Suffolk Minerals & Waste Local Plan
Responses to Preferred Options Consultation

MARCH 2018
Contact

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

Cover photograph acknowledgements:

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2. Cavenham Quarry, with permission from Allen Newport Ltd.
CONTENTS

1. Format ................................................................................................................. 3
2. Vision, aims and objectives .............................................................................. 4
3. General Policies ................................................................................................. 12
4. Minerals Policies ............................................................................................... 24
5. Waste policies ..................................................................................................... 53
6. Barham ................................................................................................................ 68
7. Barnham .............................................................................................................. 74
8. Belstead ............................................................................................................... 157
9. Cavenham .......................................................................................................... 297
10. Layham .............................................................................................................. 351
11. Tattingstone ...................................................................................................... 363
12. Wangford ........................................................................................................... 381
13. Wetherden ......................................................................................................... 845
14. Wherstead ......................................................................................................... 887
15. Worlington ......................................................................................................... 894
16. Sizewell A nuclear power station ..................................................................... 897
17. Appendices ......................................................................................................... 903
18. Proposals map ................................................................................................... 905
19. Sustainability appraisal ....................................................................................... 905
20. Habitats Regulations Assessment ................................................................... 911
21. Evidence base .................................................................................................... 918
22. Other .................................................................................................................. 921
23. Contact details ................................................................................................... 1030
24. Representations received after the deadline ..................................................... 1074
25. Consultation Statistics ....................................................................................... 1094
1. **FORMAT**

1.1 This document sets out the representations received in response to the public consultation held between the 5pm on the 30 October 2017 and 5pm on the 11 December 2017, upon the Suffolk Minerals and Waste Local Plan, Preferred Options document. Also included in the County Councils responses to those representations. The two documents should be read together.

1.2 In total 522 representations were duly made that included 582 separate comments (after removing duplicates).

1.3 In addition, 19 representations were made after the deadline.

1.4 The formats that were used for making representations were Survey Monkey (278), emails (154), mail (59) and directly received representations at community engagement events (31). Some comments submitted using survey monkey had to be rejected as they did not names or contain names or complete contact information. There were 46 such representations in total.

1.5 The representations are subdivided into the format that was used so that the originals can be more easily located if required. If prefixed by “SM” it means that it is Survey Monkey response, “E” then it is an email, “SM” means that it is Survey Monkey, “M” indicates mail, and “L” means that it was submitted after the end of the consultation period.

1.7 Words highlighted in bold text within the responses column indicate where changes have been made in response to comments made.

1.8 Email Addresses do not appear as required by the Data Protection Act 1998.
2. **VISION, AIMS AND OBJECTIVES**

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<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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<tbody>
<tr>
<td>E/24</td>
<td>Eddie Wilkinson, Melton Renewable Energy</td>
<td>Comment refers to paragraph 6.4 and the policy aim to have &quot;net self-sufficiency&quot; - managing an amount of waste within Suffolk equal to that arising in Suffolk. EPRL owns and operates a long-standing power station at Eye Airfield - EPRL Eye (c12MW). This manages around 140,000 tonnes per annum of poultry litter, waste wood and other agricultural residues to generate c90,000 MWh. Eye Power Station was commissioned in 1992 and employs around 30 full time employees with many more associated indirect jobs. Since 1992 Eye Power Station has by necessity been flexible and changed its fuel mix. Occasionally this has required changes to Eye Power Station’s planning permission and environmental permit. Looking ahead, Eye Power Station may again need to amend its fuel mix, and one possible scenario is burning 100% or a proportion of SRF/RDF. Such a change would require a change to planning and environmental permit, involve significant capital expenditure. In such circumstances, it is possible that SRF/RDF would be required from outside Suffolk, although we would seek to minimise any travelling distance to minimise associated carbon footprint, environmental impact and transportation costs. We request that Suffolk’s Minerals &amp; Waste Plan is amended to explicitly recognise the refuelling</td>
<td>While the plan aims for net self-sufficiency this does not prevent the power station at eye airfield from sourcing fuel from outside the County.</td>
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opportunity at Eye Power Station and permit the sourcing of SFR/RDF on a commercial basis, even if that is outside of Suffolk.

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<th>Reference</th>
<th>Author/Institution</th>
<th>Section</th>
<th>Proposal</th>
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<tr>
<td>E/9</td>
<td>Essex County Council</td>
<td>Aims and Objectives</td>
<td>Whilst appropriately covered by policies later in the document, it may be considered desirable to define ‘adequate provision for minerals and waste development’ within the Aims and Objectives section of the plan. As expressed by policy, ‘adequate provision for minerals and waste development’ is defined as permitting mineral equal to an average of ten years rolling sales over the lifetime of the MWLP, and permitting waste capacity sufficient to accommodate net self-sufficiency (the equivalent amount of waste to that arising within the County). It should however be highlighted somewhere in the supporting text that ‘net self-sufficiency’ with regard to waste may not be possible for all waste streams due to economy of scale considerations with regard to the facilities required to treat more specialised waste streams. This is broadly recognised in paragraph 6.7 clause h) but could be made more explicit earlier in the Plan. Reference could be added at paragraph 3.4 and perhaps also qualified in paragraph 6.4.</td>
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<tr>
<td>E/83</td>
<td>Natalie Gates, Historic England</td>
<td>Vision</td>
<td>Whilst we note that the Vision set out in paragraph 3.5 on page 8 requires that sites do not cause a significantly adverse impact upon the environment, this is not sufficient to have due regard to the pursuit of sustainable development under paragraph 9 of the National Planning Policy Framework (NPPF) or the core planning principles under paragraph 17 in respect of the historic environment. In particular, we would expect to see the historic environment references in the third paragraph</td>
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The Aims and Objectives are intended to be high level and the detail is defined later in the policies and supporting text of the Plan.

**Proposed Changes:**
Insert text at 3.4 and 6.4 that recognises the limitations of net self-sufficiency.
when considering the restoration of temporary minerals and waste sites.

**Aims and objectives**

We welcome Aim 2 to minimise and mitigate the impact of minerals and waste development on the environment. We support the identification of impact on the historic environment, cumulative impacts, landscape character and visual impact in objectives 5 and 7.

We recommend that these impacts are consistent in terms of historic environment for both minerals proposals (objective 5) and waste proposals (objective 7) as cumulative, landscape character and visual impacts are all important elements of impact on the historic environment.

While we welcome the commitment to minimise and mitigate the impact of minerals and waste development on the historic environment; as heritage assets are irreplaceable, any harm or loss to an heritage asset’s significance through development within its setting or directly affecting it should require a clear and convincing justification. Great weight should be given to an asset’s conservation. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, should be wholly exceptional (NPPF paragraph 132). In particular, non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments should be considered subject to the policies for designated heritage assets (NPPF paragraph 139).

We recommend that the aim should be to avoid the impact of minerals and waste development unless there is a clear and convincing justification which would require the harm to be minimised and mitigated against.

guidelines for each criterion” which includes paragraphs 132 and 139 of the NPPF

**Proposed Changes:**

Add reference to historic environment into the Vision.
Add reference to cumulative impact in Objective 7
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<th>Reference</th>
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<th>Comment</th>
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| E/70      | Mike Jones, RSPB | We support the inclusion of vision, aims and objectives to give a strategic direction to the plan, in particular the reference to ecology as an appropriate restoration condition. However, minerals and waste sites have significant potential to halt and reverse the massive and ongoing declines in biodiversity. Nature is in trouble, 56% of species monitored in the UK have declined over the last 40 years, with 40% having declined strongly. Mineral sites have a vital role to play in halting and reversing this decline. For example, mineral site restoration has the potential to deliver 100% of the national habitat creation targets for nine priority habitats, including reedbed, wet grassland and lowland heathland. In fact, for some of these habitats, mineral site restoration provides the only significant opportunity for inland landscape-scale habitat creation.  

As outlined in the Government’s current biodiversity strategy, Biodiversity 2020, we need to step a change in the way that we address nature conservation, shifting from piecemeal conservation action towards a more integrated landscape-scale approach. The same principle applies to the way in which we address nature conservation through mineral site restoration. This change is also reflected in the National Planning Policy Framework, which require the planning system to:  

- Provide net-gains in biodiversity where possible, contributing to the Governments commitment to halt the overall decline in biodiversity, including by establishing  |

|                      |                      | The Plan identifies in principle where minerals and waste development might take place. The detail of how the site would operate and the type of restoration and after-use is a matter for the planning applications stage. |
ecological networks that are more resilient to current and future pressures (para. 109);
- Set out a strategic approach in Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (para. 114);
- Plan for biodiversity at a landscape-scale across local authority boundaries (para. 117); and
- Identify and map components of the local and ecological networks, including...areas identified...for habitat restoration or creation (para. 117).

Planning for minerals development and mineral site restoration at this landscape scale also has the potential to provide a wide range of additional benefits, including flood mitigation, carbon sequestration, provision of access and recreational opportunities (and the associated benefits that this would provide for physical and mental health) and an improved local economy (e.g. through increased tourism revenue).

We strongly recommend that the plan Vision should reflect the requirement of the NPPF for the plan to provide positive direction the strategic landscape-scale restoration to biodiversity and green infrastructure.
In addition, the site allocations element of the plan should include the following information for each mineral site:

- The proposed restoration and after-use, prioritising biodiversity-led restoration (as required by draft minerals policy MP7) and the establishment of coherent and resilient ecological networks (the draft Nottinghamshire Minerals Local plan provides a good example of this biodiversity-led approach).
- How the restoration will contribute to delivering: (i) the landscape-scale conservation objectives for the area (as per draft policy MP7); (ii) a net-gain in biodiversity; (iii) local biodiversity targets; and (iv) a coherent and resilient ecological network (the Somerset Minerals Local Plan’s Restoration Topic Paper provides a good example of identifying how clusters of mineral sites can contribute to the ecological network of the area);
- The priority habitats that would be the most appropriate (but emphasising that restoration should avoid habitat packing, where small areas of lots of habitats are packing into the site) (the draft Nottinghamshire Minerals Local Plan provides a good example of this approach);
- A target for the minimum area (and type) of priority habitat that will be created (i.e. at least x hectares of y habitat) (the Essex
|   | Minerals Local Plan provides a good example of this approach, as outlined in its topic paper on ‘The Implementation of Biodiversity and Habitat Creation Targets’;  
|   | • How the proposed restoration will complement the restoration of other mineral sites in the vicinity (Cambridgeshire’s Block Fen/Langwood Fen Supplementary Planning Document provides a good example of this approach, with a ‘masterplan’ approach that covers a cluster of minerals sites);  
|   | • How the proposed restoration will complement existing priority habitat and nature conservation designations in the vicinity (Northamptonshire’s assessment of habitat creation opportunities through the restoration of allocated minerals sites provides a good example of this approach);  
|   | • For sites on Best and Most Versatile (BMV) Agricultural land, indicate how the long-term potential of the BMV soils will be preserved (whilst delivering biodiversity-led restoration) (the Surry Minerals Local Plan provides a good example of this approach);  
|   | • For riparian sites, give consideration to the opportunity for floodplain reconnection and naturalising the river channel (the draft Nottinghamshire Local Plan provides a good example of this approach)  
|   | We would welcome the opportunity to work with the Council and other stakeholders to develop the |
above approach if that would be considered helpful, in particular sites within landscapes that can help restore the fortunes of vulnerable and threatened species such as stone-curlew, nightingale and turtle dove.

E/78  James Meyer, Suffolk Wildlife Trust

We consider that the Vision should be for sites to be restored to maximise their ecological (and geological) value, ahead of restoration for other uses. The minerals planning system has the potential to play a fundamental role in halting biodiversity loss and creating a coherent and resilient ecological network and the Local Plan’s Vision should be to aim to achieve this.

We also recommend that the Aims and Objectives of the Local Plan include the beneficial restoration on sites, maximising the ecological gain that can be achieved.

The County Council recognises the potential for minerals sites to improve biodiversity and ecological networks and has included ecological restoration as part of its aims and objectives and policy favouring sites that provide ecological net gain. The Plan does not however prioritise one particular restoration over another.

E/98  Simon Amstutz, Dedham Vale AONB & Stour Valley Project and Suffolk Coast & Heaths AONB

Aim 1: Objective 2: The Key Diagram should be amended to reflect the full extent of areas of constraint, i.e. statutory designations such as Special Protection Areas.

Objective 3: “Identifying environmentally acceptable sources of sand & gravel and sites for waste management on the Proposals Map”. The Plan fails to thoroughly address this objective given that there is little or no assessment of the likely environmental impacts resulting from development at the selected sites. Without such information it is impossible to accurately and confidently state that the selected sites are acceptable in environmental terms.

Proposed changes:
Correct Proposals Map to show full extent of statutory designations.
Amend Policy GP4 as appropriate.
The Site Assessment reports assess the likely environmental impacts.
Aim 2: Objective 5: Landscape character, natural beauty and special qualities should also be included in the environmental protection policies.

3. General Policies

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<th>Policy GP1: Presumption in favour of sustainable development</th>
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Policy GP1 does take account of the fact that the presumption in favour of sustainable development does not apply in all cases through part b) of the third paragraph which states “...the County Council will grant permission unless material considerations indicate otherwise- taking into account whether: ...b) specific policies in the National Planning Policy Framework of National Planning Policy for Waste indicate that development should be restricted.”
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<th>SCC Response</th>
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<tr>
<td>E/62</td>
<td>Mark E North, Mineral Products Association</td>
<td>Policy GP2: Climate change mitigation and adaption.</td>
<td>The word “appropriate” already indicates that practicality is considered. If there was an instance where including a travel plan was not practical then it would not be appropriate.</td>
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<td>It is suggested that additional text is added to part e) of the above policy, to ensure a sensible approach is taken on the issue of travel plans, as follows; <strong>Proposed Changes</strong> (deletions in strikethrough; new text in bold) e) incorporate proposals for sustainable travel including travel plans where appropriate and practical.</td>
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<tr>
<td>E/108</td>
<td>Charlie Christensen, The Environment Agency</td>
<td>We welcome the inclusion of this policy, however we would like to see information on how you will encourage these factors to be included. We question whether further guidance on how operators may achieve the aims of this policy will be available. For example, guidance on taking flood risk into account in development proposals can</td>
<td>Guidance can be offered in any pre-application discussions that take place. Proposed changes: Refer to pluvial and fluvial flood risk in GP2 part d.</td>
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**POLICY GP2: CLIMATE CHANGE MITIGATION AND ADAPTATION**

Project and Suffolk Coast & Heaths AONB
Refer to bullet point 9 above and importance of para. 14 Footnote 9.

E/66 Shean Denny, CEMEX
Chapter 4: General Policies
Paragraph 4.2
Acknowledgement of the three pillars that form sustainability is welcomed, but it is felt that the three are of the same standing should be specifically stated in the paragraph. The following revision is suggested (additional text in bold):
“Sustainable development is defined in the NPPF and is seen as having three equal components: economic; social, and; environmental.”

Agreed. Appropriate text added to the plan.
be found on the Gov.uk website, and we can provide further advice and guidance if you feel this is appropriate for inclusion in the Local Plan. We support points (b) and (c) and, in particular, point (d) in Policy GP2 which takes account of sea level rise and coastal erosion. Although we agree with point (d) of policy GP2, there is no mention of the effect of climate change on fluvial and pluvial flood risk. We would like to see this incorporated into this policy. Please also see our comments below in section 7 (proposed minerals sites) under the heading ‘Climate Change’. We also note that as part of point (b), there may be opportunities for local heat networks to be developed. Further guidance on heat networks is available on the gov.uk website.

E/70 Mike Jones, RSPB
Climate change is having significant effects on our wildlife (see State of the UK’s Birds report) and we support the inclusion of a policy to minimise the contribution of mineral and waste sites to climate change. Noted

E/73 West Suffolk District Council
The Council supports this policy. Noted

**Policy GP3: Spatial Strategy**

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<th>Respondent</th>
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<tr>
<td>E/9</td>
<td>Essex County Council</td>
<td><strong>Policy GP3 – Spatial Strategy</strong></td>
<td>Thank you for the comments. The policy instruments Suffolk County Council will employ are site allocations, policies which safeguard current minerals and waste facilities and a minerals consultation area.</td>
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  It is questioned whether the ‘Spatial Strategy’ is a policy and it is instead suggested that the Spatial Strategy is included in the Aims and Objectives section of the MWLP as it is the spatial representation of those Aims and Objectives.
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<th><strong>SMWLP, Responses to Preferred Options Consultation, March 2018</strong></th>
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<td><strong>Page 16</strong></td>
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| E/79 | Malcolm Robinson, Hacheston Parish Council | Please find below the response from Hacheston Parish Council to the above consultation.  
1. General Policies - GP3 – the use of rail or sea transport for minerals and waste transport |

The Spatial Strategy only highlights in broad terms what the plan approach will be to new sites coming forward. It does not mention the principle of safeguarding key facilities which is an important consideration when ensuring a plan area has sufficient capacity. It also doesn’t mention the policy instruments to be employed to bring sites forward – direct allocations, Areas of Search, criteria-led policies etc. It may also be appropriate to consider potential new sites which can demonstrate co-location and other synergistic benefits more favourably, as it is proposed to do with sites well related to the Suffolk Lorry Route Network. It is considered that ‘centres of population’ is too vaguely defined as being another area where preference will be shown towards new sites. This term should be replaced by something along the lines of ‘Key Centres for Growth’ which can be defined as the largest urban areas in the County, and preferably named in the MWLP. This will help ensure that facilities are delivered around only those major areas rather than far smaller ‘centres of population’.

The Spatial Strategy also states that preference will be given to sites which ‘do not have adverse impacts upon features of environmental importance (natural or man-made) or endanger human health’. This is not disagreed with but it may be more appropriate to qualify this with the need for impacts to not be ‘unacceptable’ or ‘non-mitigatable’ rather than just ‘adverse’. As per the planning application stage, it may also be prudent to qualify that adverse impacts will be assessed cumulatively in combination with other existing or permitted development.

Suffolk County Council are of the opinion that the Spatial Strategy should remain a policy with reference to the key diagram, however other policy instruments can be further elaborated on in the explanatory text.

The comment regarding ‘adverse impacts’ and cumulative impacts is acknowledged and changes proposed.

**Proposed Changes**

Add further explanation of policy instruments to explanatory text of Policy GP3: Spatial Strategy.

Change policy GP3 text from “do not have adverse impacts on features of environmental importance or human health” to “do not have unacceptable impacts on features of environmental importance or human health, which includes cumulative impacts”
| E/83  | Natalie Gates, Historic England | **Spatial strategy and Policy GP3**
We welcome that the statutory landscape designations of the Norfolk and Suffolk Broads, the Suffolk Coast and Heaths and Dedham Vale Areas of Outstanding Natural Beauty have been considered in drafting the key diagram and spatial strategy. We note that the key diagram is a broad brush approach which does not include local designations or small-scale constraints, however, mapping designated heritage assets to a county level, particularly with scheduled monuments and registered parks and gardens (likely to be the largest scale historic environment landscape designations), can help to identify spatial concentrations. We would suggest that this analysis needs to be done so that Policy GP3 is sound, given GP3 states that preference will be given to minerals and waste development which is in accordance with the Key Diagram. In particular, GP3 identifies those which, “…do not have adverse impacts upon features of environmental importance (natural or man-made)…” This is particularly important given the requirements in paragraph 169 of the NPPF for an up-to-date evidence base about the historic environment. | Policies MP10 will safeguard current railheads and mineral wharfs to ensure their continued use. Inclusion of parks and gardens and scheduled monuments is not considered practical to add to the key diagram as these are small scale designations, difficult to display at the county level. However the County Council aims to address these designations in other policies in the plan such as GP4 |
| E/108 | Charlie Christensen, The Environment Agency | Paragraph 4.9 (f) refers to aggregate recycling facilities. We would like to see that these are also located where future infrastructure and housing will ensure markets for the recycled materials. | This point is adequately covered by the existing wording. |
| E/116 | Fiona Cairns, Suffolk Preservation Society | The Society considers that this policy should be amended to conform more closely with national guidance around the sustainable use of materials which includes Other policies in the Plan adequately address the points raised. | |
specific reference to the historic environment, and that locations within AONBs should be avoided where practicable. The NPPF states at para. 144 (bullet points 2 & 3) that when determining planning applications local authorities should

- As far as practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty and World Heritage sites, Scheduled Ancient Monuments and Conservation Areas.
- Ensure, in granting planning permission for mineral extraction, 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 sites and/or from a number of sites in a locality.

| E/73 | West Suffolk District Council | Spatial Strategy – proposals for development for minerals and waste sites in accordance with key diagram. | Noted |
| E/98 | Simon Amstutz, Dedham Vale AONB & Stour Valley Project and Suffolk Coast & Heaths AONB | Minerals and Waste Key Diagram  
This does not accurately represent the full extent of the Special Protection Areas, Special Areas of Conservation or Ramsar designations. We advise that this is amended to show the full extent of such areas, including where they are present in the marine environment. | Proposed changes: Correct drafting errors. |
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<tr>
<td>E/9</td>
<td>Essex County Council</td>
<td>Policy GP4 – General environmental criteria</td>
<td>Proposed Changes: Amend the last paragraph of policy GP4 to state “It is recommended that applicants engage in pre-application discussions with the County Council, and the relevant external organisations, as a way of…”</td>
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<td>No objection to the policy as a whole but the following minor clarification is proposed: “The County Council It is recommended that applicants engage in pre-application discussions with itself the County Council and the relevant external organisations as a way of…”</td>
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<tr>
<td>E/83</td>
<td>Natalie Gates, Historic England</td>
<td>Environmental criteria, Policy GP4 and Policy MP6</td>
<td>Proposed Changes: Change the map key in section 7 to identify “scheduled monument” rather than “scheduled ancient monument”. Change the term “guidelines” in policy GP4 to “statutory legislation, statutory development plans, the National Planning Policy Framework and Planning Practice Guidance”</td>
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<td>We welcome the identification of Historic England as a statutory consultee in paragraph 4.10. We also would recommend changing the reference to a Scheduled Ancient Monument to a Scheduled Monument in paragraph 4.12 and on the key in paragraph 7.1 in line with the NPPF. We do have concerns about the drafting of Policy GP4 and supporting text. We note that GP4 expects that, “…proposals should…meet or exceed the appropriate national or local guidelines for each criterion, including reference to any hierarchy of importance, and also comply with other policies of the development plan.” We note that criterion f is the historic environment and heritage assets. In the hierarchy of planning the historic environment is protected through statutory legislation, then through statutory development plans (district and county), and then through the National Planning Policy Framework as a material consideration. None of these are ‘guidelines’, which is the next tier in the hierarchy of planning, namely the National Planning Practice Guidance. The current reference in the policy to guidelines should be amended to give the correct weight.</td>
<td>Change policy GP4 to make reference to avoidance of significant impact before mitigation. Add site specific minerals and waste polices that include where necessary reference to heritage assets.</td>
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We also are concerned about the reliance in this policy on the historic environment policies of the district and Borough council’s local plans. These policies will not have been drafted to take account of minerals and waste considerations and will vary from district to Borough. Paragraph 126 NPPF requires this plan to set out a positive strategy for the conservation and enjoyment of the historic environment. Critically paragraph 157 specifies that local plans should have a clear strategy for enhancing the natural, built and historic environment. The policy as currently drafted does not meet these requirements.

Whilst we would recommend a separate policy on the historic environment, what is specifically missing are requirements for what heritage assessment a proposal will need to undertake, how it relates to specific site selection or mitigations measures proposed, how uncovered heritage assets will be treated, and how restoration should be approached. We also would expect consideration to setting of heritage assets. All these aspects are absent from the policy. This is even more important with the absence of site specific policies. Currently, the site specific requirements for the historic environment are in the supporting text, some of which are set out in the site specific comments below.

We also are concerned about the phrase “potentially significant adverse impacts” and how that relates to the tests set out in the NPPF. Policy GP4 states that development will be acceptable when the proposals, where appropriate, adequately address the potentially significant adverse impacts. As a starting point, the policy should look to avoid impacts before consideration of mitigation. The statement on
potentially significant adverse impacts should not be separated from or come before a statement that proposals need to meet or exceed legislation and the NPPF, which currently is the case. The phrase itself, whilst useful in evidential terms for environmental assessment, is not robust enough for the tests of law and policy which the historic environment is measured against. It leaves potentially negative adverse impacts reliant on material considerations. This is a particular issue if those adverse impacts are cumulative, with Policy MP6 on cumulative environmental impacts not relating back to Policy GP4. Given the other policies all refer back to Policy GP4 and rely on GP4 to avoid repetition, we find that the policy as currently drafted is unsound.

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<th>E/154</th>
<th>Alison Collins, Natural England</th>
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| We have the following comments to make in connection with the following draft policies:  
  i) **Policy GP4 General environmental criteria**  
  We have no additions to make to the list of criteria but we query the use of the phrase ‘where appropriate’ as this seems to provide a level of uncertainty. We suggest adding the following text to ensure that the Local Plan can achieve a favourable HRA at this stage:  
  ‘Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitats Regulations at project application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the project will have to be refused or pass the tests of Regulation 62, in which case any necessary compensatory measures will need to be secured.’  

**Proposed Changes:**  
Remove phrase “where appropriate” from Policy GP4.  
Add the following supporting text.  
“Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitats Regulations at project application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the project will have to be refused or pass the tests of Regulation 62, in which case any necessary compensatory measures will need to be secured.”
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<th>E/108</th>
<th>Charlie Christensen, The Environment Agency</th>
<th>Although we generally agree with the principles that underlie this policy, we ask to be included as a relevant consultees in paragraph 4.10. We welcome that consideration of pluvial and fluvial flood risk is included within this policy, however we would like to see this policy incorporate flood risk from all sources, including tidal and groundwater flooding. It may also be useful to include a reference here to the SFRA, as well as indicating that development proposed in flood zones 2 or 3, or elsewhere if the site is larger than 1ha will require a Flood Risk Assessment (FRA). Our guidance 'Flood risk assessments: climate change allowances' should be used to inform the requirements of Flood Risk Assessments (FRA) for individual applications. We also support the inclusion of the local water environment as a factor to be considered. We would welcome reference here to the Water Framework Directive (WFD), outlining that development should have no adverse effect on water quality or WFD status. It should be made clear that the 'local water environment' includes both surface water and groundwater. Permits from us may also be required for potential developments, and we would like to see a reference to this in policy GP4, as the factors above would also need to be considered in a permit application. We would also like to see included here a recommendation for developers to contact us for pre-permit discussions.</th>
<th>Proposed Changes  Include Environment Agency as a relevant consultee in paragraph 4.10.  Add tidal and groundwater flooding as a consideration in policy GP4.  Add the development in flood zones 2 and 3 will require Flood Risk Assessment.  Add reference to Water Framework Directive.  Clarify that the local water environment includes both surface water and groundwater.  Amend the plan to state Environment Agency permits may be required for development.</th>
</tr>
</thead>
<tbody>
<tr>
<td>E/116</td>
<td>Fiona Cairns, Suffolk Preservation Society</td>
<td>Criteria f) refers to heritage assets but omits reference to their setting. This does not accord with the NPPF which at para. 132 sets out: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more</td>
<td>Proposed Change: Amend part f of Policy GP 4 to state “historic environment and heritage assets, including their setting”</td>
</tr>
<tr>
<td>E/73</td>
<td>West Suffolk District Council</td>
<td>The Council supports this policy although it is suggested that the invitation for pre-application discussions be incorporated within the support text rather than the policy itself.</td>
<td>Proposed Change: Move the invitation for pre-application invitation to the plans supporting text</td>
</tr>
<tr>
<td>E/78</td>
<td>James Meyer, Suffolk Wildlife Trust</td>
<td>We support the identification of biodiversity; neighbouring land use; soil resources; air quality; light pollution and the local water environment as receptors which may be impacted upon by minerals and waste developments. We recommend that the first line of the proposed policy is amended to “…adequately assess and address the potentially significant adverse impacts upon:”. Also, particularly with regard to biodiversity, the policy should ensure that the mitigation hierarchy (avoid, mitigate, compensate) is applied to all proposals.</td>
<td>Proposed change: Amend policy GP 4 to state “adequately assess and address the potentially significant adverse impacts upon…”</td>
</tr>
<tr>
<td>E/98</td>
<td>Simon Amstutz, Dedham Vale AONB &amp; Stour Valley Project and Suffolk Coast &amp; Heaths AONB</td>
<td>Policy GP4: “General environmental criteria Minerals and waste development will be acceptable so long as the proposals, where appropriate, adequately address the potentially significant adverse impacts upon: b) vehicle movements, access and the wider highways network; add and impacts on the rural road network in particular for non-motorised road users. c) landscape character, visual impact, and protected landscapes; add including significant adverse impacts upon the natural beauty and special qualities of the AONBs</td>
<td>Proposed changes: Amend policy where appropriate.</td>
</tr>
</tbody>
</table>
d) biodiversity; add associated with statutory protected sites and non-designated sites

e) geodiversity; add associated with statutory protected sites and non-designated sites

f) historic environment and heritage assets; including cultural heritage assets

g) public rights of way; “add and users enjoyment of the network

4. MINERALS POLICIES

**MP1: PROVISION OF LAND WON FOR SAND AND GRAVEL**

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<tr>
<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>E/9</td>
<td>Essex County Council</td>
<td>MP1 – Provision of land won for sand and gravel</td>
<td>Proposed Change: Add an assessment of other relevant information to supporting text.</td>
</tr>
</tbody>
</table>

The proposed allocations, amounting to 13,639mt of sand and gravel, against a calculated need based on the 10 year rolling average of 10.442mt is supported. Whilst it does not appear that there is an assessment of ‘other relevant information’ that may impact on future mineral supply, despite significant infrastructure projects planned for the county, it is noted that the proposed allocations equate to a total permitted reserve that satisfies the plan period even when the highest annual sale figure over the last 10 years is used as the basis of mineral release. It is however noted that the 10 year average of 1.158mt is below the latest period of sales (1.203mt, 2016) and as such monitoring will be required to ensure that this remains an appropriate basis to plan provision.
| E/62 | Mark E North, Mineral Products Association | **Para 5.1**  
We believe the text needs altering to make it clear that NPPF requires SCC to plan for a steady and adequate supply of aggregates. The following wording is suggested:  
**Proposed Changes** (deletions in strikethrough; new text in **bold**)

The NPPF requires that Minerals Planning Authorities, including Suffolk County Council, **should** plan for a steady and adequate supply of aggregates.

**Proposition of land won sand & gravel**

The statements contained within the section extending from para 5.23 to 5.30, which Policy MP1 is predicated, we believe will make the Plan **unsound** and not **effective** as they are not in accord with the NPPF. The reliance exclusively on the 10-year average is wrong in terms of National Planning Policy.

It is accepted that the National Guidelines are out of date and that this makes it a challenge for mineral planning authorities when producing new plans. While the NPPF (para145) indicates that 10-year sales average should be looked at in assessing demand, it also requires that **other relevant local information** be considered. Local factors that need to be taken into consideration are housing and commercial new build as well as highway and infrastructure proposals.

Furthermore, it needs to be made clear that the aggregate provision will be kept under review through the LAA process also considering the last 3 years aggregate sales as required by the Minerals PPG at Paragraph 5.1

| **Paragraph 5.1**  
Paragraph 145 of the NPPF states “In preparing Local Plans, local planning authorities should plan for an adequate supply of aggregates.

Taking into account a review after five years there is no need to provide a 7 year landbank at the end of the Plan period in order to maintain a landbank of at least 7 years.

**Proposed Change:**

Add an assessment of other relevant information, the 3 year average, the and the need to review has been added to the to the supporting text.
paragraph 64 to identify the general trend of demand as part of the consideration of whether it might be appropriate to increase supply. As currently proposed the Plan does not have this flexibility required by NPPF and PPG
On the topic of flexibility, it is important to recognise the 10 years up to 2016 (the end date proposed by Suffolk) saw a deep recession and therefore all the policy tools outlined above need to be used to ensure the Plan is sound and effective
Additionally, a clear statement need to be made about the review of the plan as required by PPG (Local Plans) para 008 which states that Local Plans will require reviewing in whole or part at least every five years. This will allow increased flexibility to allow the Plan to react to increased demand.
There also needs to be a commitment to have at least a seven-year landbank at the end of the plan period which the calculation in this section does take into account when considering the amount of provision required.
This section needs to be rewritten to properly reflect National Planning Policy and Guidance.

Policy MP1: Provision of land won for sand and gravel
The Policy is unsound and not effective for the reasons set out in the discussion above and needs to be redrafted to properly reflect NPPF. The Policy also needs to make it clear that at least 7 years of sand and gravel reserves will exist at the end of the Plan period.
In respect of the General Minerals Policies set out in Chapter 5, SOS disputes that it is necessary or sensible to plan for such a large over-provision. There is a shortfall of 10.422 Mt over the very lengthy 20 year plan period. Yet it is proposed to allocate land for 16.539 Mt. This is a 63% excess. Even assuming that only 13.639 Mt is worked during the plan period, that is a 31% excess. Mineral workings are not benign, but often result in complete displacement of land uses, noise and disruption to communities and to ecosystems and the disfigurement for lengthy periods of beautiful and historic landscapes. There is a completely inadequate justification in the consultation document for the gross overprovision in the plan, which will also act as a discouragement to investment in recycled aggregate products.

This gross over-provision can be addressed in part by deleting some of the poorest sites. SOS’s area of interest is inevitably spatially restricted and comments are confined to this area. Generally, we would ask where do we find consideration of the setting of the AONB and its hinterland, the Additional Project Area or the Dodnash Special Landscape Area?

The need calculated by the County Council to ensure a land bank until 2036 is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive.

E/87  Chris Hemmingsley, Brett

Policy MP1

Whilst it is accepted that the National Guidelines on apportionment are out of date, there are also concerns about using the National Planning Policy Framework (NPPF) supported 10 year sales average when assessing demand. Whilst in principle this is a reasoned

Taking into account a review after five years there is no need to provide a 7 year landbank at the end of the Plan period in order to maintain a landbank of at least 7 years.
## Proposed Change:
Add an assessment of other relevant information, the 3 year average, the and the need to review has been added to the to the supporting text.

### E/118 Ian Johns, Suffolk Coastal and Waveney District Councils

<table>
<thead>
<tr>
<th>Seven Years’ Land bank</th>
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<tr>
<td>Paragraph 1.4 refers to the need to maintain a land bank which could supply the equivalent of seven years’ sand and gravel demand. The provision of additional sand and gravel will be important in increasing levels of housebuilding and so it will be important to understand the land bank in the context of the need to increase housebuilding in the future.</td>
</tr>
</tbody>
</table>
Paragraph 5.25 states that the predictions for future sand and gravel requirements are based on sales over the previous ten years. This is a reasonable basis for predicting future use but it potentially does not take into account major proposed developments in Suffolk Coastal and Waveney Districts, including the potential construction of Sizewell C and residential development at Adastral Park. These developments could have a significant impact upon future demand but are not taken into account by an analysis of previous sand and gravel sales.

**Marine Dredging**

Paragraph 5.19 refers to the dredging of sand and gravel from the seabed. While it is agreed that this can help to meet the requirements for sand and gravel reference should be made to the East Inshore Marine Plan (2014). This is to ensure that terrestrial and marine planning is properly integrated and to ensure that there are no conflicts with other marine uses.

| E/66 | Sean Denny CEMEX | Chapter 5 Minerals Policies
Paragraph 5.1

This paragraph should be revised to clarify that one of the Development Plan’s aims is to ensure the steady and adequate supply of aggregates as stated by the National Planning Policy Framework (NPPF) (deletions in strikethrough, additional text in **bold**): -

“The NPPF requires that Minerals Planning Authorities, including Suffolk County Council, **should will** plan for a steady and adequate supply of aggregates.”

**Paragraphs 5.23 – 30**

| Proposed Change: | Paragraph 5.1
Paragraph 145 of the NPPF states “In preparing Local Plans, local planning authorities **should** plan for an adequate supply of aggregates.

Taking into account a review after five years there is no need to provide a 7 year landbank at the end of the Plan period in order to maintain a landbank of at least 7 years.

**Proposed Change:**
The apparent reliance exclusively on 10-year average sales of aggregate does not reflect government guidance contained within MPPG paragraph 064 and as a consequence the Company believes the draft Plan is unsound. Whilst paragraph 145 of the NPPF advises that 10-year sales average should be considered when assessing demand, it also advises that other relevant local information be considered. Local factors that need to be taken into consideration are housing and commercial new build as well as highway and infrastructure proposals. Furthermore, it needs to be made clear that the aggregate provision will be kept under review through the LAA process, also considering the last 3 years aggregate sales as required by the Minerals PPG at paragraph 064 to identify the general trend of demand as part of the consideration of whether it might be appropriate to increase supply. Whilst the Minerals Planning Authority (MPA) may be intending to do this it is not clear as the supporting text to Policy MP1 does make a specific reference. The Company believes that the Plan should explicitly state that other relevant local information, including 3 year average sales of aggregates, will be used when seeking to forecast future aggregate provision. The Plan should also make a specific commitment to maintain at least a seven-year landbank of sand and gravel planning permissions at the end of the Plan period which the calculation in this section does not take into account when considering the amount of provision required. 

*Policy MP1: Provision of land won for sand and gravel*

Add an assessment of other relevant information, the 3 year average, the and the need to review has been added to the supporting text.
This policy should be redrafted to better reflect guidance provided by both NPPF and MPPG regarding factors relevant to the provision of aggregates and the maintenance of a landbank of permission of at least seven years at the end of the Plan period.

**Policy MP2: Proposed sites for sand and gravel extraction**

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<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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<tbody>
<tr>
<td>E/108</td>
<td>Charlie Christensen, The Environment Agency</td>
<td>Policy MP2 – Proposed sites for sand and gravel extraction. Policy MP2 details specific proposed sites for sand and gravel extraction. We have specifically looked at each of these sites under section 7.</td>
<td>County Council responses to site specific comments will be made in the appropriate section of the document.</td>
</tr>
<tr>
<td>E/78</td>
<td>James Meyer, Suffolk Wildlife Trust</td>
<td>We note the sites proposed for sand and gravel extraction and that these will be granted planning permission subject to other relevant policies within the Local Plan. We have a number of comments and concerns about the proposed sites, please find our detailed responses set out in the “Proposed Minerals Sites” section below. It is important that it is recognised that minerals extraction sites offer the opportunity for habitat creation as part of their restoration. This recognition should be included in the site allocation policies for any proposed sites and the policies must ensure that ecological enhancements are secured as part of any...</td>
<td>The Council is including site specific policies in the next draft of the plan and will consider the suggestions for site specific ecological measures. The details of working, restoration and after-use would be considered at the detailed planning application stage.</td>
</tr>
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</table>
extraction proposals. We would be happy to be involved in further discussion on restoration schemes to help maximise the biodiversity opportunities of such schemes.

E/66 Sean Denny CEMEX  

Policy MP2: Proposed Sites for Sand and Gravel Extraction  
The Company wholly supports the identification of site j) Wangford as a site where the County Council will grant planning permission for the winning and working of sand and gravel subject to other policies in the Plan. The following documents are submitted in support of this draft designation:
- A revised Supporting Information spreadsheet;
- An arboricultural assessment of the trees within the identified area;
- A discussion note considering policy guidance provided by paragraph 116 of NPPF;
- Concept working and restoration schemes;
- An outline landscape and visual assessment;
- A draft Agricultural Land Classification assessment, and;
- A revised geological assessment.

The Company proposes to revise the extent of the area it has promoted as suitable for the winning and working of mineral to that illustrated by drawing no. 17_C005_WANG_003 by excluding Field 2 from further consideration.

It is acknowledged that the site lies within the Suffolk Coast and Heaths Area of Outstanding Beauty (AONB), and in recognising this a discussion note relating to guidance provided by paragraph 116 of NPPF is submitted in support of the site’s identification. NPPF guidance must be considered as whole however, and paragraphs 115 and 116 must be balanced against

Noted
paragraphs 142 and 144, i.e., the great weight that should be attached to conserving the landscape and natural beauty of AONBs must be balanced against the essential role minerals play in sustainable economic growth, that they can only be worked where they occur and that great weight should also be attached to the benefits of mineral extraction.

Given Wangford Quarry’s position in the AONB there are no extensions to the existing workings that would not lie wholly within it. The attached discussion note details the Company’s methodology for seeking to replace the existing quarry, which at current rates of production will cease to operate by the end of 2019. It concluded that there were three potential extensions to the quarry, all within the AONB, and a fourth ‘stand alone’ option that lay partly within the AONB. All these options apart from Lime Kiln Farm have been rejected by the Minerals Planning Authority, and the ‘stand alone’ option proved unsuited to the Company’s needs after exploratory drilling revealed that the aggregate within the site was insufficiently coarse, which is a particular and sort after characteristic of aggregate from the Wangford area (this is explained in more detail within the enclosed discussion note and geological summary).

As a result of the Outline Landscape and Visual Assessments commissioned by the Company to inform its submissions to the Minerals Planning Authority it is of the view that a scheme can be developed which will conserve the landscape and scenic beauty of the AONB whilst the quarry is operational. Once working is complete and the site’s restoration completed the same will both be enhanced and make a significance contribution to the biodiversity of the area will be made. When coupling this to the economic benefits of Lime
Kiln Farm, the lack of alternatives, the disbenefits of alternative sources of aggregate supply and the loss of employment and investment opportunities that will result from the closure of the quarry (all these factors are considered in more detail within the discussion note) the Company is strongly of the view that the balance falls in favour of identifying the site for the extraction of sand and gravel.

**Policy MP3: Borrow Pits**

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<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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</table>
| E/9    | Essex County Council | **MP3 – Borrow pits**
The 10km limit is questioned and would need to be fully justified. Supporting paragraph 5.35 notes that ‘Borrow pits are in the Suffolk context sand and gravel workings used exclusively for a particular construction project’. This need for a proposed borrow pit to exclusively facilitate the development of a particular construction project is not a requirement of the policy as currently drafted. The current policy wording links the borrow pit to a project by virtue of distance only and the policy does not seem to act to stop extraction continuing beyond that required for the particular construction project.

