

Our Ref: GRM/SLF - B43/2

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Dear Sirs

Suffolk Minerals Development Framework, Minerals Specific Site Allocations Hearing 2009 – Representations Submitted On Behalf Of Lafarge Aggregates Limited

We have been engaged by Lafarge Aggregates Limited (Lafarge) to prepare representations in respect of the submission version of the Minerals Site Allocation DPD for the Suffolk Minerals and Waste Development Framework.

Lafarge have previously submitted proposed allocations at two sites, namely

- Barking – Site 11; and
- Culford – Site 14.

Both sites were listed in the Council's preferred options document but have now been omitted from the submission version. The latter proposal (Culford) has been formally withdrawn by Lafarge.

Representations in respect of the Barking Site have been prepared and submitted under separate cover. This correspondence has been prepared to re-affirm the concerns of Lafarge, which are principally centred on the issues surrounding Main Matter 2.

As submitted, the DPD estimates a 10.53mt shortfall of sand and gravel within the County during the plan period for which a total of twelve sites have been put forward for allocation, as per Chapter 3 of the submission version of the DPD. However, it is submitted that the allocations as proposed by the MPA fail the criteria of soundness as prescribed under PPS12, under a number of areas as follows:-

1. The allocations propose a 46.8% reliance on a single operator which does not provide the flexibility necessary to comply with PPS 12. This is even more relevant should the same operator successfully tender to extract the deposit from Chilton (Site 6);
2. The allocations potentially propose up to a 25% reliance on a single site to contribute to the landbank. Given the known variability in geological conditions within the County, this does not appear to be the most appropriate strategy, especially given that some of the sites are in close proximity to sites within other Counties within the same region (thus generating concerns over deliverability). In addition, it is considered that such an approach generates potential conflict with Policy 3 of the adopted Core Strategy (cumulative impact).
3. The MPA has acknowledged that the sand and gravel deposits within the County are typically fine in their grain size distribution. It is known that the deposits at Barham and Chilton are very fine, and based on the sustainability appraisal it would appear that there is very little borehole evidence for the Timworth Site. Whilst the deposits undoubtedly exist the lack and poor quality of evidence provided would appear to prohibit the MPA from collating a robust and credible evidence base;
4. With reference to the attached borehole and grading analysis the deposit at Barking proves a high quality stone rich mineral (+40% gravel). In addition, the deposits at Barking also produce a sharp sand which has historically been used in the manufacture of high quality ready mixed concrete that can be used in a more sustainable way via the existing added value operations at the nearby Barham Railhead operated by Lafarge. The existing Gallows Hill operation, plus the proposed Barking site, will provide for a continuation of production and supply of high-grade aggregates at Barham Depot, where the existing infrastructure includes:
 - (i) aggregates railhead where granite is imported from Leicestershire;
 - (ii) ready mixed concrete plant;
 - (iii) sand and gravel washing plant;
 - (iv) aggregates recycling plant; and
 - (v) regional office for Lafarge Aggregates and Contracting divisions.

Such use of this high quality resource would accord with the provisions of Aim 3 and Policy 6 of the adopted Core Strategy, and have the added benefit of using the County's mineral resources in the best and most prudent manner, in accordance with the core objectives of sustainable development.

5. With regard to Main Matter 6 the allocations propose the retention of a site that has been allocated since 1999. Although it is acknowledged that a planning application has previously been submitted by the proposer, the level of objection raised by both statutory and local objectors would probably lead to a large degree of uncertainty for bringing Site 6 forward in the plan period.

We trust this highlights the concerns of Lafarge Aggregates Limited with regard to the Suffolk Minerals Development Framework.

Yours faithfully

David L Walker Limited

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Agent for Lafarge Aggregates Limited