

MINERALS & WASTE DEVELOPMENT FRAMEWORK

Minerals Specific Site Allocation

- Responses to Representations on Preferred Options

July 2008



Minerals Specific Site Allocations Preferred Options Responses to Representations July 2008

Site/Issue	Representation by	Representation Summary	Response
Site 1A-Waldringfield	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of site 1A Waldringfield as a Preferred Site is strongly supported.	Noted
Site 1A-Waldringfield	English Heritage (Miss Katharine Fletcher) [6166]	Sites 1A and 2A, at Waldringfield, are in the vicinity of at least 10 prehistoric burial mounds, some scheduled and some unscheduled. There should be a full archaeological mitigation strategy for any known monuments and, prior to any decision on allocation in the DPD, these suggested sites should be assessed and evaluated for known monuments and any unknown archaeological sites. The safeguards relating to setting should be clearly explained, i.e. why the buffering boundaries have been located where they are and the de-watering impacts should be considered. This should be done before these sites are taken forward to the submission stage.	It is considered that working and restoration can be managed to minimise the adverse impact on the setting of the scheduled burial mounds. Prior Archaeological investigation is confirmed as an essential requirement.
Site 1A-Waldringfield	Anglian Water Services Ltd (Mr Gary Parsons) [6293]	A wastewater pumping main runs across the north of the site. Protection to the pipe or relocation will be required before extraction can commence.	This requirement is to be taken into account.
Site 1A-Waldringfield	Suffolk Coastal District Council (Hilary Hanslip) [6318]	If the land is to be developed for other uses in the longer term, then it makes total sense for the mineral assets to be worked out in advance of this; however, any decision on the future use of this land has to be decided through this Council's LDF process although both sites' have been submitted to this Council for consideration for residential use. It is equally possible that the site will remain as open countryside (particularly as 'the earlier Local Plan allocation for an Innovation Park on part of site 2A adjacent to the A12 has effectively been dropped at least for the present in favour of a major redevelopment and 'up-grading of the existing Adastral Park site).	Noted
Site 1A-Waldringfield	BT Property [6289]	For Site 1A, SCC proposes that: "The opportunity for a comprehensive restoration in conjunction with the existing quarry should be carried out and biodiversity objectives identified and applied within the restoration. A heathland habitat is preferred." The possibility of the land being used for development purposes should not be ruled out. As such, it is suggested that the text be amended to state: "The opportunity for a comprehensive restoration for open land or for other development that may be in accordance with the adopted Local Development Framework should be carried out and biodiversity objectives identified and applied within the restoration scheme. For areas of open land, a heathland habitat is preferred.".	Noted
Site 2A-Waldringfield	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of site 2A Waldringfield as a Preferred Site is strongly supported.	Noted
Site 2A-Waldringfield	English Heritage (Miss Katharine Fletcher) [6166]	Sites 1A and 2A, at Waldringfield, are in the vicinity of at least 10 prehistoric burial mounds, some scheduled and some unscheduled. There should be a full archaeological mitigation strategy for any known monuments and, prior to any decision on allocation in the DPD, these suggested sites should be assessed and evaluated for known monuments and any unknown archaeological sites. The safeguards relating to setting should be clearly explained, i.e. why the buffering boundaries have been located where they are and the de-watering impacts should be considered. This should be done before these sites are taken forward to the submission stage.	It is considered that working and restoration can be managed to minimise the adverse impact on the setting of the scheduled burial mounds. Prior Archaeological investigation is confirmed as an essential requirement.
Site 2A-Waldringfield	Anglian Water Services Ltd (Mr Gary Parsons) [6293]	A water main runs across the west of the site. Protection to the pipe or relocation will be required before extraction can commence.	This requirement is to be taken into account.