It is considered that the policy may be more effective if the distance limit is removed and the policy is redrafted to echo the requirement of paragraph 5.35 in that the material from borrow pits should be used exclusively for a particular construction project. The policy could also require the applicant to demonstrate an overriding justification or benefit as to why a borrow pit is more appropriate than relying on existing allocated sites.

Suffolk County Council do not consider that the applicant needs to justify an overriding justification for the borrow pit over existing sites as the purpose of borrow pits is that they are closer to the construction project and in many cases, do not need to use the public highway; making them more sustainable to use, due to reduced carbon emissions from transport and reduced impact on local highways. This is also the reason for the distance limit is included.

Borrow pits are attached to specific projects through a condition and would not be able to continue extracting beyond a particular construction project unless the operator applied for a variation of condition, which would be judged against the other policies within the plan.
| E/62 | Mineral Products Association | **Borrow Pits**<br>The text in para 5.35 reasonably explains the purpose of a borrow pit. The last sentence is key and states that; **The main advantage of borrow pits is that they are normally very close** (emphasis added) to the construction project and are often connected to that project by routes which do not use the public highway. Therefore, it seems odd that the Policy MP3 requires that borrow pits are within 10KM of the project site. In such a case how is it possible to stay off the public highway as indicated in 5.35. It is accepted that a borrow pit is usually adjacent and contiguous to the engineering project it serves.<br>While recognising the sustainability advantages of borrow pits providing mineral to adjacent engineering projects it is important that there is a level playing field for traditional existing and allocated quarries and the capital expenditure invested. As such it is felt that the policy is not effective needs redrafting and suggested wording is set out below:<br><br>**Proposed Changes** (deletions in strikethrough; new text in **bold**)<br><br>**Policy MP3:** Borrow pits to provide sand and gravel to serve major civil engineering projects will be acceptable as long as:<br>they are within 10 km of the project site;<br>the borrow pit is worked and reclaimed as part of the project;<br>they comply with the general environmental criteria Policy GP4.<br>While some borrow pits within the 10km range may need to use highways to transport material to the specific project, provided there is not significantly adverse impacts to the highway network, as stated in part “b)” of Policy GP4, which cannot be mitigated. |
The supply of sand and gravel will be drawn from existing or allocated sites. Sand and gravel borrow pits will only be considered where it is demonstrated that:

a. geographically they are well related to the project they will serve;
b. the quantity and timescale for the supply of sand and gravel may not pose problems of supply from existing quarries, or prejudice the steady supply of construction material for the local market;
c. an unacceptable level of mineral traffic, and / or movements of unsuitable material arising from the scheme, will be removed from the public highway and / or from passing through local communities;
d. the site will be restored within the same timescale as the project to which it relates, and that restoration can be achieved to an approved scheme if it is only part worked;
e. there will be no importation of materials other than from the project itself unless required to achieve beneficial restoration as set out in an approved scheme.

| E/70 | Mike Jones, RSPB | Whilst smaller than typical mineral allocation, the restoration of these sites to wildlife-rich habitats typical of the local landscape can provide important opportunities to provide areas for wildlife in the wider countryside and can provide sites of importance for public experience of wildlife. | This comment is noted. In terms of restoration borrow pits will be held to the same standard as a normal site. Preference is given to restoration proposals incorporating net gain for biodiversity, as per Policy MP7 |
| E/87 | Chris Hemmingsley, Brett | Whilst welcoming policy MP3 in regard to the potential use of 'Borrow Pits', we would reiterate our comments from the Issues and Options consultation in that |  |
flexibility should be brought into the policy to ensure that an existing quarry may also be considered to supply major civil engineering projects. The benefits of one compared to another should be evaluated on a case by case individual merits basis ensuring that a borrow pit does not overtly impact on the continued supply of mineral from, or adversely impact on the restoration of, existing quarry sites.

**Policy MP4: Agricultural and Public Supply Reservoirs**

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<tbody>
<tr>
<td>E/108</td>
<td>Charlie Christensen, The Environment Agency</td>
<td>Policy MP4 – Agricultural and public supply reservoirs Policy MP4 relates to the extraction of minerals to enable the construction of a reservoir for agriculture, flood alleviation and/or public water supply. We welcome this policy. In flood risk terms, sand and gravel would be classed as water compatible development, however we would not want to see the storage of heaps within the flood plain.</td>
<td>Noted</td>
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**Policy MP5: Recycled Aggregates**

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<th>Representation</th>
<th>SCC Response</th>
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</thead>
<tbody>
<tr>
<td>E/9</td>
<td>Essex County Council</td>
<td>Policy MP5 – Recycled aggregates Policy MP5 should be expanded to ensure that temporary recycling facilities do not unduly prejudice the agreed restoration timescales for mineral development at a particular location, or state that the time limit of the temporary facility will be linked to the expiration date of the quarry. Linked to this is the need to consider whether the recycling facility should be conditioned to only accept material arising from the</td>
<td>Proposed Change: Delete Policy MP5 and incorporate policy content within Policy WP8.</td>
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</tbody>
</table>
quarry it is co-located with. Such an approach is already advocated in Policy MP9 in relation to concrete batching plants and asphalt plants.

### POLICY MP6: CUMULATIVE ENVIRONMENTAL IMPACTS AND PHASING OF WORKINGS

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<th>SCC Response</th>
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<tbody>
<tr>
<td>E/9</td>
<td>Essex County Council</td>
<td>Policy MP6 – Cumulative environmental impacts and phasing workings</td>
<td>Your comment regarding the limitations of policy M6 are noted and changes are proposed, to lift the restriction of cumulative impact to minerals and waste development.</td>
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<td>It is questioned why this policy limits itself to the cumulative impact of mineral workings. The principle espoused by the policy holds true irrespective of whether the cumulative impact arises from two mineral sites or any other proposal which gives rise to environmental impacts on a temporary basis, such as any major construction operation. Whilst it is recognised that as the MWPA, non-mineral or waste planning applications and developments are outside of the remit of SCC, the need to mitigate against cumulative impacts that stem only in part from mineral and waste development is not. As such, it is appropriate to expand this policy to refer to cumulative impacts from development in general, and not just those which are minerals and/or waste related.</td>
<td>Propose Change Change policy MP6 to state “Where a proposed minerals site is considered acceptable (in its own right) but the cumulative impact of a proposal in conjunction with other existing, permitted or allocated minerals sites, or other kinds of development, in the proximity is considered unacceptable, the proposal may be considered acceptable if phased so that one site follows the completion of the other or it can be demonstrated that the adverse cumulative impacts can be adequately mitigated.”</td>
</tr>
<tr>
<td>E/54 and M46</td>
<td>Peter Orrock, Mineral Services Ltd</td>
<td>Cumulative environmental impacts and phasing of workings remained unchanged from the Issues &amp; Options Consultation document. I note that the National Planning Policy Framework, paragraph 43 (bullet point 6) which states that “in preparing Local</td>
<td>The existing wording is preferred.</td>
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</table>
Plans, local authorities should:…take into account the cumulative effects of multiple impacts from individual sites in a locality.

Policy MP6 as set out states “Where a proposed minerals site is considered acceptable (in its own right) but the cumulative impact of a proposal in conjunction with other existing permitted or allocated sites in the proximity is considered unacceptable, the proposal may be considered acceptable if phased so that one site follows the completion of the other or that it can be demonstrated that the adverse cumulative impacts can be adequately mitigated.”

Minerals can only be worked where they occur and mineral site are often in close proximity to each other. It is understood that there may be cumulative impacts by two sites working in the same locality but to rely on the phasing of two sites, run fro example by two different opertaors, may lead to one site simply closing down to prevent another coming forward. This would stifle competition and distort the market supply.

It is therefore suggested that the Policy MP6 might be reworded as follows: Where a proposed minerals site is considered acceptable(in its own right) it must be demonstrated that the adverse cumulative impact of the proposal in conjunction with other existing, permitted or allocated sites in the proximity can be adequately mitigated.”

| E/87 | Chris Hemmingsley, Brett | Policy MPG | It is noted that the cumulative environmental impacts and phasing of workings policy remains little changed from the Issues & Options Consultation document. Whilst the NPPF states that in preparing Local Plans, | The NPPF and Planning practice guidance recommend plans include policies on cumulative impact. It is considered appropriate that a |
local authorities should '... take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality', we would reiterate our comments from the previous consultation response in that minerals can only be worked where they occur and given that mineral sites are often in close proximity to each other. It was demonstrated in the last MLP review at a site in Kirton that phasing of sites, particularly cross-operator, is unfeasible and lead to a site being stymied by another operator’s site. Therefore, it is considered that physical location of mineral and market demand should drive the need argument with cumulative impact being a matter to be addressed through the screening/scoping exercise as part of the EIA process and be looked at on a site by site basis at the detailed application stage.

cumulative impact policy is included in this plan.

<p>| Policy MP7: Progressive working and restoration |
|---|---|---|---|
| Number | Respondent | Representation | SCC Response |
| E/9 | Essex County Council | Policy MP7 – Progressive working and restoration |
|  |  | The second paragraph would benefit from minor rewording: “Preference will be given to restoration proposals that incorporate a net gain for biodiversity with the creation and management of priority habitats and that support protected priority and Red Data Book Species and/or that conserve geological and geomorphological resources.” It is also considered that this policy references the multi-faceted benefits that a ‘green infrastructure’ approach to mineral site restoration can bring. Mineral site restoration creates a strong opportunity to ‘start again’ with regard to the landscape and restoration outcomes could be linked with any existing green | Your comments are noted and the following change is proposed to address it. Proposed Change: An additional sentence will be added to policy MP7: “Ecological restoration proposals should also link with existing habitats.” |</p>
<table>
<thead>
<tr>
<th></th>
<th>Infrastructure work already carried out at the County or district level.</th>
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<tbody>
<tr>
<td><strong>E/54 and M/46</strong></td>
<td>Peter Orrock, Mineral Services Ltd</td>
</tr>
<tr>
<td></td>
<td>This policy begins with the exact wording of DC8 namely “Proposals for new mineral working should be accompanied by a scheme for the progressive working and restoration of the site throughout its life” which is supported.</td>
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<td></td>
<td>Policy MP7 continues “Preference will be given to restoration proposals that incorporate a net gain for biodiversity with the creation and management of priority habitats and that supported protected priority habitat and Red Data Book Species and/or that conserve geological and geomorphological resources. Such habitats, species and resources should be appropriately and sustainably incorporated into restoration proposals focussed on flood alleviation, reservoirs, agriculture, forestry, amenity or ecology.</td>
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<td>This second part of Policy MP7 is based on DC7 which states, in the second sentence that “Preference will be given to after-uses that promote the creation and management of priority habitats listed in the Suffolk BAP and/or that conserve geological and geomorphological resources.”</td>
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<td>The introduction of a “net gain for biodiversity” was not considered in the Issues and Options Consultation and may lead to undue complication. It is understood that preference will be given to after-uses that promote the creation of priority habitat etc but the calculation for a net gain for biodiversity is complex and will change both according to the time period and also with the future management of the land.</td>
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<td>The revised wording of the Policy allows for non ecology based restorations to be approved whilst at the same time incorporating an ecological component.</td>
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| E/83 | Natalie Gates, Historic England | **Progressive working and restoration & Policy MP7 and Aftercare & Policy MP8**
Management of progressive workings and how sites are restored can be critical to appropriate mitigation measures for the historic environment. Neither policy refers to the historic environment. | The historic environment is covered under Policy GP4. |
|------|--------------------------------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| E/108 | Charlie Christensen, The Environment Agency | **Policy MP7 – Progressive working and restoration**
We would like to see a stronger statement about restoration and post-extraction use in terms of planning for ecological benefits. We would also like to see that ecological measures ‘should’ be incorporated, not ‘can’ be incorporated in paragraph 5.40.
It should be noted that restoration projects may also require a permit under the Environmental Permitting Regulations or require watercourses to be remodelled. | The existing wording is preferred. |
| E/78 | James Meyer, Suffolk Wildlife Trust | We support the intention of this policy to ensure that restoration proposals secure net gain for biodiversity. Restoration of minerals sites offers significant opportunities for enhancing biodiversity, including to help meet local and national targets for habitat creation. The minerals planning system has the potential to play a fundamental role in halting biodiversity loss and creating a coherent and resilient ecological network1. | Noted |
We therefore, consider that it is important that this policy secures maximum ecological enhancements as part of all restoration proposals.

E/87  Chris Hemmingsley, Brett  Whilst generally supportive of the opening paragraph of this policy; "... Proposals for new mineral working should be accompanied by a scheme for the progressive working and restoration of the site throughout its life", we continue to have concerns in regard to the second paragraph and in particular the emphasis on, and preference for, biodiversity restoration. Whist noting the words 'net gain' and appreciating the potential for flexibility here, we would look to encourage a wider list of alternative restoration and aftercare uses be extended to include inter alia; agricultural, forestry, flood alleviation/ water resource and amenity. It is considered that restoration policy needs to be more flexible with proposals being judged on a site basis and on their own merits.

The policy does include a list of potential restoration options, however moving development towards net-biodiversity gain is part of the National Planning Policy Framework, and can be incorporated into the other forms of restoration you have listed. Paragraph 9 states that perusing sustainable development “involves moving from a net loss of bio-diversity to achieving net gains for nature” and minerals site restoration is a good opportunity to contribute to this aim as well as Suffolk’s aspiration to ‘Creating the Greenest County’.

E/98  Simon Amstutz, Dedham Vale AONB & Stour Valley Project and Suffolk Coast & Heaths AONB  Policy MP7: Progressive working and restoration  A requirement for applicants to address landscape character and quality should be included in Policy MP7.  This aspect is covered under Policy GP4.
measures for the historic environment. Neither policy refers to the historic environment.

| E/108 | Charlie Christensen, The Environment Agency | Policy MP8 relates to aftercare. There should be liaison with Natural England, the Suffolk Wildlife Trust and other relevant bodies to develop long-term plans for these sites to maximise ecological benefits and work towards delivering high quality habitats that support important species. | Natural England and Suffolk wildlife trust will be consulted regarding planning applications and involved in maximising ecological benefits of restorations. |
| E/78 | James Meyer, Suffolk Wildlife Trust | We support the intentions of this policy, however a five-year strategy should be considered an absolute minimum length and where possible a longer term strategy should be secured to ensure that the benefits of the restorations proposals are maximised. | Five years is the minimum time that required by planning practice guidance and there is the opportunity within the policy to have longer aftercare periods. The County Council will seek longer periods where necessary. |
| E/98 | Simon Amstutz, Dedham Vale AONB & Stour Valley Project and Suffolk Coast & Heaths AONB | **Policy MP8: Aftercare** An aftercare strategy of just 5 years fails to offer sufficient scope to secure long-term benefits for landscape and biodiversity. We recommend that this term is substantially increased. | Five years is the minimum time that required by planning practice guidance and there is the opportunity within the policy to have longer aftercare periods. The County Council will seek longer periods where necessary. |

**POLICY MP9: CONCRETE BATCHING PLANTS AND ASPHALT PLANTS**

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**POLICY MP10: SAFEGUARDING OF PORT AND RAIL FACILITIES, AND FACILITIES FOR THE MANUFACTURE OF CONCRETE, ASPHALT AND RECYCLED MATERIALS**

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<td>E/9</td>
<td>Essex County Council</td>
<td><strong>Policy MP10 – Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials</strong></td>
<td>A minimum distance of 250m should be specified in the policy and will be added. The intended mechanism by which the</td>
</tr>
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</table>
The need to safeguard these facilities is agreed with. However, the implementation of the policy will be greatly aided by prescribing a particular distance from a safeguarded facility within which this policy would apply. The policy and its supporting text does not mention that many of the applications that could compromise the ability of mineral infrastructure to operate in conformity with its planning permission are likely to be non-mineral and/or waste based and as such would not be submitted to the MWPA in the first instance. A policy seeking to safeguard mineral infrastructure from non-compatible development will need to establish a consultation mechanism between the MWPA and the relevant LPA to ensure that the MWPA are alerted of any potential development that could compromise mineral infrastructure. 250m is the standard distance used to denote the distance where safeguarding policies apply.

The Minerals Products Association

Safeguarding of port and rail facilities, and facilities for the manufacture of concrete and asphalt

We welcome the fact that SCC have identified the requirement to have a separate safeguarding policy for the above facilities. However, as currently drafted we do not believe the policy is fully effective. Firstly, the sites to be safeguarded should be listed and shown on the policy map, and secondly inappropriate development in the proximity of safeguarded should be dealt with in a more explicit way in the policy as this can also have the

LPA will inform the MWPA of planning applications is the that geographic Information Systems (GIS) data of each site with a 250m buffer will be provided to the LPA, along with the new Minerals Consultation Area. This data can be added to LPA’s systems which highlight constraints. This process is proven to work as the LPAs currently consult Suffolk County Council as the MWPA regarding developments that take place within the current minerals consultation area. It will simply be a case of providing LPAs with updated data when the plan is adopted. We shall outline this in explanatory text.

Propose Changes:
Include a minimum distance of 250m from the site boundaries of facilities within which the policy would apply. Describe the consultation mechanism implemented with the policy.

A minimum distance of 250m should be specified in the policy and will be added.

These sites are listed and identified on maps of the Issues and Options Draft of the Plan in the tables of appendix 3. The tables indicate which map the sites are identified on. Orange boundaries on the maps indicate the boundaries of the site while blue boundaries indicate the
effect of frustrating the operation of the safeguarded site/operation. It is suggested that the policy is redrafted as follows; Proposed Changes (deletions in strikethrough; new text in bold)

Policy
When proposals are made which would result in the loss of or might potentially compromise the use of:
Minerals ancillary infrastructure sites identified on the Policies Map, with a 250m buffer zone, will be safeguarded against development which would prevent or frustrate the use of the site for minerals ancillary infrastructure purposes such as:
  a) an existing, planned or potential rail head, wharf or associated storage, handling or processing facilities for the bulk transport by rail or sea of minerals, including recycled, secondary and marine-dredged materials, and/or;
  b) an existing, planned or potential site for concrete batching, the manufacture of coated materials, other concrete products or the handling, processing and distribution of substitute, recycled and secondary aggregate material;
applicants will be required to demonstrate to the County Council that those sites no longer meet the needs of the aggregates industry. Where this is not the case, satisfactory alternative handling facilities should be made available by the developer. Development proposals in close proximity to the above minerals related facilities should demonstrate that they would not prejudice or be prejudiced by those facilities. Where development is proposed within an identified buffer zone permission will be granted where adequate mitigation can be provided to reduce any impacts from the existing or proposed adjacent

250m buffer, but we accept this should be specified in the policy of the text.

Proposed Changes
Include a minimum distance of 250m from the site boundaries of facilities within which the policy would apply. Describe the consultation mechanism implemented with the policy.
<table>
<thead>
<tr>
<th>E/87</th>
<th>Chris Hemmingsley, Brett</th>
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<tr>
<td><strong>minerals ancillary infrastructure uses to an acceptable level without impacting the existing or proposed level of operations of the minerals operation; and the benefits of the proposed use outweigh any safeguarding considerations.</strong></td>
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</table>
| **Policy MP10**  
We very much welcome the policy recognition for the safeguarding for port, rail, concrete, asphalt and recycled materials facilities both in terms of development pressures on these safeguarded sites but also from direct/ indirect impact from existing and proposed surrounding land uses. We would however, seek for this policy to go further and place the onus on the developer of a surrounding land use to mitigate against the impact of the existing safeguarded land use upon their new development (the principles of the 'agent of change' policy which has recently been used in the Draft London Plan). |
| **Marine Aggregates**  
Further, and again notwithstanding Policy MP10 and comments made in regard to this policy, I wish to reiterate the importance of marine aggregates within the Suffolk market. Given the prevailing sandy nature of the minerals reserves within Suffolk, there is a demonstrable need for a consistent and reliable supply of stone which is successfully supplied through the Brett site at Ipswich Wharf. Brett is committed to maintaining this vital facility and will actively seek options to enhance the wharf operation as required/ available to support the Suffolk market including the wide ranging forthcoming construction projects within the County (eg. Housing Growth and major infrastructure projects).  
Brett very much welcome the safeguarded status of the wharf, the definition of such within the safeguarding |
| **It is the intention of the County Council that development that comes forward within the vicinity of a safeguarded minerals has the responsibility of mitigating issues which arise due to this proximity. It was a question that was asked at consultation events and this was our answer, however it could be made clearer in the plan.** |
| **Proposed Change**  
Cla**rify that the onus of mitigation when development takes place within the vicinity of a safeguarded minerals site is on the developer, not the operator of the site.** |
maps along with recognition of safeguarding the Brett Facility at Ipswich wharf against direct and or indirect impact from existing and proposed surrounding land uses.

| E/66 | Shaun Denny, CEMEX | **Policy MP10: Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials**  
That such a policy is proposed is welcomed, but it felt that it could be made more effective. The sites to be safeguarded should be listed and shown on the policy map so as to clarify which sites are subject to the policy, and proposed inappropriate development in proximity of the identified safeguarded sites should be dealt with in a more explicitly. It is suggested that the policy is redrafted as follows (deletions in strikethrough, additional text in **bold**):  

- **Minerals ancillary infrastructure sites identified on the Policies Map, with a 250m buffer zone, will be safeguarded against development which would prevent or frustrate the use of:**  
a) an existing, planned or potential rail head, wharf or associated storage, handling or processing facilities for the bulk transport by rail or sea of minerals, including recycled, secondary and marine-dredged materials, and/or;  
b) an existing, planned or potential site for concrete batching, the manufacture of coated materials, other concrete products or the handling, processing and distribution of substitute, recycled and secondary aggregate material;  
applicants will be required to demonstrate to the County Council that those sites no longer meet the needs of the | Amended wording preferred |
aggregates industry. Where this is not the case, satisfactory alternative handling facilities should be made available by the developer. Development proposals in close proximity to the above minerals related facilities should demonstrate that they would not prejudice or be prejudiced by those facilities.

*Where development is proposed within an identified buffer zone permission will be granted where adequate mitigation can be provided to reduce any impacts from the existing or proposed adjacent minerals ancillary infrastructure uses to an acceptable level without impacting the existing or proposed level of operations of the minerals operation; and the benefits of the proposed use outweigh any safeguarding considerations.*

### POLICY MP11: MINERALS CONSULTATION AND SAFEGUARDING AREAS

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<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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| E/9    | Essex County Council| **Policy MP11 – Mineral consultation and safeguarding areas**  
Mineral safeguarding approaches vary between mineral planning areas and there is no objection to the approach set out here. However, based on previous experience, a number of modifications are suggested alongside further considerations. It is also noted that Essex County Council are preparing an SPD to cover what is a particularly technical area.  
The threshold of 1ha for sand and gravel is considered small and SCC may wish to increase the size of this. It is however acknowledged that an appropriate threshold will be determined by the extent of the mineral resource in the county. For information only, the adopted Essex Minerals Local Plan (MLP) sets the sand and gravel | Proposed Changes: Increase the screening threshold to five hectares. |
safeguarding threshold at 5ha. It is also unlikely that SCC will need to be consulted on every development type that accords with any thresholds. Consideration should be given to a screening protocol to ensure that SCC is only consulted on appropriate development types.

It is also advised that consideration is given with regard to whether to include sites already allocated through extant Development Plans as being within the scope of this policy. The Essex MLP mirrors the approach put forward by SCC but consideration will be given to modifying this approach in Essex when the MLP is reviewed. This is because Local Plans in the county may be recently adopted prior to the future adoption of the SCC MWLP and therefore not subject to the safeguarding policies contained within the MWLP at the point allocations were made in district Local Plans. This will mean that there may be some districts in the county with allocations extant for 15 years into the future that have not been appropriately subject to safeguarding provisions.

Policy MP11 states that “The County Council will, when consulted by the Local Planning Authority, object to such development unless it can be shown that the sand and gravel present is not of economic value, or that the mineral will be worked before the development takes place”. It is considered that more detail is required with regard to a consultation mechanism between the MWPA and LPA and how a developer should evidence the quality of any mineral at their proposed development site. Essex County Council acting as the MPA in Essex request that mineral resource assessments are carried out at the locations of potential developments with 5ha or over lying within a sand and gravel safeguarding area. These mineral resource
| E/119 | Gladman Developments | assessments are to be informed by borehole information and describe the quality and quantity of resource present, and any constraints that may impact on its excavation. Further, the need for prior extraction can significantly impact on project timescales and design. Therefore consideration will need to be given as to how SCC can raise the issue of prior extraction as early into the design phase of any development as possible. Essex County Council has worked closely with all Essex LPAs with regard to prior extraction at the site allocation phases of their individual Local Plans. |
|       |                    | The proposed Policy MP11 ‘Minerals Consultation and Safeguarding’ seeks to manage minerals resources by way of ‘Minerals Consultation and Safeguarding Areas’ (MC&SAs).

It is vital that any safeguarding policies of this nature are suitably flexible in nature to ensure that decision makers can take an appropriately balanced view between the need to safeguard mineral resources and the need for the planning process to support the development that the area requires to meet its strategic housing and economic needs.

The supporting text of the Plan at paragraph 5.46 makes reference to paragraph 143 of the National Planning Policy Framework. However, it fails to recognise that Paragraph 143 states that in preparing local plans, local planning authorities should set out policies to encourage the prior extraction of minerals, where practicable and feasible if it is necessary for non-minerals development to take place and that plans should not create a presumption that defined mineral resources will be worked. Furthermore, the Planning Practice Guidance requires minerals local plans to

**Proposed changes:**
Add reference to “and is practicable and environmentally feasible” to the last sentence of the first paragraph.
provide clear development management policies which set out how proposals for non-minerals development in Minerals Safeguarding Areas will be handled. Gladman acknowledges the need for some level of protection of mineral assets, but is of the view that the local policy framework that relates to this should be positively framed and must recognise that competing development needs will need to be suitably assessed in decision making.

Any policies and supporting text relating to MC&SAs should explain how a minerals planning authority and the relevant local planning authority will respond in relation to any proposals for non-minerals development within minerals safeguarding areas. The Plan’s proportionate evidence base should provide justification for the minerals safeguarding areas and the minerals consultation areas on the policies map should then be based on these safeguarding areas in line with paragraph 143 of the Framework.

Gladman consider that minerals safeguarding policies should avoid any wording that indicates that a minerals planning authority will object to non-minerals development in Minerals Safeguarding Areas as a matter of default. In the case of MP11, there is an exception that minerals should be worked unless they are not of economic value or can be worked before development takes place. However, this is not considered to reflect the intention of the Framework, which specifically seeks to avoid a presumption that mineral resources will be worked and simply looks to encourage prior extraction, where practicable and feasible. A more pragmatic method should therefore be expressed through ‘MP11’ and its supporting text to
acknowledge that the Minerals Planning Authority will support an approach whereby a suitably balanced view can be taken by the relevant local planning authority when making an assessment of the wider merits of non-minerals development within a Minerals Safeguarding Area. Any such approach can act to encourage the prior extraction of minerals, but should not require it. The policy should set a clear and positively framed criteria based approach against which proposals for non-minerals development within appropriately defined Minerals Safeguarding Areas can be assessed in the context of the requirement to address wider development needs and the presumption in favour of sustainable development.

E/118  Ian Johns, Suffolk Coastal and Waveney District Councils  Buffer Zones  Suffolk County Council proposes to protect all sand and gravel areas in the County by the imposition of a buffer zone around each area to prevent sterilisation of the sand and gravel resource by adjacent development. Further information would be useful to inform the Local Plan site assessments of sites located within sand and gravel resources that are not currently active.

All known sites with planning permission or proposed sites in the existing and draft Plans are already included.

5. **Waste Policies**

**Policy WP1: Management of Waste (Mt)**

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<tr>
<td>SM/112</td>
<td>Eddie Wilkinson</td>
<td>Comment refers to paragraph 6.4 and the policy aim to have &quot;net self-sufficiency&quot; - managing an amount of waste within Suffolk equal to that arising in Suffolk. EPRL owns and operates a long-standing power station at Eye Airfield - EPRL Eye (c12MW). This manages around 140,000 tonnes per annum of poultry litter, waste wood and other</td>
<td>The term net self sufficiency does not preclude the importation or exportation of waste across the Suffolk County Border.</td>
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Agricultural residues to generate c90,000 MWh. Eye Power Station was commissioned in 1992 and employs around 30 full time employees with many more associated indirect jobs. Since 1992 Eye Power Station has by necessity been flexible and changed its fuel mix. Occasionally this has required changes to Eye Power Station's planning permission and environmental permit. Looking ahead, Eye Power Station may again need to amend its fuel mix, and one possible scenario is burning 100% or a proportion of SRF/RDF. Such a change would require a change to planning and environmental permit, involve significant capital expenditure. In such circumstances, it is possible that SRF/RDF would be required from outside Suffolk, although we would seek to minimise any travelling distance to minimise associated carbon footprint, environmental impact and transportation costs. We request that Suffolk's Minerals & Waste Plan is amended to explicitly recognise the re-fuelling opportunity at Eye Power Station and permit the sourcing of SRF/RDF on a commercial basis, even if that is outside of Suffolk.

| SM/182 | Trevor Jessop | Probably WP1. As a parish councillor I have limited time to thoroughly read and digest this document and have failed to find the relevant section that talks solely about the demand for and provision of landfill sites. Recently the local press (EAST) has reported that Suffolk Coastal District Council are to levy a charge on the 'brown bins' used for the recycling of garden and food waste. When asked what affect this would have on waste disposal from households if occupiers, previously relying on these bins, | This is outside the scope of this consultation. |
could not now afford them the answer given that such previously recycled waste could be put in the general (landfill) grey wastebins. Apart from this being a total reversal of what recycling and sustainability means it would appear that the demand for landfill shall increase as a result of this stupidity and I can find no mention of this in the consultation documents.

E/9 Essex County Council

<table>
<thead>
<tr>
<th>Paragraph 6.7</th>
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<tr>
<td>Clause a) should be clarified with regard to whether there is no identified shortfall in waste management at the present time only, or whether this also applies to forecasted capacity requirements across all waste streams to the end of the Plan period. It would be useful to clarify in clauses g) and h) that whilst sites are not being actively sought or planned for with regard to these waste streams, criteria exist by which such facility types could come forward should the market wish to bring them forward.</td>
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Policy WP1 – Management of waste (Mt)

It is unclear why SCC waste capacity requirements is a policy, which also says that ‘appropriate waste management facilities will be granted planning permission’ when paragraph 6.7 Clause a) states that ‘there is no identified shortfall in waste management facilities at the present time’. Please see above request for clarification of paragraph 6.7 Clause a). If any waste capacity gap over the plan period is identified, Policy WP1 should explicitly confirm this.

Suffolk County Council agrees with suggestions to clarify clauses a), g), h) and policy WP1

Proposed Changes

Provide additional clarification as suggested, to clauses a), g) and h) and waste policy 1.

E/108 Charlie Christensen, The Environment Agency

<table>
<thead>
<tr>
<th>Provision of waste management facilities</th>
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<td>In general we consider the plan’s proposed policies to be mostly sound, but we would question, in relation to</td>
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This is a landuse Plan concerned with the delivery of minerals and waste development. Waste reduction and re-

Assessment Suffolk County Council
paragraph 6.3, why a plan that is active until 2036 only concerns itself with recycling. We would like to see waste moved up the hierarchy from recycling towards prevention, and this is an ideal opportunity to consider ways to make this happen. Over the plan period, social and cultural changes in lifestyle are likely to continue to lead to changes in waste composition. Therefore prevention, or reuse at the very least, should be promoted in order to discourage the ‘throw away’ society, encourage behaviour change and support a circular economy. Recycling technology and innovation may not be able to keep up with new waste streams – preventing waste in the first place will allow time for these technologies to catch up.

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<th>Policy WP2: Proposed site for waste management</th>
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<th>Policy WP3: Existing or designated land-uses potentially suitable for waste development</th>
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| E/9 | Essex County Council | **Paragraph 6.11**  
For clarity, the wording ‘this policy’ should be replaced with ‘Policy WP3’. | Proposed changes:  
Replace words “this policy” in paragraph 6.11 with the words “Policy WP3”. |
| E/79 | Malcolm Robinson, Hacheston Parish Council | **WP3 - the use of land for open air composting should not be encouraged in particular in the vicinity of villages or housing.** | Agree. Open air composting sites can be acceptable as long as they comply with the criteria in Policy GP4 which considers the location of sites and mitigations to safeguard any nearby residents from issues that may arise, such as odours. |

**Policy WP4: Household Waste Recycling Centres**

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**Policy WP5: Open Air Composting**

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| E/9    | Essex County Council | **Paragraph 6.13**  
Re-word to read “The windrows must be turned regularly, turned to prevent over-heating and anaerobic conditions forming, which can give rise to odours”.  
**Policy WP5 – Open air composting**  
“Any temporary planning permissions will be linked to the time limits relating to the landfill activities on site”. It is assumed this includes restoration but not any potential aftercare. What is meant by ‘landfill activities’ should be more specifically defined. | Reworking to paragraph 6.13 and clarification to WP5 agreed.  
**Proposed Changes**  
Reword paragraph 6.13 as suggested.  
Clarify ‘landfill activities’ in policy WP5. |
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<th>Representation</th>
<th>SCC Response</th>
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| E/9    | Essex County Council | **Policy WP6 – In-vessel composting facilities**  
“Any temporary planning permissions will be linked to the time limits relating to the landfill activities on site”. It is assumed this includes restoration but not any potential aftercare. What is meant by ‘landfill activities’ should be more specifically defined. | Agreed  
**Proposed Changes**  
Clarify ‘landfill activities’ in policy WP6. |
| E/79   | Malcolm Robinson, Hacheston Parish Council | **WP5 – open air composting as a waste processing methodology should be discouraged in particular in the vicinity of villages or housing.**  
Agree. Open air composting sites can be acceptable as long as they comply with the criteria in Policy GP4 which considers the location of sites and mitigations to safeguard any nearby residents from issues that may arise, such as odours. Policy WP5 requires schemes for odour and dust management and a full site specific risk assessment which considers nearby dwellings and workspaces. |  
Policy WP6 – where in-vessel composting is deployed as a waste processing methodology appropriate site licences or permits should be issued and effective regulation and enforcement action taken in particular with regard to odour and noise.  
Agree. Policy WP6 requires schemes for the management of odours and dust. Policy GP4 requires proposals to address potential noise impacts. A permit would also be required from the EA. |
### Policy WP7: Anaerobic Digestion

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<td>E/9</td>
<td>Essex County Council</td>
<td>Policy WP7 – Anaerobic Digestion</td>
<td>Agreed</td>
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<td>&quot;Any temporary planning permissions will be linked to the time limits relating to the landfill activities on site”. It is assumed this includes restoration but not any potential aftercare. What is meant by ‘landfill activities’ should be more specifically defined.</td>
<td>Proposed Changes&lt;br&gt;Clarify ‘landfill activities’ in policy WP7.</td>
</tr>
<tr>
<td>E/108</td>
<td>Charlie Christensen, Environment Agency</td>
<td>We would highlight that it may not be feasible for facilities to operate on a temporary basis at a landfill. Infrastructure costs associated with waste management facilities can be a substantial commitment, especially for anaerobic digestion where reliable feedstocks and access to power connections to the grid are required. Together with the length of time it could take for planning permission to be granted these issues could make such facilities uneconomic. It should be noted that a permit for such works may be required from us. We would recommend contacting us to discuss any permitting requirements.</td>
<td>Noted but clause included just in case such a proposal comes forward for anaerobic digestion and in other policies for other types of waste installation.</td>
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### Policy WP8: Proposals for Recycling or Transfer of Inert and Construction, Demolition and Excavation Waste

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<tr>
<td>E/9</td>
<td>Essex County Council</td>
<td>Policy WP8 – Proposals for recycling or transfer of inert and construction, demolition and excavation waste</td>
<td>Suffolk County Council agree with the points regarding policy MP5 and the</td>
</tr>
</tbody>
</table>
This policy overlaps with Policy MP5 although it includes the following informative which is not included within Policy MP5 - “At mineral sites, planning permission will be limited to the life of the mineral operation”. If there is a desire to separate CDE recycling policies into separate mineral and waste ones, it is advised that any reference to such facilities on mineral sites should be deleted from this policy and kept solely in Policy MP5.

It is uncertain why this waste management facility type can continue to exist at a landfill site and extend the lifetime of these sites when this option is forbidden for other waste facility types. As currently drafted, this policy could lead to continued waste management operations / industrial uses in the open countryside. Where the policy states “On land suitable for General Industrial or Storage & Distribution uses, activities shall take place within purpose-designed facilities”, it is considered useful to include the appropriate Use Class Order codes.

**Proposed changes:**
In response Policy MP5 has been deleted and Policy WP8 amended to tie the life of the recycling to the landfill.

---

**E/87 Chris Hemmingsley, Brett**

WP8

Whilst generally supportive of Policy WP8, we do have concerns in regard to the second paragraph that states ‘At mineral sites, planning permission will be limited to the life of the mineral operation’. We would suggest that the policy be modified so as not to preclude the retention of such recycling facilities post landfilling should it be demonstrable that this site remains the most suitable location for such ongoing working subject to planning consent.

Clause will remain to prevent development within the open countryside.

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<th>Number</th>
<th>Respondent</th>
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<th>SCC Response</th>
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</table>
| E/9    | Essex County Council     | Policy WP9 – Waste transfer stations, materials recycling facilities, end of life vehicle facilities and waste electrical and electronic equipment recovery facilities  
“Any temporary planning permissions will be linked to the time limits relating to the landfill activities on site”. It is assumed this includes restoration but not any potential aftercare. What is meant by ‘landfill activities’’s | Suffolk County Council will clarify in this policy to remove need for assumptions. Proposed Change Clarify what is meant by ‘landfill activities’' |

### Policy WP10: Residual Waste Treatment Facilities

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<tr>
<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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</table>
| E/9    | Essex County Council     | Policy WP10 – Residual waste treatment facilities  
“Any temporary planning permissions will be linked to the time limits relating to the landfill activities on site”. It is assumed this includes restoration but not any potential aftercare. What is meant by ‘landfill activities’’s should be more specifically defined. | Suffolk County Council will clarify in this policy to remove need for assumptions. Proposed Change Clarify what is meant by ‘landfill activities’’ |

### Policy WP11: Approval of Sites for Disposal of Inert Waste by Landfilling or Landraise

<table>
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<tr>
<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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<tbody>
<tr>
<td>E/9</td>
<td>Essex County Council</td>
<td>Policy WP11 – Approval of sites for disposal of inert waste by landfilling or landraise</td>
<td>The wording of the current policy is</td>
</tr>
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</table>
Consideration should be given to expanded Policy WP11 for landraising proposals other than agricultural improvements – such as those projects defined in the Chief Planning Officer letter linked below:


considered to be appropriate in terms of types proposals.

<table>
<thead>
<tr>
<th>E/87</th>
<th>Chris Hemmingsley, Brett</th>
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<tr>
<td></td>
<td>In relation to section c) of policy WP11, we would seek clarity on the meaning of the term ‘.... no acceptable alternative form of waste management..’. Further we would suggest that the policy be clarified such that the test applied is either a), b) or c).</td>
</tr>
</tbody>
</table>

Proposed changes:
Make a) and b) alternatives.
Insert “further up the Waste Hierarchy” after waste management in clause 3.

POLICY WP12: DISPOSAL OF NON-HAZARDOUS WASTE BY LANDFILLING OR LANDRAISE.

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<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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<tbody>
<tr>
<td>E/108</td>
<td>Charlie Christensen, Environment Agency</td>
<td>Policy WP12 deals with the disposal of non-hazardous waste by landfilling or landraise. Non-hazardous waste and inert landfill will need to be assessed with reference to our Groundwater Protection documents, particularly Position Statement E1 that addresses location.</td>
<td>Proposed Change: Add note that the disposal of non-hazardous and inert waste by landfill will need to be assessed with reference to Environment agency Groundwater Protection documents</td>
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</table>
### Policy WP13: Mining or Excavation of Landfill Waste

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<th>Number</th>
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<td>N/A</td>
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### Policy WP14: Waste Water Treatment Facilities

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<td>N/A</td>
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### Policy WP15: Transfer, Storage, Processing & Treatment of Hazardous Waste

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<th>Respondent</th>
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<th>SCC Response</th>
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<tbody>
<tr>
<td>E/9</td>
<td>Essex County Council</td>
<td>Policy WP15 – Transfer, storage, processing &amp; treatment of hazardous waste</td>
<td>Proposed change: Provide definition of “small proportion”</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Policy WP15 states that “Facilities for the transfer and short-term storage of hazardous waste will also be acceptable on existing waste management sites identified as having potential for non-hazardous waste transfer where hazardous waste will only represent a small proportion of waste managed on site”. It is considered that what is meant by a ‘small proportion’ needs to be better defined. The Environment Agency may be able to provide advice as to what is an appropriate proportion.</td>
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<tr>
<td>Number</td>
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<td>Representation</td>
<td>SCC Response</td>
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| E/110  | Owain Griffiths, GVA Grimley Ltd | Proposed Policy WP16 As set out in the previous representations, the NDA and Magnox support the proposed new Policy WP16 (Treatment and Storage of Radioactive Waste at Sizewell Nuclear Power Stations). However, they would request that minor changes are made to the policy title and wording for clarity, and to ensure consistency with NDA strategy (which represents national strategy for decommissioning, radioactive waste management and land remediation within the NDA estate) and national planning policy. As such, it is requested that that the draft policy is reworded as follows (suggested changes underlined in red): “Policy WP16 (Treatment and Storage of Radioactive Waste at Sizewell Nuclear Power Stations) Planning permission for the treatment and/or interim storage of radioactive waste at Sizewell Nuclear Power Stations will be granted within the licensed areas subject to the applicant demonstrating that the proposed development:
   a) is consistent with national strategies for decommissioning and radioactive waste management;
   b) there are exceptional circumstances why the development is justified within the Suffolk Coasts & Heaths Area of Outstanding Natural Beauty;
   c) includes adequate measures to mitigate adverse impacts on the environment. | Existing wording is preferred |
and local community or, as a last resort, proportionately compensate for or offset such impacts;
d) is supported by robust economic and environmental assessments;
e) utilises the existing rail link in preference to road, for the transportation of the radioactive waste unless it is demonstrated to be economically unviable where practicable.
f) the proposals comply with the environmental criteria set out in Policy GP4."

