# Minerals and Waste Local Plan Publication Stage Representation

## Form

### Page 1: Suffolk Minerals and Waste Local Plan Publication Stage Representation

| Q1. Please state if you are responding: | As an individual |
| Q2. Personal Details: | |
| Title | Dr & Mrs |
| First Name | FD & SJ |
| Last Name | Campbell (received via email) |
| Address Line 1 | Wangford Farm |
| Address Line 2 | Mardle Road |
| Address Line 3 (if this is not required, please write N/A) | Wangford |
| Address Line 4 (if this is not required, please write N/A) | Suffolk |
| Post Code | NR34 8AU |
| Telephone Number (if you do not wish to provide this information, please write N/A) | n/a |
| Email address (If you do not wish to provide this information, please write N/A) | [redacted] |

| Q3. Agent's Details: | No Response |

| Q4. To which part of the Local Plan does this representation relate? | |
| Paragraph | - |
| Policy | - |
| Policies Map | Wangford |

| Q5. Do you consider the Local Plan is | No Response |
Q6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attachment

Q7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attachment

Q8. SCC Response
No Response

Q9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?
No Response

Q10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
No Response

Q11. Your details:
Name  Dr FD & Mrs SJ Campbell
Date  23 July 2018
Suffolk County Council Draft Minerals Plan
Lime Kiln Farm Site.

Objection

We strongly object to the inclusion of the Lime Kiln Farm site in the Suffolk County Council Draft Minerals Plan for the following reasons.

In 1997, the Minerals Local Plan Inquiry Inspector concluded that;

“....to comply with Government and Suffolk County Structure Plan Policy it (the inclusion of an AONB into the draft plan) could only be justified on grounds of exceptional circumstances.

By definition, schemes which can only be justified under exceptional circumstances cannot be a development plan policy or proposal.”

The site is an AONB and therefore can only be justified under exceptional circumstances.

(NPPF par 116)

Suffolk County Council propose the following as being:

“Exceptional circumstances and in the public interest”

(Exceptional Circumstances reproduced (in italics) from SMWLP responses to the Preferred Options Consultation, March 2018)

1. “The existing quarry at Wangford has been in operation for several decades (1950) and is an important part of the local economy.”

Response.

Wangford quarry plays no part in the fragile local economy. None of its 3 or 4 employees live locally or contribute to village life which is for the most part reliant upon tourism and associated employment such as cleaning, building, maintenance, laundry, food supplies, local dining etc. All of which are labour intensive.

Self catering cottages, B&B’s and second homes provide the backbone of accommodation within the area. The village store, a modernised mini-mart, depends upon seasonal trade of holiday makers purchasing supplies. The store employs 7 regular staff and extra during peak periods.

The local full and part time staff mainly reside in the village and far exceed the current 3 to 4 employed in the quarry, who as semi-skilled, if not re-deployed, would have little or no difficulty finding alternative employment. The unemployment rate in the region stands at 3.9% against a national 4.2%.

............................./2.
con’t. CEMEX, a £15bn Mexican multi national claims to be an important part of the local economy. The company however has paid no business taxes for the past 10 years. It’s only contribution to the wider local economy being Business Rates which equates to a small amount compared to the income from derived from tourism.

Reproduced below is a copy of the companies latest business rates. No account having being made for any Business Rates Relief.

![Business Rates in NR34 8EA](image)

In this ever faster moving digital age, would-be visitors are more than likely to view an area using aerial searches such as Google Earth which provides the erstwhile tourist an eagles eye view of the selected area before deciding on making a booking. No amount of screening will limit these open and clear aerial views. Given yet further excavations in the area, these might easily discourage tourists from staying in the vicinity and certainly would wish to avoid any heavy goods vehicle crossing from Lime Kiln Farm site to the Wangford quarry processing area.

Reproduced (by permission) on page 3. is a copy letter from the owner of the Village Store submitted at the last public consultation.
From: Neil Rattenbury  
Date: Wed, 06 Dec 2017 10:48:03 +0000  
To:  
Subject: Wangford Lime Kiln Farm

Dear Sir or Madam:

Ref: Draft Minerals and Waste Local Plan Wangford Lime Kiln Farm

I am writing to object to the above proposed development on two grounds, firstly the area’s status as an AONB and secondly the likely adverse impact on our business (The Village Store Wangford) should the proposed development proceed.

Like many people in the area we are shocked that such a development is even being considered given the area’s AONB status, if allowed to proceed it would clearly make a mockery of the term. This area is blessed with rare and dwindling birdlife (Marsh Harries, Bittern, Curlews, Barn owls to name a few), wonderful countryside views and walks and if allowed to proceed this development would lay waste to a large part of the AONB. There can be no justification for this to happen.

