



Suffolk Minerals and Waste Development Framework

Minerals Specific Site Allocations Hearing 2009

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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hankinson duckett associates

† 01491 838175 † 01491 838997 e consult@hda-enviro.co.uk w www.hda-enviro.co.uk
The Stables, Howbery Park, Benson Lane, Wallingford, Oxfordshire, OX10 8BA

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- B** The Character of England: Character Area 86 'South Suffolk and North Essex Clayland.'
- C** Suffolk Landscape Character Assessment: Character Type 18 'Rolling Valley Farmlands'.
- D** Minerals Policy Statement 1: Planning and Minerals pp10-12
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1 INTRODUCTION

1.1 Qualifications and experience

1.1.1 This evidence is prepared by Moira Hankinson, BSc DipLD FLA. Ms Hankinson has a Bachelor of Science Honours Degree and a postgraduate Diploma in Landscape Design, is a Fellow of the Landscape Institute and has been engaged in the profession of landscape design for over 25 years. She is a Principal Consultant and the former Chairman of Hankinson Duckett Associates (HDA) a landscape design, masterplanning and ecology practice. HDA designs and implements landscape and restoration projects and advises on the landscape aspects of planning applications for minerals, commercial, residential and recreational development for private companies and public authorities throughout Britain. Ms Hankinson was previously a landscape architect with Peterborough Development Corporation and with Washington Development Corporation – initially as senior landscape architect, subsequently as the principal landscape architect. She has tutored at the Universities of Newcastle-upon-Tyne, London and Oxford Brookes and at RTPI seminars and the Summer School and wrote the 'Landscape and Visual Impact Assessment' section of the 'Handbook of Environmental Impact Assessment' (Blackwell Science), co-authored by a team of international experts. HDA is a member of the Institute of Environmental Assessment.

1.2 Scope of evidence

1.2.1 This evidence relates to landscape aspects of Lafarge Aggregate's objection to the omission of Preferred Options Site 11 Barking, Needham Market (*Plan HDA1*). It addresses the Mineral Planning Authority's reason for not including this site, and demonstrates that the site can be worked with minimal landscape effects and consistent with policy objectives. In this evidence, the Site is referred to as 'Darmsden'.

1.3 Methodology

1.3.1 HDA has carried out a preliminary landscape assessment of this site, to a degree of detail appropriate to a Local Development Framework hearing. Detailed working and restoration proposals have not been prepared for the site; but sufficient work has been carried out to establish its general suitability for mineral extraction.

1.3.2 The assessment methodology is consistent with advice in national publications.

2 THE LANDSCAPE OF THE LOCAL AREA

2.1 Topography of the local area

(Plan HDA 2)

2.1.1 Most of central Suffolk is formed of rolling hills of boulder clay over chalk, forming broad plateaux cut by the valleys of its rivers and their tributaries. The site lies in the valley of the River Gipping which has a wide, meandering, almost-flat valley floor and floodplain,

with very gently sloping gravel terraces to one or both sides. The valley sides are more variable; with relatively steep slopes south of Needham Market, giving a well-defined, but broad, character to the central and southern length of the valley.

2.1.2 The eastern valley side locally is formed by a ridge, occupied by Shrublands Hall and its listed parkland and woods. The western valley side is more complex, with a series of dry valleys and intervening spurs forming a strongly undulating landform (*Plan HDA 2*). One of the spurs extends north-east from Darmsden, followed by the lane, and ends at the low, rounded Gallows Hill, cut through by the B1113. The Objection Site lies on the eastern flank of this spur.

2.1.3 The valley floor is characterised by the river, in one or more channels, by ditches and dykes and by water areas (*Plans HDA 1 and 2*); older ones, such as Bosmere (*Plan HDA 1*) and Baylham Fish Pond (Livermere); newer ones such as Needham Lake and restored mineral extraction lakes and wetland.

2.2 Context and Land-use

(*Plan HDA 1*)

2.2.1 The most extensive land use in the local area is agriculture: almost entirely arable on the valley floor and hills, but with some areas of pasture in wetter areas alongside the rivers. There are extensive woods, including managed plantations on the eastern valley sides. There is a considerable recreational land use, with extensive footpaths and bridleways, and with fishing, water sports, picnicking and walking at the lakes in the valley floor.