It is noted that the policy applies to all nuclear power stations at Sizewell, which have separate licensed areas. It is suggested that the policy refers to ‘radioactive waste management’ rather than ‘treatment and interim storage.’ This more accurately reflects the on-site requirements at Sizewell, which may not be limited to treatment or interim storage. The NDA Strategy refers to ‘integrated waste management’ and provides more specific detail beneath this term.

The NDA and Magnox welcome clause (a), which recognises the significance of national strategies which govern the waste management and the decommissioning and remediation process, and requires proposals to be brought forward in line with these national strategies. For clarity, we request that the supporting text makes reference to the latest versions of the relevant strategies.

It is our considered view that clause (b) should be removed from the Policy as it repeats national
planning policy in respect of major developments within AONBs, and would be over prescriptive for any developments that are not considered ‘major’. The National Planning Policy Framework (NPPF) states at paragraph 116 (in reference to National Parks, the Broads and AONBs) that “planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest”, before going on to detail assessments required. Given that the NPPF restricts the requirement to demonstrate ‘exceptional circumstances’ to major developments in respect of AONBs, it would be inappropriate, and not in accordance with the NPPF, to require such demonstration in relation to developments within an AONB which are not considered ‘major’.

Although Policy WP16 suggests that clause (d) relates to the applicant’s economic and environmental assessments, the NDA and Magnox would be grateful for further clarification of the meaning of “robust economic and environmental assessments” within the supporting text to the policy. With respect to clause (e), the NDA and Magnox request the use of “where practicable” instead of “unless it is demonstrated to be economically unviable” in order to ensure consistency with NDA strategy wording. It is also suggested that clause (f) be removed, as it is considered superfluous to require compliance with another policy which would be applicable to development proposals in
any case. The NDA and Magnox would like to ensure that the Minerals & Waste Local Plan recognises and supports the development and activities required in connection with the decommissioning and remediation process (including those associated with waste management). These works may include the development of new buildings and other required facilities and potentially the in-situ management of waste (both radioactive and non-radioactive). The NDA and Magnox would also like to draw the Council’s attention to the emerging policy2 and regulatory guidance concerning site remediation and site end states. The Environmental Regulators’ draft guidance3 will require Magnox (and other Nuclear Site Licence holders) to review the site-wide waste management approach to identify and deliver an optimised site end state. This includes consideration of options for in-situ disposal of existing sub-surface structures and the approach to managing land contamination. This guidance should inform the policy context for radioactive waste management at Sizewell ‘A’, and

| Policy WP 17: Design of Waste Management Facilities |
|---|---|
| **Number** | **Respondent** | **Representation** | SCC Response |
| E/83 | Natalie Gates, Historic England | We welcome the identification of the natural, built and historic environment in Policy WP17. The policy would be improved by specific consideration of setting. | Proposed Change: Include reference to setting in policy WP17 |
The tautology between d) and e) may need to be re-examined. 

**Proposed change:**
Delete “are” at the end of the last sentence.

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**Policy WP18: Safeguarding of Waste Management Sites**

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<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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<tbody>
<tr>
<td>E/9</td>
<td>Essex County Council</td>
<td>The need to safeguard these facilities is agreed with. However, the implementation of the policy will be greatly aided by prescribing a particular distance from a safeguarded facility within which this policy would apply. The policy and its supporting text does not mention that many of the applications that could compromise the ability of waste infrastructure to operate in conformity with its planning permission are likely to be non-mineral and/or waste based and as such would not be submitted to the MWPA in the first instance. A policy seeking to safeguard waste infrastructure from non-compatible development will need to establish a consultation mechanism between the MWPA and the relevant LPA to ensure that the MWPA are alerted of any potential development that could compromise waste infrastructure. 250m is the standard distance used to denote the distance where safeguarding policies apply although this typically increases to 400m for Water Recycling Centres.</td>
<td>Propose Changes: Include a minimum distance of 250m from the site boundaries of facilities within which the policy would apply. Describe the consultation mechanism implemented with the policy.</td>
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6. **Barham**

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<tr>
<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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<tbody>
<tr>
<td>E/64</td>
<td>Philip Cobbold</td>
<td></td>
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I act for Mr K Elman of The Lodge, Church Lane, Barham IP6 0QE. My client has instructed me to object to the Suffolk Minerals & Waste Local Plan. My client’s property is within 100m of site M1 (at Barham) as illustrated on Map MS8. Mr Elman is extremely concerned that mineral extraction from the site will have a significant and detrimental impact on his amenity in terms of dust and noise disturbance from the mineral extraction process and from the resulting HGV movements within and to and from the site. Mr Elman also considers that the local road network is unsuitable for the HGV movements that would be generated and that consequently, the development would impact on highway safety. My client is very concerned that the details of the proposed minerals site, as set out at pages 43 to 46 of the consultation document, does not even include any assessment of how the mineral extraction would impact on residential amenity. The Council must carry out a detailed impact analysis before making any decision on site M1. I would be grateful if you could acknowledge receipt of this email.

### Amenity
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses.

It is expected that standard noise mitigation, such as earth screening bunds will be adequate to prevent harm to amenity. However, an assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the mitigation measures required and protect nearby residents and businesses.

### HGV Movements
The HGV movements would be in line with the current activities that have already been consented with vehicles.
would travel to Shrubland Quarry. The visibility exiting the quarry has been assessed as good.

**Information in the Plan**
The site information provide in the plan is high level. More detailed information is required if a planning application is submitted, which will include assessments regarding amenity, highways (both previously mentioned), and other aspects. Applications are viewable by the public and the public can also make a representation at this stage.

<table>
<thead>
<tr>
<th>E83</th>
<th>Natalie Gates, Historic England</th>
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<tr>
<td></td>
<td>This site is within the setting of a Registered Park and Garden which also is on the Heritage at Risk Register. This has not been identified in the summary in chapter 8. Paragraph 8.15 has a typographical error “preservation in sit.”</td>
</tr>
</tbody>
</table>

The County Council will make reference to the Registered Park and Garden. The typographical error will be corrected.

**Proposed Changes**
Add reference to Registered Park and Garden and also Heritage at Risk Register
Correct typographical error “preservation in sit” in paragraph 8.15.

<table>
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<tr>
<th>E154</th>
<th>Alison Collins, Natural England</th>
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</table>
|       | **8. Barham**
The proposed southern extension to Barham Quarry appears to include a section of Sandy Lane Pit, Barham SSSI which is notified for its quaternary geology. We note that the plan states that Restoration would entail the importation of inert fill materials, but would need to maintain access to the geological deposits that the SSSI is noted for (section 8.2). |

As already indicated in the supporting text any planning application submitted for this site would be expected to include a full assessment of designated areas and provide detailed avoidance/mitigation measures for significant negative impacts against the SSSI. A
For clarity, we have no objection to the quarrying operations within the SSSI but we would have serious concerns about a proposal to backfill with inert materials within the SSSI as it would prevent access to the notified interest feature and would render the SSSI in effect ‘part destroyed’. Rather, we are looking for restoration and after-use post extraction that maintains access to the geological deposits that the SSSI is notified for. In the case of this SSSI, it isn’t necessary to keep the fairly soft sands and gravels bare of vegetation. This is acceptable whilst permitted extraction is continuing but post extraction, we advise the former pit faces need to have a light covering of herbaceous vegetation to stop them eroding, i.e. we are looking for the faces to be kept in a way that allows easy re-exposure when necessary. We therefore seek confirmation that there will be no backfilling within the SSSI boundary. We do not have any concerns with the northern expansion of the quarry.

E/70 Mike Jones, RSPB

Barham

Potential impacts on wildlife
Turtle dove and nightingale are likely to be present in this area based on available information. Given the conservation importance of these species, we recommend that surveys are carried out to identify areas used by these species, and opportunities are sought to retain any suitable habitat during the working of this site. This could include, for example, marginal scrub and hedgerows.

Restoration
We note that the Site Selection Report proposes that the quarry area will be restored to an agricultural afteruse.

Paragraph 9.18 outlines the potential ecological impact this site may have, which includes the priority species and other protected species. The County Council would expect appropriate surveys and taking account of these and other ecological issues to inform mitigation and a programme of restoration.

The plan is an in principle document and detailed assessment of each site is not feasible. The plan and the habitats regulation assessment outline potential
We recommend that the restoration of this site should incorporate habitats for nightingale and turtle dove, due to their likely presence in the wider area. This would be in accordance with draft minerals policy MP7, which states that: “Preference will be given to restoration proposals that incorporate a net gain for biodiversity with the creation and management of priority habitats and that support protected priority and Red Data Book Species and/or that conserve geological and geomorphological resources. Such habitats, species and resources should be appropriately and sustainably incorporated into restoration proposals focussed on flood alleviation, reservoirs, agriculture, forestry, amenity, or ecology.” Specific measures for turtle dove that could be employed both during quarry management and restoration can be found in Annex 1 to this letter. The BTO leaflet ‘Managing Scrub for Nightingales’ contains advice about the creation and management of habitat for nightingale, which could also be incorporated into management and restoration plans.

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<thead>
<tr>
<th>E/108</th>
<th>Charlie Christensen, The Environment Agency</th>
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<tr>
<td></td>
<td>The northern extension to the quarry could damage a sinuous belt of woodland within the boundary along Dangerous Lane. To determine whether any loss of important natural asset would occur, landscape and habitat surveys should be carried out with a specific focus on this area. It might be beneficial to retain the woodland strips as a buffer between the pit and Local Wildlife Site woodland to the north.</td>
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</table>

Impacts of the Barnham site, with detailed assessments and appropriate, avoidance, minimisation and mitigation details expected at the planning application stage.

**Changes proposed:**

Add reference to Turtle Dove and Nightingale to the Plan.

Any planning application for this extension must include ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (such as the SSSI), must be submitted as part of the planning application for the site. It is expected that this woodland will be taken into account in these surveys.
| E/116 | Fiona Cairns, Suffolk Preservation Society | **Listed Buildings**  
Barham – the proposed extension to the south of an existing quarry will bring the site to within 350m of the grade 1 listed Church of St Mary. The document asserts that it will have only minor impact on the setting of this heritage asset. However this conclusion is based only upon Historic England’s previous assessment of the impact of the original site during the course of the preparation of the previous Plan. The reliance of out-of-date representations is inadequate and a more thorough assessment at the pre-allocation stage is required. | While the site extension does bring the quarry closer to the Church of St Mary, it was determined through site visits that the extension would not have any further significant impact on the setting of the listed building. |
| E/78 | James Meyer, Suffolk Wildlife Trust | Barham  
We note that this site was previously included in the Suffolk Minerals Specific Site Allocations DPD, we also note the conclusions of the ecology section relating to this site (section 8.16). In addition to the ecological receptors identified, extensions in this location could result in adverse impacts on UK Priority habitats (such as hedgerows and deciduous woodland) and UK Priority species (including birds such as turtle dove and linnet). The proposal could also result in adverse impacts on badgers.  
It must be ensured that any extraction proposal in this location adequately assess the likely impacts on biodiversity and includes appropriate mitigation measures. It must also be ensured that any extraction delivers a restoration plan which significantly enhances the biodiversity value of the area. We understand that the existing proposal is to return the site to agricultural use, however the current site is currently developing value for biodiversity and we therefore request that an alternative restoration scheme, to a more ecologically beneficial use, is secured. | A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations must be submitted as part of the planning application for the site. The County Council Envisages that this site will be restored to agriculture and conservation. Policy MP7 of the plan gives preference to restoration schemes that provide biodiversity net gain, which will encourage sites to be restored to be more ecologically beneficial. |
### 7. Barnham

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<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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</table>
| SM/12  | Mrs Colette Skelly      | The proposed site at Barnham, I object to for the following reasons: 1) Environmental, this process doesn't have sufficient filtration to the atmosphere to stop the increased dust in the air. The distance from the site to a village is not acceptable, due to the effect on people’s health and the environment. The wind will carry a high proposition of this dust to the village. This will affect health, and the environment to the village. The other environmental issue is noise, again the noise will be carried to the village that will critically effect the village environment. 2) The planning proposal cannot make sufficient requirement to stop the transportation lorries from entering the village. Once the lorries are on the high way they can choose to cut through the village. This will be detrimental to a quite village life. The village also has a school. This would have detrimental effects on the safety of the children in the school. 3) The proposed area has also has historic evidence of a Mustard gas factory. The area was also used as a test site. There is a critical risk that the area would have uncovered mustard gas. This is a high risk to environmental health. | 1) Environmental Concerns  
County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable for amenity to nearby residents and the village.  
County Noise Consultants state that a standoff in addition to standard mitigation may be required. This will be identified at the planning application stage.  
2) Lorry Movement Concerns  
Lorries will not go through Barnham Village. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106. It is possible to use a planning condition to make sure that when accessing the highway the lorries must turn a certain direction. This route does take Lorries past the Elveden Church of England Primary School, however conditions can be placed on the planning permission (if necessary). |
the village and the residence and also the project itself. This reason on its own would therefore state that the proposed location is not suitable. If this proposal has been put forward for Barnham location there must be a risk assessment available for the residence to see the basis of this proposal. 4) I would also like to understand if this proposal will effect the current valuation of my property and who will pay the difference of the current valuation to what it would be in the future if this proposal is accepted. 5) The Barnham proposal is over and above the required quota for extraction. Due to all the evidence above and this reason, this proposal must be rejected, as it doesn't make commercial or environmental sense to continue with the Barnham proposal, with the risk to environmental and public health plus the critical risk to people due to the potential contamination within the ground that is highly likely to uncover mustard gas! 6) I would also like to know if there has been a survey carried out on the water table and the effects this might have on this, such as flooding which will effect home insurance etc. 7) I would also like to know if there is any long term affects on building structure and foundation / subsidence. 8) I was informed that the site would not be used as landfill is this correct?

<table>
<thead>
<tr>
<th>3) Mustard Gas</th>
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<td>It is the County Council’s understanding that the mustard gas contamination is within little heath and the works, south of the site, and that there is sufficient distance between the site and potential contamination areas. However, it can be added to the plan as a consideration to be aware of.</td>
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<table>
<thead>
<tr>
<th>4) Property Values</th>
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<td>Property values are not a planning consideration.</td>
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<th>5) Quota for Extraction</th>
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<td>The estimated of need for sand and gravel is based on the last ten years of sales in the county, which is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be approved) in order to prevent interference with school drop off and pick up times.</td>
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refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive.

6) Water and flooding
Ground water and flooding has been considered as part of the site selection process and the site size has been decreased from its initial proposed size partly because of flood risks. An assessment of the ground water and flood risk will need to be submitted as part of any planning application as the site is within a Groundwater Source Protection Zone.

7) Structural effects
There should be sufficient distance between the extraction area and any nearby structures to prevent this issue, especially as it is likely there will be a standoff buffer between extraction areas and nearby residents and businesses.

8) Restoration of the site
The site will not be used as a landfill for household or business waste. Some inert waste (i.e. soils) may be used to assist with restoration.

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SM/96  Simon Ford  Re Barnham Quarry, we would like to object to this proposal - Given where Barnham is situated, there is no suitable route for HGV Lorry Movements
<table>
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<tr>
<th>Traffic to use to get to the majority of Suffolk as there is not a junction from the A11 to A14. This will force HGV traffic to use C633 through Barnham village or the B1106 through West Stow; this has the potential to damage these small roads (who will be responsible for repairs). The lorry route will also be passing the local school. Due to the position of the proposed quarry in relation to Barnham village, this will be directly in line with the prevailing wind, hence bringing dust and noise across the village. This can be demonstrated by a noise and smell issue from a company operating at Little Heath Barnham in 2016. The current landscape is next to a SSI and as such is used by lots of wildlife and is also a great beauty spot, what will this look like for the next 30 years, can the current wildlife withstand this time period of disruption. We are not convinced that the replacement after the quarry has moved will reflect the existing area; this will become a “sterile” landscape. Can the working hours be restricted to 9 – 5 Monday to Friday, weekend disturbance is NOT acceptable.</th>
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<tbody>
<tr>
<td>There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site. Lorries will not go through Barnham Village. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed is to take the lorries left at the crossroads onto the B1106, to Brandon, where they will access the wider haulage network via the A1065. This route does take Lorries past the Elveden Church of England Primary School, however conditions can be placed on the planning permission (if approved) in order to prevent interference with school drop off and pick up times.</td>
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**Air Quality**

County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage and Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable.

**Noise pollution**

County Noise Consultants state that a standoff in addition to standard mitigation may be required. This will be identified at the planning application stage.

**Ecology and Landscape**
The site is a designated SSSI. Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme that satisfies the County Council must be submitted as part of the planning application for the site.

**Working Hours**
Currently the proposed working hours are from 7am to 7pm on week days and 7am to 2pm on Saturdays with no working on Sundays. Specific working hours can be enforced as a planning condition.

**Ecology and Landscape**
The proposed site sits within a Special Landscape Area, Special Landscape Area and a Site of Special Scientific Interest. Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme that satisfies the County Council must be submitted as part of the planning application for the site.

<table>
<thead>
<tr>
<th>SM/158</th>
<th>Carole Youngs</th>
<th>BARNHAM QUARRY</th>
<th>Turning this area into a quarry would severely detract from the visual aspect of Thetford Heath nature reserve and impact the adjoining byway with a consequential loss of amenity. There is a relatively low density of footpaths and byways in this part of East Anglia, compared to other parts of the country and consequently negative influences on a long stretch of byway have a relatively greater overall impact.</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/159</td>
<td>Carole Youngs</td>
<td>BARNHAM QUARRY</td>
<td>The current application uses, as part of its basis, the original area granted planning permission to extract materials in November 2012. This original application was granted for Public Rights of Way (PRoW) With regards to footpaths, the County Council will seek to retain public rights of way through planning condition. There is one PRoW abutting the west of the site. A standoff with a bund will also be required to protect the</td>
</tr>
<tr>
<td>SM/171</td>
<td>Charles Merrifield</td>
<td>A great deal has already been said about this proposal to which I vehemently object on grounds already made clear. I am concerned that it would appear no one has asked the Elveden Estate as to whether or not they have carried out any form of research as to the possibility of other areas of gravel bearing land on their 22000 acres which may be less controversial. Could you please confirm either way if this question has been asked.</td>
<td></td>
</tr>
<tr>
<td>SM/177</td>
<td>Ed Wyer</td>
<td>I wish to object to the site at Barnham near Thetford being included in the WMLP. This site sits in a conservation area and has never been worked as a quarry so it cannot be classified as a working quarry. There are environmental issues that would affect the village of Barnham and in particular the houses situated close to the site, some of which are not included on the maps or the site description. I do not believe it amenity of users of the PRoW. There is also a PRoW within 200m to the east of the site, which must be retained.</td>
<td></td>
</tr>
</tbody>
</table>

**Site Selection**
During the Issues and Options consultation the County Council put out a call for sites, with this extension being one of the submissions. The County Council can only consider these submitted sites and it is at the landowner’s discretion if they want to propose an other alternative site on other land they own.

**Air Quality**
County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage and Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable.

**Noise pollution**
would be possible to protect properties from
dust and noise despite stand off areas being
built. A factory at Trimay Industrial site caused
major noise and air pollution despite being
over a mile away from the nearest house and
separated by woodland and topography. This
quarry site is much closer and would be a
significant environmental health risk to the
local residents. Most important would be the
threat to the ecology of the area. It is a SSSI,
an SPA, it sits in the Brecks special landscape
area and is inhabited by many rare species.
Why is this area being considered when there
must be other areas on the Elveden Estate that
could be used as a quarry. Have other areas
been tested? The site has conditions, which
require it to be returned to its original state, and
these conditions are due to be implemented in
the near future. These conditions were applied
to protect the landscape so any extension or
enlargement of the area must compromise this.

County Noise Consultants state that a
standoff in addition to standard mitigation
may be required. This will be identified at the
planning application stage.

Ecology and Landscape
The proposed site sits within a Special
Landscape Area, Special Landscape Area
and a Site of Special Scientific Interest. Site
phasing and restoration, should protect and
then restore affected habitats and
landscapes, by ensuring only part of the site
is extracted at one time. The site will be
restored to an agricultural use or nature
conservation.

Site Selection
During the Issues and Options consultation
the County Council put out a call for sites,
with this extension being one of the
submissions. The County Council can only
consider these submitted sites and it is at the
landowner’s discretion if they want to
propose an alternative site on other land they
own.

The Currently Permitted Site.
Once a planning application is submitted the
County Council will seek to place conditions
on the site for restoration to nature
conservation or agriculture, which is the
current use of the site.
<table>
<thead>
<tr>
<th>SM/180</th>
<th>Tony Watling</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Too many lorries already in Barnham area - it’s dangerous and polluted as it is. The proposed work would make this much, much, worse. Also in consultations one person said 18 lorries, another person said 35 lorries, and the written policy says 60 lorries, per day, so that is not clear and a bit disingenuous. The Breckland area is one of outstanding beauty and of special scientific interest, with special and protected flora and fauna. This would be destroyed by the proposal. There would be too much pollution and noise, and disruption and dangerous roads. House prices would also plummet. I strongly object to the proposed site at Barnham!</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Lorry Movements</th>
</tr>
</thead>
<tbody>
<tr>
<td>We would like to apologise for any confusion about the levels of lorry traffic for this site. There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site. The site information in the draft plan does state 60 lorry movements a day, after however further discussion with the potential site operator, Mick George, about expected extraction rates it was decided that 36 movements would be the more accurate estimate. Lorries will not go through Barnham Village. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ecology and Landscape</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme that satisfies the County Council must be submitted as part of the planning application for the site.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>House Prices</th>
</tr>
</thead>
<tbody>
<tr>
<td>House prices are not a planning consideration.</td>
</tr>
<tr>
<td>DR/2</td>
</tr>
<tr>
<td>------</td>
</tr>
</tbody>
</table>
| **Effect on the water table.** Restoration work – what are the plans? Dust/noise/effect on local habitats. Loss of a tenanted farm and food production. We don’t eat gravel. Local housing – negative effect on property values. Will it eventually become a landfill site? | **Water and Floods**
Ground water and flooding has been considered as part of the site selection process and the site size has been decreased from its initial proposed size partly because of flood risks. An assessment of the ground water and flood risk will need to be submitted as part of any planning application as the site is within a Groundwater Source Protection Zone. |
| **Air Quality**
County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable | **Noise pollution**
County Noise Consultants state that a standoff in addition to standard mitigation may be required. This will be identified at the planning application stage. |
| **Ecology and Landscape**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme that satisfies the County Council must be submitted as part of the planning application |
for the site. The site will also only be worked outside of the Stone Curlew nesting season, which is between March and October.

**Site Restoration**
The site will be restored to conservation or agriculture, similar to its current use. The site will not be used as a landfill for household or business waste. Some inert waste (i.e. soils) may be used to assist with restoration.

**Loss of Farm Land**
As it is only a temporary permission the site can be used for food production again after restoration, as stated above. The current tenancy on the land is a matter between the tenant and the landlord and the County Council cannot be involved.

**Property Values**
Property values are not a planning consideration.

<table>
<thead>
<tr>
<th>Name</th>
<th>Assessor</th>
</tr>
</thead>
<tbody>
<tr>
<td>DR/3</td>
<td>Ken Jordan</td>
</tr>
</tbody>
</table>

1. Of all the proposed sites, this is the only one in a protected ecological area – notwithstanding the fact that work will only be in the non-nesting season, it will still impact on wildlife.
2. It will destroy the livelihood of the tenant at Worth Farm

**Ecology and Landscape**
County ecologists have assessed the site and consider that as long as appropriate mitigation have is in place the site can be acceptable in ecological terms. Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation,
| DR/4 | Sarah Rush | 1. I object strongly that the tenant farmer will lose nearly all the land they have worked for many years – 2 hard working sons with young families  
2. As you approach the proposed site from Barnham, it is a beautiful East Anglian view coming round that bend which doesn't need disturbing. It is a natural breeding and living area for the preservation of stone curlews.  
3. Westerly winds will bring dust and noise to Barnham | 1) **Current Tenant**  
The current tenancy on the land is a matter between the tenant and the landlord and the County Council can not be involved.  
2) **Ecology and Landscape**  
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation and agriculture, similar to its current use. A restoration scheme that satisfies the County Council must be submitted as part of the planning application for the site.  
The operator has confirmed that the site will not be operated during the stone Curlew breeding season (approximately March to October). This can be enforced through a planning condition if the site gains permission.  
3) **Air Quality** |

| | | primarily. A restoration scheme that satisfies the County Council must be submitted as part of the planning application for the site.  
**Current Tenant**  
The current tenancy on the land is a matter between the tenant and the landlord and the County Council can not be involved. |

**Assessment Suffolk County Council**

Page 84
| DR/5 | Tim Gudgeon | Support Barnham site conditional on inert landfill | County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable. *Noise pollution*  
County Noise Consultants state that a standoff in addition to standard mitigation may be required. This will be identified at the planning application stage. |
| DR/6 | Jean Muirhead | Comment? I live down the West Farm Drive our houses each have a bore hole & I am wondering if the water levels will be reduced by the sand and ballast extraction. | The site will be restored to nature conservation and agriculture, similar to its current use. A restoration scheme that satisfies the County Council must be submitted as part of the planning application for the site. Some inert waste (e.g. soils) may be used to assist with the restoration of the site. |
| DR/7 | Katherine Hodge | I understand that landowners should be able to as they wish with their land, but I think that as a resident of Station Road that the added | An assessment of the ground water and flood risk will need to be submitted as part of any planning application as the site is within a Groundwater Source Protection Zone. This will highlight any significant issues regarding the water table and the public will also be able to make comment at the application stage if this is still a concern.  *Ecology and Landscape*  
Site phasing should minimise the impact of the operations on ecology and landscape, by |
Assessment Suffolk County Council

<table>
<thead>
<tr>
<th>DR/8</th>
<th>V. Steam</th>
<th>Ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme that satisfies the County Council must be submitted as part of the planning application for the site.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Ensure that all lorries go along proposed route and not towards Barnham crossroads to turn right to go to Bury St Edmunds – more traffic towards a very busy road with a history of accidents at the crossroads!</td>
<td>It is possible to place a planning condition stating which direction a lorry can turn upon joining the highway, and the applicant can also supply a lorry management plan as part of their application.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The road towards the Barnham Crossroads (Elveden Road) from the lorries’ entry point onto the highway has a weight restriction of 7.5 tonnes, which sand and gravel lorries would likely exceed, so lorries from the quarry should not use this road.</td>
</tr>
</tbody>
</table>
| DR/9 | Toby Rush                    | Current tenancy on site
The current tenancy on the land is a matter between the tenant and the landlord and the County Council cannot be involved.  

**Noise Pollution**
County Noise Consultants state that a standoff in addition to standard mitigation may be required in order to protect amenity of nearby residents. This will be identified at the planning application stage.

|  |  |
|---|---|---|---|---|---|---|
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
### Site phasing

To address your comment regarding the size of the site should be noted that the whole site will not be worked at one time. It is standard practice to work the site in a phased manner, only working a smaller part of the site at one time, and then restoring these parts of the site, once the material has been extracted. The exact way this is to be done must be permitted as part of the planning application.

<table>
<thead>
<tr>
<th>DR/10</th>
<th>Jonathan Ford</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I am most concerned about the Barnham to Elvedon Road which is used by HGVs going south from Thetford to rejoin A134 at Barnham crossroads. This was only supposed to be a temporary measure but has now been used by HGVs for 10 years.</strong></td>
<td></td>
</tr>
<tr>
<td>I have been briefed that the sand and gravel lorries will not use this road. Past experience suggests this ruling will be ignored. This is a dangerous road and the excavation is not going to help. Sand and gravel lorries must not be allowed to use it.</td>
<td></td>
</tr>
<tr>
<td>The Barnham to Elveden from the lorries’ entry point onto the highway has a weight restriction of 7.5 tonnes, which sand and gravel lorries would likely exceed, so lorries from the quarry should not use this road. If this is restriction is breached it should be reported to the County Council.</td>
<td></td>
</tr>
<tr>
<td>The lorry route proposed by the operator is to take the lorries left at the crossroads from the old A11 onto the B1106.</td>
<td></td>
</tr>
</tbody>
</table>

### Environment

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme that satisfies the County Council must be submitted as part of the planning application for the site.

<table>
<thead>
<tr>
<th>DR/11</th>
<th>Alex Watson</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I have significant concerns over the environmental impact in three areas:</strong></td>
<td></td>
</tr>
<tr>
<td>- Damage to unique environment</td>
<td></td>
</tr>
<tr>
<td>- Serious increase in road traffic in area</td>
<td></td>
</tr>
<tr>
<td>- Detrimental impact on local noise and pollution levels</td>
<td></td>
</tr>
</tbody>
</table>

**Site phasing**

The exact way this is to be done must be permitted as part of the planning application.
<table>
<thead>
<tr>
<th>Lorry Movements</th>
<th>There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site. Lorries will not go through Barnham Village. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106, to Brandon, where they will access the wider haulage network via the A1065.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality</td>
<td>County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable.</td>
</tr>
<tr>
<td>Noise pollution</td>
<td>County Noise Consultants state that a standoff in addition to standard mitigation may be required. This will be identified at the planning application stage.</td>
</tr>
<tr>
<td><strong>DR/12 Peter Holland</strong></td>
<td>I would recommend a particulate test of air quality over Barnham. There needs to be similar to wind farms some 'recompense' for the community.</td>
</tr>
<tr>
<td><strong>Air Quality</strong></td>
<td>County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which will</td>
</tr>
</tbody>
</table>
identify the measures necessary to make this risk acceptable.

*Community ‘Recompense’*

While it is understood that this would be desirable the National Planning Policy Framework (paragraph 204) states planning authorities can only place conditions and obligations on development where it is “necessary to make the development acceptable in planning terms”

| DR/13 | Andrea Eden | My husband and I live on the A134 (near the traffic lights at the crossroads). We are very concerned about the extra lorries that will be travelling along the A1134 as this road and Station Road are already extremely busy. A large proportion of this traffic are heavy lorries that bang, rattle and clank along at all hours of the day and night. | Lorry Movements

There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site.

Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106. |

| DR/28 | Mrs Pamela Tait | My main objection is the impact on the Watson families who farm in this area. It will devastate their homes, lives and businesses and cause much disruption and totally destroy their livelihoods. They have been a part of our village for many years & deserve better treatment than this.

Another objection is the annihilation of the lovely countryside and its wildlife, despite the efforts of many preservation interests. All this to make a profit at other people’s expense. | Current Tennant

The current tenancy on the land is a matter between the tenant and the landlord and the Council Council can not be involved.

*Ecology and Landscape*

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme |
<table>
<thead>
<tr>
<th>E/14</th>
<th>Christina Hunter</th>
</tr>
</thead>
</table>

**Barnham Quarry: Gravel and Mineral Extraction Proposal**

I have recently read Suffolk County Council's report for a proposed quarry on the edge of Barnham village on the C633, which although informative and extensive, has clearly left a great deal of wriggle room in the Council and Extractor's favour. It lacks sufficiently robust argument to balance the undeniable blight on both valuable agricultural land, health and welfare of the local population, and already precarious survival of rare fauna and flora. Anyone relying on site documentation photography would be forgiven for thinking the site devoid of interest, barren and of little merit. To identify the area under application as a "Quarry" would in polite terms be thought disingenuous but more firmly voiced as a deceit. The moving of soil into a bund does not by any stretch of the imagination constitute a quarry. At no point has ANY quarrying taken place in or near the proposed site, nor surface minerals/aggregates removed, so in this instance one can take the term of "Quarry" as an opportunistic planning device. The first Lord Iveagh spent a considerable time and effort in the

| Current Planning Permission |

While extraction has not taken place on the site with existing planning permission, it is in planning terms a quarry, as the site has permission and the bunds put in place mean that the permission has technically been implemented.

| Loss of Agricultural Land and Restoration of the Site |

As a sand and gravel quarry is a temporary planning permission, the site can be returned to agricultural use once extraction is complete. The site will be restored to nature conservation and agriculture, which is it's current use. A restoration scheme that satisfies the County Council must be submitted as part of the planning application for the site. Some inert waste (e.g. soils) may be used to assist with the restoration of the site.

Additionally, It is standard practice to work the site in a phased manner, only working a smaller part of the site at one time, and then restoring these parts of the site, once the material has been extracted. The exact way this is to be done must be permitted as part of the planning application. This means it is possible to continue agriculture on the areas of the site not undergoing extraction.
improvement of the land, thereby enabling it to become a dependable area on which to grow vitally needed food for the country - at one stage going to court to prevent the area becoming a mono crop of pine plantations for the wood industry. In the same spirit the third generation tenants of North Farm, who are integral to village life, have continued to develop what is in agricultural terms grade 4 land into highly productive land for much needed crops e.g. carrots, potatoes, onions etc. which are well suited to the soil type. With an ever increasing population and inevitable hike in food costs, it seems an incredulous act to take out of production fertile farmland to open a quarry which will operate sporadically. It is suggested that 20 new jobs would be generated although there are no quarry men or available HGV drivers in the area seeking employment. Rather the proposal would be to the severe detriment of the three families whose livelihood depends on the present flourishing farm. As the quarry work is seasonal, the contractor will obviously have an existing work force in place whom he will move across his enterprise to maximise manpower and profit margins, making local employment yet more unlikely.

**Air Quality**

County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which must identify the measures necessary to make this risk acceptable.

Mention of the air quality management area at Newmarket in the draft plan is not meant to act as a measurement of air quality at Barnham, but is mentioned to illustrate that air quality is not an issue in the area, due to its far distance from any areas identified as having an issue.

**Lorry Movements**

There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site. Lorries will not go through Barnham Village. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106.

This route does take Lorries past the Elveden Church of England Primary School, however conditions can be placed on the planning...
<table>
<thead>
<tr>
<th>Health and Welfare</th>
<th>permission (if granted) in order to prevent interference with school drop off and pick up times.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The expanding Barnham village school lies in the path of the prevailing wind from the proposed quarry, therefore air pollution is of great concern. At present the area enjoys very high air quality which is manifest in many lichens in the surrounding hedgerows which only flourish in extremely clean air and not merely good as stated in the Council documentation which has taken a measurement at Newmarket. Dust particles are unavoidable in the quarrying industry and will cause an exponential increase in asthma and other lung related problems in both the young and elderly. This should not be tolerated. It is also noted that a dramatic increase in haulage vehicles from the quarry will significantly increase diesel fumes in the vicinity of Elveden village school. Noise Pollution By the nature of the beast there is no such thing as quiet plant machinery. By necessity, the constant noise of safety bleepers, low gear manoeuvres, conveyor systems, grading equipment, washing procedures and shooting the end product into steel hulls of the haulage vehicles will be a dire cacophony borne into the village and surrounding area. Quarry companies have a habit of extraction to demand. It would have been of great interest if the Council had submitted a spread sheet</td>
<td></td>
</tr>
<tr>
<td>Noise pollution</td>
<td>County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the mitigation measures required.</td>
</tr>
<tr>
<td>Data collection for a new survey covering the 2017 period is currently under way. It should also be noted that there are no County quarried aggregates. It is a statutory duty of the council to plan for aggregate extraction. Sites are identified through submissions to</td>
<td></td>
</tr>
</tbody>
</table>
illustrating the actual use and reserves of County quarried aggregates and thereby demonstrate the need for further extraction. Light Pollution, Fauna, Flora and National Heritage For winter work periods, for safety and insurance purposes, it will be necessary to floodlight the quarry causing light pollution affecting not only a wide range of wildlife e.g. bats, owls etc. Rabbits: A new and severe strain of Viral Haemorrhagic Disease (VHD) has seriously diminished colonies which usefully crop headlands on which some bird species are reliant for nesting, such as the increasingly rare ground nesting Stone Curlew and Woodlark. The latter capable of three hatchings a year, starting as early as March. Further disturbance is undesired as despite the term “breeding like rabbits”, it is in fact not easy to re-introduce colonies. Insufficient thought has been given to the damaging affect from dust on flora by inhibiting photosynthesis. East Anglia has the lowest rainfall in the British Isles and is a precious resource essential to agriculture. The heavy demand made on the water table in the washing of aggregates and spraying the site to mitigate dust would only suit those benefiting from the quarry's profits. Of all the proposed sites, this is the only one placed in such a SSSI the Council through a call for sites, by landowners, land agents, or quarry operators

Light pollution
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

Extraction Planned for in the Minerals and Waste Local Plan

The estimation of need for sand and gravel extraction in the plan is based on the last ten years of sales in the county, which is 10.442 million tonnes. The current draft of the plan proposes 16.539 million tonnes. New quarries and extensions proposed are to replace sites that become exhausted. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also
The C633 boarders Thetford Heath and the site of the Gorse Estate on which the WII nuclear bomb storage development is situated, which is of unique historical importance. The entire length of verges are designated RNR reserve no.15. Criteria 1. By implementing the site for quarrying, the Council would run counter to its declaration to maintain natural grassland verges, which by its own admission have nationwide severely declined by 98% since 1945. There are two archaeological sites of international importance lying either side of the proposed quarry and Council is well aware of legislation PPG16 with regards to the preservation of archaeological finds in situ. The proposed area has not been fully investigated for archaeological deposits necessitating an archaeologist to be on site whilst the quarry is in operation. Is this matter still at the “desk evaluation” stage and what reports achieved or impending are available? In conclusion, the concerns I have mentioned leave me in no doubt that Suffolk County Council should dismiss the application to exploit the proposed quarry site at Barnham - not only now, but also to block any future development proposals of this type, especially as a critical look at other sites the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive.

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys, must be submitted as part of the planning application for the site.

Breeding Stone Curlews are considered within the operation of this site. In order not to disturb the nesting season of the birds (between approximately March and August) the site will only operate in winter, which will also benefit other flora and fauna that are active at this time.

Historic Buildings
Historic Buildings also have to be considered at the planning application stage. If there are found to be potential impacts on historic assets, avoidance or mitigation measure will be required.
<p>| | | |</p>
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<tr>
<td><strong>Suffolk County Council</strong></td>
<td><strong>Assessment</strong></td>
<td><strong>SMWLP, Responses to Preferred Options Consultation, March 2018</strong></td>
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<td>suggests that potential sites of low to no population impact are available.</td>
<td>It is correct that a full archaeological assessment has not been done on the whole site. For the purposes of the plan a desk based evaluation is considered appropriate. However, if a planning application is submitted a full program of archaeological evaluation, including appropriate field work, must be included. This needs to demonstrate the impacts of development/removal of the remains.</td>
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| **E/15** Amec Foster Wheeler (on behalf of National Grid) | There is a high pressure gas main which runs through the site. The 12.5 metre easements on either side should be left undisturbed. | **Proposed changes:**
Include presence of High Pressure Gas Pipeline in the site specific policy. |
| **E/16** Clare Watson | I am writing to state my objections to the Minerals and Waste Local Plan 2017. I have objections to the consultation element of the Minerals and Waste Local plan and to the inclusion of the Barnham site in the plan.
As a process, I believe that the Minerals and Waste Local Plan(MWLP) consultation is significantly flawed. It is impossible to make an informed decision about the inclusion of sites into the Minerals and Waste Local Plan when there is so much relevant information missing and incorrect. I therefore ask that you answer my questions and concerns as detailed in this correspondence within the 6 week consultation period.
Suffolk County Council’s Statement of Community Involvement (SCI) states that | **Out of Date Maps**
The maps produced by the County Council use Ordnance Survey maps as a base. The OS base maps in the plan documents were issued in 2016, the most up to date available at the time. However, after comparing the maps with online satellite images there are at least two houses north east of the proposed site extension not included in these maps. These will be added to the map in the next draft of the plan.

**Economic Viability and Extension to existing site**
No material has been extracted from the existing quarry, however it still has planning permission to extract material, which expires in March 2019, making it an existing site and the site submission to the Local Plan call for |
there is a 'great emphasis on transparency in planning processes, inclusiveness and commitment' combined with Appendix 1 of the SCI highlighting an early ‘key milestone’ of ‘produce informal issues/options report’ that outlines how 'All stakeholders will be consulted with including local communities and liaison groups, industry bodies and ‘hard to reach/marginalised’ groups (including ethnic minority groups, teenagers and the elderly.'

The two families, which both have young children, who are tenants of Elveden Estate and are totally dependent on farming the affected area for their livelihoods are still waiting for any form of communication from the Elveden Estate regarding the inclusion of a large area of land, which forms the bulk of their long standing tenancy, in the Barnham Site. Suffolk County Council was left to do their dirty work and they failed to make any contact other than a standard form letter advising of the MWLP consultation event. Is this an example of the SCI policy in action?

Paragraph 189 of the National Planning Policy Framework states that 'Local planning authorities…should also, where they think this would be beneficial, encourage any applicants who are not sites an extension. You can view the application and decision at https://www.suffolk.gov.uk/planning-waste-and-environment/planning-applications/comment-on-or-view-a-planning-application/ and searching for application number SE/14/2211.

It is correct that the material within the site has a high proportion of sand. Boreholes show that the material is overall 30% stone, 62% sand and 8% silt. These proportions of material are typical for sites Across Suffolk, with an extension to one of the sites in the plan comprising of 81% sand (Tattingstone). It is not uncommon for sand to be blended with stony material from other sites.

Visual Impact

The use of vegetated bunds will be implemented to mitigate visual impact on the site. Site phasing should minimise the impact of the operations on the landscape, by ensuring only part of the site is extracted at one time.

Access to the Natural Environments

With regards to footpaths, the County Council will seek to retain or redirect public rights of way (PRoW) through planning condition. There is one PRoW abutting the west of the site. A standoff with a bund will also be required to protect the amenity of users of the PRoW. There is also a PRoW within 200m to
already required to do so by law to engage with the local community before submitting their applications' I ask if you could confirm that this directive was made clear in the pre-application discussions undertaken between SCC, Mick George and Elveden Estate, what their response was and why it was considered not beneficial to inform the local communities.

The Rt. Hon Greg Clark MP explains in his ministerial foreword how the National Planning Policy Framework facilitates 'people and communities back into planning', yet at the earliest opportunity both stakeholders and the local community have had this possibility denied. My objections to the inclusion of the Barnham site in the MWLP are based on concerns for the impact of the excavations on the sustainability and health of the local community and environment.