As a direct result of being an AONB the area is a mecca for tourists who wish to enjoy the countryside, its wildlife and walks. A very large proportion of houses in the immediate area of the proposed development are second/holiday homes which become filled with tourists during school holidays and the week or so after when older people frequent the area.

We live and work in a fragile rural economy and rely heavily on the trade this seasonal influx of visitors brings to the area.

Our business is the Village Store, a small shop in Wangford which provides a living for myself, my wife and the seven people we employ on a permanent basis who are all local people. The shop is a vital local service for the many old and infirm people living in the area who are unable to travel any great distance to purchase food and other essentials. It is also a focal point of the community where people come to meet their friends and neighbours.

The business is very seasonal with turnover increasing by up to 50% during holiday periods when the holiday lets in the area are full with visitors. The increase in turnover during these periods allows us to keep the store open and people employed. Put simply without this influx of tourists into the area and the money they spend in our store we would not be able to continue.

The proposed development presents a clear threat to our business as a result of the material negative impact it would have on the area’s desirability as a tourist destination. There is no doubt that without the income the tourists provide our business would be devastated, unemployment would follow and the area would lose a vital service.

Accordingly we strongly object to this.

Yours truly,

Neil Rattenbury  
Owner  
Village Store Wangford
2. “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.”

Response.

Mr Gunby, the author of the current Minerals Draft Policy report was in 1997, the “Minerals and Waste Policy Officer” for Suffolk County Council. Reproduced below is an extract from the officers report in 1997.

As evidenced by the Minerals Planning Officer in 1997, there is adequate alternative supply of the same geological type and quality in the nearby Henham quarry. This has been confirmed by the new owner of the Henham quarry; Lyndon Pallet, who’s surveyor has recently proved original reserves were markedly underestimated and is of the opinion sufficient to supply the local market. It is understood that SCC are aware of the recently proven increase in reserves and have requested the surveyors report.

The market area supply availability is also confirmed by the recent report of the Competition Commission (latest update December 2017).

3. 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”.

Response.

As already evidenced, the quality of the local deposit at Henham being part of the same geological bed, and less than 2km from the Wangford quarry and the Flixton quarry, are both capable of supplying the market area. Borne out by the Competition Commissions findings 2017. Furthermore, both Brett and Tarmac are in prime position both in Ipswich and Norwich. Both have affirmed the importance of marine aggregates within the Suffolk and Norfolk markets. Brett is committed to maintaining a reliable supply through it’s Ipswich Warf and is currently seeking to enhance it’s warf operation to support the wide ranging forthcoming construction projects within the county.
4. “Processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds”.

Response.

The limited demand such as filter beds is easily supplied from the nearby Henham quarry being part of the same geological bed. There is scant need in East Anglia as most water is from underground; already naturally filtrated. UK demand is mainly from high population areas (cities).

5. “There are no other acceptable proposed sites within the north east area of Suffolk”.

Response.

Alternative sites have been dismissed as not being as commercially convenient to CEMEX who propose and sponsor the Lime Kiln site. The Competition Commission is of the opinion that there are more than sufficient aggregate operators in the market place. The SCC draft minerals plan provides for a 30% excess land bank.

6. “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”.

Response.

Details relating to CEMEX marine dredged minerals have not been made available. “Commercial sensitivity” being claimed. However both Tarmac and Brett have affirmed the availability of consistent supply of marine aggregate and are seeking to enhance their warf operations to support forthcoming housing and major infrastructure projects. The cost of marine aggregates has fallen considerably in recent years and is virtually on a par with land won aggregates, again as evidenced by the Competition Commissions findings.

7. ‘It is considered that in the AONB, recreation within the area, and the nearby residential properties and ecological designations could be moderated to an acceptable extent”.

Response.

It is unclear how this qualifies as an “exceptional circumstance”. However, there is a legacy of “Moderation” having been applied along the western side of Mardle Road and northern side of Green Lane with trees screening the quarrying and subsequent landfilling, followed by “Bunds” along the northern edge of Green Lane and western edge of Mardle Road from the junction with Green Lane extending to the Hen Reedbeds from where there is tree screen planting obscuring the view to the north. The cumulative effect of this mitigation is substantial and must be considered.

(Please see following arial map and photograph)
View south on Mardle Road from Green Lane junction
cont. The “Bund” illustrated above extends to the Hen Reedbeds nature reserve and stands some 2.5m. Further screening of any type along the eastern edge of Mardle Road bordering the Lime Kiln site would effectively create a corridor of “Bund and Trees” edging Mardle Road as far as the Green Lane intersection where there would have to be some significant alterations made to the 4 way junction and central island to facilitate a crossing point for heavy haulage vehicles.

