Suffolk Minerals and Waste Local Plan
Publication Stage Local Plan Consultation

Land at Holton Hall Farm, Holton. St Mary

Prepared by Strutt & Parker on behalf of APT Farming Ltd.

July 2018
<table>
<thead>
<tr>
<th>Site Name:</th>
<th>Land at Holton Hall Farm</th>
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</thead>
<tbody>
<tr>
<td>Client Name:</td>
<td>APT Farming Ltd.</td>
</tr>
<tr>
<td>Type of Report:</td>
<td>Minerals &amp; Waste Plan Representation</td>
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<td>Prepared by:</td>
<td>Alasdair Sherry</td>
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<td>Date:</td>
<td>23rd July 2018</td>
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1.0 Introduction

1.1 Strutt & Parker on behalf of H R Philpot & Sons in relation to the Suffolk Minerals and Waste Local Plan Publication Stage Consultation (2018) have prepared this representation. This representation has been prepared specifically in relation to the promotion of land at Holton Hall Farm, Holton St Mary, as shown on the location plan in Appendix A.

1.2 The site was previously represented as part of the Preferred Options Consultation in December 2017. Since the original representation, following the feedback from Suffolk County Council within the Site Selection Report, the applicants have now reduced the area of land being promoted, which is now limited to the eastern half of the site originally promoted. The rationale for this change to approach is set out within section 3.

1.3 This representation reviews the overall requirement for sand and gravel extraction in Suffolk, in light of the information contained in the evidence base that supports the Publication Stage Local Plan. This representation then sets out support for the inclusion of the site within the emerging Suffolk Minerals Local Plan with reference to the evidence base produced by Suffolk County Council, as well as other documents and evidence considered material in the allocation of sites to date. This includes both adopted and emerging National and Local Planning Policy, and also reports and minutes prepared by associated organisations such as the East of England Aggregate Working Party and the National Aggregates Coordinating Group.

1.4 Principally, the representation seeks to give clarification that the concerns contained in the Suffolk County Council Site Selection Report included as part of the evidence base can be addressed, and that the site represents a sustainable site for future mineral extraction to support future local and national growth.

1.5 In accordance with the criteria set out in the Planning and Compulsory Purchase Act (2004) and the National Planning Policy Framework (NPPF), when allocating sites for development Local Authorities need to be satisfied that their plan is 'sound'. It is the applicants view that the allocation of land at Holton Hall Farm, would be sound in planning terms, for the reasons set out within this representation.
1.6 As set out in paragraph 12 of the NPPF to be sound, a development should be positively prepared, justified, effective and consistent with national policy. Namely that it is:

**Positively Prepared** - The plan should be prepared on a strategy, which seeks to meet objectively assessed development and infrastructure requirements and consistent with achieving sustainable development.

**Justified** - The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Effective** - The plan should be deliverable over its period and based on effective joint working cross-boundary strategic priorities; and

**Consistent with National Policy** - The plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.7 This document also provides an assessment of the pre-submission consultation document against the key criteria in the NPPF as set out above, with reference to land at Holton Hall Farm.
2.0 The Requirement for Sand and Gravel extraction within Suffolk

2.1 The Publication Stage Minerals & Waste Plan has in the Council’s view sought to allocate sufficient mineral reserves to satisfy the demand for sand and gravel in the region. The starting point for this is the current sand & gravel landbank, which is required to be above 7 years as per paragraph 145 of the National Planning Policy Framework (NPPF). The most up to date landbank figure is set out in the Suffolk Local Aggregate Assessment (April 2018):

- Apportionment: not available
- Ten Year Average Sales: 10.63 (using December 2017 Sales Data)

2.2 The Draft Minerals & Waste Plan states that if current average sales maintained, reserves would run out by July 2028. The New Plan is required to guide Minerals & Waste development up to 31 December 2036, which leaves a resulting shortfall of 9.300 Mt (based on average sales of 1.112 Mt).

