larger settlements are located in the valleys, with more isolated buildings on the higher plateaux. The B1113 road and railway line follow the western valley edge and the A14 the eastern valley side.

- 2.3 **Landscape Character:** The site lies within:
- **National scale:** Character Area 86 'South Suffolk and North Essex Clayland'.
  - **Local authority scale:** Character type 18 'Rolling Valley Farmlands'.
- HDA has carried out local landscape assessment as a basis for considering appropriate restoration (*Plan HDA3*). Site 11 lies within the 'Valley Side Mixed Farmland'.

## 3 DARMSDEN: SITE DESCRIPTION

- 3.1 **Location:** (*Plan HDA1*): Site 11, an arable field, lies on the western valley side and floor. The site is defined by the minor road to Darmsden (also Footpath 35), hedgerows and semi-mature tree belts to the north and north-west, the B1113 and a hedgerow to the east, Baylham Fish Pond to the south and mature woodlands to the west. The site is crossed by a short section of Footpath 34.

- 3.2 **Landform:** (*Plan HDA2*): The northern part of the site lies on the east flank of the low Darmsden-Gallows Hill spur. The southern part is low-lying.

- 3.3 **Land use and vegetation:** (*Plan HDA1 and photographs*): There are semi-mature trees up to 8m in height alongside the track/Footpath 35 as it passes along the site boundary (*Photo 8*). Baylham Fish Pond, a Wildlife Heritage Site, surrounded by woodland, is located south of the site. The steeper slopes south-west of the site are in mature

woodland (*Photo 3*). A gappy hedgerow, thicker to the north, runs alongside the B1113, with recent planting to 'gap up' (*Photos 1-4*). East of the B1113 is an arable field, and a rail line, with the Gallows Hill extraction site beyond (*Photos 5-8*).

3.4 **Character:** (*Plan HDA3*): The site forms part of the undulating wooded and farmed valley side and western valley floor. It is substantially contained by mature woods and ridge to the west and south and by the Gallows Hill spur to the north.

3.5 **Existing visibility:** (*Photographs 1-10*): Although part of the site lies on the valley side, visibility is generally limited, because of containment by topography and trees to the north, west and wider south (*Plans HDA1, 2*). There are no views of the site from these directions beyond the immediate site boundaries, but there are views of the higher, northern part of the site from the valley floor to the east. Generally, the low southern part of the site has limited visibility.

#### 4 **OUTLINE WORKING PROPOSALS**

4.1 The greatest potential effects of extraction would be from the east and from adjoining paths and the road. The working method could be designed to ameliorate these constraints.

4.2 The site could be worked from the north-western corner, south-eastwards towards the lower ground, with landfill and restoration following behind. By working in such a direction, retained un-worked land would screen mineral working and landfill operations beyond (*Sections on Plan HDA4*). Any views towards the site would be of agricultural slopes – existing or restored – below a wooded skyline. Phasing, grassed mounding and structure planting can be designed to further reduce local views.

4.3 It is proposed that the land is restored, using imported material, to agricultural land, woodland, water bodies and margins, complementing neighbouring land uses.

#### 5 **OUTLINE LANDSCAPE AND VISUAL ASSESSMENT**

5.1 **Visual assessment:** The working method would reduce visibility of the workings. From the valley floor, the working face would not generally be visible and views from these locations would be a combination of retained agricultural land forming a lower rim, with increasing areas of restored agricultural land above (*Sections at Plan HDA4*). Views from the adjacent Footpath 35 and B1113 would be screened by grassed mounding, hedgerows and trees. Footpath 34 could be protected either by phased mounding or by temporary diversion.

5.2 **Landscape character:** The restoration proposed is consistent with local character.

5.3 **Assessment conclusions:** There are few inherent site constraints at Site 11; those constraints that do exist, particularly visibility from the east, could be overcome by an appropriate method of working. Once extracted and landfilled, the land could be restored in keeping with local character.

## 6 LANDSCAPE POLICY ASSESSMENT

6.1 Allocating Site 11 would not compromise the intentions of national, regional and local policies, as they relate to protection of the countryside and the landscape of Mid Suffolk.

6.2 The site is within a Special Landscape Area. PPS 7 states that criteria-based policies, using tools such as landscape character assessment, should provide sufficient protection for local landscapes. The East of England Plan, Suffolk Landscape Character Assessment, RSS and LDF policies protecting the countryside and character provide such protection. Other sites within SLAs have been allocated. The site can be developed without significant adverse effects upon the SLA, or local landscape character during the working period, with enhancement in the long term, and consistent with policy.

## 7 OTHER SUBMISSION SITES

7.1 **Proposed allocations at Coddensham and Barham:** For the Minerals DPD to be sound, it needs to be **deliverable** and **flexible**. These principles will be jeopardised by concentration with few companies. Preference should be given to satellites/extensions serving a wider range of operators; ensuring continuity of the sustainable, rail-served Broomfield Pit plant site and maintaining flexibility of supply.

7.2 The sites at Coddensham (*Site 3*) and Barham (*Site 5A and 5B*) and at Darmsden (*Site 11*) all lie within Special Landscape Areas. They all adjoin or contain County Wildlife Sites; Site 5 also adjoins Ancient Woodland. Site 3 lies adjacent to a Registered Park and Garden. All are visible from local lengths of footpath. Site 11 currently has more visibility, but that is not extensive nor should it preclude allocation: the workings would not be widely seen or significantly affect the local area.

7.3 There are potential environmental constraints to all three sites: the relative visibility of Site 11; damage to the character and landform of a Registered Park at Site 3; hydrological impacts on Ancient Woodland at Site 5. All are within or adjacent to SLAs and County Wildlife Sites. Sites 3 and 5 should not be favoured before Site 11.

## **8 REASONS FOR OMISSION**

8.1 In relation to Site 11: Barking, the Council's reasons for omission are based on SLA, visibility, CWS, and no need for the allocation.

8.2 In response to this:

- SLAs do not have national or regional policy support and should not be used to prevent acceptable, sustainable development. Working at Site 11 would be acceptable. Its function as a satellite to Broomfield Pit ensures a sustainable use of local minerals resources, established investment and rail;
- SLA policy has not precluded the selection of other sites, including Coddenham (Site 3) – also adjacent to a Listed Park and Barham (Site 5A, 5B).
- Proximity to, or, inclusion within, County Wildlife Sites has not precluded the selection of Sites 3 and 5. Site 5 also adjoins Ancient Woodland.
- Allocation of Site 11 can provide certainty and continuity of production for Broomfield Pit.

## **9 CONCLUSIONS**

9.1 This evidence has considered landscape aspects of Objection Site 11, at Darmsden, for its inclusion in the Minerals Specific Site Allocations.

9.2 The local area is the valley floor and sides of the River Gipping, with plateau beyond. The site is on the eastern valley side, below a local ridge, and on the valley floor. The site itself is relatively featureless, but it is enclosed by high ground to the north and west and by woodland to the west and south. Mineral extraction and restoration by landfill could be designed so as to minimize visual impact during working. The land could be restored to be consistent with the valley-side character. The site could be developed in compliance with national, regional and district landscape policy.