- **Out of date maps** I was troubled to see that the map shown at Barnham Village Hall during the consultation period was significantly out of date, omitting homes that were built in 2002 and even one prior to that. If the maps used to consult us are inaccurate then are we considering inaccurate plans? I have no confidence the east of the site, which must be retained. This will help to retain access to the countryside and natural environments for locals.

**Noise Pollution**

County Noise Consultants state that a larger standoff in addition to standard mitigation may be required in order to make the site acceptable. An assessment of noise impacts must be carried out at the planning application stage (where local residents will also be able to provide their views) to provide detailed information on these impacts and inform the mitigation measures required.

**Elveden School**

Planning conditions can be used to enforce when lorries use the old A 11 to access the highway network in order to cause the least impact possible on the school, such as preventing lorries passing the school during when pupils are arriving or leaving the school. This condition has been implemented on a former application on this site (planning reference F/14/2324).

**Lorry Movements and Air Quality**

There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site. These numbers were calculated assuming the use of eight wheel tipper trucks, with full
that the other documents presented as part of the Barnham site are accurate.

- **Economic viability** As the Barnham site is quoted as being ‘existing’, this suggests that extraction has already occurred at this site. Could you please confirm the quantity of sand and gravel extracted, it’s grade and what it was used for? As there is only patchy published geographical information showing any analysis of the intrinsic properties of the sand and gravel, much of it looking to be very sandy, is it economically viable? Where is the evidence used to support the economic viability of the site that would allow me to understand the reasoning behind the selection of Barnham as part of the MWLP. I would also appreciate clarification on why Suffolk wishes to extract 1,730,000 tonnes per annum, a greater figure than the 1,620,000 tonnes per annum that the Government suggests in its Minerals Core Strategy. If the lower figure were adopted, it would reduce the required tonnage by 3,300,000 tonnes which is greater than the projected extraction from Barnham and renders the site redundant.

- **Extension to existing planning approval** As the ‘extension’ to the site is such a major change of scale in both area and time, I would question whether this backfilling. However, it is possible that more lorries would be required for backfilling. Lorries will not go through Barnham Village. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106 to Brandon, where they will access the wider haulage network via the A1065. Due to a weight restriction of 7.5 tonnes the lorries should not travel down the C633 as sand and gravel lorries would likely exceed this weight.

Highlighting the air quality management area in Newmarket was not meant to propose that it would be used to measure the air quality impacts of this quarry, but to indicate that there is no known air quality issues in the local area. The number of lorry movements currently expected from this site would not exceed the threshold IAQM and EPUK guidance (100 lorry movements), so a significant increase in local pollution concentrations is not expected.

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby
can be considered an extension. I could not see any reference in the consultation documents that detail the parameters of ‘extensions’ being given. As the purpose of MWLPs are supposed to ‘secure minerals and waste development that improves economic social and environmental conditions in the area’ what are the projected improvements for the Barnham area if the extraction is to be undertaken for 30 years? Mick George states that 20 jobs will be created. Are these jobs for local residents? If seasonal extraction is the only permissible extraction option to cater for the Stone Curlew breeding and nesting seasons, would these jobs also be seasonal? Have the potential losses of full time jobs at North Farm been included in the calculation of potential employment gains?

• **Restoration** It is likely that the current tenants will struggle to farm North Farm if the Barnham site goes ahead as, although they are stakeholders, they have not been included in discussions in regard to the restoration of the land. There is apparently no coherent plan to return the land to agriculture as it is currently carried out and contradictory statements were made at the consultation evening. The SCC representative suggested that the residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

**Ecology and Landscape**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (such as the SSSI), must be submitted as part of the planning application for the site.

The Road side Nature Reserve is covered as a statutory ecological designation as part of the SSSI, however it is correct to note that it should be mentioned in the text of the plan and the plan will be changed to reflect this.

**Climate Change**
The 3.5kg figure CO₂ is an estimated average. At this stage we do not know what the specific emissions of CO₂, but policy GP2 in the plan is there to ensure Climate Change issues are considered in planning applications for minerals and waste facilities and that steps are taken to minimise emissions.
‘inert backfill’ would be a suitable replacement and could be farmed. Natural England state that they are happy for it to be returned to natural heathland. I request clarification of the confusion surrounding this point. MAFF Good Practice guidance explains ‘the need to safeguard agricultural land for the needs of future generations’ is this not considered to be relevant here?

**Public amenity**

- **Visual Impact**  
  MWLP are also supposed to ensure that public amenities experience ‘no potentially significant detrimental impacts upon the enjoyment of residents’ homes or other sensitive land uses from HGVs, noise, dust, odours or visual impact’. The idea voiced by Suffolk County Council at the consultation evening was that residents would not be disturbed by the extraction an incredible statement to make and one which I refuse to accept. There will be a huge visual impact to locals who live in the area and use the byways for leisure and recreation from the huge bunds that are proposed. Natural England produced an Access to Evidence Information note EIN018 in July 2016 which summarises ‘poor mental health represents the largest cause of disability in the UK and rates are on the increase … there is a growing body

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**Proposed Changes**

Add two houses north east of proposed extension onto maps. Include the Roadside Nature Reserve in paragraph 9.18 of the site.
of evidence which tends to demonstrate a positive association between a) population level exposure to natural environments and b) individual use of natural environments, and a variety of positive mental health outcomes and that ‘the weight of evidence suggests that future policy and decision making should take account of the potential for good quality natural spaces in and around the living environment to promote better mental health’ has the mental health impact of the extraction, related transport movements and loss of views when using the byways on the local community been analysed?  

o Noise The consultation documents also state that additional mitigation, over and above the proposed bunds, will be required because the noise created by the extraction would still fall above the nationally allowed figures, increasing the detrimental impact on the ability of residents to enjoy their homes. The proposed workings of the site are from 7am -7 pm Mondays to Fridays then 7am -2pm on Saturdays. How could this not have an impact on the local area? What form would this additional mitigation take? Would local residents be consulted on these as well?
• **Impact on children's education**

  Increased noise in the local area from either extraction or increased lorry movements will also have a long term impact on the current and future students at both Barnham Primary and Elveden Primary schools. Shield and Dockrell explain in their 2003 article that in the past 30 years there have been many investigations examining the relationship between noise exposure of school children and their performance in various cognitive tasks. It is widely accepted that noise has a detrimental effect upon the learning and attainments of primary school children, with children with Special Educational Needs being a double vulnerability group. Chronic road noise exposure of young children has ‘a particularly detrimental effect upon their reading ability, attention and long term recall’. Department for Education information reveals that Suffolk primary schools still remain below the national average in reading, maths, writing and science despite the ‘Raising the Bar’ programme. The omission of any information about the noise impact of the extraction and resulting lorry movements of all types is unacceptable. When this was raised during the consultation evening at Barnham it was dismissed as,
“Elveden School has been there for over 100 years, so this will still be better than when the A11 ran past” however, the children in Year 4 and below at the time of writing will never have experienced the A11 running past the school. This is an inadequate and irresponsible response from someone with no knowledge of, or interest in, the subject. WHO guidelines (1999) are that maximum noise levels are 35dB LAeq inside classrooms and 55dB LAeq (equivalent to light traffic) in outdoor playgrounds. Will you confirm if noise monitoring will be required as part of the proposal? If so, who will monitor this and pay for it for the 30 year lifetime of the extraction?

- **Lorry movements** I would like to see, if there is one, a breakdown of projected lorry movements, including their routes, to clarify what the claimed 60 lorry movements a day actually means. Does it include lorries bringing the backfill to Contract Farm for the Barnham site? Are they too going to be passing through Elveden village and Elveden School? As this village and school is outside of the 250m area that Suffolk County Council is supposed to consult – are these residents and parents even aware of the proposals that will impact so greatly upon them?
The predicted transport routes of the sold extracted material have not been published. I am concerned that additional lorries will be travelling eastbound along the C633 to the cross roads at Barnham to travel southbound to Bury St Edmunds. As this road does not have a pavement, there is additional risk to pedestrians and children, who walk to school, access Barnham Village Hall, or want to reach public transport. The crossroads already struggle with car and lorry volumes at peak times. Increased traffic and standing traffic will only cause more damage to the local air quality. How are these impacts to be monitored and mitigated?

• **Air pollution** It is well documented that air pollution, including particulate air pollution, is a significant cause of ill health and premature death. Public Health England states that ‘the increase in mortality risk associated with long-term exposure to particulate air pollution is one of the most important, and best characterised, effects of air pollution on health’ and that ‘current levels of particulate air pollution have a considerable impact on public health. Measures to reduce levels of particulate air pollution, or to reduce exposure of the population to such pollution, are regarded as an important public health initiative’.
Figures provided by Public Health England show currently that 5.4% of deaths in St Edmundsbury are attributable to air pollution. As this is the case, I would like to know the rationale behind exposing not only the general local community to increased air pollution, but importantly two primary schools to increased levels of particulate emissions. There are currently 236 children on-roll at these schools and yet it is considered to be sufficient that the nearest air quality sensor is 26km away in Newmarket. I find it difficult to comprehend how this can be considered adequate to monitor the current air quality or the quality of the air should the extraction commence.

- EPUK Guidance and the Suffolk Air Quality Management Group state in their publication ‘Air Quality Management and New Development 2011’ that “air quality must be measured where proposals result in new signalling, where proposals result in an increase in vehicle trip generations within the local area, increased congestion, change in average speed by <10kph, a significant alteration to the composition of traffic, particularly vehicles over 3.5 tonnes, proposals in or close to sites with features sensitive to nitrogen deposition such as SPA, SAC, SSSI and RNR”. I have not seen any evidence that
this monitoring will be carried out, or who will pay for it. What procedures are in place and what is the cost of this for the length of the extraction process? Is this the responsibility of Suffolk County Council?

I would also like to see the air quality impact assessment projected forward for the length of the project both with and without the development using an appropriate model, MET data and technical guidance including LAQM T609 to ensure that all relevant emissions sources are included and that all relevant pollutants, including particulates and NO2 are included. This is considered by the Suffolk Local Authorities to be part of ‘three basic steps’ of submitting an application. I believe that there have been NO2 monitoring studies completed in Suffolk, does data exist for areas where extraction has been undertaken and what are the noted impacts? The document also explains in paragraph 2.5.1 that ‘an impact assessment should be included for dust and contribution to PM10 levels for developments expected to take one year or more to complete. An impact assessment shall also be undertaken for mineral extraction and waste disposal and recycling sites’. Has this been
| done? Have the contractor and landowner supplied the required minimum information. ‘Minimum information to be reported in an Air Quality Assessment’ to ensure ‘the assessment should provide a transparent account of the modelling undertaken’.

- **Local environmental impact** A detailed report on the Environmental Impact of the proposed site has not been included in the consultation documents. How can the local community make informed decisions without full, easy access to reports? One such omission is that the Environmental Impact Assessment does not seem to have considered the Roadside Nature Reserve (RNR) that runs along Elveden Road ‘Barnham (Thetford Heath) Roadside Nature Reserve No.15’. This area would be directly affected by the proposed extraction. As Suffolk County Council has highlighted that ‘rare Breckland Plants such as Purple Stemmed Cat’s Tail can be found on Barnham RNR’ I am surprised that this has not been included. Suffolk County Council explains in the document that ‘by careful management of the sites we aim to preserve the species on RNRs, giving future generations the chance to enjoy these remnants of ancient grassland meadows’ has this area been considered |
as it was not included in the consultation documents and I would like to know how this area will be protected and who will pay for the monitoring of any impact upon this area. SCC considers this a high risk site and does not allow volunteers to work on it.

- **Climate change considerations**  The Climate Change Mitigation information submitted as part of the consultation process lacks depth and direction. There are no specific carbon figures. Is it going to be more or less than the 3.5kg per tonne? Who is going to be accountable for measuring the impact of the extraction? Mick George states that most of his vehicles use ‘Adblue’ and ‘EuroVI engines’ but the VW scandal proves non-compliance and the loophole is unlikely to be closed until 2019 when this consultation period will be closed. To conclude, I believe that the consultation process is flawed and that there is not enough information for local residents to make truly informed decisions about the extent of the serious and long term impacts on a local area that includes two primary schools, Breckland SPA, Breckland SAC, Breckland Farmland/Little Heath/Thetford Heaths SSSI, Gorse Grassland CWS, Thetford Heath NNR, European Protected species (Bats and
Great Crested Newt), Priority Species, Other Protected Species, Priority Habitats (Lowland Heath), two listed buildings, a site with known links to WW1, WW2 and the Cold War, the potential for the site to contain heritage assets of sufficient significance to trigger NPPF139 and need preserving in situ and within a Flood Risk Zone 3. This ‘extension’ is opportunistic and fails to take into account the long term impact of a development of such a scale on the local community which is already overburdened with HGV traffic and is currently the subject of applications for a large distribution warehouse and an oil delivery facility.

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<th>E/43</th>
<th>Caroline Dowson, Barnham Parish Council</th>
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<tr>
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<td>Barnham Parish Council is concerned about the inclusion of the proposed quarry at North Farm into the Minerals and Waste policy consultation and would like to register the following comments:</td>
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<td><strong>Background</strong></td>
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<td>The Parish Council is not aware that this site has ever been active as a quarry and has only had the top surface removed in order to build the unsightly bunds surrounding it. The site was originally given permission as a Borrow Pit but a</td>
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<td><strong>Current Planning Permission</strong></td>
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<td>There has been no breach of the planning permission on the currently permitted site. Permission was granted on the 31st of October 2012 with the condition that the site is to be restored by 31st October 2015. However, in a subsequent application permission was granted to extend extraction on 29th October 2014 to 31st March 2019, with restoration to be completed by 31st March 2020. As it is an active planning permission and has been technically implemented due to the construction of the bunds, the site is a quarry in planning terms.</td>
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<td><strong>Current Tenant</strong></td>
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subsequent application for a variation of condition was approved for a 4.5 year period. The Parish Council opposed the two applications, but the applicant, to give credibility to his application, identified two end users. To the council's knowledge neither of these end users were supplied with gravel or aggregate from this quarry. The Parish Council feels justified in assuming that there was probably never an official agreement with the two end users and the landowner has cynically used this criteria to improve the case for approval. The original approval has, therefore, allowed classification of this site as an existing quarry, thereby strengthening the case to have it included in the Minerals and Waste Policy Document. The Parish Council wishes to query whether this can be classified as an existing quarry, and if not, then this site should be excluded from the Local Plan.

As a result of the original planning approval, the local tenant farmer has been denied the use of 14.9ha of farmland reserved for the quarry. As the quarry has never been active, the land

The current tenancy on the land is a matter between the tenant and the landlord and the County Council can not be involved.

**Loss of Agricultural Land**

While there will be some loss of agricultural land during the extraction, a mineral working is a temporary land use and can be returned to agriculture through restoration. A full restoration scheme will be expected as part of any planning application for this site and the County Council would expect to see this site returned to agriculture and nature conservation. The amount of land throughout the life of the quarry will also be minimised as the working will be phased, so only a small section of the quarry area will be extracted at one time.

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

**Lorry Movements**

There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site.
| has stood redundant since 2012 and has served no practical purpose as either farmland or quarry. **If the proposed extension to the site were allowed, there would be serious implications for the viability of the business of the tenant farmer.** This should be taken into account as a major consideration. The land may be Grade 4 but it has been successfully farmed by this tenant farmer for three generations. Taking into account the demands that Brexit may present for our food industry, the loss of valuable farmland would be short sighted and irresponsible. **Environment**

The site sits, crucially, to the west of Barnham village. Due to the prevailing winds this puts the village in the path of any noise or air pollution resulting from workings on the site. There are houses, not identified on the plans, which sit within a distance that would cause serious concerns for the health of the occupants. The proposed site almost abuts the garden of the North Farm farmhouse and this would make for uninhabitable living conditions. No lorries will not go through Barnham Village. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106 to Brandon, where they will access the wider haulage network via the A1065. Aggregates lorries would likely exceed the weight limit on the C633 and so should not use it. Breaches of the weight limit can be reported to the County Council. **Elveden School**

Planning conditions can be used to enforce when lorries use the old A11 to access the highway network in order to cause the least impact possible on the school, such as preventing lorries passing the school during when pupils are arriving or leaving the school. This condition has been implemented on a former application on this site (planning reference F/14/2324).

While there was concern from the County Council about number of Lorries by the school and the initial borrow pit proposal, it should be noted that that was before the completion of the A11 bypass, which has...
amount of mitigation would be able to protect these inhabitants from the health hazards associated with the site.

**There is already an environmental issue with the increase in traffic on the C633.** The C633 was never meant to be a strategic or local access lorry route, but is a temporary route for southbound HGVs.

However, the volume of traffic using this road now causes an environmental problem from noise and pollution. Any additional source of noise or air contamination should, therefore, be prevented. During the original application for this quarry, the Planning and Development Section of Suffolk County Council expressed concern about the number of vehicles routing past Elveden School. If this quarry is included in the Minerals and Waste local Plan, then the number of vehicles would not only exceed the numbers concerned in the original application, but would be over a much more prolonged period of time.

reduced the traffic passing the school significantly.

**Ecology and Landscape**

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (such as the SSSI), must be submitted as part of the planning application for the site.

**Water and Floods**

Ground water and flooding has been considered as part of the site selection process and the site size has been decreased from its initial proposed size partly because of flood risks. An assessment of the ground water and flood risk will need to be submitted as part of any planning application as the site is within a Groundwater Source Protection Zone.
It is noted that Policy GP3: Spatial strategy states that preference will be given to proposals for minerals and waste development in accordance with the Key Diagram where individual sites are well related to the Suffolk lorry Route Network (or rail network or navigation) centres of population and do not have adverse impacts upon features of environmental importance (natural or man-made) or endanger human health.

Ecology and Landscape

The proposed site sits in, and would affect, nature conservation areas. During the original quarry application several species were identified as vulnerable to this type of development and questionable mitigating measures were put in place to protect them. This protection may have been viable in relation to the original 14.9ha site and the limited duration of the approval, but the increased area and prolonged timescale of this new quarrying must have a detrimental effect on the survival of these rare species and protected habitats. From
a visual perspective, the current bund is already an eyesore and these additional workings would be clearly seen from the C633 and the view of a typical Breckland valley would be hidden.

**Flooding**

The original application for the quarry failed to accurately investigate the implications of the relatively high water table in the area of the proposed excavations. There is a watercourse to the west of the current site, Hunwell Spring, that starts as an open watercourse and upon entering the extraction area becomes a piped watercourse. This watercourse would be compromised if extractions were allowed in the revised area. The depth of the water table is such that in the winter months flooding is likely to occur and this was confirmed when bore holes were sunk for test purposes prior to the current bund being erected. The consequence of the erection of the current bund was significant water logging to the field west of the bund.
### SUMMARY AND RECOMMENDATION

For the above reasons, the inclusion of this site in the minerals and waste proposal would contravene Aim 2, Objective 5 of the Preferred Options Draft. There are also other key Policy Statements that this site would contravene (eg. Policy GP4). There must surely be other sites, possibly even on the Elveden Estate, that would be less harmful and more appropriate than the one proposed? The employment of 20 workers for six months of the year as a reason for site development must be put into the context of two generations of a family losing their livelihood if this project continues to form part of the Waste and Minerals Local Plan.

**This site should be removed from the proposed consultation and the part of the original borrow site surrounded by the bund should be restored in accordance with the conditions.**

The Parish Council is of the opinion that the removal of this site
**would not create a shortfall in the supply of sand and gravel to meet demands to 2036**, as the calculated output from all the other sites could exceed the requirement.

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<tr>
<th>E/44</th>
<th>Dr Martin Belsham</th>
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<td></td>
<td>I wish to object to the above application on the grounds of unreasonable withdrawal of livelihood from my patients, the tenant farmers at North Farm. It is frankly disgraceful that this speculative application, based on the dubious previous granting of an extraction license, be allowed. North Farm has already lost land that has been left idle, whereas it was previously farmed, and the further land loss will place the farm at jeopardy. I am also very worried about the potential lorry traffic on the Elveden Road increasing. The road was not designed for the lorries that presently use it as a diversion resulting from the Norton ban. Any further traffic, increases hazards particularly for cyclists, something I have experienced myself. I am</td>
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<td>Current Tennant</td>
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<td>Lorry Movements</td>
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<td>There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site. Lorries from the quarry should not use the Elveden Road, or go through Barnham Village, due to the weight restriction applied. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106 to Brandon, where they will access the wider haulage network via the A1065.</td>
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<tr>
<td>E/47</td>
<td>John Wallace Huston</td>
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|      | I am writing to confirm that I wish to object to the above application on the grounds of the adverse environmental impacts of this proposal. My objections are:
- I do not believe the site is an existing quarry that has supplied product to end users.
- The site is close to heavily populated areas, including a nearby primary school (Barnham CEVC Primary School) that is directly down-wind and would suffer pollution in the form of noise, fumes, dust and dirt.
- I am concerned about, and am not aware that proper studies have been done to prove there are no redundant/buried mustard gas, or other WWII chemicals in, or adjacent to the proposed sites that could, if disturbed, pollute our air and the water table.
- The increased traffic and with it, noise, dust and diesel pollution for my family and all in the village, especially the school
- The site would have a negative effect on the landscape and countryside that should be preserved |

**The Currently Permitted Site**

It is correct that no material has been extracted from the currently existing site. However, as it has planning permission to extract material up to 31st March 2019, so the submission to the council from Elveden Estates and Mick George is classed as an extension.

**Air Quality and Noise pollution**

County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable.

County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the mitigation measures required.

**Mustard Gas**

It is the County Council's understanding that the mustard gas contamination is within...
heath and the works, south of the site, and that there is sufficient distance between the site and potential contamination areas. However, it can be added to the plan as a consideration to be aware of.

**Lorry Movements**
There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site.

The number of lorry movements currently expected from this site would not exceed the threshold IAQM and EPUK guidance (100 lorry movements), so a significant increase in local pollution concentrations is not expected.

**Ecology and Landscape**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys, must be submitted as part of the planning application for the site.

**Proposed Changes**
Include potential presence of mustard gas contamination near to the site as a consideration.
| E/48  | Paul and Jennifer Brown | My Wife and I have lived in Barnham for four years and have recently been made aware of a plan for a local quarry nearby. We moved to Barnham because of its isolation, making it a nice quiet village to live in with clean air, The Barnham Paris Council have made us aware that this could be severely compromised with both severe noise and air pollution which is very troubling. In addition there will be more traffic going through Barnham which is very concerning, especially as our local school is positioned on one of the main roads. There has already been a fatal car crash this year and more traffic will lead to more accidents and fatalities. I was told to email you in person so you know our feelings and position. Like many local residents we are fully opposed to it. | Lorries Movements
Lorries will not go through Barnham Village. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106 to Brandon, where they will access the wider haulage network via the A1065. |
| E/50  | Sue Nutt               | I write as the retired Anglican priest in Barnham to object to the mineral extraction on the Elveden Estate. I am deeply concerned about the local | Air Quality
County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable. Noise pollution
County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the mitigation measures required. |
|       |                        | Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme |
environment and the welfare of the people of this village. The entire area is a designated SPA (Special Protected Area) and also SSSI (Site of Special Scientific Interest). It is a beautiful example of the Brecks and a conservation area for wildlife, particularly the stone curlew and great crested newts, flora and fauna which presumably is the reason for the designation. What is the point of such designation of these areas if it can be overruled in the interest of commerce? It would, no doubt, be a huge visual blot on our local environment and impact on both local people's enjoyment of the local highways and byways and visitors from outside our locality.

Having studied the proposed route for lorries I am unconvinced that lorries wanting access to the A134 will not come down the totally inadequate and overloaded C633 from Elveden to Barnham traffic lights. I recently encountered 11 heavy lorries as I drove from the traffic lights to Elveden village. None of these were seasonal sugar beet lorries. The noise and pollution already has a detrimental effect on the residents of Station Road. I also understand that there are two electricity cables running through the proposed site, a nationally important gas and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (such as the SPA and SSSI), must be submitted as part of the planning application for the site.

Breeding Stone Curlews are considered within the operation of this site. In order not to disturb the nesting season of the birds (between approximately March and August) the site will only operate in winter, which will also benefit other flora and fauna that are active at this time.

**Lorry Movements**

Lorries should not come down the C633 due to the weight restriction in place on this road, which sand and gravel lorries will likely exceed. Incidents where heavy goods vehicles drive on unsuitable roads are can be reported to the County Council and action can be taken. It is also possible to place planning conditions, if planning conditions were granted to the site, stating lorries should turn a specific direction on entering the highway. If it were seen to be necessary this could be an additional measure to prevent lorries from using the Elveden road.

**Electricity and Gas Infrastructure Through the Site.**

Electricity and gas infrastructure through the site must be taken account of in the extraction...
<p>| | pipe, a water course and private infrastructure that is essential to the business of the occupying tenant and the seasonally high water table and artesian water would not allow the workings to be dry as proposed. This latter point is well known to the planning department of Suffolk County Council. Apropos the proposed new jobs this does not take into account those jobs which will be lost and the livelihood of the existing tenants destroyed. I do hope these objections will be taken into account by the County Council. | process. Any overhead cables should be diverted round the site, while below ground infrastructure should be avoided by the extraction process. We have received a response on behalf of the National Grid highlighting the gas pipeline and their approach to keeping existing transmission pipelines in situ. Any planning application for extraction close to National Grid infrastructure will be subject to agreement from the National Grid. <strong>Water and Floods</strong> Ground water and flooding has been considered as part of the site selection process and the site size has been decreased from its initial proposed size partly because of flood risks. An assessment of the ground water and flood risk will need to be submitted as part of any planning application as the site is within a Groundwater Source Protection Zone. <strong>Current Tennant</strong> The current tenancy on the land is a matter between the tenant and the landlord and the County Council can not be involved. <strong>Change</strong> Make reference to energy and gas infrastructure clarifying potential issues. |</p>
<table>
<thead>
<tr>
<th>E/51</th>
<th>Ian and Jackie Clark</th>
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|      | My wife and I would wish to object most strongly to the possible extension of the existing permission to extract sand and gravel at Barnham and would urge that this site be removed from the Suffolk County Council’s Preferred Options Draft dated October 2017. The proposed extension is within an area designated as an SSSI, as an SPA and it also lies within the area covered by the Brecks Partnership. SSSIs and SPAs are well known designations, but the Brecks Partnership less so, but suffice it to say that the area is steeped in history dating back to early man and contains wildlife and plant species found nowhere else in the UK. More details of the history and heritage of the Brecks can be found at www.brecks.org/about/history-and-heritage, while more information about the wildlife and plants resides at www.brecks.org/about/wildlife-in-the-brecks. The environmental damage that this proposed extraction site could cause if permission for it was granted, should be sufficient reason in itself, we believe, for this proposal to be withdrawn from the Draft Options document. I could go into greater detail about our various objections to this scheme, which include the fact that existing buildings to the north east of the proposed site are not included on the various maps, there are no details of where any washing and grading plant might be located, the proposed haul route is likely to cause considerable damage to the paths, byways, fauna and flora along its route and the **Ecology and Landscape** Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (such as the SPA and SSSI), must be submitted as part of the planning application for the site. **County Council Maps** The maps produced by the County Council use Ordnance Survey maps as a base. The OS base maps in the plan documents were issued in 2016, the most up to date available at the time. However, after comparing the maps with online satellite image there are at least two houses north east of the proposed site extension not included in these maps. However I can confirm these houses were sent a letter as part of the consultation process. The County aims to add missing map elements for the next stage of consultation. **Public Rights of Way (PRoW)** With regards to footpaths, the County Council will seek to retain or redirect public rights of way through planning condition. There is one PRoW abutting the west of the site. A standoff with a bund will also be required to
school at Elveden, please note the spelling which is incorrect twice on page 167 of the Sustainability Appraisal, would likely suffer from increased noise and dirt, thus affecting the health and welfare of its young pupils. Please give the foregoing remarks the closest consideration and remove this proposed extension from the list of Preferred Options.

protect the amenity of users of the PRoW. There is also a PRoW within 200m to the east of the site, which must be retained.

Site Washing and Grading Plant
Details of the site operations, including at the planning application stage, where the public will also have the opportunity to respond.

Elveden School
Planning conditions can be used to enforce when lorries use the old A 11 to access the highway network in order to cause the least impact possible on the school, such as preventing lorries passing the school during when pupils are arriving or leaving the school. This condition has been implemented on a former application on this site (planning reference F/14/2324).

Errors in Sustainability Appraisal
Thank you for pointing out these typos. They will be corrected in the next draft of the plan

Proposed Changes:
Add two houses north east of proposed extension onto maps.
Correct typos of ‘Elvedon’ to ‘Elveden’ on page 167 of SA

<table>
<thead>
<tr>
<th>E/57</th>
<th>Christina Hunter (this representation is related to County Council Maps)</th>
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<tbody>
<tr>
<td></td>
<td>In a device which may confuse those reviewing the planning application it must</td>
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<tr>
<td>representation E/14 and contains photographs</td>
<td>be noted that the some maps are outdated and may be misleading. At no point in the existing presentation has either the Suffolk County Council or Mick George Ltd mentioned the situation with regard to the presence of mustard gas which is rather alarming as one wonders if they have fully realised the risks involved. Neither Suffolk County Council nor Mick George Ltd may be aware that Little Heath which boarders the length of site 4 is the dumping site of a great deal of waste matter from the original designated mustard gas site. The spoil mounds are easily visible. Little Heath lies considerably higher than the proposed quarrying area. The concern is that leaching of until now dormant toxic chemicals will take place due to disturbance to the water table caused by quarrying. On this site are the remains of a steel reinforced concrete chemical incinerator. Of keenest interest is the lack of information regarding mustard gas and other possible chemical deposits from WWI &amp; WWII which may be at risk of seepage from toxic spoil which has been deposited in the past on Little Heath. A considerable number of</td>
</tr>
<tr>
<td>Mustard Gas</td>
<td>It is the County Council’s understanding that the mustard gas contamination is within Little Heath and the works, south of the site, and that there is sufficient distance between the site and potential contamination areas. However, it can be added to the plan as a consideration to be aware of. Risk to groundwaters will need to be considered in the planning application as the site is in a Groundwater Source Protection Zone. Proposed Change Make reference in the plan to potential mustard gas contamination south of the proposed site in Little Heath and the mapped works.</td>
</tr>
<tr>
<td>Changes</td>
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| Test boars are surly required to determine toxicity risk. There is reasonable anxiety that there may be a disturbance to poorly documented and inadequately disposed of mustard gas. All the potential sites lie lower than areas of past contamination.

Disused WWI and WWII MOD buildings have been disposed of in a phlegmatic manner.

Unless it can be irrefutably proven that mustard gas deposits and other chemicals from WWI and WWII in the area have been safely disposed of and neither seepage into the water table will take place nor air bourn toxins released through quarrying it is of the greatest urgency that Suffolk County Council undertake an open enquiry leaving absolutely no doubt in the public's mind that no contamination of the water table or air could possibly take place either now or in the future due to quarrying.

Proof must be borne by Suffolk County Council to the satisfaction of the local population as this is of serious interest to Public Health.

**Add two houses north east of proposed extension onto maps.**

<table>
<thead>
<tr>
<th><strong>E/71</strong></th>
<th>Jean Muirhead</th>
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<tr>
<td>I would like to make representation to your council to raise objections to the proposed extraction of sand and gravel from the proposed site in Barnham.</td>
<td></td>
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**Lorry Movements**

There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site.
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<tr>
<th>E/77</th>
<th>John Hiskett, Norfolk Wildlife Trust</th>
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**Suffolk Minerals and Waste Plan Site Selection report for Barnham Quarry, Elveden**

The attention of Norfolk Wildlife Trust has been brought to the Suffolk Minerals and Waste Plan Site Selection report for Barnham Quarry, Elveden. Although falling within Suffolk, Norfolk Wildlife Trust is landowner and manager of Thetford Heath, which has nesting stone curlew and rare plants and which is adjacent to the proposed allocation. We note that paragraph 5.1.1 highlights potential impacts on Breckland SPA and Thetford Heath SSSI. Section 4 of Appendix 1 assesses mitigation of environmental

**Air quality impacts on sensitive flora of Thetford Heath**

Potential receptors have been identified near to the site, which include receptors sensitive to atmospheric deposition. At the planning application stage an Air Quality Assessment will be required to take account of the impact receptors from increased dust and pollutant concentrations and define the mitigation and monitoring which will be implemented.

**Stone Curlew**

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I was assured that the Lorries leaving the site will be using the old A11. As they will be going to a holding site this may will not be the end of their journey. We already have too many large Lorries using the C633 along Station Road and onto the A134, and if the end destination for the goods is Suffolk I feel these roads will be used. I did raise a further query whilst at the Village information day which was that several of us use Bore holes as our only means of water supply and if the extraction has an end result in lowering our water table we may be left with a water shortage, can you give us any assurances on this?

Lorries will not go through Barnham Village. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106 to Brandon, where they will access the wider haulage network via the A1065.

**Ground Water**

An assessment of the ground water and flood risk will need to be submitted as part of any planning application as the site is within a Groundwater Source Protection Zone. This will highlight any significant issues regarding the water table and the public will also be able to make comment at the application stage if this is still a concern.
impacts. As part of this, we note from Appendix 1 that there is an intention to create a bund between the proposed allocation and the Elveden Road which runs immediately south of Thetford Heath. We note that paragraph 6.5 states that the county ecologist takes the view that impacts on receptors can be minimised with appropriate mitigation. However, despite these proposals we have concerns over air quality and impacts on SPA birds.

Air quality impacts on sensitive flora of Thetford Heath

We are concerned about the impact of atmospheric deposition on the rare plants, including lichens that occur on Thetford Heath. In particular, there is a large population of the Breckland endemic, Perennial Knawel on Thetford Heath, close to the Elveden Road and this is probably the most important site for this plant. Some lichen species have already been lost, almost certainly due to atmospheric deposition. If the allocation were to be taken forward, there will need to be an air quality assessment with the application and a subsequent dust management plan, which will require monitoring to ascertain whether this is working successfully with regard to heathland and calcareous vegetation on Thetford Heath.

Stone curlew

The County Council is proposing that the site will also only be worked outside of the Stone Curlew nesting season, in order to prevent disturbance of site operations on this species. While there will be some reduction in the amount of land the birds can use of the quarry is implemented site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. Site restoration can also ensure that the habitat is available to stone curlew following extraction.

More detail on how impacts will be avoided minimised and mitigated will be provided, as this was requested by Natural England
The critical area for stone curlew breeding tends to be the southern half of Thetford Heath (this is due to sward quality) and therefore in close proximity to the works and it is difficult to conceive how such a large scale works will not displace the stone curlews from breeding on Thetford Heath. Even with bunding providing some mitigation, issues such as lighting and movement within the quarry could lead to disturbance.

In addition to the above, after the breeding season, according to our observations, stone curlew from Thetford heath, use the proposed extraction area for roosting before departing the Brecks. This is likely to be because restrictions on the Open Access Land on Thetford Heath are lifted in September and birds roosting on Thetford Heath are disturbed. It is likely that during some of the time when excavation is taking place (and also before new habitat is suitable for these birds); the development area will not be available to these birds.

If the allocation were to be taken forward, NWT would potentially be able to apply for a further 28 days restriction. For this to be successful, particularly in terms of public acceptance, we would like to see the need for extended Open Access restriction on Thetford Heath recognised in any planning consent.

Conclusion
<table>
<thead>
<tr>
<th>E/104</th>
<th>Cllr Joanna Spicer</th>
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<tr>
<td><strong>The county ecologist takes the view that impacts on receptors can be minimised with appropriate mitigation. However, in contrast to the ecologists view, our concerns remain over air quality impacts on rare plants and impacts on SPA birds. These are the same concerns that we expressed with regard to the short term 2012 application, for which we considered that mitigation measures proposed would be adequate. However, the current proposal is long term, larger scale and located directly adjacent to Thetford Heath. As a result, unless it can be clearly demonstrated that mitigation will be deliverable and effective, it is our view that this allocation should not be taken forward.</strong></td>
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<th>E/104</th>
<th>Cllr Joanna Spicer</th>
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| **I write in response to the current consultation by Suffolk County Council for a new Suffolk Minerals and Waste Local Plan.**  
2. The process is described as "site selection report" from which it is understood that not all sites will need to actually be selected. I recognise that a few other sites will also have environmental concerns (AONB, SPA and SSSI sites) which is very difficult for us, SCC, whilst we maintain our commitment to designating Suffolk as “The Greenest County” and our stated role leading on environmental protection in Suffolk  
3. I am therefore formally asking the County Council to withdraw the proposed Barnham Quarry from the list of sites to be submitted to Government for a draft Suffolk Minerals and Waste Plan.** |

*Extent of Extension*  
Map of the site within the plan are the accurate extent of the extension. The site selection report does present the initial site size as submitted by the operator, Mick George, which is larger. However, this site size has been reduced due to potential impacts on landscape, ecology, public rights of way and archaeology, as was recommended in the conclusion section of the site selection report.

*Extent of Haulage Route.*  
The extent of the haulage route is described in the explanatory text of the preferred options draft of the plan in paragraphs 9.3 and 9.4 and is shown in appendix 1 of the site
4. The reasons for this are that information on Barnham Quarry, Elveden provided as part of the consultation is totally inadequate and misleading and therefore will open the County Council to a legal challenge:

i. The consultation document failed to supply correct information showing the size of the proposed extended quarry at Barnham

ii. The consultation document map did not show the full extent of the proposed haul route

iii. The consultation map did not include Elveden or the location of Contract Farm (where the materials would be stored) or indeed Elveden School

iv. The consultation was not clear about the status of the submission made by Mick George on behalf of Elveden Estate (ie which part SCC accepted and which part they rejected)

v. The consultation failed to show the adjoining proposed industrial application site

vi. The consultation ignored the known presence of the adjacent former mustard gas factory and the identified contamination risk to the water table

vii. SCC did not consult with the British Trust for Ornithology despite being aware of rare woodlarks nesting there

viii. I have been advised that the owner/manager of the Grose Industrial Estate was not notified (as he was in 2012)

ix. I have been advised that the MoD were not consulted in view of the proximity of RAF

Accepted and Rejected Site Areas on Consultation Map

This information can be found in the site selection report, which was available to view by the public as part of the plan evidence.

v) This application (which has now been granted) sits within a currently existing industrial site, however the plan can note its potential expansion in the plan. If a planning application for the minerals site comes forward it will need to take account of this development.

vi) It is the County Council’s understanding that the mustard gas contamination is within little heath and the works, south of the site, and that there is sufficient distance between the site and potential contamination areas. However, it can be added to the plan as a consideration to be aware of. Risk to groundwaters will need to be considered in the planning application as the site is in a Groundwater Source Protection Zone.

vii) British Trust for Ornithology

The BTO were consulted as were other wildlife related organisations the RSPB,
| Barnham (and the fact that they are not allowed to do any form of ground work (e.g. trenches) because of risk of environmental damage | Suffolk Wildlife Trust, Norfolk Wildlife Trust and Natural England.

viii) Gorse industrial Estate
The consultation system used highlighted addresses within 250 meters within the site boundary. Businesses sited on Gorse Industrial Estate that were within the 250 meters were consulted, however the manager of the estate may not have been highlighted. The manager of the industrial estate will be added to the consultation list.

DC/17/1487/FUL
Ministry of Defence
The Ministry of Defence were consulted through the Defence Infrastructure Organisation.

Previous Site Permission
Permission was granted on the 31st of October 2012 with In order to supply the construction of the A11 bypass, which is stated in paragraph 9.1 of the plan. However, in a subsequent application permission was granted to extend extraction on 29th October 2014 to 31st March 2019, with restoration to be completed by 31st March 2020. These applications can be seen on the County Council website (https://www.suffolk.gov.uk/planning-waste-and-environment/planning-applications/comment-on-or-view-a-planning-application/) at using the application |

x. Although it is acknowledged that consent already exists for 15 hectares it has not been made clear that this approval was for a single user destination. This 15 hectare site was NOT included in the previous SCC Waste and Minerals Plan and the application only came forward as a “borrow pit” for a specific local need (A11 construction).

xi. It may be technically correct but it is exceedingly confusing to refer to this site as Barnham “Quarry” when it has not been “worked” at all – only top soil removed to construct a bund

5. Should you feel unable to totally withdraw Barnham at this stage then I urge the County Council to only agree to submit the area of 15 hectares that already has planning consent. There may need to be variation on the current conditions of consent.

6. However, any proposal to include in the future plan an extended site (89.9 hectares or 255 hectares as proposed be Elveden Estate ) should be firmly rejected by the County Council for the following reasons:
   i. Proximity to household dwellings (in particular North Farm which is very close to the boundary of the site)
   ii. Proximity to Gorse industrial estate, MoD establishment (RAF Barnham)
|   |   | iii. Likelihood of processing plant being necessary on the site  
|   |   | iv. Noise and dust from workings and a processing plant  
|   |   | v. Haul route in use over 30 years will damage SSSI  
|   |   | vi. Noise and road safety risk to Elveden School  
|   |   | vii. Risks loss of habitats for woodlarks (who nest for 9 months a year) and stone curlews  
|   |   | Please could you acknowledge receipt of this response and confirm that an e mail response is allowable  
|   |   | numbers SE/2012/0782 and SE/14/2211 respectively.  
|   |   | **Air Quality**  
|   |   | County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses.  
|   |   | **Noise pollution**  
|   |   | County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the mitigation measures required and protect nearby residents and businesses.  
|   |   | **Ecology and Landscape**  
|   |   | Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (such as the SSSI), must be submitted as part of the planning application for the site. |
Breeding Stone Curlews are considered within the operation of this site. In order not to disturb the nesting season of the birds (between approximately March and August) the site will only operate in winter, which will also benefit other flora and fauna that are active at this time.

*Elveden School*
Planning conditions can be used to enforce when lorries use the old A 11 to access the highway network in order to cause the least impact possible on the school, such as preventing lorries passing the school during when pupils are arriving or leaving the school. This condition has been implemented on a former application on this site (planning reference F/14/2324).

**Proposed Change**
Include the permitted planning application for the industrial area east of the site.
Make reference in the plan to potential mustard gas contamination south of the proposed site in Little Heath and the mapped works
Add the manager of the Gorse Industrial Estate to the consultation list.