2.3 The plan has allocated sites that can provide a total of 14.770 Mt, however it is estimated that only 12.180 Mt can be worked in plan period. In the view of Suffolk County Council, this gives a safety margin of 31%, however this is disputed by the applicants.

2.4 It is the applicant’s case that there are certain factors that have not been addressed that affect the soundness of the plan, as well as its positive preparation. These factors are listed below, before being explained in further detail throughout the remainder of this section;

- Lack of robust assessment of growth in the future
- Limited number of allocated sites to deliver the mineral needed to meet the demands of the development industry over the plan period.
- Lack of apportionment figure
- National Policy concerns regarding the future lack of land won aggregates
Lack of Robust Assessment of Growth in the Future

2.5 The current NPPF states at paragraph 145 that Minerals Planning Authorities should participate in the operation of an Aggregate Working Party and take the advice of that Party into account when preparing their Local Aggregate Assessment. In broader terms paragraph 14 of the NPPF states that at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making, this means that Local Plans should meet the objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework as a whole.

2.6 It is the applicant’s view that in its current form the emerging Local Plan has not been positively prepared, having regard to paragraph 14 of the NPPF, in that it has not fully justified how it will meet the objectively assessed mineral needs of the County.

2.7 Draft minutes from the most recent East of England Aggregates Working Party meeting, held on the 13th June 2018, have been published. The minutes state that sand and gravel sales have risen by 1.1 Mt to 12.7 Mt across the region since 2008. This is reflected in an overall landbank increase (from all MPAs in the East of England) of 12.0. In Suffolk policy MP1 of the emerging Local Plan has states that the Council will allocate sites for the extraction of sand and gravel sufficient to supply 9,300 Mt over the plan period. As set out above, the County Council states that the allocated sites provide for a total of 14,770 Mt, which provides a 31% buffer.

2.8 However, it is the applicant’s view that the need for mineral over the plan period has not been adequately assessed by the Council. The annual need figure as calculated by Suffolk County Council is 1.112 Mt, which is based on average sales over the last 10 years. The Council also highlights within the emerging Local Plan that housing delivery growth tends to be significantly over-estimated.

2.9 Using average sales during the last 10 years is not considered to be a robust or suitable evidence base to plan for growth within the future. During the last 10 years, there was a significant recession that started in 2008 and had a significant factor in reducing the need for aggregate extraction and housing growth at the start of this 10 year period. Secondly, the publication of the National Planning Policy Framework (NPPF) in 2012
seeks to significantly boost housing growth. In addition, the new NPPF, which is due to be published imminently will set out the government’s proposals for the delivery of a minimum of 200,000 homes a year to solve the current housing crisis. Therefore, it is the wrong approach to seek to work out the need for mineral extraction in the future on the last 10 years’ sales figures.

2.10 It is the applicant’s view that the need for Mineral Extraction over the plan period, should be based on a robust assessment of the housing and infrastructure needs for the County during this period. The NPPF state that Minerals Planning Authorities making provision for the land-won and other elements of their Local Aggregate Assessment in their mineral plans should take account of the advice of the Aggregate Working Parties and the National Aggregate Coordinating Group as appropriate. Such provision should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate.

2.11 The demand for extraction is expected from continued housing growth; In 2017 it was announced that the Government would be consulting on a revised methodology, changing the way in which Objectively Assessed Housing Need is calculated nationally. The housing need for East of England Counties have been calculated as follows:

<table>
<thead>
<tr>
<th>County</th>
<th>Current local assessment of housing need, based on most recent publically available document</th>
<th>Indicative assessment of housing need based on proposed formula, 2016 to 2026 (dwellings per annum)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suffolk</td>
<td>3,050</td>
<td>3,112</td>
</tr>
<tr>
<td>Essex</td>
<td>9,201</td>
<td>10,544</td>
</tr>
<tr>
<td>Norfolk</td>
<td>3,989</td>
<td>4,106</td>
</tr>
<tr>
<td>Cambridge</td>
<td>4,638</td>
<td>4,826</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>20,863</strong></td>
<td><strong>22,588</strong></td>
</tr>
</tbody>
</table>