2.2.2 Mineral working is also a common local land use, with sand and gravel working on the valley floor and chalk quarrying on the valley sides. The broad valley floor terrace beyond the railway line east of the Objection Site has been permitted for mineral extraction. This is the 'Gallows Hill' site (*Plan HDA 1*). This is a satellite site to the rail-served Broomfield Pit processing plant site, to the south-east. A plateau site to the west, above Darmsden, has also been such a satellite site. The Objection Site would serve the same function, providing continuity of production.

2.2.3 The main settlements in the area all occur within the valley: Stowmarket, Needham Market, Great Blakenham/Claydon, Bramford, Sproughton. These are all located on the lower valley slopes, above the flood plain. The higher plateaux tend to have small villages and groups of farm buildings. The valley floor itself has occasional farms and properties on the edge of the flood plain.

2.2.4 There are large industrial areas, visually prominent, south of Stowmarket, at Great Blakenham and north and west of Ipswich. Other industrial sites are associated with the

smaller towns and larger villages – such as the Industrial Estate south of Needham Market.

2.2.5 The transport routes generally run along the valley edge: the B1113 follows the western valley side. The A14 Trunk Road is a grade-separated dual carriageway, generally following the eastern valley side, but rising up to the plateau and bypassing Stowmarket to the north. The main railway line, electrified with gantries, runs along the western edge of the valley floor.

2.2.6 There are major pylon lines serving the industrial areas south of Stowmarket and across the plateau west of Needham Market. Pylon lines cross the valley floor, such as at Gallows Hill.

2.3 Landscape Character

2.3.1 Natural England (Formerly the Countryside Agency and English Nature) is the Government's advisor on landscape and countryside issues. In 2002 The Countryside Agency and Scottish Natural Heritage published, 'Landscape Character Assessment, Guidance for England and Scotland'. In recent years there has been a significant change in national landscape guidance, towards landscape character as a basis for policy, covering the whole country, rather than local designations (*Section 6*). The recommended approach to landscape assessment, by the definition of landscape character areas, has been used in this assessment.

2.3.2 The Landscape Character Assessment Guidance describes the application of landscape character assessment at different scales. :

- **National/regional scale (Level 1):** The definition of distinct landscape types and areas at a broad scale;
- **Local authority scale (Level 1-2):** The definition of landscape types, which have unity of character due to particular combinations of landform and land cover, and a distinct pattern of elements.
- **Local scale (Level 2-3):** Sometimes it may be necessary or appropriate to carry out an assessment at a smaller area...such as an individual parish or a proposed development site. At this local scale, it is important to set the area firmly in context of a wider character assessment, to show which landscape type/ area it falls within.

2.3.3 **National scale:** The Character of England Map (*2005 Natural England*) subdivides the whole of England into 159 National Character Areas. This part of Suffolk is within Character Area 86 'South Suffolk and North Essex Clayland.' The relevant 'Key Characteristics' of this area are:

- 'Broadly flat, chalky, boulder clay plateau dissected by undulating river valley topography...

- 'Predominantly arable with wooded appearance. Some pasture in valley floors. Irregular field pattern despite rationalization...
- Scattered farmsteads, deep ditches and moats, parishes with scattered, small settlements around 'tyes' (commons) or strip greens, with isolated hamlets...
- '...Large villages and frequent towns, most with medieval street plans and elaborate timberframe houses...
- 'Hedgerow tree ... oak and ash in Suffolk. Few large woods (20 acres plus), but some ancient coppice woods and typical pattern of copses connected by hedgerows. Trees and woods appear to join together to give wooded skyline, with some bare ridgelines.
- 'Winding road pattern away from major routes, often with wide verges and strong hedgerows. Sunken hollow lanes are a feature, lined with hedgerows, but impact of Dutch Elm disease apparent'.

2.3.4 **Local authority scale:** The Suffolk County Council Landscape Character Assessment describes 31 landscape typologies. The site is within the Character type 18 'Rolling Valley Farmlands'. The 'Key Characteristics' of this area are:

- 'Gentle valley sides with some complex and steep slopes
- 'Deep well drained loamy soils
- 'Organic pattern of fields smaller than on the plateaux
- 'A scattering of landscape parks
- 'Small ancient woodlands on the valley fringes
- 'Sunken lanes
- 'Towns and villages with distinctive mediaeval cores and late mediaeval churches
- 'Industrial activity and manufacture, continuing in the Gipping valley'.

A landscape assessment and strategy for the Gipping Valley area was prepared by Suffolk County Council in 1993/4. This is no longer current.

2.3.5 **Local scale:** The published assessments cover relatively large areas. HDA has therefore carried out local landscape assessment, consistent with guidance.

