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For more information about our minerals and waste planning policy go to:

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1. **EXECUTIVE SUMMARY**

1.1 As a result of a “call for sites” included within the Suffolk Minerals & Waste Local Plan Issue & Options Consultation which ran from the 29 November until the 6 February a number of sites were put forward for consideration.

1.2 In total 3 sites proposed for sand and gravel extraction were put forward for consideration as extensions to Wangford Quarry.

1.3 Following consideration of internal consultees views and of the proposals against the stated site selection criteria, only one of the proposed sites were recommended for inclusion in the draft Plan, namely Lime Kiln Farm.

2. **PROPOSED DEVELOPMENT**

2.1 Three sites were proposed as extensions to Wangford Quarry by Cemex.

2.2 Hill Farm (see Appendices) is located to the north of the existing processing plant site. The existing processing plant site access utilizes the U1628 to the A12, which is classed as a Strategic Lorry Route in the Suffolk Lorry Route Network.

2.3 Southern Extension (see Appendices) is located to the southeast of the existing processing plant site.

2.4 Lime Kiln Farm (see Appendices) is located to the east of the existing processing plant. It is noted that the estimated life of this proposed extension at 5 to 7 years is much shorter that the County Council’s estimate of 30 years.

3. **GEOLOGY**

3.1 No geological report has been received for Hill Farm at the time of writing.

3.2 The Southern Extension is estimated to contain approximately 0.606 Mt of sand and gravel. The grading is 78% gravel, 18% sand and 4% silt.

3.3 Lime Kiln Farm is estimated to contain approximately 2.4 Mt of sand and gravel. The grading is 70% gravel, 25% sand and 5% silt.

4. **DEVELOPMENT PLAN AND PLANNING APPLICATIONS**

4.1 As of April 2017, the Development Plan for the area is made up of the following documents:

   a) Suffolk Minerals Core Strategy 2008;
   b) Suffolk Minerals Specific Site Allocations 2009;
   c) Suffolk Waste Core Strategy 2011;
   d) WDC The Approach to Future Development in Waveney to 2021 Core Strategy 2009;
e) WDC Sites for Future Development Site Specific Allocations 2011;
f) WDC Development Management Policies 2011;
g) Lowestoft Lake Lothing & Outer Harbour Area Action Plan 2012;
h) Options for the new Waveney Local Plan April 2016

4.2 There are no adopted or draft plan proposals that conflict with the proposed sites.

4.3 At the time of writing there are no known planning applications which affect the sites.

5. CONSULTATION RESPONSES

HILL FARM

Highways

5.1 No objection, subject to conditions. May require a contribution towards replacement of the bridge.

Landscape

5.2 Hill Farm- Inside AONB with likely impact on designation, possible residential amenity issues.

Historic Buildings

5.3 No objection.

Archaeology

5.4 Hill Farm- The site occupies a highly favourable topographic location for early occupation and ritual activity. Evidence for prehistoric, Roman, and Medieval occupation, including three Medieval wells (WNF 011) is recorded on the County Historic Environment Record (HER) from the earlier phases of extraction. Cropmarks of linear ditches (WNF 054), and a ring ditch (WNF 002) are recorded from within the proposed extraction site. High potential for Palaeolithic and Mesolithic remains, indicated in association with Lowestoft formation deposits, as demonstrated by finds of flint axe and a Mesolithic quartz mace head (WNF 011) on similar deposits from the earlier phases of extraction, lying immediately south. The impact on the setting of Grade II listed Henham Park (NHLE 1000557) also needs to be addressed.

5.5 Archaeological field evaluation, and deposit modelling for Palaeolithic potential, will be required at an appropriate stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed.

5.6 Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should
demonstrate the impacts of development/extraction on archaeological remains, including deposits with Palaeolithic potential, and proposals for managing those impacts.