Mardle Road is a single track “Lane” with no passing points and subject to the national speed limit of 60 MPH.

The foregoing “Exceptional Circumstances” proposed by SCC falls well short of meeting the criteria laid down in the NPPF para 116, notwithstanding the absence of “In The Public Interest”.

Indeed there is serious cause for concern that the fragile local economy would suffer irreparably should the proposed Lime Kiln site of AONB become a quarry against the “Public Interest”

We strongly object to the Lime Kiln site being included into the SCC draft minerals plan as this would open the way for CEMEX to apply for planning permission to excavate the site.

We are of the opinion that if planning were granted as a consequence of Lime Kiln being included in the SCC Draft Minerals Plan, the cumulative effect of multiple site quarrying would have a serious and detrimental effect upon the entire area.

“The continued cumulative impact on the AONB from ongoing local development detracts from it’s National importance”

(Suffolk Coast & Heaths Countryside Management Project)

NPPF para 144.

“Ensure, in granting planning permission for mineral development, that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality”
Government has announced plans to increase the number of designated National Parks and Areas of Outstanding Natural Beauty. Against this backdrop, Suffolk County Council are consulting on the inclusion of yet a further Area of Outstanding Natural Beauty; the Lime Kiln Farm site into the Draft Minerals Plan; an area which falls within the Suffolk Coasts and Heaths AONB. Ceding a further 22.5 ha. (56 acres) onto the currently excavated 32.4 ha (80.6 acres) bringing the total to 44 ha. (109.5 acres) of quarried AONB.

Sand and gravel extraction has taken place on land East of Hill Road, Wangford since the 1950’s. In the early 1980’s, extraction extended onto land North of Green Lane and East of Hill Road, (see following map) subsequently land filled and restored to a flat profile. From 1984 excavation proceeded East, North of Green Lane and West of Mardle Road (see map). Following landfill, the site is now in the final stages of capping.

In 2002, an extension (Wangford Covert) was approved (see map). Being 11.2 ha. (27.7 acres) of AONB, “exceptional circumstances” were cited as being: The applicant was willing to give up an old planning permission at Westleton which adjoined an AONB and an SSSI also designated a Special Protection Area, Special Area of Conservation and a Ramsar site. Access to the site was also over narrow lanes and fronted residential properties.

A further extension of 10.6ha. (26.2 acres), South of Green Lane and West of Mardle Road (see map) was approved in 2006. Being an AONB, CEMEX, the applicant put forward as “exceptional circumstances” the revocation of mineral working permission at Holton St. Peter. The Planning Committee chairman questioned the CEMEX representative, Mr Frost, regarding “last potential working phase” statement in CEMEX’s proposal page 9, para 7.1 (reproduced below). Mr Frost assured the committee that CEMEX had no further plans to extend it’s workings. On that assurance the vote was taken and planning approved. (extract reproduced below).

7.0 THE PROPOSAL

7.1 This planning application is for the extraction of sand and gravel and placement of soils from an area comprising of approximately 7.55 hectares with progressive restoration to heathland for nature conservation purposes, using indigenous on-site materials. There will be no importation of any waste material. The proposal represents the last potential phase of working at the Wangford Quarry site.

................../9.
At each stage of extension application, the forecasted excavation period has been seriously underestimated resulting in each case of further time being sought and granted. The 1984 - 1996 being extended by 7 years. The Wangford Covert estimated time was 6 years and subsequently extended by 6 years; The west of Mardle Road extension was estimated at 2006 - 2013 and further extended by 8 years. Furthermore, on each occasion, the detailed progressive restoration plans submitted and approved were all set aside. Excavation of the sites proceeded without the benefit of progressive restoration as agreed in the original applications. NPPF 144 calls for restoration and aftercare at the earliest opportunity.

Based upon the foregoing, there is no reason to suppose any future proposals would not follow a similar pattern. Allowing for the site size, the projected 14 years of Lime Kiln site excavation would likely require a further extension of 10-12 years.

CEMEX claim the Lime Kiln development represents a mere 0.05% of the Suffolk Coasts and Heaths AONB however fails to include the already excavated 32.4 ha. (80.6 acres).

Arial view displaying cumulative/multiple sites in the Wangford locality
We strongly challenge the assertion of there being a Biodiversity net gain should the Lime Kiln site be excavated and restored to heath.

Desk based reports commissioned by CEMEX extol the benefits of restoration to heathland. The opportunity having not being taken to present an analysis of the results of restoration to heath of the Wangford Covert which was to have been restored in 2006.