2.3.6 From the assessment, the following landscape character types were identified (*Plan HDA 3*). These local characteristics have been used as a basis for considering appropriate restoration.

- **Valley Floor Extraction (VFE):** mineral extraction on the almost flat Gipping Valley; this includes the permitted Gallows Hill site.
- **Valley Floor Lakes (VFL):** along the valley floor there are a number of lakes, which are either natural, or have been restored to water after mineral extraction. The restored lakes close to settlements have been developed for recreational uses. Another characteristic of these areas is the extent of vegetation around the water bodies.
- **Open Agricultural Valley Floor (OVF)** – these areas have few features and field sizes are larger than elsewhere on the valley floor. Vegetation is limited to short stretches of hedgerows, well spaced lines of trees of small scrub areas on field

boundaries. These produce an open character, which is influenced by the proximity of the transport corridors.

- **Enclosed Agricultural Valley Floor (EVF)** – similar land uses to those in the above character area but it is more enclosed. Fields are smaller and the sense of enclosure is created by more extensive belts of vegetation alongside the river, more mature hedgerows, small copses and small plantations. Contains wetland areas, such as Baylham Fish Pond.
- **Enclosed Agricultural Valley Edge (EVE)** – a similar character area to the one above, where the sense of enclosure is reinforced by the rising landform on the valley edge.
- **Valley Edge Transport Corridor (VET)** – on either side of the valley, above the flood plain and on ground which is still at a reasonable grade, are two transport corridors. The easterly corridor contains the A14(T) along with its embankments and the major junction with the A140. The B1113 and the railway line provide very strong edges to the western transport corridor which, where these two features pass close together, includes the narrow tract of land between the two routes.
- **Valley Side Extraction (VSE)** – Mineral extraction on the valley-side slopes, surrounded by small screen planting belts and hedgerows.
- **Wooded Valley Side (WVS)** – extensive areas of woodland on the valley sides; it includes areas of mature mixed woodland as well as commercial coniferous plantations,
- **Settled Valley Sides (SVS)** – areas of settlement have developed along the edges of the valley and towards higher ground, above the flood plain. Settlements are primarily residential, but also include associated facilities and recent industrial parks.
- **Valley Side Mixed Farmland (VMF)** – the minor dry tributaries have produced an undulating landform to the valley sides. Land-use in this area is of mixed farmland with arable fields, areas of pasture, and small woodlands, particularly on steeper slopes, giving a degree of enclosure. There are a number of farms and more isolated groups of houses. The character of this area is one of transition between the modified, more urban, valley floor and lower slopes, and the rural farmland of the higher ground towards the plateau. The Objection Site at Darmsden (*Site 11, Barking*) lies within this character area.
- **Plateau Farmland (PF)** – on the higher ground, the landscape is predominantly agricultural, with larger arable fields and fewer areas of woodland. The gentler topography and less extensive vegetation creates a more open character.
- **Parkland (P)** – this is the area of parkland associated with Shrubland Hall.
- **Plateau Extraction (PE)** – Mineral extraction on the higher ground bounded to the west by Wooded Valley Side and to the east by Plateau Farmland.

3 DARMSDEN: SITE DESCRIPTION

3.1 Location

(Plan HDA 1)

- 3.1.1 The Darmsden site lies on the western valley side and lower slopes. 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, a low gappy hedgerow and Baylham Fish Pond to the south and mature plantations/ woodland to the west.

3.2 Physical Description

(Plans HDA 1 and 2 and Photographs)

3.2.1 **Landform:** The northern part of the site lies on the east flank of the low Darmsden-Gallows Hill spur, up to about 35m AOD, dropping to about 20m AOD alongside the B1113 (*Photograph 3 and 10*). The southern part of the site is low-lying, forming part of the valley floor edge, at about 14 to 18m AOD (*Photograph 4*). Beyond the site to the north, west and south, the undulating valley sides continue, up to about 60m AOD to the south-west.

3.2.2 **Land use:** The site is in arable crop production. There is a high voltage electricity pylon just beyond the northern section of the site, with cables running north-east to south-west across the wider landscape. Footpath 34 crosses the site linking the hamlet of Darmsden on higher ground west of the site with the B1113 (*Photograph 3*).