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Site 2A- Waldringfield	Suffolk Coastal District Council (Hilary Hanslip) [6318]	If the land is to be developed for other uses in the longer term, then it makes total sense for the mineral assets to be worked out in advance of this; however, any decision on the future use of this land has to be decided through this Council's LDF process although both sites have been submitted to this Council for consideration for residential use. However it is equally possible that the site will remain as open countryside (particularly as 'the earlier Local Plan allocation for an Innovation Park on part of site 2A adjacent to the A12 has effectively been dropped at least for the present in favour of a major redevelopment and 'upgrading of the existing Adastral Park site).	Noted
Site 2A- Waldringfield	BT Property [6289]	For Site 2A: SCC indicates that, when mineral extraction is completed, it is likely that the site frontage will be developed as an Innovation Park. BT has agreed with EEDA, Suffolk County Council and Suffolk Coastal District Council, promoters of the Innovation Park, to identify an alternative site for the Innovation Park within Adastral Park, and that Site 2A could be developed for alternative uses to be determined in the Suffolk Coastal Local Development Framework.	Noted
Sites 5A and 5B- Barham	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of sites 5A and 5B Barham as Preferred Sites is strongly supported.	Noted
Sites 5A and 5B- Barham	English Heritage (Miss Katharine Fletcher) [6166]	Sites 5A and 5B, at Barham. We have no comment on site 5A. Site 5B could increase the impact of the existing quarry on the grade I church to the south. This should be considered in advance of any planning application and necessary mitigation included as part of the proposals.	It is confirmed that detailed investigation will be considered at the planning application stage
Site 3- Coddensham (Shrubland Quarry)	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of site 3 Coddensham as a Preferred Site is strongly supported.	Noted
Site 3- Coddensham (Shrubland Quarry)	English Heritage (Miss Katharine Fletcher) [6166]	Site 3, at Coddensham, is immediately adjacent to a grade I registered park, Shrublands. Any impact on the setting of the park should, according to PPG15, be a material consideration in your decisions. As a grade I park, Shrublands is in the top 10% of designed landscapes nationally. The arrangements relating to site traffic are also unclear. This site should not be given consent.	It is considered that this extension to the existing quarry can be worked without adverse environmental impact, as has the existing site.
Site 4- Layham, Layham/Shelley	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of site 4 Layham as a Preferred Site is strongly supported.	Noted
Site 4- Layham, Layham/Shelley	English Heritage (Miss Katharine Fletcher) [6166]	Site 4, at Layham, would not affect any designated sites, but may have buried archaeological remains and should be assessed in more detail prior to extraction.	The need for an archaeological evaluation is recognised
Site 6- Chilton	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	The inclusion of site 6 Chilton as a Preferred Site is strongly supported.	Noted
Site 6- Chilton	English Heritage (Miss Katharine Fletcher) [6166]	Site 6, at Chilton, lies to the east of the grade II registered park, at Chilton Hall. There is also a grade II* house on the side of the park nearest to the suggested quarry site. English Heritage has concerns regarding the impact of the quarry on the setting of Chilton Hall and its registered landscape. There has already been some encroachment on the setting of the Hall to the south with the industrial development to the north of Sudbury. We would not wish to see the setting eroded further with development to the north of the Hall which may compromise the historic character, amenity and viability of the site.	It is not considered that the development proposals would affect the setting of Chilton Hall

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Site 6- Chilton	Cornard Tye Residents Association	<p>The allocation of this site fails to represent the most appropriate and is not founded on robust and credible evidence base. This site has been carried forward from the old plan, without a proper reassessment. The fact that the Inspector had already agreed the site some ten years earlier and an operator has, at last, come forward is insufficient evidence to presume acceptability. New facts have come to light and new assumptions can now be made. The Inspector approved this site mainly by accepting 3 fundamental assurances from the MPA. These assurances were - that the proposed ghost island junction access was safe and practicable, that the basal sands were workable, and that the site was commercially viable. (see Inspector's Report dated 10.3.98, paragraphs 2.230/2)</p> <p>The Ghost Island Junction Access Is Unsafe. The MPA now agree with the objectors that this access arrangement IS unsafe and are reverting to the more expensive roundabout proposal.</p> <p>The Basal Sands Are Not Workable. (see site sand below) The Inspector agreed to accept the MPA assurance that the basal sands are suitable and would be worked along with the gravel. Therefore the workable deposit would be thicker than the minimum requirement. It now transpires that this assumption was wrong; the basal sands are not workable and the site should have been rejected for failing to meet the required criteria.