Ecology

5.7 Potential impacts upon nature conservation interest including Suffolk Coast & Heaths AONB, Minsmere-Walberswick SPA, Minsmere-Walberswick Heaths & Marshes SSSI, Wangford Marshes CWS, Suffolk Coast NNR, Hen Reedbeds (SWT Site), Reydon Wood (SWT Site), Groundwater Source Protection Zone (River Wang, Wolsey’s creek, River Blyth), European Protected Species (Otters, Bats), Priority Species (Bittern, Water Vole, Barn Owl), other protected Species (Badger), Priority Habitats (REEDBEDS, Grazing Marshes) need to be adequately assessed and where necessary mitigation proposed.

5.8 The Ecologists have high concern over Hill Farm.

Air Quality

5.9 Hill Farm- Air Quality near the site is currently good; Waveney District Council has not declared any Air Quality Management Areas.

5.10 There are a number of residential properties within 250m of the site; including Hill Farm immediately to the south of the site boundary, and properties on Hill Farm and Norfolk Road to the north of the site.

5.11 There are no statutory designated habitats near to the site.

5.12 Traffic generation is anticipated to be the same as for the existing Wangford Quarry. It is considered unlikely that additional traffic generated by the proposed extraction site will exceed the thresholds defined within IAQM/EPUK guidance, and therefore traffic emissions are unlikely to significantly increase local pollutant concentrations.

5.13 The site lies within 250m of the Wangford Quarry northern boundary, and there is a risk of cumulative impacts should both be operational at the same time. Hill Farm is located between the two sites.

5.14 It is expected that an Air Quality Assessment would be submitted with the planning application for the site which considers the potential impacts of increased dust and pollutant concentrations associated with the extraction process, the potential cumulative impacts, and which defines the mitigation and monitoring which will be implemented at the site to minimise the identified risk of impacts at the identified nearby residential properties.

Noise

5.15 All extension sites will require standard mitigation measures such as the use of earth screening bunds. Additional standoff buffer areas will be required at Hill Farm.
Public Rights of Way

5.16 No public rights of way are affected.

Floods

5.17 Wangford- The site is high risk of groundwater flooding and is underlain by a minor aquifer. There are areas of predicted surface water flooding for the site. The site also falls within SPZ Zones.

SOUTHERN EXTENSION

Highways

5.18 No objection, subject to conditions. May require a contribution towards replacement of the bridge.

Landscape

5.19 Southern Extension- Inside AONB with likely significant impact on designation

Historic Buildings

5.20 No objection.

Archaeology

5.21 Southern Extension- The site occupies a favourable topographic location for early occupation and ritual activity. Cropmarks if linear ditches and curvilinear enclosures (WNF 022) are recorded on the County Historic Environment Record (HER). Previous phases of extraction revealed extensive evidence of prehistoric and Medieval (WNF 023) occupation. Archaeological trenched evaluation identified a number of features with archaeological interest (WNF 029).

5.22 No objection in principle but consent will require planning conditions under the NPPF to secure a programme of archaeological investigation, which will include assessment of, and provide mitigation strategies for, near surface archaeological potential and Palaeolithic potential (at depth).

Ecology

5.23 Potential impacts upon nature conservation interest including Suffolk Coast & Heaths AONB, Minsmere-Walberswick SPA, Minsmere-Walberswick Heaths & Marshes SSSI, Wangford Marshes CWS, Suffolk Coast NNR, Hen Reedbeds (SWT Site), Reydon Wood (SWT Site), Groundwater Source Protection Zone (River Wang, Wolsey’s creek, River Blyth), European Protected Species (Otters, Bats), Priority Species (Bittern, Water Vole, Barn Owl), other protected Species (Badger), Priority Habitats (REEDBEDS, Grazing Marshes) need to be adequately assessed and where necessary mitigation proposed.

5.24 The Ecologists have high concern over the Southern Extension.
Air Quality

5.25 Southern Extension- Air quality near the site is good; Waveney District Council has not declared any Air Quality Management Areas.

5.26 There are two cottages within 250m of the site, approximately 200m east of the site boundary, south of Halesworth Road.

5.27 The Minsmere-Walberswick Heaths & Marshes SSSI lie adjacent to the southern boundary of the site, whilst the Minsmere-Walberswick SPA/Ramsar lies approximately 40m from the eastern boundary at its closest point. Features sensitive to nitrogen deposition are identified by APIS for these sites.