3.2.3 Footpath 35, which passes the site's northern and western boundaries, is a track which also provides access from the B1113 to Darmsden (*Photograph 1 and 9 and 10*). Beyond the B1113 to the east, land use on the valley floor is generally agriculture, with the railway line running parallel to the road. The road is in a 2.5m cut as it passes the north-eastern boundary of the site (*Photograph 1*). Between the B1113 and the railway, to the north-east of the site is an old chalk pit with areas of scrub. The Gallows Hill gravel extraction site lies east of the railway (*Photograph 6*), with an open arable field, not part of that site, between the B1113 and the rail line (*Photograph 5*). Baylham Fish Pond, surrounded by woodland, is located south of the site. This is a Wildlife Heritage Site. The steeper slopes south-west of the site are generally covered in mature woodland; within one of these – Great Plantation – is a small pond.

3.2.4 **Vegetation:** A low gappy hedge bounds the site's southern tip. A gappy hedgerow runs alongside the B1113, with some recent hedgerow planting to 'gap up' (*Photograph's 1-4*). It is more overgrown on the northern section of road, in cut (*Photograph 1*). Woodland to the south and west of the site is generally mature with a mixture of deciduous and evergreen species. There are semi-mature trees up to 8m in height alongside the track/Footpath 35 as it passes along the site boundary. North and west of this track is a mature hedgerow up to 3½m high (*Photograph 9 and 10*).

3.3 Landscape Character

3.3.1 The character of this area falls into the 'Valley Side Mixed Farmland' character area (*para 2.3.6 above*). The site forms part of the undulating wooded and farmed valley side and western valley floor. It is substantially contained by the mature woods and ridge to the west and by the Gallows Hill spur to the north.

3.4 Outline visual assessment of existing site

3.4.1 **Introduction:** Although part of the site lies on the valley side, visibility is generally limited. The northern slopes, and lower parts of the site are naturally contained by topography and woodlands. There are no views of the site from the north, west or south, beyond the immediate site boundaries, but there are some views of the higher, northern part of the site from the valley floor from the local east (*Photographs 5-7*).

3.4.2 **Properties:** There may be glimpses from some upper west-facing windows from properties at Pipp's Ford to the north-east (*Photograph 11*). From properties in Darmsden, views towards the site are generally obscured by woodland in and around Chalk Pit and Great Plantations, and by the ridge.

3.4.3 **Footpaths:** Most views from local footpaths to the north, south and west of the site are obscured. There are partial and open views of the site from the two footpaths (nos. 34 and 35) which pass through and alongside the site (*Photograph 3, 9 and 10*). Views from footpath 35 are obscured in part by semi-mature tree planting, but with open views where there are short gaps along the high, western section of the track. There are some views of the upper, northern slopes of the site from lengths of footpaths in the valley to the east (*Photographs 5-7*).

3.4.4 **Road & Railways:** Views of the site are limited to partial views of the northern slopes from the adjacent stretch of the B1113, passing along the eastern site boundary, with some more open views where there is no hedge (*Photographs 1-4*); more distant and transient views from elevated sections of the A14 and occasional glimpses from the minor road running parallel to the A14. There will be partial transitory views from a short stretch of the railway line as it passes the site.

3.4.5 Generally, the low southern part of the site has very limited visibility. The northern part is well-screened from most areas, but there are views towards these slopes from the immediate lengths of roads, paths and the rail line to the north-east. In these views, there is a wooded skyline containing the site, and some filtering by intervening vegetation.

4 OUTLINE WORKING PROPOSALS

4.1 Introduction

4.1.1 This section outlines a likely working method and restoration that would limit views of the quarry and allow appropriate restoration.

4.2 Working method

- 4.2.1 It is proposed that sand and gravel would be extracted from the site and the land then be restored, using imported material, to uses appropriate to the local landscape. The Darmsden site is located on the western valley side, with few notable site features. The greatest potential effects of extraction here would be from potential viewpoints within the valley floor, and footpaths 34 and 35 within and adjacent to the site. It may be necessary to divert the internal short length of Footpath 34.
- 4.2.2 In order to minimise the effects on the surrounding landscape, the working method could be designed to ameliorate these existing constraints. This would include direction of working, phasing, mounding and advance planting. It is assumed that restoration would be carried out to contours lower than existing.
- 4.2.3 **Direction of working:** The site could be worked from the north-western corner, eastwards towards the lower ground adjacent to the B1113, with landfill and restoration following behind. The direction of working could then change to a southerly direction, parallel to the road. By working in such a direction, retained unworked land would screen mineral working and landfill operations beyond.
- 4.2.4 The effectiveness of this is illustrated by the sections on Plan HDA 4. These show, as an example, the view line from the Gipping Valley River Path (Footpath 32), directly opposite the site. Early working (*Section 1*) would be screened by a retained lip of land. As that early working is restored, the retained lip would be worked lower, but with views of restored land, not working areas (*Section 2*). As extraction approached the B1113 (*Section 3*), it would be necessary to put screen bunds behind the hedge to screen views from the road. Those bunds would, again, keep any views only to the upper, restored, slopes.
- 4.2.5 Hence, throughout the working period, it would be possible to design a practicable working method that would mean that any views towards the site would be of agricultural slopes – existing or restored – below a wooded skyline.
- 4.2.6 **Phasing:** The site could also be worked and restored in phases, so that only a relatively small proportion of the site will be excavated or landfilled at any one time. Consequently, the impact on the surrounding landscape would be kept to a minimum.
- 4.2.7 **Mounding:** In order to reduce the impact of workings at potential viewpoints closer to the site, grassed mounding could be used to screen views of extraction and landfill, as is common with mineral sites. Low grassed mounding along the north and north-western boundary of the site would supplement the semi-mature tree belts; these mounds could