</p> <p>The Site, on Its own, Is not Commercially Viable. This site was in the Plan as a 'Preferred Site', and should have quickly attracted an operator. In spite of being vigorously promoted around the industry none of the major operators has shown any interest. This is the only site in the plan not to have been granted planning approval in the last 10 years. An operator has now come forward with an elaborate plan based mainly on waste recycling, bagging and cement batching, using the gravel quarry as a base and loss leader. The current application is now subject to serious downgrading following strong objections. The current Proposer has submitted an application, which shows the importation of approximately 20,000 tonnes of processed sand or unprocessed sand and gravel for the cement batching plant. They assess that 4 inward lorry movements per day will be needed to supply sand for grading to meet suitable standards. This equates to 26,000 tonnes (perhaps 6,000 tonnes to the bagging plant).</p> <p>The proposed importation of sand is more than enough, on its own, to produce the proposed 15,000 cubic metres of cement; therefore it must be assumed that none of the on-site sand is suitable for this purpose.</p> <p>I submit that, with the facts as they are now known, the Inspector would not have approved this site. Therefore it was wrong to carry it forward into the new plan without a detailed reappraisal. The Inspector highlighted many of the drawbacks, and the length of time taken to find an operator together with the substantial recycling development proposals should have alerted the MPA as to the inferior qualities of this site.</p>	<p>A planning application for the site was refused in March 2008 on highways issues. The applicant has indicated that it wishes to submit a new planning application with modified access designed to overcome the reasons for refusal. This site has been subject to the same rigorous sustainability appraisal as other proposed sites. The economic viability of the site has already arguably been demonstrated by the submission of a planning application.</p>
Site 7- Kirton	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	<p>Kirton should be a preferred site because;</p> <ol style="list-style-type: none"> 1. The site complies with Core Policies 1 and 2 2. The site meets all the Site Selection criteria 3. The site should be safeguarded because it is within 250m of the existing Bucklesham quarry and contains a proven resource of sand and gravel 4. A commitment can be given to ensure that all vehicles are required to turn south towards the A14 5. The identification of the site at this stage is in accordance with the national and local planning guidance. 6. The owner has agreed to plant trees and shrubs <p>It is accepted that to identify Kirton as a preferred site whilst the Bucklesham Quarry is active would conflict with Core Policy contained in the Minerals Core Strategy (Submission Stage) dated October 2007. However, the site meets all the other criteria</p>	<p>Although the site is generally acceptable, the cumulative environmental effects with the neighbouring existing workings are considered to be unacceptable, and therefore the site is excluded from the list of specific sites.</p>

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Site 8 - Acton	Mineral Services on behalf of Bretts Aggregates Ltd (Mr Peter Orrock) [4893]	<p>The principal reason for rejection is stated to be 'the potential impact on the crayfish through dewatering of the site, which would seem necessary in order to win material', the conclusion being 'the potential impact on the crayfish is considered unacceptable'.</p> <p>In order to address the potential impact on the crayfish a report to investigate the hydrogeological impact of the proposed mineral extraction was undertaken on behalf of Brett Aggregates by Hafren Water. The report is included as Appendix 1 to this letter. (This is available on request from Development Control, SCC)</p> <p>The conclusions within the hydrogeological report provide detailed information which has been evaluated by Bioscan Environmental Consultancy and a letter is included within Appendix 2 which confirms that, in the opinion of Dr Chris Gibson, mineral extraction at Bassetts Farm can be achieved without negative impact to the nearby crayfish population provided the site is worked in accordance with the following recommendations;</p> <ol style="list-style-type: none"> 1. Wet working of the site so that no dewatering is needed. 2. An unworked buffer zone is maintained between the extraction site and the brook. 3. All storage of overburden and materials to be placed on the opposite side of the site to the brook. 4. Other pollution control measures to be enforced by appropriate conditions as is typical for such sites, for instance the avoidance of refuelling vehicles on site and any liquid storage to be bunded to over-capacity. 5. Suitable booms or other emergency control facilities to be readily available to the site and maintained in good condition at all times. 6. Monitoring programme for water quality and annual monitoring of crayfish populations. 7. Remedial measures for clearing up any incident revealed by monitoring. 8. No monitoring personnel to be allowed to access the brook unless they show clear written evidence to the site manager that they have taken appropriate precautions to avoid the accidental import of alien crayfish or disease from other waterways. 9. Restoration scheme to include waterbody structures suitable for crayfish as advised by the best practice at the time. <p>In addition it is noted that the southwest section of the proposed site lies within Flood Zone 3 of the Chad Brook, as a consequence the original proposed site area has been reduced so that the site lies entirely to the east of an old railway track embankment on higher ground. The estimated available tonnage has therefore decreased from 350,000 tonnes to 280,000 tonnes.</p>	<p>The points made regarding: reduction in area; wet working; buffer zones; storage of overburden etc; pollution control measures; emergency booms; crayfish monitoring; water quality monitoring; remedial measures; precautions to be taken by monitoring personnel; restoration to a waterbody suitable for crayfish; access; and, planning conditions, are noted. However, despite these precautions, the site is very sensitive and the potential detrimental impact upon the Crayfish is considered unacceptable.</p> <p>In addition there would be a detrimental change in the character of the landscape as a result of the creation of a permanent water body. The access from the site to the Strategic Lorry Route Network would also use narrow roads and junctions and could therefore have an unacceptable impact on highway safety.</p>