*Table 1: Housing Need*

2.12 When the new NPPF is adopted later in 2018, it is very likely that there will be an increased demand for housing which will inevitably lead to more permissions, and a greater requirement for aggregates and aggregate related mineral products to be sourced from sustainable sites within the Eastern region. The changes within the NPPF result in a 8.3% in housing increase across eastern region, and is an increase in demand that is expected to occur nationally. This does not appear to have been considered within the submission version of the Local Plan.
2.13 National Planning Policy Guidance states at Paragraph 084 that a reason for bringing an application for aggregate minerals extraction forward include significant increases in demand that can be forecast with reasonable certainty. It is considered that the uplift in development forecast for the East of England area, needs to be positively planned for by Mineral Planning Authorities. Conversely, policy MP1 of the emerging Local Plan and the calculation of the need for 1.112 Mt of extraction a year, appears to have been worked out on extraction rates over the last 10 years and the wrong assumption that housing growth tends to be significantly ‘over-estimated.’ This approach is at contrary to both the adopted and emerging National Planning Policy Framework and therefore in its present form policy MP1 has not been positively prepared, is not in accordance with national policy and has not been justified.

2.14 In order to be made sound, it is the applicant’s view that the calculated need for Mineral extraction within Suffolk up to 2036 should be prepared positively in accordance with the governments growth agenda, and in accordance with proposed housing growth as set out within adopted and emerging Local Plans within the Districts in Suffolk.

2.15 From the East of England Aggregate Working Assessment, Suffolk was one of the few Counties within the area, that provided no data on major infrastructure and housing developments that are likely to come forward over the plan period. Therefore again, it is questioned whether a robust evidence base has been used to prepare the plan and it appears that there is a lack of information available to adequately plan for future growth in the County. A full assessment of major infrastructure (such as A12 improvements and housing schemes) should be provided in order to inform growth over the plan period.

2.16 The Minerals Products Association itself has commented on the Government’s revised NPPF, stating that the proposed housing growth has not adequately emphasised the reliance such growth would have on the steady and sufficient supply of aggregates. Should these concerns be realised, there will be a requirement for additional sites to be identified to support the increased demands, rather than relying on the further excavation at existing sites.

2.17 In order for policy MP1 to be considered as sound, it is considered that a revised assessment of need should be undertaken within Suffolk and that a higher figure sufficient for the supply of sand and gravel, significantly higher than the currently allocated 9,300Mt should be provided.
2.18 Paragraph 145 of the NPPF states that Mineral Planning Authorities should plan for a steady and adequate supply of aggregates by ensuring that large landbanks bound up in very few sites do not stifle competition.

2.19 In its present form, Suffolk County Council are only seeking to allocate one further site for mineral extraction. The remainder of the additional need is made up of extensions to existing sites. As set out within policy MP2, a total of only 10 sites across the whole of the County have been allocated for mineral extraction up to 2036.

2.20 While it is the view of the Council that the 10 identified sites can provide a sufficient quantum of estimated mineral resources, the applicants are concerned with this approach given the low level of extraction from existing sites in the last three years, against the regional target. It is considered that relying on fewer sites to support the landbank will not provide the increase in extraction in order to meet Suffolk County Council's objectively assessed extraction needs.

2.21 Paragraph 5.33 of the Publication Draft Plan states that the 31% safety margin acts as a buffer, should one of the sites not achieve planning permission during the timeline of the plan, and also to take account of further planning constraints related to ecology and landscaping that would be introduced by the Plan. The Plan references the uncertainties of future demand for sand and gravel, which have been alluded to earlier in this report.

2.22 This raises significant concern regarding lack of competition within Suffolk, stifling housing and infrastructure growth in the County, which could also have the impact of pushing up aggregate prices and the need for importation of mineral from adjacent counties. This lack of completion is clear having regard to the relatively modest levels of extraction in recent years within the County. It is considered that in order to meet the requirements of policy 145 of the NPPF, and in order to positively plan for mineral extraction, additional quarries need to be allocated to increase the completion for mineral extraction over the plan period.
Policy MP2 is not therefore considered to be sound in its current form, on the basis that it is not in accordance with national policy and that it has not taken opportunities to positively prepare for housing growth.