be designed to be of a height which did not obscure distant views of the far valley side from Footpath 35. Once extraction moves to the lower land adjacent to the B1113, a grassed mound would be required along the north-eastern section of the site boundary. This would be extended as the phases continue southwards. Similar phased mounding alongside the internal short length of Footpath 34 would protect that path on its current alignment or diverted alignment.

4.2.8 **Structure planting:** There has been structure planting (now up to 8m in height) along the northern and north-western boundaries of the site. Additional planting could be extended to the site's other boundaries where appropriate.

4.2.9 **Restoration proposals:** It is proposed that the land is restored, using imported material, to include agricultural land, woodland, water bodies and margins. The steeper wooded slopes which exist beyond the south west of the site could be extended into the north-western and northern edges of the site. These slopes would fall to a water body on the lower ground, complementary to Baylham Fish Pond, with surrounding land returned to agriculture.

5 **OUTLINE LANDSCAPE AND VISUAL ASSESSMENT**

5.1 **Introduction**

5.1.1 This section broadly assesses the likely visibility of working at Objection Site 11, and the effect on local landscape character.

5.2 **Visual assessment during working**

5.2.1 The working method described above would reduce visibility of the working quarry, as described in this section.

5.2.2 From some of the footpaths within the valley floor, the north-western part of the site is the most visible (*Photograph's 5, 6 and 7*). By working in phases in an easterly direction, the working face of extraction would not be visible and views from these locations (between 150m and 1500m away) would be of the retained upper rim of retained agricultural land, seen as a narrow strip within a wider landscape context. As extraction progresses down the steeper slopes, the back face would have been landfilled and restored and views would be of an emerging restored landscape (*Plan HDA 4, Section 1-3*). There may be transient views of an upper sliver of mineral working from the slightly higher A14.

5.2.3 Low grassed mounds along the north-western boundaries of the site, together with existing structure planting would screen views of working from Footpath no 35. Similar mounding, in turn to the north and south of Footpath 34 would screen views of working but still allow more open views, on the opposite site, of retained, then restored, land.

5.2.4 From the B1113, railway and stretches of footpaths to the east, visibility during the initial stages of extraction, would be similar to those from within the valley floor to the east, with no views of extraction, only of existing then restored agricultural land. As extraction progresses to the lower ground adjacent to the road, views would be of a low grassed mound alongside the extraction areas. These views would, in any case, be transitory views seen "at speed" from the road and railway.

5.3 Landscape character of restored land

5.3.1 The local area has an undulating landform, created by minor dry tributaries, with woodland on steeper slopes and water bodies within local depressions. The restoration of this site proposes to extend the steeper wooded slopes which occur to the south-west, incorporating new water bodies and margins, and areas restored to agriculture. Such features and landform are consistent with the locality, would enrich and extend local habitats and would not alter the landscape character of this area.

5.3.2 The previous Minerals Local Plan Inspector found that;
'...Working the site would result in some harm to the character and appearance of the landscape, but this may only be temporary and evidence was given that the site could be restored to a condition which was at least compatible with its surrounding...' (*Appendix A, para 3.28*).

5.4 Assessment conclusions

5.4.1 The proposed site for mineral extraction is located on the Gipping valley side and valley floor; the majority of the site is currently in arable production. There are no significant site features; a footpath crosses the site. Visibility is limited mainly to paths and a road close to the site and some parts of the valley floor to the east, with most longer distant views obscured. The effect of extraction of this site would be minimal, partly because there are few inherent site constraints and partly because 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; steeper slopes would be consistent with the locality, as would be areas of woodland planting, water bodies and farmland.