Site 9- Leavenheath	Leavenheath Parish Council (Dr Jane Gurden) [6291]	<p>On behalf of Leavenheath Parish Council, I register our support for your decision to place Site 9 (Leavenheath) on the list of rejected sites. We would wish to have the opportunity to be reconsulted if, as a result of further consultation on the preferred sites, the Council was minded to include site 9 (Leavenheath) on the list of preferred sites.</p>	Noted
Site 9- Leavenheath	The Boxford Groups Limited [6321]	<p>The site already has planning permission for development as an extension to the adjoining golf course. Construction of the golf course will result in sterilisation of mineral unless it is extracted prior or during the construction phase. Government policy supports protection and recovery of primary aggregate resources whenever possible. It is proposed to restore the site to a pond/reservoir and margins which will increase biodiversity and provide water storage for golf course irrigation. Mineral extraction can take place over a relatively short period and any impacts (including the protection of water quality) can be addressed in a scheme of working.</p>	<p>The points made in your response are noted. If the site were to be worked over a short period of time as a satellite working to Layham Quarry and thus minimising the impact upon the local area and resulting in only left in and right out HGV movements, development may be acceptable. However such an arrangement is not certain and to allow for movements to the site from the south would require the construction of a right-hand turning lane' which would undermine the viability of the development based upon the small resource of 0.15mt, and therefore the site is excluded from the list of specific sites.</p>
Site 12 & 12A- Timworth	English Heritage (Miss Katharine Fletcher) [6166]	<p>Sites 12 and 12A, at Timworth, appear to be in a area with strong archaeological potential and you should ensure that these site are discussed with the County Archaeologist. Additionally, there is the grade II* Church of St Andrew to the north west of 12A. The setting of this listed building needs to be given careful consideration prior to determination of any planning application.</p>	Noted

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Site 12 - Timworth	Ramblers Association Suffolk Area	On the matter of public access we would recommend the proposals should be drafted to incorporate realignment of Timworth No.3 footpath within Area 12, the old railway line would seem to be a suitable alternative. We would also request a safe roadside verge be incorporated in the proposals on the south side of Area 12 to link up with Fornham St.Martin No.2 bridleway at the junction of the B1106 and the C651 road, as we understand the B1106 will bear the extra burden of traffic. The creation of safe roadside verge would be a welcome feature around the perimeter of sites 12 and 12A wherever this would remove a significant traffic hazard to walkers. Perhaps the aspirations described under 2b of the proposals viz enjoyment of public access, could usefully be extended to include the whole of the land to the west of the old railway line, bearing in mind the width of the existing path, 9.1 metres according to the Definitive Statement	Noted
Site 12A - Timworth	Ramblers Association Suffolk Area	The creation of safe roadside verge would be a welcome feature around the perimeter of sites 12 and 12A wherever this would remove a significant traffic hazard to walkers. Perhaps the aspirations described under 2b of the proposals viz enjoyment of public access, could usefully be extended to include the whole of the land to the west of the old railway line, bearing in mind the width of the existing path, 9.1 metres according to the Definitive Statement.	Noted
Site 13- Creeting St Mary	Poundfield Products Ltd (Mr Jardine) [6309]	It is considered that the Sustainability Assessment (SA) carried out for the Grove Farm site (Site 13) included some incorrect assessments of the perceived environmental impacts and that the weighting given to the obvious transport and economic benefits of including the site were not scored highly enough. By comparing SA scores with various Preferred Sites, together with the listed environmental constraints of these sites, it would again appear that there are some ambiguities. Given a revised SA score to reflect the known situation of Site 13, it would confirm that this site is in many cases better than some of the Preferred Sites that have been included. Without any amendment to the scoring system, it is considered that the site does not appear to be any worse. The Poundfield Products concrete manufacturing business is totally reliant on substantial quantities (some 30,000 tonnes) of minerals as raw materials, which could be sourced from the land directly adjacent to the business. It is therefore considered that Site 13 should be included as a Preferred Site to ensure that the business develops in a sustainable manner, with minimal impact on the environment when compared with similar areas included as Preferred Sites.	It is considered that the The Sustainability Assessments for Site 13 are representative of the situation. The harmful environmental impacts of the proposal outweigh the the transport and economic benefits. The overall qualities of this site do not exceed the qualities of other sites selected for preferred options and the site continues to be excluded from the preferred list of options.