CEMEX restoration plans to create heath which would indeed increase a limited resource but the site is of insufficient size or even close enough to any historic established existing heath to improve the current fragmentation of these habitats. Unless heathland wildlife were to be were imported, it's highly unlikely that indigenous species to heathland would find their way to an unestablished site so far removed. Even so, the successful relocation, survival and flourishing of indigenous species is highly questionable.

Leaving the site as a hollow, much as the Wangford Covert has been left, will significantly affect the landform and rather than bringing diversity, it would detract from the local character of open fields edged by ancient woodland and useless as farmland thereby reducing the Lime Kiln Farm acreage.

CEMEX commissioned the environmental firm of Crestwood to produce a desk based report in which they identify the land as graded some 3a, 3b and grade 4 and being intensly farmed. Indeed so. However, the truth is that the land is ideally suited to the type of crops grown in East Anglia; cereal, wheat, sugarbeet, peas, all well suited to the well drained soil.

Moreover, Crestwoods desk exercise reports no significant wildlife. Rather, wildlife is abundant and apart from owls, sparrow hawk, Harriers and other indigenous species, is a winter feeding site for the Eurasian Curlew, a RED endangered species, which although the subject of a recent DEFRA/RSPB report, seems to have evaded the attention of the latter as it supports the inclusion of the site. One can only presume yet another desk based response to the consultation.

CEMEX notes in it’s annual report that they enjoy a close partnership with the RSPB.

Paragraph 117 of the NPPF states:
“Promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, ......”

Paragraph 115 of the NPPF states:
Great weight should be given.....highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and The Broads.”

The Curlew is one of our most rapidly declining breeding birds, showing a 46% decline across the UK from 1994 to 2010. Curlew was added to the UK red list in December 2015, and it is argued to be the bird of greatest conservation concern within the UK.

(Game & Wildlife Trust).
The Eurasian curlew was added to the UK red list in December 2015. (© Laurie Campbell)

The curlew we have in the UK is one of eight species found worldwide, two of which are already likely to be extinct. There have been no confirmed sightings of eskimo curlew for over 50 years¹ or slender-billed curlew for 15 years². Our species, the Eurasian curlew, is also facing this threat, and we must do all we can to prevent its continued decline, and possible loss from the UK³.

The curlew used to be a common species in Britain, breeding in marshes, meadows and arable fields as well as on moorland. However, the curlew population has declined rapidly in recent decades. There are now only half the number of breeding curlew in the UK compared to 25 years ago⁴. The curlew was added to the UK red list in in December 2015⁵, and it is argued to be the most pressing bird conservation priority in the UK⁶. The famously evocative and previously familiar call of the curlew is becoming increasingly rare.

The UK plays an important role in shaping the future for curlew because we hold important breeding and overwintering populations – our coastal areas are estimated to support a fifth of the world’s curlew in winter, with around a quarter of the world’s pairs breeding at UK sites in spring and summer⁷. With so many of the world’s curlew within our borders, the UK has an obligation to do all we can to protect them. What happens to curlew in the UK will have serious consequences for the global population.

Flock of Curlews on Lime Kiln AONB site - November 2017
DEFRA in partnership with the RSPB recently published “International Single Species Action Plan for the Conservation of the Eurasian Curlew”.

para 1.5.2 Winter site fidelity:
Adults and first winter birds show a high degree of site fidelity to their wintering sites both within and between years. Ringed as fully grown birds during the non-breeding season, 81% were recovered within 30km of the original ringing site in subsequent winters. At one study site in Wales, of 3,000 captures over 36 years, only one bird had been recovered elsewhere.

para 1.6.3 Winter Habitat Selection.
Outside of the breeding season, the species frequents a variety of coastal and inland habitats. The majority are found in coastal areas. Substantial numbers also forage in adjacent grasslands at high tide.

The DEFRA/RSPB report clearly demonstrates that no amount of mitigation will suffice in the case of the Eurasian Curlew.

We respectfully submit that there is no case for the inclusion of the Lime Kiln Farm site in the Suffolk County Councils Minerals and Waste Local Plan. Futhermore, we reserve the right to address the minerals planning inspector at the examination in public.

Dr FD and Mrs SJ Campbell
Wangford Farm
Mardle Road
Wangford
NR34 8AU

/ www.wangfordfarm.co.uk

Attachments: 4 expanded views

................./13.
View south from Mardle Rd / Green Lane junction
Bund to the right extends to Hen Reedbeds. Uninterrupted views to left over Wang Valley
Larger aerial view Wangford Quarry area.
Arial showing current and projected “Bund” and “Tree” mitigation
View of Lime Kiln Farm and site from Wangford Farm