<table>
<thead>
<tr>
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<th>Robert Watson</th>
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<tr>
<td>E/128</td>
<td>I wish to strongly object to the inclusion of the land currently farmed as North Farm, Barnham in the Suffolk Minerals and Waste Local Plan.</td>
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</table>
The proposed area of over 100ha has been farmed by three generations of my family since 1963 and its loss will have a significant impact on the income of the farm business. We as tenants of Elveden Farms have endeavoured to invest and improve the farm for the benefit of all. The farm has an irrigation system fed by a borehole which enables high value cropping of potatoes and other vegetables beyond the traditional limits of Grade 4 soil. North Farm is a productive and profitable mixed farm. This needless proposal is an underhand deceit to gain the removal of the tenants by our landlord and to this aim Suffolk County Council have been complicit. The original A11 borrow pit application and the subsequent variation had end-uses with no economic foundation. Also the landowner was committed to a restoration plan which he was unable to deliver under the terms of our tenancy. Neither of these planning permissions should have been granted.

The current tenancy on the land is a matter between the tenant and the landlord and the County Council can not be involved.

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (such as the SSSI), must be submitted as part of the planning application for the site.

The site will also only be worked outside of the Stone Curlew nesting season, which is between March and October.

Level of Detail in the Plan
The level of detail regarding the site is considered sufficient for inclusion in the plan. However, if the site stays in the plan when the final version is adopted, the landowner/quarry operator will still need to submit a planning application, accompanied by a greater level of detail regarding impacts to ecology, landscape, public amenity (e.g. noise and air quality), highways access and issues. This information, as well as full details regarding mitigation to these issues must form part of any planning application, only
considering ones with merit and the consent of all involved.
After, it became apparent that the original borrow pit was not required for the construction of the Elveden bypass, this application became redundant. The site should be returned to farmland and all future applications rejected.
The site is within the Breckland farmland SSSI. The Brecks are an ecologically unique landscape within the British Isles and have international significance.
Permitted development of any kind within Breckland is severely constrained by any effects on its flora and fauna, notably the breeding cycle of the stone curlew.
Stone curlew nest and flock on arable land exactly like the site proposed and it is inconsistent of planning to allow a new long-term 100ha quarry within the heart of Breckland whilst other less disruptive projects are restricted.
The consultation documents often refer to the environmental impact of the original 14.9ha borrow pit. However, this new proposal is clearly massively different.
The current planning restricts the operation of the site through the summer, details a restoration plan and insists that the aggregate be transported along farm tracks to Contract Farm, Elveden. It is however difficult to envisage that 2.5 million tonnes of sand and gravel will be removed along the designated haul route over a 30 year period and that any future full planning application or variation of, the public will also be able to view and make comment.

Public Rights of Way (PRoW)
With regards to footpaths, the County Council will seek to retain or redirect public rights of way through planning condition. There is one PRoW abutting the west of the site (Ickneild way). A standoff with a bund will also be required to protect the amenity of users of the PRoW. There is also a PRoW within 200m to the east of the site, which must be retained.

Water and Floods
Ground water and flooding has been considered as part of the site selection process and the site size has been decreased from its initial proposed size partly because of flood risks. An assessment of the ground water and flood risk will need to be submitted as part of any planning application as the site is within a Groundwater Source Protection Zone.

Site Restoration
Sand and Gravel permissions are temporary, as such the site must be restored and so could be used for agriculture again after extraction. The site will be restored to conservation or agriculture, similar to its current use.
will not seek to utilise the main road network. Furthermore, future planning or variations of, may change the months of permitted workings with questionable mitigation. The operational lifespan of the site could be lengthened and any restoration plan revised. Suffolk County Council are asking the residents of Barnham and Elveden to comment on proposals that are totally insufficient in their detail to the actual application whenever or whatever that entails. We are not able to assess the environmental impact on our villages with the information currently provided. Therefore, this a flawed consultation which will however be referred to, in allowing any future planning application.

Again, Suffolk County Council as the planning authority should act firmly and decisively with this ambiguous proposal and dismiss it as a speculative application.

The site proposed covers over 100ha of farmland both arable and permanent pasture, this land, the food it produces and the employment it provides will be lost. The site adjoins the Thetford Heath Nature reserve and the Icknield way, an ancient Roman by-way from numerous vantage points these give stunning views over open countryside to tree lined horizons these vistas will be lost.

The village of Elveden waited 30 years for a by-pass and now enjoys relative peace and quiet. The working of the site and the lorry

Electricity and Gas Infrastructure Through the Site.

Electricity and gas infrastructure through the site must be taken account of in the extraction process. Any overhead cables should be diverted round the site, while below ground infrastructure should be avoided by the extraction process. We have received a response on behalf of the National Grid highlighting the gas pipeline and their approach to keeping existing transmission pipelines in situ. Any planning application for extraction close to National Grid infrastructure will be subject to agreement from the National Grid.

Aggregates from Other Sources

Recycled aggregates contribute approximately 0.5 Mt per annum however the availability is restricted by the amount of demolition waste etc. that is available.

There are licences to dredge 9Mt per annum of sand and gravel off the cost of East Anglia however economics dictates that most of this is transported for use in London. The level landed in Suffolk is not significant relative to the licenced resource.

While there is movement of sand and gravel between counties, the National Planning Policy Framework state that when making plans authorities should “plan for a steady
movements to and from Contract Farm will mean that hard won serenity will be lost. A series of drains and ditches diverts water from the Hunwell Low springs through the site, often at high levels especially in late winter. The working of the site will disturb the integrity of this system and will have to be addressed. Additionally, an underground high pressure mains gas pipeline passes through the site, workings either side of which will be prohibited, furthermore two sets of electricity pylons dissect the site when all these factors are considered along with the sporadic nature of the gravel deposits and the chalk contamination of the sand leads one to the conclusion that this is not a credible site for a quarry operation.

I would also like to question the need for Suffolk County Council to undertake this whole process. The statutory requirement to retain granted permission for 7 years supply of predicted sand and gravel use can easily be achieved through a combination of using recyclable material; offshore deposits; existing sites and co-operation with neighbouring authorities. Indeed Essex has granted planning permission for over 35 million tonnes (Essex Local Aggregate Assessment Oct 2017). The site at Barnham is overlooked by Norfolk and is within a few miles of Cambs, it is inconceivable that aggregate from Barnham will not be used in these counties at least. A holistic East Anglian appraisal of the sand and gravel needs would show adequate supply of aggregate by... making provision for the maintenance of landbanks of at least 7 years for sand and gravel...”. The County Council can not solely rely on minerals from outside the county to meet its need.
<table>
<thead>
<tr>
<th>E/134</th>
<th>Donald Hunter</th>
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<tbody>
<tr>
<td>Thank you for sending the information regarding the Suffolk Minerals and Waste Local Plan report. Your department has certainly covered the pros and cons of the various proposed sites in great detail. However, I strongly oppose the proposed site in Barnham. I note that observations would be made of wind direction during extraction, but as the prevailing wind is in the direction of Barnham residential area and Barnham village school, there will inevitably be significantly poorer air quality through dust pollution caused by quarrying. Diesel emissions from plant and lorry manoeuvres must also be factored in. There is already a sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses.</td>
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| Air Quality | County air quality consultants have identified sensitive receptors nearby the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses. |

<p>| Noise pollution | County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the |</p>
<table>
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<tr>
<th>M/1</th>
<th>J.George Coleman</th>
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<td></td>
<td>I am writing to express my dismay over the proposed plan to extract sand and gravel on the outskirts of Barnham village. I am a graduate of the London School of Economics and have been a resident of Barnham for the mitigation measures required and protect nearby residents and businesses.</td>
</tr>
</tbody>
</table>

**Assessment**

Suffolk County Council

Page 139

considerable increase in cases of asthma and other respiratory conditions, especially in children, and the opening of a quarry would exacerbate the problem. Also I am concerned that the problems of noise, vibration and light pollution are not sufficiently mitigated. It is highly likely that important archaeological deposits would be uncovered, thereby preventing continuation of extraction. As you know there is a Palaeolithic site in Barnham which is under continuing excavation for three weeks annually by the British Museum, Natural History Museum, Queen Mary and Leiden University, and is of international importance. There is another important Palaeolithic site at a disused brick pit within the grounds of Center Parks, Elveden. The third generation tenant farmers of North Farm have developed the land into a valuable resource for essential root crops and it would be a disaster if they were unable to continue as a result of the proposed quarry.

**Light pollution**

The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

**Archaeology**

It is correct that a full archaeological assessment has not been done on the whole site. For the purposes of the plan a desk based evaluation is considered appropriate. However, if a planning application is submitted a full program of archaeological evaluation, including appropriate field work, must be included. This needs to demonstrate the impacts of development/removal of the remains.

**Current Tenant**

The current tenancy on the land is a matter between the tenant and the landlord and the County Council can not be involved.

**Noise Pollution**

County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning
past 32 years. I am 96 years old and because of this I am unlikely to attend the meeting to discuss the County Council Minerals and Local Plan on 6th November 2017.

I am concerned about the impact that this proposed plan will have on the village of Barnham and its residents. My concerns are:
1. The effects of noise due to extraction and loading of sand and gravel on the quality of life of those living in the village.
2. The large increase in heavy vehicular traffic that the plan would generate both in terms of the removal of the extracted material and also any subsequent landfill would be extremely intrusive and unsuited to a populated area such as Barnham.
3. Barnham is a delightful, rural, Suffolk village which would be transformed into a semi-industrial, unattractive environment.
4. Residents of this attractive village will suffer depressed value of their houses through vast increase in noise, pollution and danger. A walk along the street will become unpleasant, as will the use of gardens.
5. There are no benefits to the residents of Barnham arising from this plan, only disadvantages. These will continue for decades given the proposed 30 year timescale for the plan. By contrast, it may be assumed that the Elveden estate will be the only local beneficiary and this needs no support as its owner is, I am told, extremely wealthy, living abroad and making use of tax havens.

application stage to provide detailed information on these impacts and inform the mitigation measures required and protect nearby residents and businesses.

Lorry Movements
There are an estimated 36 lorry movements a day associated with this site. 18 lorries into the site and 18 lorries out of the site.

Lorries will not go through Barnham Village. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106 to Brandon, where they will access the wider haulage network via the A1065.

Site Restoration
A site restoration scheme must be submitted with a planning application. The county council would expect this site to be restored to agriculture and nature conservation purposes. Restoration may require inert soils to backfill the site. The site will not be used as landfill for local authority collected waste or commercial waste following extraction.

Amenity of Nearby Residents
It is expected that mitigation measures can be put in place to ensure the amenity of nearby residents and businesses are not harmed. Vegetated earth bunds are standard
To summarise, I object to the proposal to undertake industrial sand and gravel extraction on the outskirts of Barnham village. Location of this activity so near a village is undesirable as noise pollution is inevitable; moreover, sixty tow lorry loads mean one hundred and twentyfour intrusions on the road and landfill will call for bin lorries to have access in addition to this. Barnham residents would suffer only disadvantages for decades and because of this a less populated site should be chosen. I hope that the Barnham proposal will meet with overwhelming misgivings and will be rejected.

Mitigation at sand and gravel quarries, to reduce visual impact and attenuate noise and dust. It is also expected an additional stand-off will be required of this site.

Property values
Property values are not a planning consideration.

Further to the public consultation held at Barnham Village Hall on Monday 6th November I wish to comment on proposals for the Barnham site. I am responding as an individual. There are a number of points which I think should be considered further and some gaps in the information available which I think should be addressed before a properly informed decision can be arrived at.

My contact details are above. If my comments are to be published, I request that my contact details are not shown which is why I have omitted them from my comments.

Suffolk County Council Minerals and Waste Local Plan Preferred Options

Proposed Barnham Site

- This proposal is classed as a variation on an existing planning approval. The existing approval is for up to

Current Planning Permission

There has been no breach of the planning permission on the currently permitted site. Permission was granted on the 31st of October 2012 with the condition that the site is to be restored by 31st October 2015. However, in a subsequent application permission was granted to extend extraction on 29th October 2014 to 31st March 2019, with restoration to be completed by 31st March 2020. As it is an active planning permission and has been technically implemented due to the construction of the bunds, the site is a quarry in planning terms.

Location of Mineral Workings

Minerals can only be worked where they present and where local constraints allow. The site at Barnham also has good access to
400,000 tonnes to be extracted over 12-18 months specifically to be used in the A11 upgrade. One reason for approval being granted was that the material would not have to be transported far. The material was never used for the A11 upgrade because it was not fit for purpose. Lignacite in Brandon, who manufacture concrete building products seems to be of the same opinion. The revised proposal is for 3,000,000 tonnes to be extracted over 30 years or more, to be used who knows where and for who knows what? The estimate that 85% of sand would be used for house building in Suffolk is completely unsubstantiated and impossible to verify. Who knows how any house will be built and where in the next 3 years let alone 30? I would suggest that the new application should be treated exactly as that, an entirely new application.

- Sand and Gravel are pretty cheap compared to transport costs and so if 85% of the sand is to be sued for Suffolk house-building as stated, why site the quarry in such a remote part of the county? Certainly the A11 is convenient for Newmarket or perhaps Brandon, where there are quarries already anyway, but for most other centres the road connections are indifferent at best.

The strategic Lorry Network and housing growth is expected to increase across the County.

There will not be a condition limiting where the material from the quarry will be sold as supply is determined by the market. There is currently movement of sand and gravel across county boundaries in both directions.

Electricity and Gas Infrastructure Through the Site.

Electricity and gas infrastructure through the site must be taken account of in the extraction process. Any overhead cables should be diverted round the site, while below ground infrastructure should be avoided by the extraction process. We have received a response on behalf of the National Grid highlighting the gas pipeline and their approach to keeping existing transmission pipelines in situ. Any planning application for extraction close to National Grid infrastructure will be subject to agreement from the National Grid.

Anglian Water have been consulted as part of the formal consultation.

Water and Floods

Ground water and flooding has been considered as part of the site selection process and the site size has been decreased from its initial proposed size partly...
- Will there be a condition that the material is used in Suffolk because it forms part of the Suffolk Minerals and Waste Local Plan or will it be permissible for the contractor to ship it off elsewhere, perhaps to Thetford in Norfolk or along the A11 towards Attleborough or Wymondham where massive developments are proceeding?
- Anglian Water, Cadent and UK Power Networks, all of who have a major interest in how this site should be managed, have not been approached about this proposal. The lack of their input, which would have been of great interest to those attending the consultation, leaves a substantial gap in the information available.
- This area, as stated in the notes to the consultation, is in a Groundwater Source Protection Zone and there are well documented water courses running through it, the Hunwell Springs. An excavation of the size proposed will undoubtedly have a major impact on these springs which are fed from a chalk aquifer outside the currently proposed excavation site. What measures need to be taken to prevent the destruction of these water sources and very importantly, who will monitor that they are performed correctly and who will pay for that over 30+ years?

<table>
<thead>
<tr>
<th>Site area proposed by Extractor</th>
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<tbody>
<tr>
<td>The site area originally proposed by the extraction company (Mick George) was reduced by Suffolk County Council in allocation the site. The site reduction was due to a number of constraints including ecology, floods and minerals quality. This is why the site boundary in the plan is different to that which was originally proposed by Mick George.</td>
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<tr>
<th>Site Phasing</th>
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<td>because of flood risks. An assessment of the ground water and flood risk will need to be submitted as part of any planning application as the site is within a Groundwater Source Protection Zone. Conditions may be placed on the site in order to protect groundwater. Monitoring and enforcement are carried out by Suffolk County Council.</td>
</tr>
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</table>

**Loss of Agricultural Land**
While there will be some loss of agricultural land during the extraction, a mineral working is a temporary land use and can be returned to agriculture through restoration, while still providing ecological benefits. A full restoration scheme will be expected as part of any planning application for this site and the County Council would expect to see this site returned to agriculture and nature conservation.
• Cadent have a major high pressure gas pipeline crossing this site. This is not mentioned at all in the literature available and measures for its protection are not address.

• UK Power Networks have high voltage overhead power lines crossing this site. This is not mentioned at all in the literature and measures for protecting the pylons and cables are not addressed.

• The new proposal stated that 'inert material' will be used in recreating the profile after approximately 1,900,000 cubic metres of sand/gravel have been removed. There is no mention of what constitutes 'inert material' or how its quality will be monitored over the 30 year extraction period or what long term effect it will have on the Hunwell Springs which are currently high quality water.

• Restoration and aftercare in the original application consisted of creating a shallow valet and reducing the fertility of the excavated area by burying the original fertile topsoil 'below the plough layer' followed by overburdening with less fertile topsoil so that vegetation suitable for rabbits and stone curlew is created. There would be a few shallow ponds and enough grass for a few sheep. The new Barnham proposal seems to follow the same model and so eventually 80 Site phasing (working a site a small part at a time then restoring the worked part in a rolling process) is standard practice in the aggregates industry. As previously stated, restoration could return the site to agriculture, while still providing ecological benefits. A good example of an agricultural restoration is Suffolk is the former Layham quarry. While an applicant would be free to submit an application in these areas excluded by the County Council, the applicant would need to justify why this is acceptable and provide evidence.

Inert waste means soil or other inert material which is often left over from construction or demolition works. Waste permits are regulated by the Environment Agency.

**Lorry Movements near Elveden School**

The number of lorry movements currently expected from this site would not exceed the threshold IAQM and EPUK guidance (100 lorry movements), so a significant increase in local pollution concentrations is not expected.

Planning conditions can be used to enforce when lorries use the old A 11 to access the highway network in order to cause the least impact possible on the school, such as preventing lorries passing the school during when pupils are arriving or leaving the school. This condition has been implemented...
hectares of currently productive agricultural land will be downgraded to heath. Is that a good thing in the current turbulent economic circumstances?

- There was a suggestion made at the information meeting, confirmed by reading the contractor’s notes, that the workings would be performed in strips or sectors and restoration carried out as the next area is stripped. This is supposed to minimise the disruptive impact on the agriculture that currently takes place on the site. It is hard to see how this could happen in reality if the restored land is deliberately reduced in fertility so that only short grass will grow. It is effectively ‘death by a thousand cuts’ as far as crop growing is concerned.

- The contractor’s concept phasing plan for the site nears no resemblance to the site map produced by Suffolk CC, and includes areas containing housing and buried WW1 mustard gas (BNH 063 on the Suffolk Heritage Map). As there is claimed to be another 2,000,000 tonnes of sand/gravel in areas currently excluded from this application by the constrains map and fluvial flood plan but included within the contractor’s concept phasing plan, can you say categorically that this area will not be subject of a second or even third variation of the existing planning on a former application on this site (planning reference F/14/2324).

**Amenity of Nearby Residents**

It is expected that mitigation measures can be put in place to ensure the amenity of nearby residents and businesses are not harmed. Vegetated earth bunds are standard mitigation at sand and gravel quarries, to reduce visual impact and attenuate noise and dust. It is also expected an additional standoff will be required of this site. A minimum standoff distance of 100m between areas of extraction and nearby residences, with a bund, will be required.
approval in order to extend the site, as is happening in other instances?

- The School at Elveden has been free of traffic pollution since the A11 improvement was completed. Having 60 HGV movements per day right past it for 30 years has to be a retrograde step as the toxicity of diesel particulates, even from the cleanest of current vehicles, are considered harmful to the long term health of children. As witnessed by the Volkswagen scandal, ‘clean diesel’ is still some way off. As I’m writing this, environmental lawyers are launching legal action against HMG for failure to tackle illegal air pollution.

- Having looked at proposals for other sites included in the SCC Minerals and Waste Local Plan it seems that this one is in closest proximity to residential property by far. The original site was well away from these properties, the eastern boundary of the new proposal is within metres of some. Although there are all kinds of mitigation measures proposed for dust, noise, visual impact etc. the values of those dwellings close by will undoubtedly be adversely affected. Will there be a case for financial compensation to be sought from SCC, the Elveden Estate and the contractor by those affected?
<table>
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<tr>
<th>M/4</th>
<th>Donald Hunter (Duplicate of E/134)</th>
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<tr>
<td></td>
<td>Thank you for sending the information regarding the Suffolk Minerals and Waste Local Plan report. You have covered the pros and cons of the various proposed sites in great detail. However, I strongly oppose the proposed site in Barnham. I note that observations would be made of wind direction during extraction, but as the prevailing wind is in the direction of Barnham residential area and Barnham village school, there will inevitably be significantly poorer air quality through dust pollution caused by quarrying. Diesel emissions from plant and lorry manoeuvres must also be factored in. There is already a considerable increase in cases of asthma and other respiratory conditions, especially in children, and the opening of a quarry would exacerbate the problem. Also I am concerned that the problems of noise, vibration and light pollution are not sufficiently mitigated. It is highly likely that important archaeological deposits would be uncovered, thereby preventing continuation of extraction. As you know there is a Palaeolithic site in Barnham which is under continuing excavation for three weeks annually by the British Museum, Natural History Museum, Queen Mary and Leiden University, and is of international importance. There is another important Palaeolithic site at a disused brick pit within the grounds of Center Parks, Elveden.</td>
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<td>Archaeology</td>
<td>It is correct that a full archaeological assessment has not been done on the whole site. For the purposes of the plan a desk based evaluation is considered appropriate.</td>
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<tr>
<td>M/41</td>
<td>Ian and Jackie Clark (Duplicate of E/51)</td>
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<td>----------------------------------------</td>
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<td></td>
<td>The third generation tenant farmers of North Farm have developed the land into a valuable resource for essential root crops and it would be a disaster if they were unable to continue as a result of the proposed quarry. I would be interested in your comments.</td>
</tr>
</tbody>
</table>
|      | However, if a planning application is submitted a full program of archaeological evaluation, including appropriate field work, must be included. This needs to demonstrate the impacts of development/removal of the remains.  

Current Tenant  
The current tenancy on the land is a matter between the tenant and the landlord and the County Council cannot be involved.  

My wife and I would wish to object most strongly to the possible extension of the existing permission to extract sand and gravel at Barnham and would urge that this site be removed from the Suffolk County Council’s Preferred Options Draft dated October 2017. The proposed extension is within an area designated as an SSSI, as an SPA and it also lies within the area covered by the Brecks Partnership. SSSIs and SPAs are well known designations, but the Brecks Partnership less so, but suffice it to say that the area is steeped in history dating back to early man and contains wildlife and plant species found nowhere else in the UK. More details of the history and heritage of the Brecks can be found at [www.brecks.org/about/history-and-heritage](http://www.brecks.org/about/history-and-heritage), while more information about the wildlife and plants resides at [www.brecks.org/about/wildlife-in-the-brecks](http://www.brecks.org/about/wildlife-in-the-brecks). The environmental damage that this proposed extraction site could cause if permission for it was granted, should be sufficient reason in

Ecology and Landscape  
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (such as the SPA and SSSI), must be submitted as part of the planning application for the site.

County Council Maps  
The maps produced by the County Council use Ordnance Survey maps as a base. The OS base maps in the plan documents were issued in 2016, the most up to date available at the time. However, after comparing the maps with online satellite image there are at least two houses north east of the proposed site extension not included in these maps. However I can confirm these houses were
itself, we believe, for this proposal to be withdrawn from the Draft Options document. I could go into greater detail about our various objections to this scheme, which include the fact that existing buildings to the north east of the proposed site are not included on the various maps, there are no details of where any washing and grading plant might be located, the proposed haul route is likely to cause considerable damage to the paths, byways, fauna and flora along its route and the school at Elveden, please note the spelling which is incorrect twice on page 167 of the Sustainability Appraisal, would likely suffer from increased noise and dirt, thus affecting the health and welfare of its young pupils.

Please give the foregoing remarks the closest consideration and remove this proposed extension from the list of Preferred Options.

sent a letter as part of the consultation process. The County aims to add missing map elements for the next stage of consultation.

Public Rights of Way (PRoW)
With regards to footpaths, the County Council will seek to retain or redirect public rights of way through planning condition. There is one PRoW abutting the west of the site. A standoff with a bund will also be required to protect the amenity of users of the PRoW. There is also a PRoW within 200m to the east of the site, which must be retained.

Site Washing and Grading Plant
Details of the site operations, including at the planning application stage, where the public will also have the opportunity to respond.

Elveden School
Planning conditions can be used to enforce when lorries use the old A 11 to access the highway network in order to cause the least impact possible on the school, such as preventing lorries passing the school during when pupils are arriving or leaving the school. This condition has been implemented on a former application on this site (planning reference F/14/2324).

Errors in Sustainability Appraisal
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<td><strong>E83</strong></td>
<td><strong>Natalie Gates, Historic England</strong></td>
<td>We are concerned about the allocation of this site for two reasons. The site is part of the setting of the scheduled Atomic Bomb Store which also includes grade II* listed buildings. The original setting of the Bomb Store would have been open heathland. If this site goes forward, these highly graded designated heritage assets require a programme of temporary mitigation to setting along the Elveden Road side of the site, progressive restoration of the site as it is worked, and restoration which could enhance the setting of the designated heritage assets through returning the land to heathland setting. These should all be required through a site specific policy reference. We would question the allocation of the site given paragraph 9.17 states that it is possible that the site may have archaeological potential which would trigger paragraph 139 of the NPPF. This supporting text goes on to say that if paragraph 139 was triggered preservation</td>
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<td>Proposed Changes: Add two houses north east of proposed extension onto maps. Correct typos of ‘Elvedon’ to ‘Elveden’ on page 167 of SA</td>
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<tr>
<td>E154</td>
<td>Alison Collins, Natural England</td>
<td>The extension to this quarry lies entirely within Breckland Farmland SSSI which is designated for its population of breeding stone curlew and is a component of Breckland SPA (designated for breeding stone curlew, nightjar and woodlark). It is situated adjacent to Breckland SAC (designated for vegetation communities), Thetford Heaths SSSI, Thetford Heath NNR which are components of Breckland SAC, and Little Heath, Barnham SSSI (designated for stone curlew and dry grassland communities) which is a component of Breckland SPA. The proposed extension represents a considerable increase in the area of the existing permitted quarry and without avoidance and mitigation measures would significantly impact adversely on designated features, such as breeding stone curlew. However, in principle, we have no objection to the extension subject to further information being provided which demonstrates that impacts to designated features have been satisfactorily avoided and mitigated.</td>
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</table>

in situ would be required. If this site remains as an allocation such requirements should be secured through this plan in the form of a site specific policy reference. We find the inclusion of Barnham as unsound given the archaeological potential of the site and the lack of policy protection for identified historic environment considerations if such an allocation was pursued.
avoided where possible and mitigation measures put in place for those impacts which cannot be avoided and monitoring to ensure the measures are effective. Ideally, the proposal should provide a net benefit to biodiversity, particularly notified features, following restoration. Several mitigation measures were agreed for the existing quarry and we suggest that these measures should be considered for the extension, for example avoidance of activities during the stone curlew breeding season, making the land available for breeding stone curlew during the breeding season, where appropriate temporarily sowing areas with crops to discourage stone curlew nesting and minimising vehicle movements. The impact assessment should also provide evidence that there will be no adverse effects on the nationally and internationally designated features from dust blow, changes to hydrology etc.

We would like to be involved in discussions at all stages.

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<tr>
<th>E/108</th>
<th>Charlie Christensen, The Environment Agency</th>
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<td></td>
<td>The Barnham site is located within part of a SSSI that is not dependant on groundwater, however Natural England may have comments on this excavation within the SSSI and we assume that they have provided comments. Groundwater quality on this site is very sensitive. The site is located within a Source Protection Zone (SPZ) 2 and the Bretenham and Euston Safeguard Zones. For this reason we would not consider hazardous or non-hazardous restoration appropriate. A Strategic Flood Risk Assessment forms part of the evidence base for the Plan and concludes that all of the sites can be included under the sequential test without the need for the exceptions test. Site specific Policy MS2 Barnham has been added which stipulates inert waste materials. The policy also requires proposals to develop the site to take into account the implications for groundwater and controlled waters.</td>
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</tbody>
</table>
A thorough hydrogeological risk assessment would be required before restoration that collects substantial baseline data. Strict Waste Acceptance Criteria (WAC) would also be applied to ensure the protection of groundwater quality.

Flood risk needs to be considered from all sources. There is a clear surface water flow path across the site as shown on the risk of flooding from surface water flood map. Flow paths should be maintained to ensure flood risk is not increased.

A very small part of the site is within flood zones 2 and 3. The flood zones are close to the boundary of the site, but the impact of climate change will need to be considered. A flood risk assessment (FRA) would be needed to demonstrate the risk of flooding to those working onsite and to ensure that flood risk is not increased. It should be demonstrated that the flood risk sequential approach has been applied within the site in order to direct development to areas of lowest flood risk.

There is the potential for this site to offer betterment through reducing the runoff rates, thereby reducing the flow to the Little Ouse and Thetford. It should be explored if betterment could be achievable, particularly when it comes to restoration.

| E/70      | Mike Jones, RSPB | Barnham, We note the inclusion of this proposed site, which is within the Breckland SPA. We are concerned that the | Proposed changes: add reference in to the site specific Policy to the need for a Flood Risk Assessment. | The plan is an in principle document and detailed assessment of each site is not feasible. The plan and the habitats regulation assessment outline potential impacts of the Barnham site, with detailed assessments and |
| HRA supporting the plan does not appear to have investigated the potential impacts on the SPA of the allocation in any detail. Minerals extraction on these sites will result in adverse effects on the integrity of the SPA through displacement of nesting birds, and without adequate mitigation would not me permissible at the development control level, leaving the plan undeliverable. We have set out our wider concerns with the HRA report elsewhere in our response. With specific reference to this proposed allocation, as an absolute minimum we recommend the following would be required to demonstrate that the proposal could avoid an adverse effect on the Breckland SPA.  
• Provision of alternative habitat for displaced SPA features for the period of the extraction. Whilst the proposed allocation is temporary, it will result in a loss of SPA habitat for a significant period, and this should be mitigated for by provision of suitable nesting habitat elsewhere for the period of the works.  
• Restoration to wildlife-rich habitats. In line with existing minerals consents in the SPA, restoration of mineral sites within the stone-curlew habitat of the SPA should be to Brecks grass-heath, the preferred habitat of stone-curlew, in order to maximise the likelihood of the SPA species returning | appropriate, avoidance, minimisation and mitigation details expected at the planning application stage. |
| E/73 | West Suffolk District Council | 9.6 – this paragraph states that the site is within Forest Heath and St Edmundsbury. The site only in St Edmundsbury BC, although both councils form West Suffolk. The site is a major groundwater vulnerability classification. This is a very sensitive area for landscape and ecology and we have significant concerns with to use the site after the minerals working.  
• Given the proposed allocation’s location within the SPA, any allocation must be able to demonstrate that it will be able to avoid any significant increases in pollution to the surrounding site, from sources including (but not necessarily limited to) dust, noise, lighting, human and vehicle disturbance on site and on access routes and changes to the surrounding hydrology.  
• We expect that such measures would also apply to any similar international designations (such as Ramsar sites and SACs) and also include similar measures to avoid adverse effects on Sites of Special Scientific Interest.  
• If the above is possible and the sites are taken forwards in the plan, then they should be included as site specific policies in the submission stage of the plan, and accompanied by the appropriate level of detailed assessment in a revised HRA. | The western part of the haul route and the stockpiling area at Contract Farm are in Forest Heath. Natural England have stated that they have not objection to the site, provided more information is presented showing how impacts can be avoided, minimised or |
<table>
<thead>
<tr>
<th>E/78</th>
<th>James Meyer, Suffolk Wildlife Trust</th>
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<tbody>
<tr>
<td></td>
<td>Barnham</td>
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<tr>
<td></td>
<td>This site is within the Breckland Special Protection Area (SPA) and the Breckland Farmland Site of Special Scientific Interest (SSSI), these sites are designated for internationally important numbers of breeding stone curlew. The site is adjacent to Thetford Heath SSSI and National Nature Reserve (NNR). Thetford Heath is also a component of the Breckland Special Area of Conservation (SAC). We note that it is proposed to only operate the site outside of the stone curlew nesting season to avoid impacts on breeding stone curlew. However, we query whether the loss of the availability of this area of land to nesting stone curlew has been assessed? Such impacts must be assessed as part of mitigated, which Suffolk County Council will be including.</td>
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<td>An HRA has been prepared.</td>
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</table>

The Forestry Commission have also been consulted.

The County Council are aware of the gas pipeline and have received a representation from the National Grid highlighting the gas pipeline and their approach to keeping existing transmission pipelines in situ. Any planning application for extraction close to National Grid infrastructure will be subject to agreement from the National Grid.

The allocation without details of the mitigation and restoration plans, due to the size of the site and its land coverage. It is recommended that the Forestry Commission and Natural England are fully engaged.

It should also be noted that the site is traversed by a HSE Major Hazard pipeline, and National Grid and the HSE’s guidance should be sought in this regard.
the Habitats Regulations Assessment (HRA) for the Local Plan and sites should not be allocated which would result in an adverse impact on the designated sites. It must also be ensured that should any extraction be allocated in this location, that the site restoration plan maximises the area’s value for the species for which the SPA and SSSI are designated.

8. **Belstead**

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<thead>
<tr>
<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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<tbody>
<tr>
<td>SM/1</td>
<td>Dr Michael Bamford</td>
<td>Re Belstead site. This proposes to industrialise a significant band of countryside, South of the A14 in what has up to now been considered a green belt. As resident on Bentley Old Hall (grade 11* listed) it potentially impacts on the visual, and locality amenity of the property. I would like to see what mitigation is proposed. The local Woods: Bentley Old Hall and Brockley have major wildlife interest - dormice, owls, badgers, deer inter alia, and Bentley Old Hall Wood is the historic founding site of the Suffolk Naturalist Trust by Claude Morley. We should like to see what protection will be given to these. The proposal may significantly affect the water table. as local residents dependent on the water table. Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact. It is expected that any established woodland bordering the site, including vegetation along the road will be retained, as this provides an established barrier. This mitigation will also be implemented for the plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with restoration required as one part becomes exhausted and a new part is started.</td>
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<td></td>
<td><strong>Visual Impact</strong></td>
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<td>Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact. It is expected that any established woodland bordering the site, including vegetation along the road will be retained, as this provides an established barrier. This mitigation will also be implemented for the plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with restoration required as one part becomes exhausted and a new part is started.</td>
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<td></td>
<td><strong>Loss of Greenbelt</strong></td>
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<td></td>
<td>Minerals workings are one of the few uses which can be acceptable in the countryside, as extraction can only occur where minerals are located. A site</td>
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Assessment Suffolk County Council
on borehole water, we should like to see an impact evaluation. The application indicates 'some backfill from inert material' What is the nature of this material? and is it proposed that the site should become a landfill site after use, or is it considered that there will be water infill?

restoration scheme must be submitted with a planning application. The County Council would expect this site to be restored to agriculture and nature conservation purposes.

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts. Standard mitigation includes a standoff (in the case of Barnham standoff would likely be 10m from the end of the tree canopy), followed by an earth bund which is usually vegetated.

Site Backfilling
Inert material is the term used to describe waste soils (typically from other excavations or from construction activity) and construction waste. The site will not become a landfill for household waste. Water infill is not expected as water was not found in any of the test bores for the site.

SM/2 Spencer Deakin NOT GO AHEAD

Noted
<table>
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<tr>
<th>SM/3</th>
<th>Miles Cooke</th>
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<tr>
<td></td>
<td>I'd like to object to Belstead being used as a new quarry site. The area is predominantly rural with picturesque landscapes and is host to a wide range of wildlife. It serves as a place of relaxation for the local community and improves the quality of life of the local populace. Building a quarry at this location would negatively effect the whole Belstead area. Roads would become busier, causing noise and air pollution and it'd be another example of losing precious green belt land. It'd be a disaster, environmentally, and I'd hope common sense would prevail over approving this just to raise a quick buck.</td>
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</table>

**Ecology and Landscape**

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

**Loss of Greenbelt**

Minerals workings are one of the few uses which can be acceptable in the countryside, as extraction can only occur where minerals are located. A site restoration scheme must be submitted with a planning application. The county council would expect this site to be restored to agriculture and nature conservation purposes.

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.
| SM/5 | Richard | I am a resident of Belstead - why have we not been consulted directly? | **Public Consultation**
Standard practice when consulting on new sites is to send letters directly to residents who are within 250 meters of the site boundary.

The ways that the County Council used to inform the public of the consultation and consultation events were: letters to residents and businesses within 250m of the site; advertisements in the local press (East Anglian Daily Times and the Newmarket Journal), email notification to Belstead Parish Council. Social media was also used to promote the consultation events. |
| SM/7 | E J Peake | Belstead site To desecrate a beautiful area with a sand hole and turn our already over used roads into rat runs with sand vehicles is beyond comprehension. But the council will pay no heed to the council tax payer. STOP THIS STUPID IDEA NOW | **Visual Impact**
Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact. It is expected that any established woodland bordering the site, including vegetation along the road will be retained, as this provides an established barrier. This mitigation will also be implemented for the plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with restoration required as one part becomes exhausted and a new part is started.

**Traffic (Belstead)**
There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries. It is possible to implement conditions which determine the direction that lorries... |
SM/8  Steve Woolnough  Both the M3 & M9 proposed sites are in areas of natural beauty. There will be an increase in air-borne dust that will cause issues to home owners in a wider area. The will be an increase in noise pollution from the excavations and also from the increase in heavy plant movements. There is already far too much traffic congestion on the A14 and A12. When there are closures on those roads the heavy plant will increase volumes and delays on the back roads.

Turn upon leaving a site. This would prevent lorries using the Old London Road.

Air Quality
Potential receptors have been identified near to these sites. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

Noise Pollution
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road and roads through Belstead. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage. There should be no
| SM/9 | Kate Dinnes | We own a house on Belmont Road. This is a main road and cut through from the A12 to access Belstead. We are already sick of lorries thundering past going to Asda in Stoke Park and various other companies. Our gable end wall of our house literally shakes when we are in bed when lorries go past. As I am decorating and removing old wallpaper we are finding huge cracks in the walls on this side of the house. I directly blame heavy lorries shaking the house as they go past. There is no way we can bear plant machinery too. It is a busy route for children going to Gusford school near us and Sprites further up the other side of Belmont road, and lots of pedestrians and cyclists about all day. I don't think it is safe to have heavy plant machinery using this road too as well as the potential of our home collapsing with subsidence. If our concerns are all ignored because basically at the end of the day money talks, then I would at least insist road speed bumps positioned along the road nearer ellenbrook road junction as the speed 30 flash light further up doesn't really do much especially as vehicles speed up at the bottom of the road. |
| SM/11 | Paul Banjo | Belstead proposed new site - the big concern I have is road access. The three roads into Belstead |

Traffic

There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries, so there should not be a significant increase in lorry traffic using Belmont Road from this site.
| SM/20 | Terry Corner | Belstead. Site Machinery likely to be sited close to the listed properties on London Road. Volume of traffic leaving site likely to use London Road, Copdock to access A14 via Swan Hill, Beagle Roundabout, and Sproughton. Route has a weight restriction Beagle roundabout down to Swan Hill. | There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries. It is possible to implement conditions which determine the direction that lorries turn upon leaving a site and which direction they come from. Lorries will access the site from the A12 |
| SM/21 | Terry Corner | Belstead Site Why open a new site when existing sites can be extended. Land nominated would be better used for a garden community village taking pressure off other Parishes in Babergh District. | Historic Assets
Historic assets, including listed buildings, have been considered as part of the site selection process and it is not expected that these will be affected. A full assessment of historic assets in relation to the site will be required as part of a planning application.  

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.  

Site Selection Process
As part of the Issues and Options consultation a call for sites was issued and sites submitted by, land owners, land agents and quarry operators, one of which was the site near Belstead. While other sites are being extended the inclusion of the site in this plan is not considered excessive. |
The estimation of need for sand and gravel in the plan is based on the last ten years of sales in the county, which is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel.

Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments.

SM/24  Stephen Edgell
Brockley Wood Belstead: As a resident of the Old London Road near to Folly Lane, and a daily commuter on the A12 south of Ipswich, consider the proposal to build a quarry wholly inappropriate. My concerns are its unsuitability in terms of the dust and dirt put into the atmosphere very close to us (in distance from the proposed site we are only taking a 200 metres) but also in terms of traffic use accessing the site from the small roundabout where Old London Road joins the A12 at junction 32B. It would be inevitable that more heavy lorry journeys would use Old London Road at times of congestion (especially northbound on the A12

Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine...
<table>
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<th>Ref</th>
<th>Name</th>
<th>Description</th>
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<tr>
<td>SM/25</td>
<td>Clive Pearsons</td>
<td><strong>Site M 3</strong> The entrance/exit for this site is onto the A12 and any extra vehicle movements travelling north on the A12 will increase the congestion from Capel St Mary to Copdock Mill Interchange. When this happens at peak times, many vehicles use the route of the old A12 through Copdock &amp; Washbrook to the Beagle Roundabout on the Hadleigh Road. This often means that residents of Copdock &amp; Washbrook are unable to leave the village to meet appointments.</td>
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<td><strong>A12 Congestion</strong> We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.</td>
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<td>SM/27</td>
<td>Robin Wraight</td>
<td>My concern revolves around the location of, and proximity to the Wherstead site, this coupled with proposed housing development will have a major adverse impact on the environment in terms of traffic congestion, local listed properties, wild life, noise and quality of life. The infamous Copdock junction is incapable of handling the current volume of traffic, aggravated by consistent problems on the Orwell Bridge. The proposed site is adjacent to protected wild life woods. There are a number of listed buildings within meters of the site. This constant creeping industrialisation of the site...</td>
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<td><strong>Cumulative Impact</strong> Cumulative impact caused by multiple sites (that on their own don't necessarily caused significant problems independently) is taken account of in the plan and must also be considered in greater detail if a planning application is submitted. Mitigation would be required to reduce the impact if the site is to go ahead.</td>
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<td><strong>Housing Proposals in the Babergh Mid Suffolk Joint Local Plan</strong> The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will...</td>
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<tr>
<td>Area is unacceptable and must not be allowed to continue</td>
<td>work with the District Councils as both plans progress.</td>
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**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Historic Assets**

Historic assets, including listed buildings, have been considered as part of the site selection process and it is not expected that these will be affected. A full assessment of historic assets in relation to the site will be required as part of a planning application.