6 LANDSCAPE POLICY ASSESSMENT

6.1 Introduction

6.1.1 This section considers aspects of landscape policy relevant to the Minerals Specific Site Allocations document.

6.2 National landscape policy and guidance

6.2.1 **MPS 1** (November 2006) seeks to:

'protect and enhance the character of surrounding rural and urban areas by careful planning and design of any proposals for minerals development...' (para 17).

'take account of the opportunities for enhancing the overall quality of the environment and the wider benefits that sites may offer, including nature and geological conservation and increased public accessibility, which may be achieved by sensitive design and appropriate timely restoration...' (para 19).

6.2.2 This evidence has demonstrated that, by 'careful planning and design', the Objection Site at Darmsden can be worked and restored in a way that protects and enhances the local environment.

6.2.3 In terms of sensitive planning and design, the Darmsden site (Site 11) can be restored to a landform consistent with the locality, with woodland and agricultural land appropriate to the valley-side location replacing a featureless arable field.

6.2.4 **PPS 7** refers to 'local landscape designations', setting out the Government's priority for landscape policy to be based on landscape character assessments, rather than on such designations. This is addressed at section 6.6 below.

6.3 Regional landscape policy

6.3.1 The East of England Plan (May 2008) does not recognize local landscape designations.

Policy Env2 states:

'Planning authorities and other agencies should recognize and aim to protect and enhance the diversity and local distinctiveness of the countryside character areas...by:

- **Developing criteria based policies, informed by the area-wide strategies and landscape character assessments to ensure all development respects and enhances local landscape character; and**
- **Securing mitigation measures where, in exceptional circumstances, damage to local landscape character is unavoidable.'** (my underlining)

6.3.2 This evidence is based on character assessment and identifies that the Objection Site can be restored, consistent with local character.

6.3.3 The Environmental Assessment legislation does not refer specifically to 'mitigation': it requires that developers demonstrate the measures taken to 'avoid, reduce or remedy' any potentially significant effects. This evidence has identified that the Objection Site is visible from the immediate valley floor to the east, but that potential visual impacts during working can be avoided by careful project design. 'Local distinctiveness' would be protected during working and 'diversity' and 'countryside character' enhanced by restoration.

6.4 Minerals and Waste Development Framework landscape policy

6.4.1 The site lies within a broad belt of land preferred for mineral extraction in the Minerals Core Strategy. **Policy 2** states:

'preference will be given to aggregate sites in Suffolk located in the broad belt that follows the A14 stretching from east of Ipswich to the western extremity of the county and other areas identified on the proposals map, where geological information suggests the existence of viable deposits of sand and gravel'.

6.4.2 MWDF para 9.2.3 states:

'Suffolk is currently preparing a Landscape Character Assessment (LCA) for the county, which is expected to be completed in 2007. The LCA will identify Suffolk's Landscape Character Types (LCTs) and will be accompanied by the designation and assessment criteria. It is considered that in the course of time the LCA will remove the need to identify and protect Special Landscape Areas (SLAs)....'

6.4.3 MWDF **Policy DC1** states:

'Proposals that would result in an adverse impact on landscape character and/ or historic features of a Suffolk Landscape Character Type (LCT) will not be permitted.

'Working and restoration proposals, including advanced planting, shall be designed to respect the particular LCT in which the site is situated.'

6.4.4 The Suffolk LCA has now been published, which suggests that character policy should be preferred over local designations. This assessment has taken account of the Suffolk LCA (*Section 2.3 above*) and demonstrates that adverse effects would be minimised and local character respected.

6.5 Adopted Mid-Suffolk Core Strategy landscape policy

6.5.1 **Policy CS 5** (*Appendix I*) states (*inter alia*):

'The Council will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encourage development that is consistent with conserving its overall character'.

6.5.2 As set out above, the Objection Site can be worked and restored consistent with these objectives.

6.5.3 Until all the Development Plan Documents are adopted, old Local Plan 'saved' policies will be used (*Appendix I*). In summary:

- **Saved Policy CL 1:** seeks to protect the quality and character of the countryside and favours development required for (*inter alia*) mineral extraction.
- **Saved Policy CL 4:** encourages the conservation of the landscape and ecological qualities of Mid-Suffolk's river valleys;
- **Saved Policy CL 5:** protects woodlands;
- **Saved Policy CL 8:** protects nature conservation interests;

- **Saved Policy CL 23:** favours new landscapes, wildlife habitats or agricultural restoration to minerals sites.