Site 16- Homersfield/Flixt on	Environment Agency (Mr Andrew Hunter) [4911]	We maintain our objection to sites 16 and 17 (Homersfield/Flixt on) in accordance with the grounds set out in our earlier letter dated 24th July 07. The grounds for our objection are repeated below: 'Objection based on the proximity of the proposal to inert and non-inert closed landfills. The closed landfills could be unlined in a high water table area. Therefore, dewatering and general development could mobilise leachates from the closed landfills to the working site. This could then result in the pollution of groundwater which is an offence under the Water Resources Act 1991. There is sufficient uncertainty in the construction of the closed landfills and the waste accepted to conclude that the sites can not be conditioned without prior investigation'.	The neighbouring former landfill sites were used for the disposal of inert and construction wastes.They are located between the proposed extensions and the River Waveney with the land fall away from the quarry. Any "potential" pollution is therefore regarded as negligible.
Site 16- Homersfield/Flixt on	English Heritage (Miss Katharine Fletcher) [6166]	Sites 16 and 17, at Homersfield and Flixt on, are in an area of good archaeological potential and the County Archaeologist should be consulted. Additionally, site 16 could impact on the setting of the grade II* church on the opposite side of the lake. This should be carefully considered prior to determination of any planning application.	Consultation has been undertaken with the County Archaeologist as part of the site selection process.These sites will be also subject to Archaeological investigation
Site 17- Homersfield/Flixt on	Environment Agency (Mr Andrew Hunter) [4911]	We maintain our objection to sites 16 and 17 (Homersfield/Flixt on) in accordance with the grounds set out in our earlier letter dated 24th July 07. The grounds for our objection are repeated below: 'Objection based on the proximity of the proposal to inert and non-inert closed landfills. The closed landfills could be unlined in a high water table area. Therefore, dewatering and general development could mobilise leachates from the closed landfills to the working site. This could then result in the pollution of groundwater which is an offence under the Water Resources Act 1991. There is sufficient uncertainty in the construction of the closed landfills and the waste accepted to conclude that the sites can not be conditioned without prior investigation'.	The neighbouring former landfill sites were used for the disposal of inert and construction wastes.They are located between the proosed extensions and the River Waveney with the land fall away from the quarry. Any "potential" pollution is therefore regarded as negligible.
Site 17- Homersfield/Flixt on	English Heritage (Miss Katharine Fletcher) [6166]	Sites 16 and 17, at Homersfield and Flixt on, are in an area of good archaeological potential and the County Archaeologist should be consulted. Additionally, site 16 could impact on the setting of the grade II* church on the opposite side of the lake. This should be carefully considered prior to determination of any planning application.	Consultation has been undertaken with the County Archaeologist as part of the site selection process.These sites will be also subject to Archaeological investigation
Site 19- Worlington Quarry, Red Lodge	M Dickerson Ltd (Mrs Sarah Clover) [4903]	The inclusion of this site as a preferred option is supported.	Noted

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Site 19- Worlington Quarry, Red Lodge	English Heritage (Miss Katharine Fletcher) [6166]	Sites 19 and 20, at Worlington, would not impact on any designated historic assets but should be discussed with the County Archaeologist.	Consultation has been undertaken with the County Archaeologist as part of the site selection process.