**Ecology and Landscape**

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded
| SM/28 | Ann Ross | My objection is to extra noise, we have a predominant wind from that area, my concern is that the smell from any dumped waste or any other gases we will be in direct line of. We are also concerned about traffic (lorries and heavy plant) using already heavily used lanes through the village. |

**Noise Pollution**  
County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the mitigation measures required and protect nearby residents and businesses.

**Odours and Site Restoration**  
There will be no waste odours coming from the site, as the site will not be used to landfill household waste after extraction. Some inert waste soils may be used to aid restoration and the County Council expects the site to be restored to agricultural use and nature conservation.

**Traffic**  
There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries. It is possible to implement conditions which determine the direction that lorries turn upon leaving a site. This would prevent lorries using the Old London Road.

**Noise Pollution**  
County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the
mitigation measures required and protect nearby residents and businesses.

Odours and Site Restoration
There will be no waste odours coming from the site, as the site will not be used to landfill household waste after extraction. Some inert waste soils may be used to aid restoration and the County Council expects the site to be restored to agricultural use and nature conservation.

Traffic
There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries. It is possible to implement conditions which determine the direction that lorries turn upon leaving a site. This would prevent lorries using the Old London Road.

| SM/30 | James Ross | My objection is to extra noise, we have a predominant wind from that area. My concern is that the smell from any dumped waste or any other gases we will be in direct line of. We are also concerned about traffic (lorries and heavy plant) using already heavily used lanes through the village. |
| SM/75 | E.J.V. Carey | It is important that all traffic to and from the site does not pass through local villages which have narrow roads many of which have no footpaths. The access is shown to be to and from the old A12 which is suitable but there must be measures in place to ensure there is no temptation for heavy traffic. |

Traffic
There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries. It is possible to implement conditions which determine the direction that lorries turn upon leaving a site. This would prevent lorries using the Old London Road.
| SM/97 | Paul Bastick and Sally Kington | **SUFFOLK MINERALS AND WASTE LOCAL PLAN PREFERRED OPTIONS CONSULTATION**
Comments from Paul Bastick and Sally Kington, Bentley Old Hall Barn, Old Hall Lane, Bentley IP9 2LW 27 November 2017
If Belstead (M3) were to go ahead in 2020 as proposed, our property would be within 0.2 miles of that quarry and 0.9 miles of one that not only already exists at Wherstead but has plans for future extension (M8). We object to two quarry sites operating at once in such close proximity. For the sake of local residents, of wildlife and of Ipswich’s Green Belt, we strongly recommend that land at Belstead is cleared for quarrying only when work at Wherestead has finished and vegetation at Wherestead has been reestablished. If or when Belstead (M3) did get underway, we would want to know • precisely what steps were being taken to avoid any adverse effect on our water supply, which is from a private borehole to 18 metres.

We would want assurance that there would be • maximum stand off from adjacent woodland, wooded tracks and wildlife corridors
• no weekend working |

|  |  | **Cumulative Impact**
Cumulative impact caused by multiple sites (that on their own don’t necessarily caused significant problems independently) is taken account of in the plan and must also be considered in greater detail if a planning application is submitted. Mitigation would be required to reduce the impact if the site is to go ahead

If a planning application were submitted for Belstead, nearby residents, within 250 meters of the site would be informed by letter and the Parish Council would also be informed.

**Water and Floods**
Ground water and flooding has been considered as part of the site selection process. Water was not found in the bore holes during the geological boreholes testing, so extraction is not expected to reach the water table.

**Ecology and Landscape**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of |
- the most effective protection against noise, dust and particulates
- backfill with a proportion of inert waste to organic matter that would allow successful return of the land to agriculture and conservation.

| | the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts, including standoffs. |
| | Working Times
| | Exact working times of the site Is decided at the planning application stage, however these times can be restricted by planning conditions. |
| | Air Quality
| | Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided. |
| | Noise Pollution
| | The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted. |
| | Site Restoration
<p>| | A site restoration scheme must be submitted with a planning application. The county council would expect this site to be restored to agriculture and |</p>
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<tr>
<th>Reference</th>
<th>Name</th>
<th>Comment</th>
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<tr>
<td>SM/105</td>
<td>Christopher Charles Spink</td>
<td>There are no indications that there has been adequate consideration or provisions made for the associated increase in traffic levels through county roads and lanes. There are no indications that the rural nature of the environment has been considered with a sense of responsibility bestowed upon yourselves. The rural nature of Suffolk must be treated with more sensitivity.</td>
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<tr>
<td>SM/107</td>
<td>Wendy Thorpe</td>
<td>Site - Brockley Wood, Belstead. I am objecting to the above mentioned site for a number of reasons. 1. The noise pollution from such a site during the proposed opening times is unacceptable being so close to residential houses. 2. Air pollution from the dust and dirt created from a quarry. The wind will often come across from the A12 sending dust and dirt across the road and onto the opposite fields towards residential housing. 3. Access on and off of the A12 at Copdock is not sufficient enough for the proposed 80-100 lorries per day. 4. The dirt coming off the lorries when leaving the quarry will make the roads muddy and unsafe, who and when will these be cleaned. 5. Light pollution during the winter months when the quarry needs to be lite for work to continue. 6. I live under 237m as the crow flies from the quarry in a 500 year old wooden framed grade 2 listed building. The impact</td>
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**nature conservation purposes. Restoration may require inert soils to backfill the site.**

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Noise Pollution**

The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

**Access onto the Highways**
| on the structure and foundation could be severely impacted by the mining of minerals so close. What insurances will I and other residents have against damage to our properties. 7. What assurances we will have that lorries using the quarry will not be using the Old London Road (old A12). | Through consultation with Highways England it has been determined that the proposed access is technically acceptable. |

**Mud on the Road from Lorries.**
Planning conditions can be implemented to require installation and use of wheel washes for lorries, if planning permission was granted. This measure should prevent mud being brought onto the roads by lorries.

**Light pollution**
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

**A12 Congestion**
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

*Impacts to Building Foundations*
<table>
<thead>
<tr>
<th>#</th>
<th>Name</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/131</td>
<td>Adrian Ward</td>
<td>The proposed site is unsustainable from a traffic perspective. The A12 is already queued back to junction 32b every day. Hundreds of heavy lorry movements will exacerbate problems and mean that lorries will divert through villages of copdock and Belstead which will have a horrendous environmental and quality of life impact on residents. A joined up infrastructure plan is required not just a superficial land grab. Furthermore, the site of the plant right next to the A12 will be an absolute eyesore for those travelling up to Suffolk from the south - what an ugly impression to create of our beautiful county. Listen to the democratic representations of local people through the PCC’s!</td>
</tr>
<tr>
<td>SM/141</td>
<td>Peter Sutters</td>
<td>LAND AT BROCKLEY WOOD, BELSTEAD (M3) Potential damage to buildings of historic interest. There are 16 listed buildings within approximately half a</td>
</tr>
</tbody>
</table>

| A12 Congestion | We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage. |

| Visual Impact | Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact. It is expected that any established woodland bordering the site, including vegetation along the A12 will be retained, as this provides an established barrier. |

<p>| Historic Assets | Historic assets, including listed buildings, have been considered as part of the site selection process and it is not expected that these will be affected. A full assessment of historic assets in relation to the site will be required as part of a planning application. |</p>
<table>
<thead>
<tr>
<th>SM/142</th>
<th>Peter Sutters</th>
</tr>
</thead>
</table>
| **LAND AT BROCKLEY WOOD, BELSTEAD (M3)**
Noise, dust and general disturbance to the residential area of Copdock & Washbrook. The wind direction typically blows from the south or south-west (Source: Met Office). This means that dust etc. will be mainly blown over the A12 in the direction of Copdock & Washbrook. Not only are there currently some 464 domestic properties in Copdock & Washbrook – but if house building under the Babergh “call for sites” did proceed to successful planning applications then there will be more properties suffering from disturbance. This will be in addition to the considerable noise in the Copdock & Washbrook village from traffic noise from the A12 and A14. | **Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted

**Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.**
The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan, and have informed the District Councils of the proposals in the Issues and Options Document and will work with the District Councils as both plans progress. |
| SM/143 | Peter Sutters | LAND AT BROCKLEY WOOD, BELSTEAD (M3) | Loss of grade 2 Agricultural Land. Post Brexit the UK needs good agricultural land to maximise food production. This land is, from information in the Suffolk County Council documentation, Grade 2. This is land with minor limitations and the level of yield is generally high. Loss of this land, so close to rivers and seas where dredging can produce sand and gravel, cannot be allowed. |
| SM/144 | Peter Sutters | LAND AT BROCKLEY WOOD, BELSTEAD (M3) | Road infrastructure inadequate  
  a) The plans state that the A12 can be used by lorries and also that 85% of the sand and gravel will be used in Suffolk. As most of Suffolk is either north or west of this site, this means that lorry movements will be concentrated on the Copdock Interchange. This junction is already overwhelmed throughout most of the day and cannot cope with even more lorry movements.  
  b) Any use of the Old London Road would mean northwards trips up Swan Hill towards the A1071. This country lane is totally inadequate for its current use by large and heavy vehicles. Southbound large lorries, apart from agricultural use, are banned. However, many vehicles flaunt the signage especially during times when the Copdock Interchange is under pressure. Drivers looking to join the A12 towards the Copdock Interchange will be tempted to use the Old London Road as a “rat run” to avoid the Interchange when |

**Loss of Agricultural Land and Site Restoration**  
Sand and gravel quarries are a temporary land use and it is expected that the land, once restored, will be used for agriculture and nature conservation. A restoration plan will be required if a planning application is submitted. Also, as sites are worked in phases only a small section of the quarry site (if permitted) will be extracted, minimising the lost farm land during extraction.

**A12 Congestion**  
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.
seeing the many tailbacks that occur on a regular basis from Junction 32B.

| SM/145 | Peter Sutters | LAND AT BROCKLEY WOOD, BELSTEAD (M3) | Ecology and Landscape  
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.  
At this stage in the process full reports on the flora and fauna on the site are not required, however if the site reaches the planning application stage appropriate ecological assessments will need to be included in the with the application. The public will also have the opportunity to comment at this stage.  

| SM/146 | Peter Sutters | LAND AT BROCKLEY WOOD, BELSTEAD (M3) | Air Quality  
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.  

Lack of a water supply. To suppress dust etc. water will be needed for sprinkling and other washing processes. The report by Greenfield Associates says that there was no water found in bore holes. Importing water will require considerable effort, including additional vehicle movements if imported that way, and proves the
<p>| SM/155 | James Potter | I am commenting on and objecting to the site at Brockley wood, Belstead for the following reasons: 1- my primary concern regards the effect of quarrying on the water table. I live at the nearest property to the site and my only water supply to the property is via a well. The well is on land that is higher than the quarry site and only 10m deep. Any quarrying in the area will change the water table and therefore my ability to draw my drinking water. I also have concern with the back fill and the potential for contamination of this water supply - I have a family and newborn child who rely on this water and it’s safety. If planning is granted, I would like to see compensation in the form of the proposer paying for me to be connected to the mains water supply. 2- noise and dust from quarry. My research shows that Suffolk’s most common prevailing wind direction is southwest. The site of the quarry is exactly south west to my property and therefore any noise and dust from quarrying travels directly to my property. This was the same issue as when the A12 was built and we were reassured that trees would be planted to block the noise, some 30 years later, this has still not happened. The planned quarry adjoins my property/land and therefore it’s noise/ dust effects will be significant and disruptive to life in the peaceful countryside. 3- contamination of Water and Floods Ground water and flooding has been considered as part of the site selection process. Water was not found in the bore holes during the geological boreholes testing, so extraction is not expected to reach the water table. Site Restoration The County Council would seek to have the site returned to agriculture and nature conservation. Some backfilling with waste soils, which will be inert, may be required as part of the site restoration. A full site restoration scheme must be submitted as part of a planning application. Household and business waste would not be used to infill the quarry as this waste from Suffolk now goes to the Energy from Waste Facility at Great Blakenham. This should not affect water supplies. Air Quality Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided. Noise Pollution |</p>
<table>
<thead>
<tr>
<th>SM/156</th>
<th>Peter Emery</th>
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<tbody>
<tr>
<td>The Belstead site is ill considered and the September 2017 selection report hastily written. The A12 regularly is blocked from the Copdock roundabout to Capel St Mary. Highways have</td>
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The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted. |

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is |
stated that the interchange will not be sufficient within 2 years. What new infrastructure is to be built? The site selection report says nothing about regeneration post the pit. The plan does not consider the impact on neighbouring property values which is likely to be in the region of 15-30% for those most proximate. The plan also does not take any account of the proposed nearby housing developments and the likely impact on what will be a much denser residential area than currently exists. The plan takes no account of Article One of the 1st protocol of the human rights act regarding property. Specifically the state must not interfere with the peaceful enjoyment of property. Given that planning proposals will make this a more densely populated area this should be given greater consideration. The report also glosses over issues such as the socio-economic impact, matters of noise and those of dust pollution. I own 3 properties that will be blighted by this development due to their proximity on Oakfield road and the avenue and will oppose this by every legal means.

possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Site Restoration
The County Council would seek to have the site returned to agriculture and nature conservation. Some backfilling with waste soils may be required as part of the site restoration. A full site restoration scheme must be submitted as part of a planning application.

House Prices
House prices are not a planning consideration.

Amenity of Nearby Residents
It is expected that mitigation measures can be put in place to ensure the amenity of nearby residents and businesses are not harmed. Vegetated earth bunds are standard mitigation at sand and gravel quarries, to reduce visual impact and attenuate noise and dust. It is also expected an additional stand-off will be required of this site.

Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.
The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.
### Noise Pollution
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

### Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

| SM/164 | Mrs D. M. Ransom | I object to the chosen sites as the road connections will not be suitable for the increased traffic flow. Traffic is a ready problem for Copdock and Washbrook as it is used as a cut through to avoid the main Copdock roundabout for A 12/14 |

### A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.
| SM/165 | Christina Galvin | Belstead site. Objection due to air and noise pollution to nearby housing, but primarily due to traffic problems in the area. Just having direct access to the A12 does not mean there are no problems: - A12 is already backed up from A12/A14 junction EVERY day to Capel St Mary in the rush hour, and further housing developments in the area are already approved which will make it worse - As a result traffic, including heavy vehicles, use Copdock&Washbrook to avoid this which effectively cuts off the village each day (Swan Hill is also unsuitable for large vehicles, and could cause accidents) and creates further congestion on the Hadleigh roundabout/road - Report states A12 will be ‘over-capacity’ by 2020 - Congestion at A12/A14 roundabout was so bad for business than Felixtowe Port were willing to pay for improvements - although it made no difference! | Air Quality | Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided. |
| SM/166 | Mr Terry Babbs | I object to the proposed site in Belstead's Brockley Wood for the following reasons: - No consideration has been given to the impact that additional HGV | A12 Congestion | We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage. |
vehicles will have on existing traffic congestion at Copdock Interchange, which already results in heavy traffic volumes (including HGV's) using the "old" A12 as an alternative route to Ipswich and the A14. The resultant gridlock through Copdock and Washbrook can be seen any week day morning. If Babergh and Mid-Suffolk's plan to build hundreds of new houses and introduce new Industrial sites on this road takes effect the cumulative result will be the effective destruction of the existing rural environment and the total failure of the existing road systems.

SM/170 Simon Gibbs

Site:- Belstead I feel that the proximity of this site to the A12 with no screening presents risk to the road users. during excavation and then as a landfill. the amount of debris and Birds etc. would interfere with the road. The road system around the junction in question is already over capacity especially in the morning with queues back past this junction every weekday from Copdock Interchange to Capel St Mary. This would have an adverse effect on the wildlife. example there are families of deer in the woodland in Brockley wood & Belstead wood

Visual Impact and the A12
Earth bunds, planted with vegetation and a standoff should provide appropriate screening of the A12. It is expected that any established woodland bordering the site, including vegetation along the road will be retained, as this provides an established barrier.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times, to avoid peak hours. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.
The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.
SM/172  Mark Fletcher  

Belstead & Wherstead proposed sand quarries. I STRONGLY object to both sites (especially Belstead) for the following reasons. Our village will be ruined, the end of village life, the end of our community. That has stood for hundreds of years. If the constant industrialisation of Belstead continues we will soon disappear into Pinewood, I cannot understand the councils desire to destroy our village. But then none of them actually live in our village. They are all NIMBY's. Roads are too narrow for sand lorries that WILL come through our village (despite what you say). This will bring about the destruction of our roads, there is too much traffic through Belstead already, the council has

Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Lorry Movements
The current number of lorry movements for this site is not known as we do not have an estimated rate of
done NOTHING to address this and the quarry traffic will only make them even busier and more dangerous, we already have to tolerate heavy traffic and speeding!! Heavy traffic and industrialisation will bring about the destruction of local businesses, properties (including grade 2 listed buildings and Belsteads 700+ year old church), woodlands, hedgerows, old established trees, bridal ways and footpaths used by horse riders, dog walkers, joggers and ramblers, the landscape will be ruined forever and be a constant eyesore, fields that could be used for food will be lost, natural habitat for wildlife and endangered species will be lost (dormice, moths, bees, butterflies etc). No information was given on how the sites would be back filled, our understanding is that they could be used as a landfill site, this was NOT ruled out at the meeting. Due to the excessive hours the quarry will be worked we will be affected by noise pollution, air pollution (sand, dust and fumes from lorries and machinery), light pollution from the site and machinery used, traffic pollution from lorries. Nobody gave us a time scale on how the sites would be worked. This could go on for years!! It was interesting that at our meeting the council had the two proposed sites on different maps and not one larger map to show how Belstead sat between the TWO quarries and would effectively be hit from both sides!!, VERY DEVIOUS. This is ALL about money and NOTHING about community or rural life, Suffolk working for the site. However, it is not expected that lorries from this site will travel through Belstead accept in the case of local deliveries.

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

Site Restoration
The site is expected to be restored to agriculture and nature conservation. Some inert waste may be landfill at the site to aid restoration, by raising the land level. Inert wastes are typically soils and possibly construction waste. The site will not be used as a landfill for household or commercial waste. Sites can be restored to provide a net gain in biodiversity, which is encouraged plan policy MP7.

Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it
county council have a total disregard for the areas they are supposed to serve and protect. They are just lining their pockets. After the recent destruction of a local woodland for "8 EXECUTIVE HOUSES" and more being built on the old chicken farm site I have NO CONFIDENCE in the council to protect our village and totally mistrust anything they say. Q: How do you know if Suffolk Council is lying? A: You can see their lips moving!!

is expected that adequate mitigation can be provided, which includes dust management. Although the exact number of lorry movements from this site are not known, if more than 100 per day are expected then an assessment of the air quality impact from additional traffic will be required.

**Noise Pollution**
County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the mitigation measures required and protect nearby residents and businesses.

**Light Pollution**
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

**Consultation Events and Site Maps**
The purpose display maps at consultation events was to show the individual sites in detail. The County Council was not trying to obscure the location of sites relative to one another and this information could be seen on Map B2 of appendix 3 of the plan, and on the Safeguarding and Proposals...
SM/176  Kristian Thorpe  Suffolk Minerals & Waste Local Plan - site Belstead Quarry 2020. The current infrastructure of the roads around Copdock interchange and North bound at Copdock and Capel St Mary are currently not fit for purpose with 2 mile tail backs morning and evening on a daily basis. Traffic using Old London Road as a rat run in and out of Ipswich already dangerous with the volume of traffic and the speed this traffic travels down this road. Commuters travelling North into Ipswich coming off the A12 at Copdock only to go back on up the slip road to gain a few hundred yards causes great danger to those going onto the roundabout from the Old London Road as you are unable to see due to the amount of traffic turning left onto the Old London Road. So this is only going to be made worse by 40T lorries going on and off this roundabout from the proposed hours which I believe are totally unrealistic. These factors are also all heightened by the fact that we are currently in a consolation period for a proposed 600+ house to be build in Copdock again with no infrastructure being put in first. What is currently a green, relatively quiet village will become Urban, light polluted, noise polluted, and dirty.

SM/179  Daniel Hutton  I wish to comment on the proposed gravel extraction site at Belstead. It would appear that access to the site would be via the current access in this case use of the tracks in order to reach the extraction site would be subject to agreement between the landowners and site operators.

Map, which were available to access throughout the consultation period.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.
The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.
at the 32b junction on the A12. It should be noted that the access is a single lane shared track that runs for nearly 400 yards (without passing places) until it reaches the first field (owned by Mr Ingram). The access track has the slip road for junction 32b on one side and farmland that belongs to someone else on the other. The hedge that is between the track and the slip road also belongs to someone else. Having consulted with the land owner, they have told me that they do not want or need to sell any land. This means that there isn't any scope for widening the track and the 400 yards access will remain a single lane track, which I doubt is acceptable for the amount of vehicle movements expected.

| SM/184 | Mike Watling  
| Brockley Wood Belstead | (this all that is in the representation – has also ticked ‘Object’) |

Proposal for Belstead Quarry

I wish to object to this proposal for the following reasons:

- Increased noise pollution
- Increased Light pollution
- The amount of Dust & particulates in the air reducing quality and causing visual hazard to the A12.
- The amount of silt and residue that will be carried along the roads causing additional hazard.

Junction/roundabout 32b from the A12 not being suitable

The highways agency identifies the A12 as an issue to any future developments in the area and should include this proposal. This is due to the congestion. The A12 is a key business route to the

**Noise Pollution**

County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the mitigation measures required and protect nearby residents and businesses.

**Visual issues on the A12**

There is a band of established vegetation between along the site boundary and the A12, which combined with a bund would mitigate this issue.
county. The increased traffic on the A12 effects other routes through the village of Copdock including Swan Hill and Church Lane. The build up of traffic in the morning to get into Ipswich starts at 07:00 until 09:00. This traffic is not local residents going to work but users of the A12 cutting through to the A14 at Great Blakenham. It can take me at least 40 minutes on a daily basis, without any problems on the A12, to travel from Copdock village to work at Endeavour House a total of 7 miles. - come and see for yourself. This in itself is a pollution issue with idling traffic. I also object for the effect on the wildlife to the area - they don’t have a say. I also question is it actually needed when existing quarries have not been exhausted. Once again the consultation had been kept quiet from the residents of Copdock although they will be severely affected by the proposal.

Additionally, dust management is usually a requirement of sand and gravel sites for air quality impact mitigation, which should also help to alleviate the issue.

**Light pollution**
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

“Silt and residue” on the Road
If the site reaches the planning application stage, it is possible to implement a planning condition requiring lorries to use a wheel wash, before entering the highway, which should mitigate this issue.

**A12 Congestion**
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is
<table>
<thead>
<tr>
<th>SM/193</th>
<th>Mr &amp; Mrs Merry</th>
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<tbody>
<tr>
<td>Belstead Quarry proposed option. Changes we would like to make are, for you not to even consider this site for a quarry. The amount of disruption this would cause would be unimaginable. The constant movement of heavy traffic added to the already busy Villages of Copdock and Washbrook, this is without the proposed threat of housing and commercial development going ahead that would further greatly increase the movement of traffic. Old London Road/Swan Hill/Church Lane is already a rat run due to the A12 being congested every morning, and as the northbound has no weight restriction the quarry trucks will in no doubt use this road also, adding to disruption. The amount of truck movements in and out of the quarry will have a deversating effect to the villages as just one truck will have 2 movements per visit not one, as you have counted. The position of the fixed grading/wash plant will be a complete eyesore, and the proposed entrance/weighbridge to the site will be the very noisy and cause a lot of pollution add to this the prevailing winds it will be possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.</td>
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**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Lorry Movements**

The current number of lorry movements for this site is not known as we do not have an estimated rate of working for the site, however both in and out movements are take account of when counting lorry movements.

**Visual Impact**

Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact. It is expected that any established woodland bordering the site, including vegetation along the
increased. Having lived close to a quarry site before I have first hand experience of the disruption and continued noise that these developments bring, add this to the level of traffic that can run 24hr a day from the quarry even when a proposal states they will not continue after set times. There are already other quarry sites that are in use in the surrounding areas that could have there options extended, so why totally ruin yet another village. There are sites away from settlements that the SCC could quarry that are more suitable as per the mineral report, so i say again WHY, ruin yet another village. We moved to a village, from a town. Away from commercial and built up areas, and quarry. How would the proposing council members feel if like us you find yourself caught in a proposed pincer movement to place you back in a situation you paid a lot of money to escape from. Not only will these proposed developments destroy our villages, it will have a knock on effect to all house prices in our area!!. Are the council willing to compensate all effect due to there proposed plans!!

road will be retained, as this provides an established barrier. This mitigation will also be implemented for the plant machinery.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**Site Selection Process**
To clarify, the sites proposed in the plan are not County Council sites. As part of the Issues and Options consultation a call for sites was issued and sites submitted by, land owners, land agents and quarry operators, one of which was the site near Belstead. While other sites are being extended the inclusion of the site in this plan is not considered excessive.

The estimation of need for sand and gravel in the plan is based on the last ten years of sales in the county, which is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation
<table>
<thead>
<tr>
<th>SMWLP</th>
<th>Responses to Preferred Options Consultation, March 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Assessment Suffolk County Council Page 191 of 34</td>
</tr>
</tbody>
</table>

- **Assessment**
  - Suffolk County Council

  - Assessment of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments.

- **House Prices**
  - House prices are not a planning consideration.

<table>
<thead>
<tr>
<th>SM/209</th>
<th>James Lucas</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>I get the impression that this is a clear case of financial gain taking precedence over the quality of life the current residents enjoy. The increase in heavy industrial traffic along a residential road may well increase the risks of road safety issues.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SM/226</th>
<th>Judith Mitchell</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Re proposed Belstead site 1. Public footpath access 2. Road access to site very busy junction on A12 at peak times you have vehicles coming off at junction 32b northwards and going straight up the on ramp onto the A12 trying to jump the queue and not observing traffic coming from the right (proposed access site) 3. Noise and air pollution 4. Wildlife we have deer as well as breeding buzzards near this site 5. A corridor for door mice</td>
</tr>
</tbody>
</table>

- **A12 Congestion**
  - We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

- **Public Rights of Way (PRoW)**
  - With regards to footpaths, the County Council will seek to retain or redirect public rights of way through planning condition. The PRoW to the north of the site will likely be redirected. Tree lined paths need to be retained, as these are important landscape features. Mitigation will also be required to protect the amenity of users of the PRoW.

- **A12 Congestion**
was constructed a short time ago to protect the door mice at great expense which would be a total waste of money

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>Noise Pollution</strong></td>
</tr>
<tr>
<td>The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.</td>
</tr>
</tbody>
</table>

| **Air Quality** |
| Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided. |

| **Ecology and Landscape** |
| Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that
satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

The County Council are aware of the Dormice and other priority species in the adjacent woodland mitigation and surveys and mitigation would be expected to take account of these, and landscape features that benefit them, if the site proceeds to a planning application.

<table>
<thead>
<tr>
<th>SM/228</th>
<th>Chris Heath</th>
</tr>
</thead>
<tbody>
<tr>
<td>Belstead Quarry proposal Please accept the following as my objections to the proposed quarry at Belstead. Firstly junction 32B is totally unsuitable for the numbers of lorries that would be using it and the A12 and old London road are already unable to cope with the current volume of traffic being grid locked for long periods every day of the week. Secondly the air, noise and light pollution would be a potential hazard to the health and well being of the surrounding village population and wildlife. Has a full risk assessment been carried out and if so where can this be viewed. Thirdly would all lorries using the proposed site be electric powered as the 100</td>
<td></td>
</tr>
</tbody>
</table>

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Lorry Movements**

The current number of lorry movements for this site is not known as we do not have an estimated rate of
movements per day stated in the Greenfield's report would have implications on air quality, smog formation, global warming and other environmental issues. And lastly can I ask why the local residents were not sent information from the council regarding the proposed site. This is a repeat of the draft proposal for housing in the area, creating the perception that these were deliberate acts by the council to deny residents the opportunity to voice their opinions and could then claim that no objections were received. I would like to state that I am not against development but feel that if there is a genuine need for further quarry capacity the expansion of existing quarries should be considered first. If new ones are to be developed they should be in areas which have adequate road networks and do not destroy villages which are part of the history of this country.

working for the site. More information regarding this will be available if a planning application is submitted.

Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

Noise Pollution
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

Light pollution
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time.
restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

**Full Site Assessments**

Full site assessments including risks from noise, dust and light pollution, must be provided as part of a planning application, if one is submitted. Current assessments of the site are high level and available in the site selection reports, available here: [https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/minerals-and-waste-local-plan-consultation/](https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/minerals-and-waste-local-plan-consultation/)

**Lorry Movements**

The current number of lorry movements for this site is not known as we do not have an estimated rate of working for the site. The reference to 100 lorry movements a day in the Issues and Options Document is simply to identify the threshold at which an air quality impact assessment of the additional traffic generated would be required to determine a planning application for this site.

**Public Consultation**
The ways that the County Council used to inform the public of the consultation and consultation events were: letters to residents and businesses within 250m of the site; advertisements in the local press (East Anglian Daily Times and the Newmarket Journal), email notification to Belstead Parish Council. Social media was also used to promote the consultation events.

<table>
<thead>
<tr>
<th>SM/229</th>
<th>Glenn Mitchell</th>
</tr>
</thead>
</table>
| 1. Access to site on a very busy junction on the A12  
2. Disturbance of wildlife  
3. Access to public footpath  
4. There are already existing extraction sites up and running  
5. Air and noise pollution  
6. Our village already has to deal with a high volume of traffic as the A12 is so congested during the week. If the Orwell Bridge is closed traffic can back up to the point that we cannot get out of our property |

**A12 Congestion**
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Ecology and Landscape (Belstead)**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site.
| Public Rights of Way (PRoW) | With regards to footpaths, the County Council will seek to retain or redirect public rights of way through planning condition. The PRoW to the north of the site will likely be redirected. Tree lined paths need to be retained, as these are important landscape features. Mitigation will also be required to protect the amenity of users of the PRoW. |
| Currently Operating Sites | The current permitted land bank of sand and gravel in Suffolk will last until 31st December 2027 (as of 31st December 2016). However as the plan period lasts until 31st December 2036, so there is a shortfall of 9 years supply, or approximately 10.422 million tonnes. The County Council needs to identify sites which will ensure a land bank until the end of the plan period. So, while there are sand and gravel quarries currently operating through Suffolk, more sites need to be identified. |
| Air Quality | Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided. |
| Noise Pollution | The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to |
| SM/234 | Stephen Clarke | The site is inappropriate for the proposed usage as there are many more appropriate sites. There is absolutely no doubt that the quarry trucks would opt to use the "old A12" rather than the existing A12 because of the daily serious traffic delays caused by the roundabout at the A14 junction. The old A12 is completely inappropriate for an additional (projected) one hundred or so truck journeys per day as it runs through a residential area and is already used as a "rat-run" to avoid the A12 congestion. Swan Hill is already at a standstill on many mornings and this will add to the problems. Copdock village already suffers from significant noise pollution from the A12 and this proposal, if approved, will make matters much worse. | bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted. |
| SM/239 | David Lincoln | There are a number of factors that have been underestimated in the plan the Belstead site. The Copdock interchange is already one of the worst junctions in Suffolk and backs up to Capel St Mary twice a day. The London Rd is used as a rat run | **Lorry Movements**
The current number of lorry movements for this site is not known as we do not have an estimated rate of working for the site. The reference to 100 lorry movements a day in the Issues and Options Document is simply to identify the threshold at which an air quality impact assessment of the additional traffic generated would be required to determine a planning application for this site.  

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**A12 Congestion**
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site.
and traffic backs up. Swan hill is a major traffic problem morning and evening. This will get far worse and traffic will increase down back lane where there is no footpath and children going to school. Lorries already ignore the restricted signs and these lorries are unlikely to be different making the overused roads more dangerous. The noise and air pollution will be intolerable. There are 15 listed buildings within half a mile. It will blight the area and destroy what is now a strong village community. These issues cannot be adequately mitigated. There are adequate sites at present and already ones in this vicinity. These sites can cope with the increased demand. It feels as this is a speculative bid by an ambitious business man, who has only regard for profit and not any regard for the consequences to the environment and the community. There is no justification for this site being developed.

This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Noise Pollution**

The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

**Historic Assets**

Historic assets, including listed buildings, have been considered as part of the site selection process and it is not expected that these will be affected. A full assessment of historic assets in relation to the site will be required as part of a planning application.

**Visual Impact**
| SM/241 | Andy Roxburgh | The proposal for this site at the A12 Washbrook / Copdock area will cause huge travel disruption in the area with the A12 backed up to Washbrook every morning and people using the old A12 as a rat run into Ipswich, swan hill is already heavily congested. This quarry proposal will make this awful daily problem even worse. There is also massive house building proposed for this area this will also impact this problem. | Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact. It is expected that any established woodland bordering the site, including vegetation along the road will be retained, as this provides an established barrier. Site phasing should also help minimise this issue, by ensuring that only part of the site is excavated at once. |
| SM/253 | Richard Barnes | The proposed site for a quarry and then land fill site on the South side of the A12 between Copdock and Belstead is wholly un-acceptable. The amount of traffic this site would generate in the area, which all ready has traffic problems, can only lead to increased incidents and traffic jams not to mention | A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage. |
the air pollution that comes with increased traffic. There is also the question of air and noise pollution from the site itself without the continuous stream of heavy lorries, up to 100 trips a day. The whole aspect of having a quarry so close to a small village and an area of outstanding natural beauty in Suffolk is ridiculous. When there are so many other quarry sites than can be extended by just a little to accommodate the extra minerals needed I don’t comprehend why the council see fit to disrupt the quality of life of so many people in the local area.

Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

Noise Pollution
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Lorry Movements
The current number of lorry movements for this site is not known as we do not have an estimated rate of working for the site. The reference to 100 lorry movements a day in the Issues and Options Document is simply to identify the threshold at which an air quality impact assessment of the additional traffic generated would be required to determine a planning application for this site.
<table>
<thead>
<tr>
<th>SM/254</th>
<th>Amanda Barnes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I am commenting on the proposed quarry at Belstead. This area is heavily wooded and populated by a lot of wildlife. The quarry would have a huge impact on this as their natural habitats would be eroded. Also we have a commercial premises directly opposite where this would be and are hugely concerned about the amount of traffic, i.e. heavy lorries and workers vehicles, on the Old London road. GVA</strong>This would be hazardous for our customers leaving our premises. It would also be extremely hazardous for people who live on that road exiting their driveways. Despite the intention for the lorries to use the A12 - they won't they will use the Old London Road just like everyone else who cannot bear sitting in queues on the A12.</td>
<td></td>
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<table>
<thead>
<tr>
<th>Ecology and Landscape</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation, such as a standoff to, to protect wildlife.</strong></td>
</tr>
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<tr>
<th>A12 Congestion</th>
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<table>
<thead>
<tr>
<th>SM/256</th>
<th>Julia Faulds</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. There are other sites still with many years of workable life in the close locality to sustain the needs of the building trade. 2. The site would add a considerable burden on the Copdock Interchange which cannot cope with the traffic using it already. The local villages then have to take a huge burden of traffic on some single track</strong></td>
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<table>
<thead>
<tr>
<th>Currently Operating Sites</th>
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</thead>
<tbody>
<tr>
<td><strong>The current permitted land bank of sand and gravel in Suffolk will last until 31st December 2027 (as of 31st December 2016). However as the plan period lasts until 31st December 2036, so there is a shortfall of 9 years supply, or approximately 10.422 million tonnes. The County Council needs to identify sites which will ensure a land bank until the end of the</strong></td>
</tr>
</tbody>
</table>
3. The noise pollution  4. The air pollution  
5. The light pollution  
This will effect Capel St. Mary, Copdock and Washbrook.  6. There are 15 listed building within half a mile from this site to be considered. 7. Village life will be effected by this site. 8. It is a very unwelcome proposal by our community and I wish to stress my objection to the proposal.

plan period. So, while there are sand and gravel quarries currently operating through Suffolk, more sites need to be identified.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Noise Pollution
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.
| **SM/257** | Jennifer Cremer | Light pollution  
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted. |
| **Historic Assets** |  |
| Historic assets, including listed buildings, have been considered as part of the site selection process and it is not expected that these will be affected. A full assessment of historic assets in relation to the site will be required as part of a planning application. |
| **SM/257** | Jennifer Cremer | A12 Congestion  
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage. |
| **SM/258** | Jennifer Cremer | Lorry Damage to Buildings  
Site access for lorries is directly onto the A12, with lorries only expected to use smaller, local roads and lanes in the area in the case of local deliveries. |
| **Air Quality** |  |
| I am commenting on the proposed Belstead site (as was my previous email) Use of this site would bring unnecessary misery to the lives of local residents of an essentially rural community. The increased volume of heavy traffic on roads and lanes not designed to take it. Older houses close |
to these lanes do not have adequate foundations to cope with the vibrations this traffic will cause. Pollution will destroy the air that people expect to be able to breathe in rural locations. In fact the whole area that people have made their home will be adversely changed without thought for the consequences to people's lives. I say unnecessary because I believe there are other sites, equally or more suitable in terms of mineral content away from residential settlements.

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

Although the exact number of lorries from this site are not known, if more than 100 per day are expected then an assessment of the air quality impact from additional traffic will be required.

Amenity of Nearby Residents

It is expected that mitigation measures can be put in place to ensure the amenity of nearby residents and businesses are not harmed. Vegetated earth bunds are standard mitigation at sand and gravel quarries, to reduce visual impact and attenuate noise and dust. It is also expected an additional stand-of will be required of this site.

Loss of Agricultural Land and Site Restoration

Sand and gravel quarries are a temporary land use and it is expected that the land, once restored, will be used for agriculture and nature conservation. A restoration plan will be required if a planning application is submitted. Also, as sites are worked in phases only a small section of the quarry site (if permitted) will be extracted, minimising the lost farm land during extraction.

A12 Congestion

<table>
<thead>
<tr>
<th>SM/266</th>
<th>Joanne Bray</th>
</tr>
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</table>
| I would like to object to the proposed minerals and waste site in Belstead due to the impact on our rural villages once our field have been changed there is no going back to farm land. There will be a negative impact on the wildlife in this area. The air and noise pollution will increase causing health problems. The infrastructure is not in place to cope with large vehicles and copdock interchange is almost at full capacity. There are major problems with the amount of traffic that currently travels via copdock interchange and adding the }
proposed housing, business and the minerals site is just unacceptable. I understand the need for development but surely we should be looking at sites which are already approved and not being used. We need to protect our villages and agriculture land for as long as we can, this will help with health, children’s understand of past times and wildlife.

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Ecology
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it
### Assessment Suffolk County Council

<table>
<thead>
<tr>
<th>Reference</th>
<th>Name</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/267</td>
<td>Colin Hinkins</td>
<td>I object to selecting the site in the first place, it should never have been called given known existing and future reserves that were clearly identified by the same Minerals Crown Agency that SCC have used in this study IN 1970 - yet two officers at the Belstead 'exhibition' expressed surprise at the amount of sand at the site yet we know this 47 years ago! We are sitting on circa 760 million tonnes of minerals through to the river Orwell and this site is simply not suitable given the impact it will have on Local habitat in Brockley Wood. There is simply not enough land to allow development that would not ruin this area for 15-20 years. The land should never have been called for in the first place.</td>
</tr>
<tr>
<td>SM/268</td>
<td>Michael Bray</td>
<td>I object to the Belstead minerals and waste site due to the impact on the village with the increased volume of traffic, there is currently a high volume of traffic using our local village roads when the copdock interchange has problems and even is expected that adequate mitigation can be provided. Noise Pollution The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.</td>
</tr>
</tbody>
</table>

**Evidence of Minerals Deposits**

The 1970 study was a very broad survey of the area which did not include a measurement of the Belstead site specifically. Using the best available data from the British Geological Survey indicated that large areas of this site did not contain sand and gravel deposits. However, geological assessment that accompanied the site proposal indicated otherwise.

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable.
without problems such as bridge closing and accidents our roads get back up all long the old A12. There is also a concern re the air and noise pollution that this minerals site would create due to the big volume of minerals that would be trucked out every day. The wash plant is so close to peoples home this will impact their noise pollution greatly. Also we have a few listed buildings within a couple of hundred meters of this proposed site with cold cause major damage as with listed building don't have very good foundations.

and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**Historic Buildings**
Consultation with Historic England did not identify any issues relating to listed building within the vicinity of this site.

<table>
<thead>
<tr>
<th>SM/269</th>
<th>Colin Hinkins</th>
</tr>
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<tbody>
<tr>
<td>I Object to the proposed site because Suffolk Highways were totally wrong in not commenting upon the suitability of 'connecting to the national trunk road network'. Yes, we know junction 32b does connect as describe but EVERY single morning it would not be used by quarry trucks travelling north because from circa 7.30am until circa 9-9.30am it is queued back to Capel St. Mary. and any quarry trucks would legally use the Old London Road that itself is gridlocked at Swan Hill spilling back to the Old London Road just adding to the journey times of workers literally trying to do that - one minerals officer at Belstead said that he was unaware of the queues back to Capel every morning - on what planet do some of these officers live? The Copdock Interchange</td>
<td></td>
</tr>
</tbody>
</table>

| A12 Congestion |
| We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times to reduce impact. Traffic impacts and possible mitigations must be fully assessed at the planning application stage. |
makes national traffic news every morning. It is patently unacceptable that local planning officers claim ignorance of this fact.