6.5.4 The Objection Site can be worked and restored consistent with these policies.

6.6 Local landscape designations

6.6.1 **National policy:** PPS 7, para 24 states:

'The Government recognizes and accepts that there are areas of landscape outside nationally designated areas that are particularly highly valued locally. The Government believes that carefully drafted, criteria-based policies in LDDs, utilizing tools such as landscape character assessment, should provide sufficient protection for these areas, without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas'.

6.6.2 The 'local landscape designations' in Suffolk are the 'Special Landscape Areas' (SLAs). These are defined in the Saved Mid Suffolk District Plan (*September 1998*) and referred to in the Mid Suffolk District Core Strategy (*September 2008*) and Suffolk Minerals Core Strategy (*September 2008*). The Darmsden site is within an SLA in the Saved Mid Suffolk District Plan. That is now in conflict with PPS7.

6.6.3 PPS7 Para 25 states:

'Local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. LDDs should state what it is that requires extra protection, and why. When reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations. They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned'.

6.6.4 The Local Plan refers to the Structure Plan (superseded by the RSS) para 2.4.6:

'...The Structure Plan defines Special Landscape Areas as being:

- a) River valleys which still possess traditional grazing meadows with their hedgerows, dykes, and associated flora and fauna;**
- b) Areas of breckland including remaining heathland, and the characteristic lines and belts of Scots Pine;**
- c) Historic parklands and gardens;**
- d) Other areas of countryside where undulating topography and natural vegetation, particularly broadleaved woodland, combine to produce an area of special landscape quality and character.'**

6.6.5 The Objection Site is not within an area with characteristics (a), (b) or (c). In relation to (d), the local area has predominantly coniferous and mixed woodlands; it otherwise has characteristics such as undulating countryside and natural vegetation, that occur throughout England.

6.6.6 MWDF Para 9.2.4 states:

'A number of SLAs identified in Suffolk's Local Plan/ LDFs will continue to be supported throughout the county until such time as criteria based policies have been developed in the county's and districts LDDs that utilize the results of the Suffolk LCA. Planning applications will be considered against SLAs and the developing LCA in accordance with MPS1 and PPS7'.

6.6.7 Regional Spatial Strategies are replacing Structure Plans. The East of England Plan does not have SLA policy. It has criteria-based character and countryside policies, based on assessments such as the Suffolk Landscape Character Assessment.

6.6.8 Saved Policy CL2 of the Mid Suffolk Local Plan states that:

'Within Special landscape Areas, particular care will be taken to safeguard landscape quality, and where development does occur it should be sensitively designed, with high standards of layout, materials and landscaping'.

The site could be designed to be consistent with this policy.

6.6.9 Para 3.18 of the Mid Suffolk Core Strategy states;

'The Landscape Character Assessment does not replace the Special Landscape Area local designations. These designations will form part of the Development Control Policies DPD and will remain adopted until superseded by a Level 3 Landscape Character Assessment for the District'.

6.6.10 This paragraph is contrary to national planning policy and the Minerals Core Strategy, which require criteria-based policy to be developed in the DPD, based upon landscape character assessment. This evidence provides a local scale Level 3 character assessment for the site in the context of regional and national landscape character assessment. A Level 3 character assessment is not appropriate for the whole District. This evidence demonstrates that the proposals will have little impact upon the landscape character and, in time, local landscape character will be enhanced by the proposals. The site can be worked with minimal visual intrusion, and restored to a topography and land use in character with the locality.

6.7 Landscape policy: conclusions

6.7.1 Including the site would not compromise the intention of the national, RSS and LDF planning policies, as they relate to protection of the countryside and the landscape of Mid Suffolk.

6.7.2 The site is within a local landscape designation covered by the Saved Local Plan. PPS7 states that carefully drafted criteria based policies in LDDs using tools such as landscape character assessment, should provide sufficient protection for the countryside. The East of England Plan, Suffolk Landscape Character Assessment, RSS and LDF policies protecting the countryside and local character all provide such protection.

Notwithstanding that SLA policy is, effectively, out of date, other sites within SLAs have been allocated.

- 6.7.4 The site can be developed without significant adverse effects upon the SLA, or the 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 Coddendam and Barham

- 7.1.1 Lafarge Aggregates Limited has objected to the concentration of sites in the control of a very few operators and which prevent the continuity of minerals working at the otherwise sustainable Broomfield Pit.