Policy MP2, could be made sound by the allocation of land at Holton Hall Farm, Holton St Mary, as a deliverable site for mineral extraction located in a very sustainable location for mineral extraction.

**Lack of Apportionment Figure**

Notwithstanding the applicants concerns raised above, the plan is also quiet on the supply of minerals when compared to the sub regional apportionment figure. Whilst it is appreciated that sub-regional apportionment figures no longer form part of the NPPF, they do provide a useful overview in terms of the need for aggregates within larger geographical areas than just Suffolk.

The most recent Local Aggregate Assessment (LAA) for the MPA, dated April 2018, states that “In the 1990s the first Suffolk Minerals Local Plan was based on an annual subregional apportionment figure for sand & gravel of 2.43 Mt per annum. In the 2000s the Suffolk Minerals Core Strategy was based initially upon a sub-regional apportionment of 1.73 Mt per annum, which was later revised to 1.62 Mt per annum based on the revised national guidelines”.

This gives a current apportionment target of 1.62Mt per annum. The LAA goes on to state that, as per appendix 6 of the LAA, the average of the last three years sales is 1.117Mt. This is significantly below the current sub regional apportionment target figure of 1.62Mt per annum. This gives concern regarding the rate of extraction from existing allocated quarries and raises further concern that the plan and in particular policy MP1 has not been positively prepared.

While the NPPF does not reference the apportionment method, the most recent LAA states that Suffolk has always sought to maintain a landbank of permitted sand and gravel reserves of at least 7 years, and that historically the annual figure was based on the sub-regional apportionment or the revised national guidelines. While it is accepted that the intention to base the landbank on the average of the last ten years’ sales is in accordance with the NPPF, it is considered that failing to meet both the
average 10 year sales as well as the apportionment figure affects the robustness of the plan.

2.29 The plan and policy MP1 in its current form is therefore considered to be unsound, on the basis that it has not been justified and that it does not accord with national policy. Further detail and clarification on regional apportionment should be provided in order for the plan to be considered as sound.
3.0 Land at Holton Hall Farm, Holton St. Mary

3.1 The site at Holton Hall Farm has not been included as a potential site for sand & gravel extraction in the new plan. The evidence base for the Publication Stage Local Plan includes Site Selection Reports for the sites put forward, including for sites not identified. These reports are based on the evidence and representations provided for the Preferred Options Consultation. This section sets out the findings of the report relevant to Holton Hall Farm, and seeks to address the concerns voiced as part of the conclusions of the report.

Review of Site Selection Report

3.2 The Site Selection Report relevant to Holton Hall Farm was published in April 2018. The report sets out the Local Plan promotion to date, as well as any statutory responses to the proposed allocation.

3.3 The report also sets out a number of criteria to be used when determining which sites should be included in the Plan. Of these, the report highlights three points of clarification/areas of concern, which include the information provided with reference to the quantum of material to be extracted as well as Landscaping and Transport matters. All three of these areas of concern, have been now addressed by the applicants, as outlined below. On all the other assessment criteria, the site scored well and it should be noted that even in relation to matters such as transport, it was acknowledged that the site is well connected to the strategic road network and that the concerns raised were minor having regard to routing.

Quantum of Sand and Gravel to be Extracted

3.4 The Site Assessment Report concludes that the lack of geological information is unacceptable to support the identification of the site at this time. It correctly identifies that the site has been put forward to sand and gravel extraction.