<table>
<thead>
<tr>
<th>SM/270</th>
<th>Colin Hinkins</th>
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<tr>
<td>The A12 at Copdock cannot cope with the volume of traffic as it is. Lorries from the proposed quarry would inevitably use Swan Hill in Copdock Village, if the A12 was blocked going north, as it has no weight limit on it. In a morning Swan Hill is blocked back to the Old London Road and can take 20mins to get to Sproughton roundabout. The light pollution and noise from the gravel washing facility would be very disturbing as it is proposed that the Wash/grading facility is planned to be immediately next to Brockley Wood which is a protected environment for dormice and bats.</td>
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</table>

**Light pollution**

The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

<table>
<thead>
<tr>
<th>SM/271</th>
<th>Colin Hinkins</th>
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<tr>
<td>The SCC plan shows access to the wash/grading plant by a single (red) internal road. This is just not correct - ALL of that area currently claimed to not be part of the quarry will be a loading, turning, parking area for trucks plus there will be permanent offices, weighbridge and truck service buildings. and yet SCC have chosen not to identify how built up this area will be plus the light pollution on the winter months. Proposing a quarry is bad enough, not disclosing the area above that is fundamental to a quarry operation is simply inept and that omission is extremely worrying. We</td>
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</table>

The Belstead site, outlined in red in the Issues and Options document is what the County Council would expect to come forward, if an application for this site was submitted. All site activities would be expected to take place within this boundary including areas for lorry movements, offices, weighbridges and other ancillary buildings.

The landowner did submit a larger site than is in the Preferred Options Draft during the call for sites. However, as part of the site selection process, the County Council chose to reduce the area when allocating the site, due to ecological concerns. While an applicant is free to submit a planning application including areas outside the red line boundary in the plan, they would need to justify to the County
<table>
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<th></th>
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<th>need to see competent planning before any decision can be considered.</th>
<th>Council why permission should be granted on land that has already been discounted as part of the plan making process.</th>
</tr>
</thead>
</table>
| SM/272 | Keith Smith | I feel the proposed quarry, along with the vast number of proposed houses in villages in and around the Copdock/Washbrook area are a ruination of the Suffolk countryside that we love and enjoy. Who is going to want to buy a house with a blot on the landscape like a quarry near by, along with the noise and traffic that will ensue. At times the roads are a nightmare now! I do in fact wonder where all these so-called homeowners are coming from. Many people couldn't afford a house even if there was one available. Are the residents of nearby properties going to be compensated for their loss of value and loss of being in a country environment. Where in the future are crops going to be grown with the continued loss of land? | House Prices  
House prices are not a planning consideration.  
Loss of Agricultural Land and Site Restoration  
Sand and gravel quarries are a temporary land use and it is expected that the land, once restored, will be used for agriculture and nature conservation. A restoration plan will be required if a planning application is submitted. Also, as sites are worked in phases only a small section of the quarry site (if permitted) will be extracted, minimising the lost farm land during extraction. |
| SM/273 | Graham Moxon | Brockley Wood, Belstead  
1. A brand new quarry is an unnecessary blight on this beautiful landscape, the required mineral volumes can be satisfied with available capacity from existing quarry sites included in the proposal.  
2. The A12 / A14 junction does not have capacity to handle the estimated 200 lorry journeys per day (100 in / 100 out) plus the associated employee cars and vans. These slow, lumbering vehicles will add to the existing congestion.  
3. The proximity of the new quarry to the residents of Copdock & Washbrook will be detrimental to their air quality and enjoyment | Lorry Movements  
The current number of lorry movements for this site is not known as we do not have an estimated rate of working for the site. The reference to 100 lorry movements a day in the Issues and Options Document is simply to identify the threshold at which an air quality impact assessment of the additional traffic generated would be required to determine a planning application for this site. |
|   |   |   | A12 Congestion |
of this area. 4. The new quarry will give a dreadful impression of Ipswich to anyone arriving from the south on the A12.

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Quantity of Extraction Over the Plan Period**
The County Council does not consider the inclusion of this site excessive. The estimation of need for sand and gravel in the plan is based on the last ten years of sales in the county, which is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments.

**Lorry Movements**
| SM/276 | Clare Coupland | Belstead quarry 2020 | My concerns are; Noise - traffic and works (damage to lungs and visibility for traffic especially dry dust on cars when wet) | Traffic build up - Issue with already over used roads such as the old A12 | The number of lorry movements are currently not known and would

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**Visual Impact**
Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact. It is expected that any established woodland bordering the site, including vegetation along the road will be retained, as this provides an established barrier.

|   |   |   |   |   |   |
and swan hill. Issues with parents walking children to school on already overused roads.

and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**A12 Congestion**
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

<table>
<thead>
<tr>
<th>DR/14</th>
<th>Anne-Marie Cracknell</th>
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<tbody>
<tr>
<td>To both Wherstead and Belstead the access to both these sites are not appropriate. The Belstead site mentions ancient woodland that will be affected despite suggestions they will be protected. How can they be?</td>
<td>Site Access – Belstead, A12 Junction</td>
</tr>
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<td>The County Council consulted Highways England regarding this access and determined that it was acceptable.</td>
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<tr>
<td>Site Access Wherstead</td>
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<tr>
<td>The access to this extension is the same as a currently permitted site, and is considered acceptable</td>
<td></td>
</tr>
<tr>
<td>DR/15</td>
<td>Mrs. D Catchpole</td>
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**Belstead site** will strongly affect Copdock residents. An embankment (50m wide 20m high) with trees planted on it may alleviate dust and noise pollution, but may be insufficient. The A12 is already overloaded, extra lorries will add to this problem. Wherstead, which roads will be used for access – if A137 Ipswich to Manningtree OK, but will need traffic control on and off it. I am very concerned about **noise** and **dust** – the wind often blows from the east.

**Ecology and Landscape**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts. Standard mitigation includes a standoff (in the case of Barnham standoff would likely be 10m from the end of the tree canopy of woodland), followed by an earth bund which is usually vegetated.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

**Noise Pollution**
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noise assessment will be required with any planning application submitted.

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**DR/16 J. M Wilson**

Speculative venture and not one for the present

**Noted**

**DR/17 James Easter**

There are few positive points about this – ill-conceived, ill-planned expedition. Plainly the traffic features have been grossly underestimated. Already there are serious problems with the traffic taking a short cut through a previously quiet village. The massive influx of heavy transport on the A12 would only make the situation worse. There are not guarantees about landfill once any quarry would reach exhaustion. The effect on nearby homes and facilities would be catastrophic.

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Lorries from this site should only go through Barnham in the case of local deliveries. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Site Restoration**
A site restoration scheme must be submitted with a planning application. The county council would expect this site to be restored to agriculture and nature conservation purposes. Restoration may require inert soils to backfill the site. The site will not be used as a landfill for household waste once the material is extracted.

**DR/18**

| Dr Michael Bamford | Belstead Site - ? Effect on water table (household wells, boreholes) | Water and Floods
|                   | ?Traffic movements? Weekend?evenings | Ground water and flooding has been considered as part of the site selection process. Water was not found in the bore holes during the geological boreholes testing, so extraction is not expected to reach the water table.
|                   | ?Mitigation re woodland/wildlife/amenity of local residents & 11 listed buildings |

**Lorry Movements**
The current number of lorry movements for this site is not known as we do not have an estimated rate of working for the site. Full details of lorry movements would be assessed if a planning application for the site were submitted. However lorries should not take routes through Belstead or Copdock, with the exception of local deliveries. Access to the site is directly onto the A12 and it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and

**DR/25**

| Lynda Collins | My concern is around the volume of traffic that may occur around the villages, both from lorries and staff working within the site. How will this affect village life with traffic already using village roads as ‘rat runs’ especially at peak times |

**Lorry Movements**
The current number of lorry movements for this site is not known as we do not have an estimated rate of working for the site. Full details of lorry movements would be assessed if a planning application for the site were submitted. However lorries should not take routes through Belstead or Copdock, with the exception of local deliveries. Access to the site is directly onto the A12 and it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and
<table>
<thead>
<tr>
<th>DR/27</th>
<th>Jennifer Easter</th>
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<tr>
<td></td>
<td>The proposed site will create massive and long lasting destruction and negative health and wellbeing issues to the nearby populace. The internal tracks used by lorries will create dust-pollution-noise with prevailing s.west winds. 90% of wind comes directly from the proposed areas over and into the villages of Belstead, Wherstead and Copdock. The massive (40 lorries as day) increase in traffic to/from the A12 will result in many more cars/van taking to the small ‘U’ and ‘C’ class lanes around the surrounding villages. The proposal shows little or no knowledge of the area – a total lack of thought and planning given consideration of the negative desecration of a whole series of local villages.</td>
</tr>
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**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

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Belstead site 1) attention must be given to road infrastructure. At present the A12 is not coping and the London Road, taking the A12 overspill is frequently backed up from hotel onwards. Additional site traffic will exacerbate the problem. 2) if area to north-west of A12 is developed (see recent Local Plan) proposed extraction site will be very close. Noise (and dust) nuisance. 3) ecological integrity of the area must be protected, extraction process must not in any way impinge on Brockley Wood

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage. There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries.

**Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.**

The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.

**Ecology and Landscape**

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and
ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

<table>
<thead>
<tr>
<th>DR/31</th>
<th>Tim Hunter</th>
<th>As long as rights or way are preserved or diverted</th>
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</table>
| E/3   | Spencer Deakin | RE - Proposed quarry site at Belstead  
This site couldn't be more wrong! I live in the Village of Belstead, and we are already blighted by noise from the A14, A12 and A137 and the main line railway. Noise travels easily around this area! We are already going to be subjected to the gravel extraction at Pannington Hall - Brett aggregates. Soon to commence. I firmly believe this will blight the area with noise, dust and increases in traffic. Your proposed new site in Belstead would only add to the problem. With proposed access straight onto the A12 sounding like a good idea, this will only add to the traffic gridlock at the Copdock interchange which already exists every day of the week. Not to mention the increase in traffic that would come with recent proposed Babergh housing developments along the old A12. and in Nearby Washbrook. Which are in very close proximity to this proposed gravel site. The other considerations are the wildlife. The woods surrounding the proposed quarry site are home to many wild animals including herds of deer. These deer roam this area and cross the

**Public Rights of Way**
Public rights of way lined by trees will be retained as these are important landscape features. Others will be diverted.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**Lorry Movements**
The current number of lorry movements for this site is not known as we do not have an estimated rate of working for the site, however Lorries hould not travel through Belstead, except in the case of local deliveries.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.
other Pannington hall site and surrounding areas. Where are these animals supposed to go? Once the Brett site becomes active, they will be displaced from the Pannington hall site. There natural roaming routes will be blocked! Let's move on to infill with inert waste! - this is fairly high grade agricultural land at present. Will it return to this after extraction? My understanding is inert waste is concrete, brick, and any hard type waste. Does this also include such things as asbestos? I can't really see this site ever returning to agricultural use can you. Whilst I understand, there may be a need for gravel, it surely can't be the right thing to do, to subject one community to two separate sites, one each side of a village.

**A12 Congestion**
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.**
The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.

**Ecology and Landscape**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.
### Site Restoration
A site restoration scheme must be submitted with a planning application. The county council would expect this site to be restored to agriculture and nature conservation purposes. A previous example of successful restoration schemes in Suffolk is Layham quarry, which was returned to agriculture after extraction. Restoration may require inert soils to backfill the site. Hazardous waste, such as asbestos will not be used as site infill.

### Cumulative Impact
Cumulative impact caused by multiple sites (that on their own don’t necessarily caused significant problems independently) is taken account of in the plan and must also be considered in greater detail if a planning application is submitted. Mitigation would be required to reduce the impact if the site is to go ahead.

<table>
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<tr>
<th>E/11</th>
<th>Lisa Ray</th>
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| **Further to the presentation in Belstead regarding the Minerals and Waste plan for Suffolk I have the following comments to make, I have emailed as requested rather than complete the online survey given multiple comments.**  
1. Whilst the exit site for Belstead is proposed to be directly onto the A12, the document states 85% of the materials will be for Suffolk, therefore the majority of the traffic from the site will head Northbound on the A12. The Copdock interchange is already a heavily congested junction at various points throughout the day and this will only worsen going forward. As a result of existing congestion many vehicles already use the village as a cut through, |

### A12 Congestion
We recognise the potential for congestion and if the Belstead site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries. Lorries from the Wherstead site Traffic impacts and possible mitigations must be fully assessed at the planning application stage.
including heavy goods vehicles and the existing infrastructure would not sustain a significant increase in traffic, not to mention emission levels. What safeguards would be put in place to prevent the quarry lorries from using the village lanes to avoid the Copdock interchange? I have a similar concern with the extension at Wherstead given the consultation document states up to 150 HGV movements per day, with the potential for the lorries to cut through the village to join the A12.

2. The prevailing winds in the UK are from the South West. This would mean that Belstead village would be directly in the path of noise and dust pollution, in particular fine dust particles which may affect air quality and is potentially detrimental to health.

3. The document states that at the end of the extraction, the quarry will be backfilled with inert waste and restored to farmland. What safeguards will be put in place that this will not include landfill/toxic materials that would be detrimental to the environment, or the plans would change to become a landfill site?

4. Belstead village, despite its close proximity to Ipswich is currently a peaceful, rural community and should the extension to the Wherstead quarry and a new quarry in Belstead both go ahead, the village will be surrounded by industrialisation which has the potential to impact quality of lifestyle and property prices in the area.

5. I would have concerns about the impact of any blasting to extract the materials.

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**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

**Noise Pollution**

The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**Site Restoration**

A site restoration scheme must be submitted with a planning application. The County Council would expect this site to be restored to agriculture and nature conservation purposes. Restoration may require inert soils to backfill the site. Household waste would not be used to infill at this site, as the waste that can’t be recycled is sent to the energy from waste plant at Great Blakenham. In order to fill the quarry with any potentially hazardous waste the site would require planning permission and the correct permits from the Environment Agency. The Suffolk Waste Survey identifies that there is sufficient landfill capacity within this plan period.
| E/28 | Samantha Barber, Belstead Parish Council | Belstead Parish Council wish to make the following points regarding potential quarry sites at Belstead and Wherstead.  
**Belstead**  
The parish council wish to object to a site at Belstead on the grounds of noise and dust from the extraction works and the quality of life effect on the nearest residents. Although we are led to believe that lorries would not be using the roads through the village we know that in practice when there are accidents on the A12 or Orwell Bridge then the roads are gridlocked and lorries from the quarry site may add to this issue unless there is a ban on them using small village roads. Concerns have also been raised regarding wildlife and the management of footpaths through the site and the use of the site after extraction is finished. | **Blasting**  
Sand and gravel quarries do not use blasting.  

**Air Quality**  
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.  

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Public Rights of Way
Public rights of way will be either retained throughout the working of the site, or redirected. Tree lined public rights of way will be retained as these are important landscape and wildlife features. Other rights of way will be redirected.

E/52 Ian Evans

I am writing to express my concerns at the Belstead Quarry plans being considered by Suffolk County Council. Firstly I’m querying the need for a new quarry when we have so many current sites across the county and the capacity to increase the levels of extraction at them? The other obvious concern is the level of heavy traffic this will create with an estimated 100 journeys a day expected in the local area with the extra traffic and pollution that entails, especially with the poor traffic management off the A12 at the Copdock/Washbrook turnoff.

I live in Church Lane, Copdock, which already serves as a dangerous ‘rat-run’ at peak commuter times with no visible police presence to stop drivers speeding at 50-60mph down a country lane.

Quota for Extraction
The estimation of need for sand and gravel in the plan is based on the last ten years of sales in the county, which is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council does not consider the inclusion of this site excessive.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the
which has a 30mph speed limit. What’s more, whenever a large lorry is foolish enough to drive down our narrow road, queues and traffic chaos ensues bringing the road to a standstill. The road cannot cope with large vehicles all the way from Copdock to the Wherstead Road if large vehicles use it in the event of congestion on the A12. I’ve no doubt heavy lorries from the quarry will use Church Lane if the A12 is blocked. Similarly the already heavy congested Swan Hill will struggle to accommodate large lorries in the event of traffic problems on the A12. I don’t think this has been thought through and despite a public meeting last year which a SCC highways officer attended, I’ve seen no solid plans to slow traffic along the Old London Road during peak commuter times and when motorbikes use it as a racetrack. As well as the obvious traffic problems, the issue of noise and dust pollution from this huge and currently beautiful site will impact on the two villages. We already feel ‘under siege’ from form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

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Noise Pollution
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Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.
The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.
<table>
<thead>
<tr>
<th>E/53</th>
<th>Daniel Hutton</th>
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<tbody>
<tr>
<td><strong>Babergh and Mid Suffolk Joint Local Plan</strong> which has earmarked land for up to 650 new houses in the area without the prospect of a quarry on our doorstep and the loss of a local amenity. As our elected representative at SCC I trust you will listen to local residents and oppose the plans at the next SCC committee meeting. I'd hate to think this was already a ‘fait accompli’ without the views of local people being considered.</td>
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**I wish to comment on the proposed gravel extraction site at Belstead.**

It would appear that access to the site would be via the current access at the 32b junction on the A12.

It should be noted that the access is a single lane shared track that runs for nearly 400 yards (without passing places) until it reaches the first field (owned by Mr Ingram). The access track has the slip road for junction 32b on one side and farmland that belongs to someone else on the other. The hedge that is between the access track and the slip road also belongs to someone else. Having consulted with the land owner, they have told me that they do not want or need to sell any land. This means that there isn't any scope for widening the track in which case the 400 yards access will remain a single lane track, which I doubt is acceptable for the amount of vehicle movements expected. The reason I know these specific details is that up until 2 years ago |

**Access Tracks**

The County Council has been made aware of this issue. It is for the landowners and site operator to make any agreements as to how this issue can be resolved.
| E/56 | Graham Baldry | The infrastructure would not be able to cope with the extra amounts of H.G.V.s involved in this plan. Nearly all the surrounding roads within Copdock and Washbrook are congested for much of the time due to the problems on the Interchange and to add to this would impact on the quality of life of the local residents. I believe that this new site is not necessary as existing sites have the capacity to supply current and future needs. |

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Currently Operating Sites**

The current permitted land bank of sand and gravel in Suffolk will last until 31st December 2027 (as of 31st December 2016). However as the plan period lasts until 31st December 2036, so there is a shortfall of 9 years supply, or approximately 10.422 million tonnes. The County Council needs to identify sites which will ensure a land bank until the end of the plan period. So, while there are sand and gravel quarries currently operating through Suffolk, more sites need to be identified.

| E/102 | Julia Faulds | I object to this proposed site for the following reasons:- |

**Currently Operating Sites**
1. There are other sites still with many years of workable life in the close locality to sustain the needs of the building trade.
2. The site would add a considerable burden on the Copdock Interchange which cannot cope with the traffic using it already. It is most days backed up to Washbrook turnoff on A12 as it is. When there is an accident it is backed up to Capel St. Mary and beyond. The local villages then have to take a huge burden of traffic on some single track roads. The extra lorries coming into and leaving this area would make it intolerable for users of the A12.
3. The noise pollution
4. The air pollution
5. The light pollution
6. There are 15 listed buildings within half a mile from this site to be considered.
7. Village Life will be effected by this site.
8. It is a very unwelcome proposal by our community and I wish to stress my objection to the whole Proposal.

The current permitted land bank of sand and gravel in Suffolk will last until 31st December 2027 (as of 31st December 2016). However as the plan period lasts until 31st December 2036, so there is a shortfall of 9 years supply, or approximately 10.422 million tonnes. The County Council needs to identify sites which will ensure a land bank until the end of the plan period. So, while there are sand and gravel quarries currently operating through Suffolk, more sites need to be identified.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Noise Pollution
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality
<table>
<thead>
<tr>
<th>E/107</th>
<th>Adrian Ward</th>
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<tr>
<td></td>
<td>I am a resident of Washbrook and am writing to complain in the strongest possible terms about the SCC's plans for a quarry alongside the A12 at Belstead / Copdock and the lack of consultation with the local community. My main points are these.... * SCC has shown scant regard for local opinion on the matter by avoiding to share any plans or make any serious attempt to engage with villages that will be enormously affected by such an environmentally damaging proposals. A public meeting one midweek night in Belstead is NOT consultation. There is massive concern in the</td>
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**Light pollution**

The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

**Historic Assets**

Historic assets, including listed buildings, have been considered as part of the site selection process and it is not expected that these will be affected. A full assessment of historic assets in relation to the site will be required as part of a planning application.

**Public Consultation**

The ways that the County Council used to the inform the public of the consultation and consultation events were: letters to residents and businesses within 250m of the site; advertisements in the local press (East Anglian Daily Times and the Newmarket Journal), email notification to Belstead Parish Council. Social media was also used to promote the consultation events.

**Visual Impact**

Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual
villages of Washbrook and Copdock about the impact of this proposal but no attempt has been made to understand or listen. The quarry will be an ugly blot on the landscape for years. What a sight to greet visitors to Suffolk as they come into the county up the A12. The quarry will be an eyesore to what currently is an unspoilt area of natural beauty.

* The impact of lorry movements will be horrendous. Ever working day the A12 backs up to Capel and traffic comes through Copdock and up Swan Hill to get around this. The impact of hundreds of lorries a day doing this would be horrendous. Junction 32b is NOT the answer.

* there are other existing sites that can be extended rather than opening up an ugly scar amongst lovely villages and countryside. Alongside ill thought through land grabs for housing, the way of life of successful villages like Copdock and Washbrook is under attack from all sides. There is no joined up thinking on infrastructure or consultation. SCC should be in no doubt about the anger and concern being held by all, even if they are trying to avoid engaging with it.

impact. It is expected that any established woodland bordering the site, including vegetation along the road will be retained, as this provides an established barrier. This mitigation will also be implemented for the plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with restoration required as one part becomes exhausted and a new part is started.

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Site Selection Process**

As part of the Issues and Options consultation a call for sites was issued and sites submitted by, land owners, land agents and quarry operators, one of which was the site near Belstead. While other sites are being extended the inclusion of the site in this plan is not considered excessive.

The estimation of need for sand and gravel in the plan is based on the last ten years of sales in the county, which is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes
will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments.

**Cumulative Impact**
Cumulative impact caused by multiple sites (that on their own don't necessarily caused significant problems independently) is taken account of in the plan and must also be considered in greater detail if a planning application is submitted. Mitigation would be required to reduce the impact if the site is to go ahead.

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**E/109 David Benn**

I wish to make my comments regarding the proposed quarry for Belstead – Brockley Wood: I feel there is no need for any further quarry development in the county, we have sufficient quarry areas with extensions already proposed for them. The impact on both Belstead and Copdock villages will be dire to say the least. Road infrastructure totally inadequate, Highways Agency has already stated that the A12 will be beyond capacity by 2012. Copdock junction 32b is totally unsuitable for heavy vehicle movement. No further traffic load will be taken.

**Site Selection Process**
As part of the Issues and Options consultation a call for sites was issued and sites submitted by, land owners, land agents and quarry operators, one of which was the site near Belstead. While other sites are being extended the inclusion of the site in this plan is not considered excessive.

The need calculated by the County Council to ensure a land bank until 2036 is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9
needed along the Old London Road A12, which without doubt will be used, and so will our country lanes, also already over subscribed

Proposed siting of Wash and Grading Plant, could not be in a worse position, creating noise, light, air pollution etc. No consideration given to close by residents

Brockley Wood could suffer badly from the overall interruption of having a quarry right next to it, it has been known to have endangered dormouse and bats, a complete upset to the biodiversity of the woodland, which is needed to aid our village enviroment

This is a badly thought out development which will have a very bad impact on village life, especially for Copdock residents. Life will be a complete misery and totally unnecessary. Serious consideration should be given regarding the proposed planning of this quarry.

A12 Congestion

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries.

Air Quality

Potential receptors have been identified near to the site. At the planning application stage an Air Quality
Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**Light pollution**
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

**Ecology and Landscape (Belstead)**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded
I am a resident of Washbrook and am writing to complain in the strongest possible terms about the SCC's plans for a quarry alongside the A12 at Belstead / Copdock and the lack of consultation with the local community. My main points are these:

* SCC has shown scant regard for local opinion on the matter by avoiding to share any plans or make any serious attempt to engage with villages that will be enormously affected by such an environmentally damaging proposals. A public meeting one midweek night in Belstead is NOT consultation. There is massive concern in the villages of Washbrook and Copdock about the impact of this proposal but no attempt has been made to understand or listen.

* The quarry will be an ugly blot on the landscape for years. What a sight to greet visitors to Suffolk as they come into the county up the A12. The quarry will be an eyesore to what currently is an unspoilt area of natural beauty.

* The impact of lorry movements will be horrendous. Ever working day the A12 backs up to Capel and traffic comes through Copdock and up Swan Hill to get around this. The impact of hundreds of lorries a day doing this would be horrendous. Junction 32b is NOT the answer.

* There are other existing sites that can be extended rather than opening up an ugly scar amongst lovely villages and countryside. Alongside ill thought through land
grabs for housing, the way of life of successful villages like Copdock and Washbrook is under attack from all sides. There is no joined up thinking on infrastructure or consultation. SCC should be in no doubt about the anger and concern being held by all, even if they are trying to avoid engaging with it.

This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Site Selection Process**

As part of the Issues and Options consultation a call for sites was issued and sites submitted by, land owners, land agents and quarry operators, one of which was the site near Belstead. While other sites are being extended the inclusion of the site in this plan is not considered excessive.

The estimation of need for sand and gravel in the plan is based on the last ten years of sales in the county, which is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments.

**Cumulative Impact**
<table>
<thead>
<tr>
<th>E/117</th>
<th>Fred Green</th>
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<tbody>
<tr>
<td>Note – this representation has 3 attachments which are from Steven and Allison Blakeley duplicate representation M/33 about Layham Quarry.</td>
<td>i object to this proposal at belstead i understand at the present time it is not required besides the site entrance is very poor it will make the already a12 that goes through copdock which already at times grinds to a halt at swan hill and the beagle roundabout on top of the traffic we will suffer the noise and pollution and our village and way of life</td>
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**Cumulative impact caused by multiple sites (that on their own don't necessarily caused significant problems independently) is taken account of in the plan and must also be considered in greater detail if a planning application is submitted. Mitigation would be required to reduce the impact if the site is to go ahead**

**The Need for Sites**

The current permitted land bank of sand and gravel in Suffolk will last until 31st December 2027 (as of 31st December 2016). However as the plan period lasts until 31st December 2036, so there is a shortfall of 9 years supply, or approximately 10.422 million tonnes. The County Council needs to identify sites which will ensure a land bank until the end of the plan period. So, while there are sand and gravel quarries currently operating through Suffolk, more sites need to be identified.

**Access onto the A12**

Highways England, who have been consulted have determined the access to be acceptable.

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.
Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

Noise Pollution
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

E/120 Rob and Pam Rivers
we are very sorry we couldnt make the recent meeting, we are very very concerned about the proposal of a quarry at brockley wood, and the proposal to build over 600 new houses in the copdock area, we feel that the road infrastructure can not take any more traffic, we live on church lane between the old a12 copdock and belstead village, the traffic is already horrendous at peak times, made worse when there is a problem at the copdock mill interchange, we then get a constant flow of traffic cutting through this lane at speed, with no consideration for it being a

Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.
The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London
rural country lane used by horses, cycles, joggers, dog walkers etc, it is a lane with many bends and is of poor condition, pot holes and receding banks, making it difficult to pass oncoming traffic, it also affects swan hill badly at these times causing huge tailbacks and long delays, the same goes for grove hill and ellenbrook road and surrounding roads, we have lived here for 27 years and it gets worse every year, there is also the noise and pollution problem that will go with the quarry, property devaluation is another concern, we are totally against these proposals and very worried.

Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries.

Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

Noise Pollution
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

House Prices
House prices are not a planning consideration.

E/124 Linda Emery

Please find below my objections to the development of a quarry at Belstead which I hope all parties will find useful.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is
Traffic safety on the A12, A14 and Copdock Interchange would be severely compromised by this proposal, which could, if it were to proceed, be the cause of many deaths following Road Traffic Accidents. In the site selection report point 5.11 contained within the Air Quality section, special note is made of the expected detrimental effect on air quality (caused by pollutants arising from the pit) to properties on the corner of Oakfield Road and The Avenue in Copdock. These properties are on the opposite side of the A12 to the proposed pit. The report, therefore, confirms that copious air pollutants, which will supposedly include much dust, will travel across the A12. With the area well known for being windy, to acknowledge the risk to clear visibility for road users at this incredibly busy point within our local road system, but continue to propose it as a viable development proposition, seems to be quite reckless. May I politely remind the council of previous instances within the UK where smoke from (for example) a private firework display was carried to a main road, resulting in dreadful visibility. The dreadful result was carnage and mayhem and the poor people that lost their lives and the families that now grieve their loss would be horrified to think that any governing body within the UK would seek to give a company licence to cause such carnage, grief and loss again. As a directly affected homeowner I received nothing from the council whatsoever regarding this proposal. Sadly, this is also true for nearly all the residents of Washbrook and Copdock. Were it not for the kindness of a local resident, nobody possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which will include dust management.

**Visual issues on the A12**
There is a band of established vegetation between along the site boundary and the A12, which combined with a bund would mitigate this issue. Additionally, dust management is usually a requirement of sand and gravel sites for air quality impact mitigation, which should also help to alleviate the issue.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be
would have known, nobody would have therefore been able to make their comments to the council and the closing date for comments would have come and gone with a supposed ‘lack of interest’ from Copdock and Washbrook residents. Democracy would have failed. I am quite prepared to sign any legal document required confirming that I received nothing from the council as, I can say with absolute certainty, other local residents would be too. The continued success of the port of Felixstowe, which is of course a major employer and income generator for our county, should be considered and protected. With the Highways Agency officially predicting the failure of the Interchange’s sufficiency by 2021, increasing commercial traffic at this point is, at best, questionable. The expected increased traffic created by such a huge pit needs to be viewed not in isolation, but considered within the total effect created by the pits development, a possible 600+ homes together with multiple businesses proposed within Washbrook and Copdock, 2,500 new homes proposed in Sproughton as well as proposed developments within Burstall (?) and Belstead. ALL these proposals would have impact on the Interchange, A14, A12, A12 Jnr, Swan Hill and the A1070. Further ‘chocking’ of Ipswich will be inevitable and would, I believe, serve to dissuade businesses from locating themselves in that vicinity at a time when the council is seeking to attract investment and also achieve City Status. Previously the council has pledged to improve efficiency. This proposal is the very antithesis of this objective.

acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

Public Consultation
The ways that the County Council used to inform the public of the consultation and consultation events were: letters to residents and businesses within 250m of the site; advertisements in the local press (East Anglian Daily Times and the Newmarket Journal), email notification to Belstead Parish Council. Social media was also used to promote the consultation events.

Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.
The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.

Site Selection and Calculated Need for Sand and Gravel
The current permitted land bank of sand and gravel in Suffolk will last until 31st December 2027 (as of 31st December 2016). However as the plan period lasts until 31st December 2036, so there is a shortfall of 9 years supply, or approximately 10.422 million tonnes. The County Council needs to identify sites which will ensure a land bank until the end of the plan period. So, while there are sand and gravel quarries currently operating through Suffolk, more sites need to be identified.
Consideration should be given to ALL draft proposals within the area, not just consideration in isolation of the proposed pit. A recent Highways report has declared the Copdock Interchange as operating beyond capacity by 2021. This proposal would increase the problems experienced on a daily basis here already and its commencement is timetabled for after the Interchange is predicted to be unfit for purpose. Existing traffic issues in the area are acknowledged by Councillor Steve Merry of Suffolk County Council in the minutes of Copdock and Washbrook Parish Council's AGM dated 3rd May, 2016 within point 1178/1617. No further traffic load should be considered at this point until the Copdock Interchange is restructured.

The access point for the pit would inevitably cause difficulties, at an already failing point on the A12. Exiting pit vehicles would have to give priority to traffic approaching from the right. Traffic at this point is heavy and the ease of movement for incoming/outgoing pit traffic would be inevitably compromised. Placing traffic lights at this point would simply cause existing traffic issues/queues on the Copdock Interchange, A12, A12 Jnr and Swan Hill to escalate. With several thousand new homes proposed by the council as well as many industrial businesses within this point’s immediate vicinity, the suggested placement of the access point would cause road user misery, frustration and inevitable accidents. Any realignment of the present two roundabouts will not solve any issues for this junction which is the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive.

**Lorry Movements**

This information from the Greenfields Report should be included and it will be added in the next draft.

**Lifetime of Quarry**

Thank you for highlighting this discrepancy. It will be corrected in the next draft of the plan.

**Visual Impact**

Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact. It is expected that any established woodland bordering the site, including vegetation along the road will be retained, as this provides an established barrier. This mitigation will also be implemented for the plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with
oversubscribed already every single day. Church Road is equally unsuitable as an entry/exit point for the large, extremely heavy lorries which are essential for pit use. Suffolk County Council claims a lifespan of ten years for the site. Greenfields anticipate a life of fifteen years. With such a huge discrepancy in the pits expected life, how have these figures been calculated and who is right or wrong? The Greenfields report clearly states up to 100 movements per day for the proposed pit. This was accepted by Suffolk County Council in June 2017 as sufficient to include in their Draft Local Plan yet they have chosen not to state lorry movements per day. Drivers can be easily distracted. A massive development such as the proposed pit could cause people to become momentarily distracted and find themselves in road traffic accidents at a place in our local road system which is currently already plagued by shunts and accidents. ‘Rubbernecking’ is inevitable and even a momentary lapse of attention by a driver can have quite tragic consequences. Church Road in Copdock is a small lane. It is difficult for two cars to pass in places and it is entirely unsuited to Pit lorries. The road surface and its sub surface would most certainly be damaged. Inevitable danger to normal vehicles using this road, should pit lorries be permitted to use it would ensue. In addition, Swan Hill is another small road, entirely unsuitable for large lorries. Lorries travelling to and from Church Road would not be able to use Swan Hill as a viable route to the A14 or A1070. Pit lorries are extremely large and heavy. Swan restoration required as one part becomes exhausted and a new part is started. These measures should ensure that the site is not visible from the road.

Site Selection Process
During an issues and options consultation stage which took place in early 2017 a call for sites was issued, where landowners, land agents and minerals extraction companies submitted sites for the County Council’s consideration. That is how this site came forward despite there being no proposals following the 1970s minerals surveys.

Health and Amenity of Nearby Residents
It is expected that mitigation measures can be put in place to ensure the amenity of nearby residents and businesses are not harmed. Vegetated earth bunds are standard mitigation at sand and gravel quarries, to reduce visual impact and attenuate noise and dust. It is also expected an additional stand-off will be required of this site.

Light pollution
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

Cumulative Impact
| Hill, Church Road and the A12 Jnr were all built a very long time ago when maximum tonnage levels for lorries were set at a completely different level. This would mean that the roads mentioned would almost certainly be incapable of supporting such frequent heavy loads. Traffic mayhem would ensue should major repair works become necessary due to road surface or sub surface damage repairs. Travel by the large pit lorries along these roads would inevitably be attractive to their drivers as a means of avoiding the daily queues that exist between Capel St Mary and the Interchange along with other daily queues formed on the other 'arterial' routes to the interchange. The council has a policy promoting the use of cycles and has worked on betterment for cyclists with the introduction and upgrading of cycle lanes. Steve Merry of SCC at the AGM of Copdock and Washbrook Parish Council Tuesday 3rd May, 2016 acknowledged the existing pressure on Copdock and Washbrook and the Old London Road (A12 Jnr). The introduction of a one lane, one cycle track split on the A12 Jnr was offered as a solution to the traffic problems. With over 3,000 new homes, multiple industrial businesses and a gravel pit being proposed by the council in the immediate area amplification of existing traffic problems will be inevitable. To reduce vehicular traffic to one lane as muted in the aforementioned minutes would undoubtedly exacerbate this. With the proposed expansion of pits at Barham, Barnham, Cavenham, Layham, Tattingstone, Wangford, Wetherden |
| Cumulative impact caused by multiple developments (that on their own don’t necessarily caused significant problems independently) is taken account of in the plan and must also be considered in greater detail if a planning application is submitted. Mitigation would be required to reduce the impact if the site is to go ahead. |
| Proposed Changes: Add estimated Lorry Movements from Greenfields report into plan document – 80 to 100 movements per day. Change lifetime of quarry in paragraph 10.12 from 10 years to 15 years. |
, Whereinstead and Worlington and the declared downturn in demand shown in official figures available on the internet, the proposed siting of a gravel pit at Belstead is unnecessary. All of the aforementioned sites must be enlarged as per their granted planning permission before any consideration is ever given to Belstead Quarry. There is clearly already excess capacity in the system to well past 2036. There is, therefore, no justifiable need for a new quarry at Belstead. In 1970 several Crown borehole surveys including those at Red House Farm Copdock Blacksmith Corner Belstead and Oakfield Road, Belstead were made. No desire for a pit came forth from these borehole survey findings. Can the council please explain what changes have occurred within the earth in this area to persuade them that this is now an area with such rich ‘pickings’ that it is worth their sanctioning of traffic misery, ill health of local residents, disruption and possible eradication of endangered species and important archaeological evidence, especially in view of the expansion of nine other pits already mentioned which clearly have spare capacity?

With the expected detriment to air quality confirmed in the site selection report (point 5.11 of the Air quality section) and the resultant effect on properties in Oakfield Road and The Avenue, should the council not also consider the health implications caused through the proposed pits development? These effects would not be felt purely by a few homes situated currently on the corner of Oakfield Road and The Avenue, but also by the homes and businesses proposed within the draft Housing and Industrial proposals.
of SCC for Washbrook and Copdock, many of which would be proximate to the meeting point of these two roads. Possible litigation may ensue, a point which should be considered by the council, as it would prove to be costly in both man hours, negative PR for the Council and also in financial terms. With reference to the point made in the paragraph above (point 5.11 of the Air quality section of the site selection report), I would ask the council to confirm whether due consideration would be given to the pit at Belstead if there were a school, hospital or other public building present in that location? The official sanctioning of ill health that would follow should the pit receive permission to proceed would be a precursor to their involvement in time consuming and costly repercussions, which should, most sensibly, be best avoided. Our local village school is not far away from this stated location.

The increase to noise levels created by such development would be significant. As well as air pollution, this proposed site would also cause unacceptable and horrendous noise pollution. What are the councils strategic plans for mitigation of noise or their proposals for the site’s reinstatement once the proposed quarry has reached the end of it’s useful life?

The proposed siting of the Wash and Grading Plant is unsuitable. It would cause, light, noise and air pollution to homes situated in close proximity but would also be a terrible ‘blot on the landscape’ and a poor welcome to Ipswich. The light pollution caused to Brockley wood would sorely affect the local protected wildlife such as dormice and bats. Housing
| E/127 | Mr and Mrs R Mundy | We object to these plans on the basis that the proposed site will cause significant noise and vibration disturbance and nuisance. This will continue for a proposed 61 hours a week which is unacceptable. We already experience noise from the adjacent motor cycle scrambling track at Charity Farm so dread the effect of quarrying. There would also be light pollution to the area which at the moment has very little lighting. There would be the partial destruction of a conservation wood and the varied landscape so vital to our flora and fauna. The estimated 100 lorry movements would add to an already over congested road system that frequently comes to a standstill virtually trapping residents in the village. We note there is no mention of banning lorries from using the village as a rat run. The possibility that when quarrying finishes the hole would be used for landfill is most objectionable. This would lead to more noise pollution, foul smells and an explosion in the vermin population and blight the whole local area for decades to come. What a wonderful welcome to Ipswich, our county town. |

**SMWLP, Responses to Preferred Options Consultation, March 2018**

<table>
<thead>
<tr>
<th>Noise Pollution</th>
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<tbody>
<tr>
<td>County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the mitigation measures required and protect nearby residents and businesses.</td>
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I am directly affected by this proposed development as indicated in point 5.11 of the Air Quality section of the Site Selection report. I did not receive anything from the Council whatsoever regarding this proposal. I heard about it a short while ago from a kindly resident. The Parish Council Meeting this Tuesday 5th December clearly showed that almost nobody in the village had received anything either. Without my kindly neighbour nobody would have known about this or had the ability to make comments to the Council and the democratic process would have failed. I am happy to sign any legal document required confirming that I received nothing from the Council advising me of this proposal. The air pollution created by this proposed development is acknowledged in point 5.11 of the Air Quality section of the Site Selection report. Surely this would make a significant and dramatic change to visibility on the A12 resulting in an increase in RTA’s?

A homeowner was famously prosecuted for allowing smoke to drift from his property onto a main road not so long ago, resulting in poor visibility. Many road users were involved in accidents as a result and sadly there was also loss of life. Can the council please bear this in mind before allowing massive clouds of dust to be times, to avoid peak traffic. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Public Consultation**

The ways that the County Council used to inform the public of the consultation and consultation events were: letters to residents and businesses within 250m of the site; advertisements in the local press (East Anglian Daily Times and the Newmarket Journal), email notification to Belstead Parish Council. Social media was also used to promote the consultation events.

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

**Site Selection and Estimated Need for Sand and Gravel Sites**

The current permitted land bank of sand and gravel in Suffolk will last until 31st December 2027 (as of 31st December 2016). However as the plan period lasts until 31st December 2036, so there is a shortfall of 9 years supply, or approximately 10.422 million tonnes. The County Council needs to identify sites which will ensure a land bank until the end of the
created in this already difficult junction within our road system? Regarding point 5.11 mentioned above, many other properties would be similarly affected. Wind does not of course always blow in the same direction! I am sure that if resident’s human rights were walked on in this way there would be difficult times to follow for the Council and health misery for many residents. Our village school is also close to this proposed site. The elected Council are there for public good, but making hundreds of residents suffer ill health and utter misery is surely not in the public interest? More residents and businesses would be affected if the villages draft proposed plan were to be adopted too. There is obviously spare capacity until well past 2036 within the County’s existing network of pits making the siting of a new pit at Belstead unnecessary. Planning permission for expansion of pits at Barham, Barnham, Cavenham, Layham, Tattingstone, Wangford, Wetherden, Wherestead and Worlington is currently being considered. All the sites listed should be enlarged in line with their passed planning permission before any consideration is ever given to Belstead Quarry. Highways have stated that the Copdock Interchange will be operating beyond capacity by 2021. Steve Merry of Suffolk County Council acknowledged existing traffic issues in the area in the meeting of Washbrook and Copdock’s Parish Council’s AGM. His comments can be found in point 1178/1617 of the minutes. No further traffic load should be given consideration until the Copdock Interchange is restrucatured. The plan period. So, while there are sand and gravel quarries currently operating through Suffolk, more sites need to be identified.