5.28 Traffic generation is anticipated to be the same as for the existing Wangford Quarry. It is considered unlikely that additional traffic generated by the proposed extraction site will exceed the thresholds defined within IAQM/EPUK guidance, and therefore traffic emissions are unlikely to significantly increase local pollutant concentrations.

5.29 The site lies adjacent to an existing area of Wangford Quarry, and there is a risk of cumulative impacts should both be operational at the same time.

5.30 It is expected that an Air Quality Assessment would be submitting with the planning application for the site which considers potential impacts of increased dust and pollutant concentrations associated with the extraction process, the potential cumulative impacts, and which defines the mitigation and monitoring which will be implemented at the site to minimize the identified risk of impacts at the identified nearby residential properties and statutory habitats.

Noise

5.31 All extension sites will require standard mitigation measures such as the use of earth screening bunds.

Public Rights of Way

5.32 No public rights of way are affected.

Floods

5.33 Wangford- The site is high risk of groundwater flooding and is underlain by a minor aquifer. There are areas of predicted surface water flooding for the site. The site also falls within SPZ Zones.

LIME KILN FARM

Highways

5.34 No objection, subject to conditions. May require a contribution towards replacement of the bridge.

Landscape
5.35 Lime Kiln Farm- Inside AONB but will be capable of mitigation if overriding need case exists.

Historic Buildings

5.36 No objection.

Archaeology

5.37 Lime Kiln Farm- The site occupies a favourable topographic location for early occupation and ritual activity. Extensive cropmarks of linear and curvilinear ditches and enclosures (REY 077, REY 76, REY 075) and finds of Roman and Medieval date (REY 026, REY 028) are recorded on the County Historic Environment Record (HER) in the vicinity. Archaeological investigations associated with previous phases of extraction lying immediately west of the proposed site identified a range of features of prehistoric and Medieval date (WNF 023, WNF 018, WNF 021).

5.38 Archaeological field evaluation, and deposit modelling for Palaeolithic potential, will be required at an appropriate stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed.

5.39 Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development/extraction on archaeological remains, including deposits with Palaeolithic potential, and proposals for managing those impacts.

Ecology

5.40 Potential impacts upon nature conservation interest including Suffolk Coast & Heaths AONB, Minsmere-Walberswick SPA, Minsmere-Walberswick Heaths & Marshes SSSI, Wangford Marshes CWS, Suffolk Coast NNR, Hen Reedbeds (SWT Site), Reydon Wood (SWT Site), Groundwater Source Protection Zone (River Wang, Wolsey’s creek, River Blyth), European Protected Species (Otters, Bats), Priority Species (Bittern, Water Vole, Barn Owl), other protected Species (Badger), Priority Habitats (REEDBEDS, Grazing Marshes) need to be adequately assessed and where necessary mitigation proposed.

Air Quality

5.41 Lime Kiln Farm- Air Quality at the site is currently good; Waveney District Council has not declared any Air Quality Management Areas.

5.42 There are a number of residential properties within 250m of the site; Lime Kiln Farm lies within approximately 50m of the Southern boundary of the site. Reydon Grange, Toad Hall and Wangford Farm lies within 250 of the northern boundary of the site.
5.43 There are no statutory designated habitats adjacent to the site.

5.44 Traffic generation is anticipated to be the same as for the existing Wangford Quarry. It is considered unlikely that additional traffic generated by the proposed extraction site will exceed the thresholds defined within IAQM/EPUK guidance, and therefore traffic emissions are unlikely to significantly increase local pollutant concentrations.

5.45 The site lies adjacent to an existing landfill site, and there is a risk of cumulative impacts should both be operational at the same time.

5.46 It is expected that an Air Quality Assessment would be submitted with the planning application for the site which considers the potential impacts of increased dust and pollutant concentrations associated with the extraction process, the potential cumulative impacts, and which defines the mitigation and monitoring which will be implemented at the site to minimize the identified risk of impacts at the identified nearby residential properties and statutory habitats.

**Noise**

5.47 All extension sites will require standard mitigation measures such as the use of earth screening bunds. Additional standoff buffer areas will be required at Lime Kiln Farm.