- 7.1.2 For the Minerals DPD to be sound, it needs to be **deliverable** and **flexible**. Lafarge's objection considers that both of these principles will be jeopardised by the concentration of extraction with few companies through the plan period. Preference should be given to a wider range of operators, to satellite and extension sites serving a wider range of processing plant sites; ensuring continuity of the sustainable, rail-served Broomfield Pit plant site and maintaining flexibility of supply sources.

- 7.1.3 HDA has carried out an outline assessment of the DPD sites at Coddendam (Site 3) and Barham (Sites 5A, 5B). These assessments are based on desk studies and field visits.

7.2 Site 3 Coddendam (Shrubland Quarry)

(Plan ref HDA6)

- 7.2.1 The Coddendam site is an extension to an existing minerals site lies within the ridge-top woodland of Shrubland Park, on the east side of the Gipping Valley. There are no national landscape designations but the site does lie in a Special Landscape Area and falls within the Shrubland Park County Wildlife Site which supports coniferous and deciduous trees. A Registered Park and Garden (Shrubland Park) adjoins the site's south-western boundary. There is a footpath along the eastern boundary between the existing quarry and the proposed extension. The site is visually well-contained in the wider landscape by the surrounding woods, but visible from the adjacent footpath.

7.3 Sites 5a and 5b Barham

(Plan ref HDA7)

- 7.3.1 The Barham sites comprise two extensions to the east and west of the existing working. The sites lie within a side valley east of the Gipping valley. The existing working is on the western slopes of the valley. The eastern extension, 5B, will extend over the lower part of the opposite side of the valley with possible glimpsed views through the valley.

The western extension, 5A, is likely to be visible from parts of an adjoining footpath which is in continuity with an area of linear commonland. Site 5A falls within a Special Landscape Area. Part of the site's north western edge abuts an Ancient Woodland. The north western edge also adjoins a County Wildlife Site.

7.4 Site 11: Barking (Darmsden)

7.4.1 Site 11, the Objection Site, also lies within the SLA. It is adjacent to a County Wildlife Site at Baylham Fish Pond. The site is visible from the adjacent footpaths and from an area of the valley to its immediate east. Design of the working method can avoid significant effects from such views.

7.5 Other Submission Sites: conclusions

7.5.1 The three sites considered all lie within the Special Landscape Area. They all adjoin or contain County Wildlife Sites; Site 5 also adjoins Ancient Woodland. Site 3 lies adjacent to a Registered Park and Garden. They are all visible from, at least, local lengths of footpath. Site 11, in itself, currently has more visibility than the other two. However, that is neither extensive nor should it preclude allocation: this evidence has demonstrated that the workings themselves would not be widely seen or significantly affect the local area.

7.5.2 It is considered that there are environmental constraints to all three sites: the relative visibility of Site 11; the potential damage to the inherent character and landform of a Registered Park at Site 3; potential hydrological impacts on adjacent Ancient Woodland at Site 5. All are within or adjacent to SLAs and County Wildlife Sites. These do not suggest that Sites 3 and 5 should be favoured before Site 11.

8 REASONS FOR OMISSION

8.1 Site 11

8.1.1 The Council set out its reasons for selection and omission of minerals sites in 'Minerals Specific Site Allocations: Final Sustainability Appraisal Report Submission' (SCC, August 2008).

8.1.2 In relation to Site 11: Barking, the SA states:

'The site lies within a Special Landscape Area, is highly visible from the road to Darmsden and would be difficult to screen. Baylham Fish Pond to the south is a County Wildlife Site and the site lies within Groundwater Protection Zone 2. Gallows Hill Quarry on the opposite side of the road is undergoing preparatory works, and expected to finish extraction in 2015. A review of the Mineral Specific Site Allocations document is expected before this, where this may be considered, but at present, there is no need to identify additional sites'.

8.1.3 In response to this:

- Local landscape designations, such as SLAs, do not have national or regional policy support and should not be used to prevent acceptable, sustainable development. This outline assessment identifies that 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;
- In any case, SLA policy has not precluded the selection of other sites, including Coddenham (Site 3) and Barham (Site 5A, 5B). Coddenham is also adjacent to a Listed Park;
- Nor has proximity to, or, inclusion with, County Wildlife Sites precluded the selection of Coddenham and Barham. The test is whether the CWS could be protected by such extraction. The Barham site (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. Landscape character varies with topography, land use, vegetation, positive features such as parkland, and detracting elements such as transport corridors and pylons.
- 9.3 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 a landform and land use consistent with the valley-side character.
- 9.4 The site could be developed in compliance with national, regional and district landscape policy.