3.5 While the quantum of sand and gravel is not considered to be a matter of soundness, it should be demonstrated that any site proposed for an allocation can make a viable contribution to the landbank. Submitted with this representation at Appendix B is a previous application for the extraction and processing of sand and gravel, as well as other ancillary development, submitted by Redland Aggregates Ltd in December 1991
on the site at Holton St. Mary. Section 4 of the application sets out evidence in respect of the mineral reserve held within the site. The report indicates that a total of 38 boreholes were drilled across the site (which includes land within the wider western part of the site that is no longer being promoted), providing information suggesting that there is a seem of underlying sand and gravel under the 40 ha site, and that the seam is duplicated in the south west corner. The seam consists of sand and gravel over a sand seam with occasional clay and silt lenses.

3.6 The borehole data suggests that the thickness of the deposit varies, averaging at 7.05m beneath an average of 1.99m of overburden and soil. At its thickest, the deposit is closer to 14m in areas through the centre of the site.

3.7 Initial calculations taking into account varies site constraints such as allowances at the margins suggest that the deposit within the original site contains some 3,500,000m³ (5,800,000 tonnes) of mineral with an average stone content at 30%. The report anticipates that the site contains some 3,500,000 saleable material, and envisages the deposit could be worked in 17.5 years. It is considered that the revised site area of 40 hectares, contains approximately 2,500,000m³ of mineral, which could be worked over the plan period.

3.8 While dated, it is considered that the land has not experienced any use that would alter it’s geological characteristics, having been used as arable farm land in the time since the report was collated. It is therefore considered that the site still contains a viable deposit of sand and gravel, in a sustainable location, which would assist the MPA in addressing proposed future shortages of construction aggregates.

Landscape

3.9 The Site Assessment Report undertaken by Suffolk CC concludes that the western part of the site would cause an unacceptable impact upon the adjacent AONB as there is no screen planting currently proposed. The report raises impact on the listed buildings as a concern, stating that this would be assessed further by a future a site visit. There is also concern over the proposed access arrangements, with Highways England responding with concern over proposed HGV routing plans.

3.10 For these reasons, the recommendation was to not include the site as part of the future plan. In response to this, the applicants have taken on board the concerns raised within the Site Selection Report. In response, the applicants have now removed the western
side of the site from the site promotion, to ensure that the AONB will not be adversely impacted by the development. In addition, the applicants have also prepared a Landscape Masterplan, prepared by SES which recommendations for mitigation to views to and from the proposed quarry within the wider landscape.

3.11 The assessment noted that the western part of the site would have an unacceptable impact upon the adjacent AONB as there is no screen planting. The impact on the setting of listed buildings on the Western Boundary of the site is also a concern.

3.12 Included at Appendix C is a Landscape Visual Appraisal, including a Landscape Strategy Plan, prepared by SES. The plan shows the proposed mitigation measures within the context of the site and the surrounding sensitive receptors including the adjacent AONB and the nearby listed buildings.

3.13

3.14 Although the site is enclosed from Holton St. Mary to the north and wider views from across the Stour Valley to the south west by the perimeter tree belts, there are local views through the gap in the tree belt from the A12 to the south and across the open fields from the B1608 and Sandpits Lane and associated scattered properties to the west and north west. The landscape masterplan has sought to address this.

3.15 The masterplan sets out the retention of the perimeter tree belts and hedgerows, with relevant offsets, in order to maintain the views across the site. The plan also details appropriate buffers to allow for appropriate bunding and screen planting to come forward. Additional screen planting is proposed to infill the gap north of the B1068 and restrict views from the A12.

3.16 A new hedgerow and further tree planting along the track and B1068 to the west will reinforce existing field boundaries with the gapping up of hedgerows and planting of hedgerow trees to further limit views from Sandpits Lane and associated properties, including the listed buildings, and provide landscape enhancement in accordance with the Suffolk Landscape guidelines.

3.17 The plan also recommends that a phasing plan would set out that the northern field would be phase 1, the western field phase 2 and the southern section closest to the access phase 3. Further phases could be introduced within these stages.
3.18 Once the mineral resource is worked and the quarry is restored, it is considered that the process will provide the opportunity for significant potential landscape benefits. While the quarry is worked and restored in phases, a comprehensive landscape scheme could be in place that directs the restoration work to allow the land to respond to the surrounding landscape. Included in the provided scheme is areas of woodland and replacement hedgerows to encourage biodiversity, while maintenance of public access routes and other landscaping features will allow the site to respond more effectively to the adjacent AONB.