**Public Rights of Way**

5.48 No public rights of way affected.

**Floods**

5.49 Wangford- The site is high risk of groundwater flooding and is underlain by a minor aquifer. There are areas of predicted surface water flooding for the site. The site also falls within SPZ Zones.

6. **SITE SELECTION CRITERIA**

**HILL FARM**

**ABSOLUTE CRITERIA**

**Geology**

6.1 Geological results have not been provided at the time of writing for Hill Farm. It would be possible to the sites within the draft plan on an Area of Search basis based on published geological mapping. Past and present quarrying activity in the vicinity indicates that high stone content sand and gravel resources are to be found within the area underlain by the Westleton Beds. However, the sand and gravel are variable in quality and extent.
Highways

6.2 The County Highways Authority have not object to the proposed highways access arrangements for Hill Farm which would use the existing quarry access onto the A12.

Landscape

6.3 Hill Farm is unacceptable in landscape terms because of the potential impact of working the exposed site on the wider Area of Outstanding Natural Beauty and Henham Park.

Cultural Heritage

6.4 The Historic Buildings Officer raises no objection to Hill Farm.
6.5 The County Archaeologist considers that with suitable mitigation that the impact upon archaeology could be acceptable.

Ecology

6.6 The County Ecologist has identified important ecological constraints both within and in close proximity to the proposed development.
6.7 The lower lying parts of the site close to the River Wang should be excluded. Elsewhere further mitigation will be required to proposed following appropriate studies.

Public Amenity

6.8 The County Air Quality Consultant has identified that there are a number of sensitive receptors within the vicinity of the quarry and that an Air Quality Assessment will be required at the planning application stage. It is expected however that adequate mitigation would be able to be provided.
6.9 The County Noise Consultant concludes that with standard noise mitigation techniques such as the use of earth bunds and standoff buffer zones the levels of noise generated will be within excepted guidelines. A full noise assessment would be required at the planning application stage.
6.10 The County Public Rights of Way Officer concludes that no public rights of way are affected.

COMPARATIVE CRITERIA

Air Quality

6.11 No impacts upon identified Air Quality Management Areas were identified.

Climate Change Mitigation

6.12 Cemex have provided a figure of 6.72m² for Site 3.

Economy

6.13 Three Jobs would be safeguarded.
Housing
6.14 50% of sand and gravel sold within Suffolk.

Soil
6.15 Agricultural land is 3b or lower.

Waste
6.16 Silt and reject minerals would be used in restoration.

Water
6.17 Dry working.

SOUTHERN EXTENSION

ABSOLUTE CRITERIA

Geology
6.18 The Southern Extension is estimated to contain approximately 500,000 tonnes of sand and gravel. The grading is 78% gravel, 18% sand and 4% silt.

Highways
6.19 The County Highways Authority have not objected to the proposed highways access arrangements for the Southern Extension which would use the existing quarry access onto the A12.

Landscape
6.20 The Southern Extension is unacceptable in landscape terms because of the potential impact of working the exposed site on the wider Area of Outstanding Natural Beauty.

Cultural Heritage
6.21 The Historic Buildings Officer raises no objection to Hill Farm.
6.22 The County Archaeologist considers that with suitable mitigation that the impact upon archaeology could be acceptable.

Ecology
6.23 The County Ecologist has identified important ecological constraints both within and in close proximity to the proposed development.
6.24 The County Ecologist has a high level of concern over this site because of its location adjacent to designated habitats of international, European, national and local importance.
Public Amenity
6.25 The County Air Quality Consultant has identified that there are a number of sensitive receptors within the vicinity of the quarry and that an Air Quality Assessment will be required at the planning application stage. It is expected however that adequate mitigation would be able to be provided.

6.26 The County Noise Consultant concludes that with standard noise mitigation techniques such as the use of earth bunds and standoff buffer zones the levels of noise generated will be within excepted guidelines. A full noise assessment would be required at the planning application stage.

6.27 The County Public Rights of Way Officer concludes that no public rights of way are affected.

COMPARATIVE CRITERIA

Air Quality
6.28 No impacts upon identified Air Quality Management Areas were identified.

Climate Change Mitigation
6.29 Cemex have provided a figure of 6.72m² for Site 3.