Site 19- Worlington Quarry, Red Lodge	National Grid (Rosalind Eyre) [6323]	<p>Site 19: Worlington Quarry Red Lodge</p> <p>This site is crossed by National Grid's High Pressure gas transmission pipeline. Please find attached a plan showing the detailed location of the pipeline at the proposed site.</p> <p>Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to allow Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please find the attached guidance:</p> <ul style="list-style-type: none"> - specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties - Gas Transmission Underground Pipelines - Guidance <p>Should the site be taken forward as a minerals site, the operator should be made aware of the above issues.</p>	Noted
Site 20- Worlington Quarry, Red Lodge	M Dickerson Ltd (Mrs Sarah Clover) [4903]	The inclusion of this site as a preferred option is supported.	Noted
Site 20- Worlington Quarry, Red Lodge	English Heritage (Miss Katharine Fletcher) [6166]	Sites 19 and 20, at Worlington, would not impact on any designated historic assets but should be discussed with the County Archaeologist.	Consultation has been undertaken with the County Archaeologist as part of the site selection process.
Site 22- Henham	S Grundon (Ewelme) Limited	<p>The actual area being promoted lies to the east of the existing extraction site, and as such, would be considered as an extension to the existing site at Henham Park, in accordance with Policy 2 in the Submission version of the Minerals Core Strategy whereby there is a presumption in favour of extension to existing sites.</p> <p>The area falls outside of the Grade II Historic Park and Garden, and thus outside of Tuttle's Wood, which is designated a County Wildlife Site (ancient semi-natural woodland).</p> <p>The area is currently in agricultural use but only for rough grazing and does not contribute positively to the landscape character of the Historic Park and Garden. The extraction and appropriate restoration of the site could afford the opportunity to enhance the landscape character of the Historic Park and Garden and assist in completing Sir Humphrey Repton's vision for the grounds. The extraction would also help to provide necessary finance to ensure the Estate continues to be restored and enhanced.</p> <p>Given the geology of the area, further extraction would most likely provide Henham cobbles, a specialist product with very limited sources in the East of England which is used in restoration projects. Without such a supply, there is a risk that local character could be lost as no other quarry produces Henham cobbles. The appropriate restoration of the site, with appropriate species, could also enhance bio-diversity, an important factor given the proximity of Tuttle's Wood. The Minsmere Heath and Marshes Special protection Area and Ramsar Site and the River Wang lies to the east; the Appropriate Assessment carried out by Suffolk County Council concluded that it was unlikely there would be any identifiable negative impacts on the SPA/Ramsar Site. The mineral reserves exist above and below groundwater. The principle of extracting into the groundwater has already been established on the adjoining mineral site and over a larger area.</p> <p>This current extraction has had no impact through any change in the water table, and it is therefore unlikely that extraction of the extension site would have any adverse impact.</p> <p>There is good access from the Henham Estate via the U1518 to the A12 (about 700 metres to the east) where the junction has been improved with the provision of a right turning lane into the U1518. As part of the Section 106 agreement, the operator contributes annually towards the costs of surfacing and repair of the U1518. With respect to the AONB designation, it should be remembered that when the application for extension of time for the extraction and restoration of the site with the importation of inert waste, the County Council considered that the low level restoration of the site would enhance the northern edge of the AONB and historic parkland. This enhancement would be achieved by the introduction of parkland where previously there had been agricultural land. The same applies to the proposed extension site.</p>	<p>Although an area of land related to your client's existing site was considered prior to the publication of the Preferred Options document, the proposals now encompass a completely different area to that originally considered. It would not be possible to include the site in its present form at this late stage without re-consulting and thereby significantly delaying the process leading to the adoption of the Minerals Specific Site Allocations document.</p> <p>It is acknowledged that the revised proposals have advantages over the original proposals in terms of reducing significantly the impact of working the site. The points made regarding: the Grade II Historic Park and Garden; Tuttle's Wood County Wildlife Site; mineral resources; Special Protection Area; Ramsar Site; water resources; existing access; and, the potential enhancement of the Area of Outstanding Natural Beauty are noted.</p>