**Transport Issues**

3.19 Included at Appendix D is a Transport Statement prepared by Waterman Infrastructure & Environment Ltd. that sets out the proposed access arrangements from the B1068, providing preliminary sweep path analysis drawings and other plans that ensure a suitable access for HGVs can be achieved. It is estimated that the proposals are likely to generate 40 HGV daily movements, and that there is sufficient space to provide the required level of car, motorcycle and cycle parking on the site. Additional information is provided on vehicle routing as required by the Highway Authority. This sets out the proposals to route all vehicles via the B1068, to ensure that no HGV traffic is directed through Holton St Mary as a result of the proposals.

3.20 The plans included in the report also support proposals for a range of HGVs to access the A12 heading both directions at the Four Sisters interchange, allowing minerals products from the site to be delivered throughout the region. The report states that the increased HGV movements will have an insignificant impact on the A12.

3.21 Collision data from the surrounding roads has also been used in the report, and it is concluded that the proposed increase in HGV traffic as a result of the proposals is unlikely to have a detrimental effect with regards to road safety. It is considered that the site can be considered in the Local Plan without any undue negative impact in terms of highways and transportation.

**Sustainability Appraisal**

3.22 Also comprising part of the evidence base for the Pre-submission Plan is a Sustainability Appraisal, prepared by Place Services on behalf of Suffolk Council. While the SA predominantly seeks to justify the selected sites in terms of sustainability,
it also provides assessment criteria on a range of sustainability factors, and assesses all of the sites put forward at earlier consultation opportunities.

3.23 The site at Holton Hall, referenced HO1, is considered to have been scored negatively on factors and criteria that can in fact be mitigated against. The site was scored down in respect of its location adjacent to an AONB and within view of a number of listed buildings. The Landscape Masterplan, while not providing in depth restoration and after-care proposals, does provide information on strategies that seek to mitigate the impact the working of the land would have on the surrounding visual amenity. This includes the implementation of additional hedgerows, retention of woodblocks and the removal of some of the land from the proposed allocation area.

3.24 Further, the Landscape Masterplan details revisions to the PRoW network that will maintain access and enjoyment of the land throughout the proposed quarries lifetime, while in the long term there is an opportunity for the site to be restored in a way that it can further contribute to recreation and amenity, possibly through further enhancement to the PRoW network.

3.25 The SA has also picked up on the potential access arrangements, citing the proposal to utilise the existing industrial access from Holton Park. The SA identifies that the proposal to use the B1068 would not be in line with the Suffolk Lorry Network, however the accompanying Transport Statement concludes that sufficient access can be achieved using the surrounding road network, without any undue impact on Road and Highway Safety.
4.0 Conclusions and Summary

4.1 This representation sets out the requirement for sites to be allocated within Suffolk for the extraction of sand and gravel, specifically to maintain the steady supply of necessary aggregates to support the envisaged national growth.

4.2 Fundamentally, it is considered that the current Draft Plan has not been positively prepared and has not provided a robust assessment of future housing and infrastructure growth over the plan period. The plan also has an over reliance on only 10 sites to meet the aggregate needs up to 2036, which will not provide the required competition as set out within paragraph 145 of the NPPF.

4.3 It is considered that the allocation of further sites will strengthen the position of Suffolk in terms of its capacity to supply further resources if required in the future, and that by limiting the extent of the works to address the sales data of the county alone shows a lack of understanding of the national implications of the aggregates industry.

4.4 With regard to the Land at Holton Hall Farm, this representation addresses concerns outlined in the previous Local plan consultation concerning the suitability of the site, and provides additional information to support the inclusion of the site within the plan.

4.5 It is therefore respectfully requested that the site at Holton Hall is identified within the submission plan as a site to provide future sand and gravel extraction operations.