Economy
6.30 Three Jobs would be safeguarded.

Housing
6.31 50% of sand and gravel sold within Suffolk.

Soil
6.32 Agricultural land is 3b or lower.

Waste
6.33 Silt and reject minerals would be used in restoration.

Water
6.34 Dry working.

LIME KILN FARM

ABSOLUTE CRITERIA

Geology
6.35 Lime Kiln Farm is estimated to contain approximately 2,400,000 tonnes of sand and gravel. The grading is 70% gravel, 25% sand and 5% silt.

Highways
6.36 The County Highways Authority have not objected to the proposed highways access arrangements for Kiln Farm which would use the existing quarry access onto the A12. A crossing for dump trucks across Mardle Lane will be required.
Landscape

6.37 Lime Kiln Farm is potentially acceptable within the Area of Outstanding Natural Beauty provided that appropriate mitigation is provided and the case for working within the AONB is justified.

Cultural Heritage

6.38 The Historic Buildings Officer raises no objection to Kiln Farm.

6.39 The County Archaeologist considers that with suitable mitigation that the impact upon archaeology could be acceptable.

Ecology

6.40 The County Ecologist has identified important ecological constraints both within and in close proximity to the proposed development. Appropriate survey and mitigation would be required.

Public Amenity

6.41 The County Air Quality Consultant has identified that there are a number of sensitive receptors within the vicinity of the quarry and that an Air Quality Assessment will be required at the planning application stage. It is expected however that adequate mitigation would be able to be provided.

6.42 The County Noise Consultant concludes that with standard noise mitigation techniques such as the use of earth bunds and standoff buffer zones the levels of noise generated will be within excepted guidelines. A full noise assessment would be required at the planning application stage.

6.43 The County Public Rights of Way Officer concludes that no public rights of way are affected.

COMPARATIVE CRITERIA

Air Quality

6.44 No impacts upon identified Air Quality Management Areas were identified.

Climate Change Mitigation

6.45 Cemex have provided a figure of 6.72m2 for Site 3.

Economy

6.46 Three jobs would be safeguarded.

Housing

6.47 50% of sand and gravel sold within Suffolk.

Soil

6.48 Agricultural land is 3b or lower.
Waste
6.49 Silt and reject minerals would be used in restoration.

Water
6.50 Dry working.

7. CONCLUSION

7.1 Hill Farm would have an unacceptable impact upon the AONB, Henham Park and potentially also the adjacent site of local nature conservation interest.

7.2 The Southern Extension would have an unacceptable impact upon the AONB and potentially also the adjacent sites of international, European, national and local nature conservation interest.

7.3 Kiln farm could subject to a proven case for working within the AONB be included in the draft Plan.

7.4 The National Planning Policy Framework (NPPF) provides guidance in respect of development within the AONB:

a) NPPF paragraph 115 states that great weight should be given to conserving landscape and scenic beauty in AONBs which have the highest status of protection in relation to landscape and scenic beauty;

b) NPPF paragraph 116 indicates that planning permission for major development (which would include sand and gravel extraction) should be refused except in exceptional circumstances and where it can be demonstrated that it is in the Public Interest. It states that such proposals should be considered in the light of an assessment of:
   i) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
   ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
   iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated, and;

c) NPPF paragraph 144 states that when determining planning applications local authorities should as far as practicable provide for minerals from outside of ANOBs.

7.5 Having appraised the proposed site within the context of the NPPF and other material considerations it was considered justified to include the Lime Kiln Farm within the Plan because of the following exceptional reasons:
a) the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy;

b) there is a shortage of gravel in the market area served by this quarry and the proposed extension contains an unusually high percentage of gravel compared to most other quarries;

c) the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area;

d) processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds;

e) there are no other acceptable proposed sites within the north-east area of Suffolk;

f) alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability;

g) it is considered that in the impact upon the wider AONB, recreation within the area, and the nearby residential properties and ecological designations could be moderated to an acceptable extent.

8. **RECOMMENDATION**

8.1 It is recommended that Kiln Farm, subject to a proven case for working within the AONB, be included within the draft Plan.