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		<p>The selection of this site would afford additional sand and gravel for the Lowestoft area which has been designated as a Key Centre for development and Change. The only other sites identified in the Preferred Site Allocations in the northeast part of the county are the two extensions to Flixton quarry further to the west. Given the above more detailed information relating to the sites, it can be seen that if the impact of the site on the Sustainability Objectives were to be re-analysed, a far lesser impact would be identified.</p> <p>Another factor to be taken into account is the manner in which the current extraction site is managed. The site is subject to monitoring by the County Council's Minerals and Waste Section and inspected three times a year under the chargeable inspection regime which began in April 2006. On the first inspection, five breaches of condition were noted; within two weeks of receipt of the letter, Grundon Estates office had responded, addressing the breaches. Subsequent inspections have revealed no further breaches which is a reflection of the responsible manner in which Grundon manage the site. The Planning Monitoring and Enforcement Officer commented in his letter attached to the latest report: 'I am pleased to note that, subject to any matters identified being addressed in the stated timescale, the quarry is progressing satisfactorily. I am sure this is due to your on-going keen interest in ensuring planning matters are properly respected.'</p>	<p>The submitted information does not however provide sufficient detail in respect of the: mineral resource; the justification for working within an Area of Outstanding Natural Beauty; general screening of the site from the surrounding area; restoration ground levels; and, buffering of the adjacent County Wildlife Site and Grade II Historic Park and Garden, and therefore the site is excluded from the list of specific sites.</p>
Site 23- Cavenham Quarry (western extension)	English Heritage (Miss Katharine Fletcher) [6166]	<p>Sites 23 and 24, at Cavenham, fall either side of an existing quarry. Both would have some impact on the historic environment, and should be considered by the County Archaeologist. Site 23 is on an area already utilised as an airfield and we do not have any further comments to make on it.</p>	<p>Consultation has been undertaken with the County Archaeologist as part of the site selection process.</p>
Site 24- Cavenham Quarry (eastern extension)	English Heritage (Miss Katharine Fletcher) [6166]	<p>Sites 23 and 24, at Cavenham, fall either side of an existing quarry. Both would have some impact on the historic environment, and should be considered by the County Archaeologist. Site 24 is adjacent to the scheduled Saxon boundary, Black Ditches. Our Inspector of Ancient Monuments has been involved in more detailed discussions on this case since our last response and is now satisfied with the mitigation suggested.</p>	<p>Consultation has been undertaken with the County Archaeologist as part of the site selection process.</p>
Site 25- Lawn farm Wetherden	PDE Consulting	<p>General concept is that of a land swap whereby only 6 hectares of the total of 16.4 hectares of site 25 involved. A significant area of the existing site would be given up.</p> <p>The site is located within Rolling Valley Farmlands and Furze. Generally rolling, with good tree cover and fragmented woodlands on valley sides. There would be no loss of landscape features with restoration back to grade. The new site area would be much less visually intrusive than existing site.</p> <p>The initial archaeological evaluation would be sufficient for planning purposes with additional evaluation work to be conditioned. The public right of way could be left along same route as working would not progress that far north.</p> <p>The existing ALC Grade is 3b. Restoration materials brought on to the site could actually improve the quality of the land. There would be no impact on viability of agricultural units.</p> <p>Surveys may be required but no overriding constraints likely. Promotion of BAP species could be included within the proposals. The site is further away than existing permitted site from adjacent former landfill area. Existing monitoring of groundwater for leachate and for landfill gas has picked up no methane.</p> <p>The site would be a dry working. Existing monitoring of workings have found no deterioration in water quality.</p>	<p>Although an area encompassing your client's site was submitted prior to the publication of the Preferred Options document, the proposals now entail a land swap principle and are completely different to that which were originally considered. It would also not be possible to include the site in its present form at this late stage without re-consulting and thereby significantly delaying the process leading to the adoption of the SSA document.</p> <p>It is acknowledged that the revised proposals provided have advantages over the original proposals in terms of reducing significantly the visual impact of working and restoration of the site. The points made regarding: landscape character; archaeology; public rights of way; restoration of agricultural land; ecology; promotion of BAP species; and, the adjacent landfill, are also noted.</p>
Chapter 1- Introduction	GO East (Miss Maydo Pitt) [6121]	<p>2. Overall, we consider the scope, structure and presentation of the document to be useful, engaging and appropriate at this stage. We are particularly pleased to see that the options considered are detailed and clear. We have made a few comments below that we think will further improve the document before submission.</p> <p>3. We would like you to note, however, that we have not scrutinised the individual preferred sites, and we therefore make no comments on the merits or otherwise of those specific sites proposed.</p>	<p>Noted</p>