The current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Light pollution
The proposed access point for the pit is entirely unsuitable and the realignment of the present two roundabouts will not solve any issues for a junction that is already oversubscribed every single day. Church Road is an equally unsuitable site for entry/exit of pit vehicles. Such a huge development would cause drivers to ‘rubberneck’ at an extremely busy point on the A12. This always leads to shunts or worse and this effect must be considered by the Council. The surface and sub surface of the A12 Jnr, Church Road and Swan Hill would most certainly be wrecked by large pit lorries. If repairs needed to be made to these roads, traffic mayhem would result. Pit lorry drivers would not be able to resist the temptation to use A12 Jnr, Church Road and Swan Hill to avoid the awful Copdock Interchange traffic. These roads would become congested and Church Road and Swan Road would become dangerous for ordinary drivers as the roads are narrow and Pit lorries are enormous and have considerable ‘stopping distances.’ Already awful traffic in the area would be made worse and getting to and from work would be made considerably more difficult. The light pollution caused by the lighting of the proposed pit would impact the protected wildlife in Brockley Wood. This wildlife which includes dormice and bats has prevented housing development in the past. The impact of a gravel pit would surely be most certainly at least as much if not more as that of housing development.

The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

Archaeology
The site does have potential for historic human occupation and the County Historic Environment Record has recorded this. If a planning application is submitted a full program of archaeological evaluation, including appropriate field work, must be included, This needs to demonstrate the impacts of development/removal of the remains.

Site Selection Process
During an issues and options consultation stage which took place in early 2017 a call for sites was issued, where landowners, land agents and
There is stated archeological evidence of prehistoric man in this area. Surely this is something to be preserved and indeed promoted by the Council. Not simply evidence that should disappear in the bucket of a large earth removal vehicle? Crown borehole surveys were made in 1970 at Red House Farm Copdock, Blacksmith Corner Belstead and Oakfield Road Belstead and the results of these did not make the council want to develop a gravel pit. What has happened to the earth in this area to now persuade the council that this development should proceed, despite the traffic misery, ill health of locals, disruption and even possible eradication of endangered species and important archaeological evidence that it would cause?

SCC states a lifespan of ten years for the pit but Greenfields anticipate a lifespan of fifteen years. A huge discrepancy which makes me request an explanation of the calculations. Who is right and who is wrong? The proposed site for the Wash and Grading Plant is unsuitable. It would cause light, noise and air pollution to homes situated in close proximity but would also be a terrible blot on the landscape and inevitably cause problems through ‘rubbernecking.’ The increase in noise pollution by this proposed development would be significant. What plans have the council in mind to mitigate this?

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**Lifetime of Quarry**

Thank you for highlighting this discrepancy. It will be corrected in the next draft of the plan.

**Visual issues on the A12**

There is a band of established vegetation between along the site boundary and the A12, which combined with a bund would mitigate this issue. Additionally, dust management is usually a requirement of sand and gravel sites for air quality impact mitigation, which should also help to alleviate the issue.

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There is a band of established vegetation between along the site boundary and the A12, which combined with a bund would mitigate this issue would screen the site from the A12 and nearby residents.

**Proposed Changes:**

*Change lifetime of quarry in paragraph 10.12 from 10 years to 15 years.*
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Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

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There is a band of established vegetation along the site boundary and the A12, which combined with a bund would mitigate this issue. Additionally, dust management is usually a requirement of sand and gravel sites for air quality impact mitigation, which should also help to alleviate the issue.

**Surplus Mineral**
The need calculated by the County Council to ensure a land bank until 2036 is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31%
Council and health misery for many residents. Our village school is also close to this proposed site. The elected Council are there for public good, but making hundreds of residents suffer ill health and utter misery is surely not in the public interest? More residents and businesses would be affected if the villages draft proposed plan were to be adopted too. There is obviously spare capacity until well past 2036 within the County’s existing network of pits making the siting of a new pit at Belstead unnecessary. Planning permission for expansion of pits at Barham, Barnham, Cavenham, Layham, Tattingstone, Wangford, Wetherden, Wherestead and Worlington is currently being considered. All the sites listed should be enlarged in line with their passed planning permission before any consideration is ever given to Belstead Quarry. Highways have stated that the Copdock Interchange will be operating beyond capacity by 2021. Steve Merry of Suffolk County Council acknowledged existing traffic issues in the area in the meeting of Washbrook and Copdock’s Parish Council’s AGM. His comments can be found in point 1178/1617 of the minutes. No further traffic load should be given consideration until the Copdock Interchange is restructured. The proposed access point for the pit is entirely unsuitable and the realignment of the present two roundabouts will not solve any issues for a junction that is already oversubscribed every single day. Church Road is an equally unsuitable site for entry/exit of which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Site Access
The proposed access site has been approved by Highways England. Church Road is not a proposed access to the site.

Visibility of the Site from the A12
There is a band of established vegetation along the site boundary and the A12, which combined with a bund would visually screen the site from the road.
pit vehicles. Such a huge development would cause drivers to ‘rubberneck’ at an extremely busy point on the A12. This always leads to shunts or worse and this effect must be considered by the Council. The surface and sub surface of the A12 Jnr, Church Road and Swan Hill would most certainly be wrecked by large pit lorries. If repairs needed to be made to these roads, traffic mayhem would result. Pit lorry drivers would not be able to resist the temptation to use A12 Jnr, Church Road and Swan Hill to avoid the awful Copdock Interchange traffic. These roads would become congested and Church Road and Swan Road would become dangerous for ordinary drivers as the roads are narrow and Pit lorries are enormous and have considerable ‘stopping distances.’ Already awful traffic in the area would be made worse and getting to and from work would be made considerably more difficult. The light pollution caused by the lighting of the proposed pit would impact the protected wildlife in Brockley Wood. This wildlife which includes dormice and bats has prevented housing development in the past. The impact of a gravel pit would surely be most certainly at least as much if not more as that of housing development. There is stated archealogical evidence of prehistoric man in this area. Surely this is something to be preserved and indeed promoted by the Council. Not simply evidence that should disappear in the bucket of a large earth removal vehicle?

**Traffic**
There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries. It is possible to implement conditions which determine the direction that lorries turn upon leaving a site. This would prevent lorries using the Old London Road.

**Light pollution**
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

**Housing Proposals in the Babergh Mid Suffolk Joint Local Plan and Planning Applications.**
The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.

**Lifetime of Quarry**
Thank you for highlighting this discrepancy. It will be corrected in the next draft of the plan.

**Site Selection Process**
During an issues and options consultation stage which took place in early 2017 a call for sites was issued, where landowners, land agents and minerals extraction companies submitted sites for
Crown borehole surveys were made in 1970 at Red House Farm Copdock, Blacksmith Corner Belstead and Oakfield Road Belstead and the results of these did not make the council want to develop a gravel pit. What has happened to the earth in this area to now persuade the council that this development should proceed, despite the traffic misery, ill health of locals, disruption and even possible eradication of endangered species and important archaeological evidence that it would cause? SCC states a lifespan of ten years for the pit but Greenfields anticipate a lifespan of fifteen years. A huge discrepancy which makes me request an explanation of the calculations. Who is right and who is wrong? The proposed site for the Wash and Grading Plant is unsuitable. It would cause light, noise and air pollution to homes situated in close proximity but would also be a terrible blot on the landscape and inevitably cause problems through 'rubbernecking.' The increase in noise pollution by this proposed development would be significant. What plans have the council in mind to mitigate this?

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<tr>
<th>E135</th>
<th>Iain Pocock</th>
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<td>• Proposed site will further increase pressure on A12/14 intersection which already experiences 1 mile tailbacks</td>
<td></td>
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<td>• Will displace traffic through Copdock which is unsuitable for large HGVs due to number of lorries proposed</td>
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the County Council’s consideration. That is how this site came forward despite there being no proposals following the 1970s minerals surveys

**Proposed Changes**

**Change lifetime of quarry in paragraph 10.12 from 10 years to 15 years.**

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.
| E/136 | Linda Emery | Please find below my objections to the development of a quarry at Belstead which I hope all parties will find useful. Traffic safety on the A12, A14 and Copdock Interchange would be severely compromised by this proposal, which could, if it were to proceed, be the cause of many deaths following Road Traffic Accidents. In the site selection report point 5.11 contained within the Air Quality section, special note is made of the expected detrimental effect on air quality (caused by pollutants arising from quarrying activities)

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times.

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**Visual Impact**

Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact, which is industry standard mitigation. It is expected that any established woodland bordering the site, including vegetation along the A12 will be retained, as this provides an established barrier. This mitigation will also be implemented for the plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with restoration required as one part becomes exhausted and a new part is started.

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**Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.**

The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.
from the pit) to properties on the corner of Oakfield Road and The Avenue in Copdock. These properties are on the opposite side of the A12 to the proposed pit. The report, therefore, confirms that copious air pollutants, which will supposedly include much dust, will travel across the A12. With the area well known for being windy, to acknowledge the risk to clear visibility for road users at this incredibly busy point within our local road system, but continue to propose it as a viable development proposition, seems to be quite reckless. May I politely remind the council of previous instances within the UK where smoke from (for example) a private firework display was carried to a main road, resulting in dreadful visibility. The dreadful result was carnage and mayhem and the poor people that lost their lives and the families that now grieve their loss would be horrified to think that any governing body within the UK would seek to give a company licence to cause such carnage, grief and loss again.

As a directly affected homeowner I received nothing from the council whatsoever regarding this proposal. Sadly, this is also true for nearly all the residents of Washbrook and Copdock. Were it not for the kindness of a local resident, nobody would have known, nobody would have therefore been able to make their comments to the council and the closing date for comments would have come and gone with a supposed 'lack of interest' from Copdock and Washbrook residents. Democracy would have failed. I am quite prepared to sign any legal document required times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries.

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which will include dust management.

**Visual issues on the A12**

There is a band of established vegetation between along the site boundary and the A12, which combined with a bund would mitigate this issue. Additionally, dust management is usually a requirement of sand and gravel sites for air quality impact mitigation, which should also help to alleviate the issue.

**Noise Pollution**

The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.
confirming that I received nothing from the council as, I can say with absolute certainty, other local residents would be too. The continued success of the port of Felixstowe, which is of course a major employer and income generator for our county, should be considered and protected. With the Highways Agency officially predicting the failure of the Interchange’s sufficiency by 2021, increasing commercial traffic at this point is, at best, questionable. The expected increased traffic created by such a huge pit needs to be viewed not in isolation, but considered within the total effect created by the pits development, a possible 600+ homes together with multiple businesses proposed within Washbrook and Copdock, 2,500 new homes proposed in Sproughton as well as proposed developments within Burstall (?) and Belstead. ALL these proposals would have impact on the Interchange, A14, A12, A12 Jnr, Swan Hill and the A1070. Further ‘chocking’ of Ipswich will be inevitable and would, I believe, serve to dissuade businesses from locating themselves in that vicinity at a time when the council is seeking to attract investment and also achieve City Status. Previously the council has pledged to improve efficiency. This proposal is the very antithesis of this objective. Consideration should be given to ALL draft proposals within the area, not just consideration in isolation of the proposed pit. A recent Highways report has declared the Copdock Interchange as operating beyond capacity by 2021. This proposal would

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increase the problems experienced on a daily basis here already and its commencement is timetabled for after the Interchange is predicted to be unfit for purpose. Existing traffic issues in the area are acknowledged by Councillor Steve Merry of Suffolk County Council in the minutes of Copdock and Washbrook Parish Council’s AGM dated 3rd May, 2016 within point 1178/1617. No further traffic load should be considered at this point until the Copdock Interchange is restructured. The access point for the pit would inevitably cause difficulties, at an already failing point on the A12. Exiting pit vehicles would have to give priority to traffic approaching from the right. Traffic at this point is heavy and the ease of movement for incoming/outgoing pit traffic would be inevitably compromised. Placing traffic lights at this point would simply cause existing traffic issues/queues on the Copdock Interchange, A12, A12 Jnr and Swan Hill to escalate. With several thousand new homes proposed by the council as well as many industrial businesses within this point’s immediate vicinity, the suggested placement of the access point would cause road user misery, frustration and inevitable accidents. Any realignment of the present two roundabouts will not solve any issues for this junction which is oversubscribed already every single day. Church Road is equally unsuitable as an entry/exit point for the large, extremely heavy lorries which are essential for pit use. Suffolk County Council claims a lifespan of ten years for the site. Greenfields anticipate a life of fifteen years. With such a huge discrepancy in the pits expected life, this leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive. **Lorry Movements**
This information from the Greenfields Report should be included and it will be added in the next draft.

**Lifetime of Quarry**
Thank you for highlighting this discrepancy. It will be corrected in the next draft of the plan.

**Visual Impact**
Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact. It is expected that any established woodland bordering the site, including vegetation along the road will be retained, as this provides an established barrier. This mitigation will also be implemented for the plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with restoration required as one part becomes exhausted and a new part is started. These measure should ensure that the site is not visible from the road.
<table>
<thead>
<tr>
<th>how have these figures been calculated and who is right or wrong? The Greenfields report clearly states up to 100 movements per day for the proposed pit. This was accepted by Suffolk County Council in June 2017 as sufficient to include in their Draft Local Plan yet they have chosen not to state lorry movements per day. Drivers can be easily distracted. A massive development such as the proposed pit could cause people to become momentarily distracted and find themselves in road traffic accidents at a place in our local road system which is currently already plagued by shunts and accidents. ‘Rubbernecker’ is inevitable and even a momentary lapse of attention by a driver can have quite tragic consequences. Church Road in Copdock is a small lane. It is difficult for two cars to pass in places and it is entirely unsuited to Pit lorries. The road surface and it’s sub surface would most certainly be damaged. Inevitable danger to normal vehicles using this road, should pit lorries be permitted to use it would ensue. In addition, Swan Hill is another small road, entirely unsuitable for large lorries. Lorries travelling to and from Church Road would not be able to use Swan Hill as a viable route to the A14 or A1070. Pit lorries are extremely large and heavy. Swan Hill, Church Road and the A12 Jnr were all built a very long time ago when maximum tonnage levels for lorries were set at a completely different level. This would mean that the roads mentioned would almost certainly be incapable of supporting such frequent heavy loads. Traffic mayhem would ensue should major</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Selection Process</td>
</tr>
<tr>
<td>During an issues and options consultation stage which took place in early 2017 a call for sites was issued, where landowners, land agents and minerals extraction companies submitted sites for the County Council’s consideration. That is how this site came forward despite there being no proposals following the 1970s minerals surveys</td>
</tr>
<tr>
<td>Health and Amenity of Nearby Residents</td>
</tr>
<tr>
<td>It is expected that mitigation measures can be put in place to ensure the amenity of nearby residents and businesses are not harmed. Vegetated earth bunds are standard mitigation at sand and gravel quarries, to reduce visual impact and attenuate noise and dust. It is also expected an additional stand-off will be required of this site.</td>
</tr>
<tr>
<td>Light pollution</td>
</tr>
<tr>
<td>The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.</td>
</tr>
<tr>
<td>Cumulative Impact</td>
</tr>
<tr>
<td>Cumulative impact caused by multiple developments (that on their own don’t necessarily caused significant problems independently) is taken account of in the plan and must also be considered in greater detail if a planning application is</td>
</tr>
</tbody>
</table>
repair works become necessary due to road surface or sub surface damage repairs. Travel by the large pit lorries along these roads would inevitably be attractive to their drivers as a means of avoiding the daily queues that exist between Capel St Mary and the Interchange along with other daily queues formed on the other ‘arterial' routes to the interchange. The council has a policy promoting the use of cycles and has worked on betterment for cyclists with the introduction and upgrading of cycle lanes. Steve Merry of SCC at the AGM of Copdock and Washbrook Parish Council Tuesday 3rd May, 2016 acknowledged the existing pressure on Copdock and Washbrook and the Old London Road (A12 Jnr). The introduction of a one lane, one cycle track split on the A12 Jnr was offered as a solution to the traffic problems. With over 3,000 new homes, multiple industrial businesses and a gravel pit being proposed by the council in the immediate area amplification of existing traffic problems will be inevitable. To reduce vehicular traffic to one lane as muted in the aforementioned minutes would undoubtedly exacerbate this. With the proposed expansion of pits at Barham, Barnham, Cavenham, Layham, Tattingstone, Wangford, Wetherden, Wherestead and Worlington and the declared downturn in demand shown in official figures available on the internet, the proposed siting of a gravel pit at Belstead is unnecessary. All of the aforementioned sites must be enlarged as per their granted planning permission before any consideration is ever given to Belstead Quarry submitted. Mitigation would be required to reduce the impact if the site is to go ahead.

**Proposed Changes:**

Add estimated Lorry Movements from Greenfields report into plan document – 80 to 100 movements per day.

Change lifetime of quarry in paragraph 10.12 from 10 years to 15 years.
There is clearly already excess capacity in the system to well past 2036. There is, therefore, no justifiable need for a new quarry at Belstead. In 1970 several Crown borehole surveys including those at Red House Farm Copdock Blacksmith Corner Belstead and Oakfield Road, Belstead were made. No desire for a pit came forth from these borehole survey findings. Can the council please explain what changes have occurred within the earth in this area to persuade them that this is now an area with such rich ‘pickings’ that it is worth their sanctioning of traffic misery, ill health of local residents, disruption and possible eradication of endangered species and important archaeological evidence, especially in view of the expansion of nine other pits already mentioned which clearly have spare capacity? With the expected detriment to air quality confirmed in the site selection report (point 5.11 of the Air quality section) and the resultant effect on properties in Oakfield Road and The Avenue, should the council not also consider the health implications caused through the proposed pits development? These effects would not be felt purely by a few homes situated currently on the corner of Oakfield Road and The Avenue, but also by the homes and businesses proposed within the draft Housing and Industrial proposals of SCC for Washbrook and Copdock, many of which would be proximate to the meeting point of these two roads. Possible litigation may ensue, a point which should be considered by the council, as it would prove to be costly in both man hours, negative PR for the Council and also in financial terms. With reference to the point made in the
paragraph above (point 5.11 of the Air quality section of the site selection report), I would ask the council to confirm whether due consideration would be given to the pit at Belstead if there were a school, hospital or other public building present in that location? The official sanctioning of ill health that would follow should the pit receive permission to proceed would be a precursor to their involvement in time consuming and costly repercussions, which should, most sensibly, be best avoided. Our local village school is not far away from this stated location. 

The increase to noise levels created by such development would be significant. As well as air pollution, this proposed site would also cause unacceptable and horrendous noise pollution. What are the councils strategic plans for mitigation of noise or their proposals for the site’s reinstatement once the proposed quarry has reached the end of it’s useful life?

The proposed siting of the Wash and Grading Plant is unsuitable. It would cause, light, noise and air pollution to homes situated in close proximity but would also be a terrible ‘blot on the landscape’ and a poor welcome to Ipswich. The light pollution caused to Brockley wood would sorely affect the local protected wildlife such as dormice and bats. Housing development proposals for this area have been prevented in the past by such species. How can the pits inevitable disruption to and possible eradication of protected species within his area be seen as any less significant than that of housing development? There is historical evidence of pre historic man in
this area. Archealogically, this area is unsuitable for ANY form of development.

### E/140  Jill Girling

**BELSTEAD SITE**

1. Increased traffic movement is of major concern. The Greenfield Report of 31/5/2017 makes reference to up to 100 2-way movements. To this needs to be added the 2-way movement of the estimated 8 members of staff. In addition, 2-way movement of any drivers based at the site plus delivery of supplies (eg fuel for the machinery being operated). Thus potentially 120 plus movements a day.
2. Access to A12 - whilst this may be seen as an advantageous reason to site the proposed workings, no account has been taken of the regular daily congestion of the A12 as a result of the inadequate A12/A14 interchange. There is not a day goes past when the delays are reported in the traffic news. Traffic regularly backs to the junction at which the lorries will be joining the A12 and indeed beyond this.
3. Alternative traffic routes – as a result of the congestion on the A12 northbound, lorry movements may then use alternative route through Copdock and Washbrook Village. There is currently no weight limit northbound. This route also suffers for major congestion at peak times and when accidents occur at the A12/A14 interchange and surrounding area. Again, you have only to listen to the traffic news everyday to be aware of this.
4. Copdock and Washbrook Village – if even only a proportion of the Belstead site traffic were to use the route through the village, this is large.

### A12 Congestion

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries.

*Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.*

The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.

*Air Quality*

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it

Nothing in the proposal interests the Parish of Copdock. It would be different if the area was adopted for a garden village with infrastructure. **Ecology and Landscape**

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and | is expected that adequate mitigation can be provided

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

HGV traffic causing further concern to the safety of residents. Village Hall, Cricket Pavilion, Bowls and Tennis all being sited to the East, thus requiring crossing of the road. There are NO crossings in place on the road. Speeding and traffic on this road has already been raised by local residents as a major concern.

5. Current housing/location to dwellings – whilst reference is made in reports to the current housing situation in the locality, no mention is made of the current Babergh consultation on proposal for housing and commercial development areas. Any development and screenings would have to be carefully considered with this in mind to ensure adequacy. Plus the additional traffic this would add in addition to the HGV movements commented on above.

6. Protection to current nearby residents – if the proposal is to progress, adequate screening and noise and dust mitigations MUST be made to realistically protect those living close by.

7. The nature of prevailing winds must be taken into account when considering noise and dust levels and extent of impact further afield.
provided in advance of housing. The ancient woodlands could be incorporated into the village and a new bridge across the A12 would allow villagers in Copdock and Washbrook access to the new infrastructure. A 7.5 tonnes weight limit at the start (southern end) of London Road, north bound would remove the HGVs from the Parish. Note, a limit is already in place Beagle Roundabout down to the foot of Swan Hill prevents HGVs meeting on the narrow road as well as Beagle Roundabout to Sproughton.

Object
Justification? There are ten sites. 8 are existing quarries with room for expansion. Site nine is Wherstead where the developer has yet to commence extraction and indeed is applying to extend their planning permission. So, what is the demand for an additional site at Belstead? Marine aggregates are landed at Griffin Wharf, Ipswich all of which is taken by train to London. Could this supply be increased? Our contention is this site is not needed.

People/sites affected. 17 listed buildings are within an approximate mile radius of the proposed site. All will be affected by noise, dust, light and air pollution as well as road congestion. There is a outdoor recreation area with a cricket field, football pitch tennis courts and bowls club all within one mile of the site. Upwards of 100 young people enjoy ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

Site Selection and Calculated Need for Sand and Gravel
The current permitted land bank of sand and gravel in Suffolk will last until 31st December 2027 (as of 31st December 2016). However as the plan period lasts until 31st December 2036, so there is a shortfall of 9 years supply, or approximately 10.422 million tonnes. The County Council needs to identify sites which will ensure a land bank until the end of the plan period. So, while there are sand and gravel quarries currently operating through Suffolk, more sites need to be identified.

the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive.
cricket coaching at weekends and the sports clubs are active all year round. The noise and air pollution could be mitigated with earthworks and tree planting along both sides of the A12. Transport. The effects on existing roads and lanes in the Village of 80 to 100 two-way movements will be detrimental and not mitigated. Traffic regularly over flows daily from the north bound A12 at the Old London Road (Junction 32B). A. Drivers seek a minor advantage and are already leaving the northbound A12 at the Capel / Copdock / London Road interchange and immediately take the on-slip road to re-join the A12, saving around 8 car lengths! HGVs leaving the quarry site would have to compete with this cross-slip road traffic as well as those using the old London Road as a rat run. B. The interchange will require alteration to accommodate HGVs regularly joining at this interchange. We are sure the aggregate HGVs heading north will not be using the congested A12. The Copdock Interchange is already predicted to exceed capacity in 2021. To avoid this each morning people preferring the existing dual carriage way, the Old London Road, which becomes a single-track country road at Whights Corner, along Chapel Lane to the Swan Hill junction, up the hill to the Beagle Air Quality Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided Noise Pollution The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted. A12 Congestion We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries. Traffic impacts and possible mitigations must be fully assessed at the planning application stage. Historic Assets
<p>| | | | |</p>
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<td></td>
<td>Roundabout. There is a 7.5 tonnes limit through Sproughton and Bramford. HGVs will have to head towards Ipswich. At the Hadleigh Road junction traffic can either take the Hadleigh Road or continue to the present London Road adj. to the Holiday Inn Hotel. Either route will queue at the Hadleigh Road / London Road / Ranelagh Road junction. C. When the Orwell Bridge closes the volume of traffic seeking alternatives isolates Copdock and Washbrook villages. HGVs will also be interested in the lanes through Bentley and East Bergholt to reach sites off the A137 in Essex. Summarising our objections: - 1. Justification? 8 other sites with room for expansion and one yet to start 2. Wildlife site – once damaged or removed cannot be recreated 3. Traffic congestion 80 to 100 movements daily on top of existing 4. Noise pollution from grading and loading plant adj. Houses 5. Light pollution from grading and loading plant adj. Houses 6. Air pollution from diggers &amp; HGVs on the site adj. Houses 7 Effect on listed buildings and existing houses in Copdock 8. Availability of marine aggregate from Ipswich docks 9. Paperwork reads as a done deal before public consultation starts</td>
<td>Historic assets, including listed buildings, have been considered as part of the site selection process and it is not expected that these will be affected. A full assessment of historic assets in relation to the site will be required as part of a planning application. <strong>Marine Dredged Aggregate</strong> While it is the case that there is up to 9 million tonnes of sand and gravel off the coast of east Anglia licenced for dredging every year, economics dictates that these are either landed in London, or landed elsewhere and transported to London by rail. Only a small quantity is landed in Suffolk and the County Council is required to maintain a landbank as stated in paragraph 145 of the National Planning Policy Framework: “Minerals planning authorities should plan for a steady and adequate supply of aggregates by…using landbanks of aggregate minerals reserves principally as an indicator of the security of aggregate minerals supply, and to indicate the additional provision that needs to be made for new aggregate extraction and alternative supplies in mineral plans” and “making provision for the maintenance of landbanks of at least 7 years for sand and gravel...” The supply 10.422 million tonnes of sand and gravel the plan is required to provide would ensure a landbank across the County until the end of the plan period.</td>
<td><strong>Consultation Process</strong></td>
</tr>
<tr>
<td>Comment</td>
<td></td>
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<td>-----------------------------------------------</td>
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<tr>
<td>A copy of the Site Selection report came into our hands just before the closing date which had not been made available to residents or the Copdock Parish Council. Charity Cottage is referred to par 5.11. The owner has not been contacted by Officers. The consultation gives the impression of a ‘done deal’. The Officers have evaluated the sites and considered mitigation measures before the public consultation started. They were able to suggest to us where the sorting and loading would take place. Across the A12 and all immediately opposite the largest group of properties, the barn development(s) at Red House. Relocation of the washing and loading plant would reduce the impact on C&amp;W residents and their open spaces. A secondary access/exit onto the A137 to the east would help spread the HGV traffic and minimise use of the existing lanes between Copdock, Belstead and Wherstead. It should be noted that northbound Ipswich traffic queue back from Junction 56 on the A14 passed Jimmy’s Farm daily. We note the desire by Greenfield Associates to retain ancient trackways to preserve and maintain the established wildlife corridors. There is no input from the SCC Rights of Way Officer. The developer’s views are unknown.</td>
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</table>

**Site Selection Report**

The site selection reports were made available on the County Council Website before the beginning of the consultation and can be found with all the other evidence documents.

**Charity Cottage**

Our records show a letter was sent to Charity Cottage notifying the residents. Officers also recall speaking to them during the consultation event.

**Site Selection**

As part of the Issues and Options consultation a call for sites was issued and sites submitted by, land owners, land agents and quarry operators. Officers, consulting with colleagues in various departments assessed each site to see if they could be made acceptable in planning terms. The site selection reports were written and their conclusions identified whether a site should or should not be included in
the draft plan. All of these reports can be read on the consultation web pages of the County Council web site.

The County Council does accept that the assessments done to determine what sites to include in the draft plan are high level and that more detailed assessments (which will likely be done at the planning application stage) could provide evidence showing the site to be unsuitable.

**Location of Plant Site**
Current suggestions of where a plant site could be located are indicative at this stage. Final position of the plant site will be decided if a planning application is submitted.

**Public Rights of Way**
The Public Rights of Way team were consulted on all sites submitted to the County Council and made comments on each site. The County Council also expects the retention of ancient trackways.

<table>
<thead>
<tr>
<th>M/6</th>
<th>R.G.Clift</th>
<th>Noise, dust and pollution when wind is in the prevailing quarter (westerly). Traffic through village when A12 is blocked, along narrow single track roads</th>
</tr>
</thead>
</table>

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

<table>
<thead>
<tr>
<th>M/7</th>
<th>Mrs Valerie Clift</th>
</tr>
</thead>
</table>
|      | Concerns – **noise** for 6 ½ days a week 7.30 am to 6 pm (midday Saturday) traffic- if problems on A12/14 the road from old A12 through to A137 will be used by lorries – this road is already a rat-run & becomes gridlocked if Orwell Bridge is closed as it is not suitable for heavy lorries.
|      | The **environment** – ancient woodlands will be disturbed - also **two grade II listed buildings** Charity and Crope Hall. Also feel County Council should be aware that many people are not |

**Noise Pollution**

The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road.
computer literate and in spite of assurances information is easy to access it really isn’t.

Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

Historic Assets
Historic assets, including listed buildings, have been considered as part of the site selection process and it is not expected that these will be affected. A full assessment of historic assets in relation to the site will be required as part of a planning application.

A12 Congestion
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site.

<table>
<thead>
<tr>
<th>M/9</th>
<th>Mrs. C.J. Fisher</th>
</tr>
</thead>
<tbody>
<tr>
<td>My main concern is the extra traffic involved with the proposed scheme. The current A12 is already overloaded with vehicles and slow moving quarry lorries joining that road could prove an accident risk.</td>
<td></td>
</tr>
<tr>
<td>M/11</td>
<td>Mrs. Carolyn A Hodge</td>
</tr>
<tr>
<td>M/15</td>
<td>Daphne Eliss</td>
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<td>Reference</td>
<td>Name</td>
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<tr>
<td>M/16</td>
<td>Mr. M. Curtis</td>
</tr>
<tr>
<td>M/17</td>
<td>Mrs Karen Beaton</td>
</tr>
<tr>
<td>M/18</td>
<td>Mr and Mrs R. Spencely</td>
</tr>
</tbody>
</table>
and evening and cannot take further traffic. Therefore not a viable plan.

With the proposed entrance to the quarry from the slip road to the A12 at Junction 32b, this would increase the traffic using old London Road/Swan Hill. In the region of 50% of the quarry traffic would use this route – see letter below.

**Re Suffolk Minerals and Waste Local Plan Preferred Option Consultation**

I am writing to register my objection to proposed quarry at Belstead’s Brockley Wood being a preferred option using the site access via the slip road to the A12 at Junction 32b.

It is proposed that 240,000 tonnes be removed annually from the Quarry. Using average 20 tonne trucks that would be 12,000 truck movements. Using 250 annual working days, that equates to 48 movements into the Quarry and 48 movements out of the Quarry every day.

As we all know, the A12 backs up from the Copdock roundabout to Capel St Mary between 8.00-10.00 hours in the morning and likewise from 16.00 -18.00 hours in the evening, and traffic uses

Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. There should be no lorries from the site going through Belstead, Copdock, or Washbrook with the exception of local deliveries. Traffic impacts and possible mitigations must be fully assessed at the planning application stage

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. There should be no lorries from the site going through Belstead, Copdock, or Washbrook with the exception of local deliveries. Traffic impacts and possible mitigations must be fully assessed at the planning application stage

**Housing Proposals in the Babergh Mid Suffolk Joint Local Plan.**

The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.
the Old London Road and Swan Hill as a 'rat run' to avoid Copdock roundabout.

That means in the normal working day of a haulage company (07.30 to 17.30), 10 hours, three and a half hours of that time the A12 is unusable and the Old London Road and Swan Hill would be used. This equates to 35% of the daily traffic in and out of the quarry guaranteed to use this route.

It is not unreasonable to assume that some of the lorry drivers would continue to use the Old London Road/Swan Hill route out of rush hours and it only needs 15% of this traffic to do this to achieve HALF of the traffic from the Quarry using Old London Road./Swan Hill route DAILY.

All this is in addition to Suffolk County Council's recent draft planning proposal to build 623 houses in Copdock, which would increase traffic movements daily in the area by 1200+ trips.

At present we have to queue to get out of Washbrook during rush hour, so with these two current proposals by Suffolk County Council there would be 1300+ additional movements daily.

In my opinion, it is more important for Suffolk County Council to concentrate on redesigning the layout of Copdock roundabout to reduce the two hour queues during rush hour.
<table>
<thead>
<tr>
<th>M/29</th>
<th>Mr. M Potter</th>
<th>We are very concerned that it will affect the water supply as we run off a surface water well which can be overcome by putting a mains water supply to our property.</th>
</tr>
</thead>
<tbody>
<tr>
<td>M/30</td>
<td>Mr Alan and Mrs Maureen Aldous</td>
<td>We think this development should not go ahead because of the increase in road traffic of all kinds particularly heavy goods. Swan Hill is gridlocked already at peak times. The Old London Road is used as a rat run and a lot of traffic not keeping to the speed limit. Has any HIGH UPS considered what MORE disruption this will cause if all this goes ahead?</td>
</tr>
</tbody>
</table>
| M/31 | Zena Gravener | Each site is considered on its impact on - HIGHWAYS, LANDSCAPE, ECOLOGY, CULTURAL HERITAGE. These comments are about BELSTEAD SITE  

A) **HIGHWAYS** The site is proposed to access a congested small roundabout onto the A12 which is blocked with traffic for long periods. It is not at all suitable to be considered and will add to an already congested, dangerous road complex |

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**Water and Floods**  
Ground water and flooding has been considered as part of the site selection process. Water was not found in the bore holes during the geological boreholes testing, so extraction is not expected to reach the water table.

**A12 Congestion**  
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Ecology and Landscape**  
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.
<table>
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<tr>
<th>B) <strong>LANDSCAPE</strong></th>
<th>The siting of works close to listed buildings is obviously totally unsuitable and detrimental to them.</th>
</tr>
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<tbody>
<tr>
<td>C) <strong>ECOLOGY</strong></td>
<td>Woods adjacent to site have a diversity of wildlife including woodmice, owls and ancient woodlands</td>
</tr>
<tr>
<td>D) <strong>CULTURAL HERITAGE AND ENVIRONMENT</strong></td>
<td>Proposed site is within sight and sound of at least six listed properties and would quite patently be totally unsuitable</td>
</tr>
</tbody>
</table>

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

**Historic Assets**

Historic assets, including listed buildings, have been considered as part of the site selection process and it is not expected that these, or their settings will be affected. A full assessment of historic assets in relation to the site will be required as part of a planning application.

**M/32 E.P. Wyatt**

Quarry site. It puts too much traffic onto London Road. If Orwell Bridge is closed as it is sometimes it will courses myhem as traffic comes off A12. You will never get out of your gateway. Traffic out of the quarry will use London Road and bring it to a standstill as in the past.

**A12 Congestion and Old London Road**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times, such as peak travel times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.
<table>
<thead>
<tr>
<th>M/35</th>
<th>Mrs. M.A.G Osborne</th>
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<tbody>
<tr>
<td></td>
<td>1 – The proposed access site roundabout is unadopted</td>
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<td>2 – The increased traffic is going to worsen the A12 congestion, particularly at peak periods in the morning and evening</td>
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<td>3 – if the A12 is blocked lorries will use the old A12, as there are no restrictions currently which will exacerbate the rat runs currently espoused leading to more erosion of church lane</td>
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<tr>
<td></td>
<td>4 – The pollution of air &amp; noise from the proposed plant will affect Belstead &amp; Copdock &amp; the A12</td>
</tr>
<tr>
<td></td>
<td>5 – Back filling of this site is proposed which will increase the traffic road loadings</td>
</tr>
<tr>
<td></td>
<td>6 – Copdock will become an urbanised village with an increased traffic flow and affect to road quality</td>
</tr>
</tbody>
</table>

**Site Access**
Highways England are responsible for the roundabout the site is accessed from. Upon consulting them, they determined that the access was suitable.

**A12 Congestion**
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full
<table>
<thead>
<tr>
<th>M/36</th>
<th>Steven Potter</th>
<th>My concerns revolve around the following:</th>
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<tbody>
<tr>
<td></td>
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<td>- Continuous impact on the environment</td>
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<td></td>
<td></td>
<td>from the proposed quarries there duration</td>
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<tr>
<td></td>
<td></td>
<td>and volume of extraction, coupled with</td>
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<td></td>
<td>the adjacent housing development, which</td>
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<td></td>
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<td>will push pollution way past acceptable</td>
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<td>levels</td>
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<td>- The ability of the road infrastructure</td>
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<td>to cope with any additional traffic, the</td>
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<td>Copdock junction being a daily example</td>
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<td>of unacceptable traffic movement, which</td>
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<td>causes overload on the village lanes from</td>
</tr>
<tr>
<td></td>
<td></td>
<td>those wishing to avoid the highway</td>
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<tr>
<td></td>
<td></td>
<td>congestion</td>
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<td></td>
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<td>- The impact of heavy traffic movement on</td>
</tr>
<tr>
<td></td>
<td></td>
<td>local listed buildings and the infrastructure</td>
</tr>
</tbody>
</table>

**Ecology and Landscape**

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

**Cumulative Impact**

Cumulative impact caused by multiple developments (that on their own don’t necessarily caused significant problems independently) is taken account of in the plan and must also be considered in greater detail if a planning application is submitted. This includes the proposed housing the Babergh and Mid Suffolk, Joint Local Plan.

**Historic Assets**

Historic assets, including listed buildings, have been considered as part of the site selection process and it is not expected that these will be affected. A full assessment of historic assets in relation to the site will be required as part of a planning application.
The roads through Copdock and Washbrook are at a standstill most of the time during rush hour. I feel the extra traffic, noise and pollution levels would be intolerable. If the Orwell Bridge is closed due to accident or bad weather we become completely at a standstill unable to get out of the village due to traffic.

**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

**Noise Pollution**

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| M/37 | Caroline N Fox | The roads through Copdock and Washbrook are at a standstill most of the time during rush hour. I feel the extra traffic, noise and pollution levels would be intolerable. If the Orwell Bridge is closed due to accident or bad weather we become completely at a standstill unable to get out of the village due to traffic | **A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

**Noise Pollution**

The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted. |

<p>| M/39 | Diane Evans | Our concerns are based on noise, pollution and the effect a quarry in this area will have on the | <strong>Air Quality</strong> |</p>
<table>
<thead>
<tr>
<th>M/40</th>
<th>J.R. Castle</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed new gravel pit, which although in Belstead parish, will afflict and blight the parish of Copdock and Washbrook in far greater measure. The pollution by noise, light and dust and the huge number of heavy good vehicle movements will be horrendous. The loss of wildlife habitat is</td>
<td>Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.</td>
</tr>
<tr>
<td>Noise Pollution</td>
<td>A12 Congestion</td>
</tr>
<tr>
<td>The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.</td>
<td>We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.</td>
</tr>
<tr>
<td>Air Quality</td>
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</tbody>
</table>
irreplaceable and the further loss of excellent agricultural land is of great importance not only now but in the future. Surely the extension proposed to the existing pits as outlined in your ‘Public Engagement’ event at Belstead Village Hall on 9th November last will be more than sufficient to cover needs for the foreseeable future.

**THIS DEVELOPMENT IS NEITHER ACCEPTABLE NOR REQUIRED AND WILL DAMAGE THIS PARISH BEYOND MEASURE.**

is expected that adequate mitigation can be provided, which includes dust management.

**Noise Pollution**
The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**Light pollution**
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

**Ecology and Landscape**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.
**Loss of Agricultural Land**

Sand and gravel quarries are a temporary land use. A site restoration scheme must be submitted with a planning application. The County Council would expect this site to be restored to agriculture and nature conservation purposes. A good example of a sand and gravel quarry restored to agriculture in Suffolk is Layham Quarry.

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**Mr and Mrs. R Forsdike**

Main concern traffic on main A12 also the old A12 at peak times traffic stationary back to Capel St Mary. Another concern air pollution diesel fumes from the lorries

---

**Duncan Clarke**

This will result in many heavy trucks from the plant using the old A12 when the Copdock roundabout is congested as the traffic often backs up to the turn off for the old A12. This will mean some trying to get along Church Lane which has no passing places for 30 ton lorries, making the road very dangerous for the locals using it. The general noise and dust will also greatly affect my property and the

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**A12 Congestion**

We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

If the expected number of lorries per day exceeds 100 an assessment of air quality caused by traffic generated will be required with the planning application.
<table>
<thead>
<tr>
<th>E/108</th>
<th>Charlie Christensen, The Environment Agency</th>
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<tbody>
<tr>
<td></td>
<td>The proposed area includes a watercourse in the northern section. We would not want to see this impacted, or its flow or surrounding habitat affected in any negative way. During the extraction of minerals from the sections nearby we would wish to see an adequate buffer zone left</td>
</tr>
</tbody>
</table>

Traffic cause damage to my boundaries. There are also big projected property and industrial expansions along the old A12 which will greatly increase the traffic and this will only exacerbate the problem.

times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

**Noise Pollution**

The County Noise Consultant concludes that standard noise mitigation techniques should be acceptable along with an additional stand off to bring noise levels within accepted guidelines. A full noise assessment will be required with any planning application submitted.

**Housing Proposals in the Babergh Mid Suffolk Joint Local Plan**

The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.

The County Council will include the potential to impact the northern water courses in the plan and will include the need for a buffer and potentially planting around the watercourse to mitigate these potential impacts.
entirely unaffected. Some research may be needed to determine how large this should be to protect flows and avoid impacts. As part of the mineral extraction here we would like to see some mitigation such as native woodland planting along the watercourse to provide shading and permanent natural woody habitat along it. This is a useful way of mitigating for the visual and disturbance impacts of the quarrying as well as helping to mitigate for climate change impacts along the watercourse. If hedgerows are likely to be lost we would like to see some planting carried out along the A12 buffer and the hedges reinstated after the mineral extraction. If wet or seasonably damp ditches are likely to be lost we would wish to see a network of permanent ponds set in the landscape upon restoration.

The site is surrounded by a large amount of woodland, which the County Council expects to be retained. We would also expect there to screening along the A12.

The County Council can include the potential need for permanent ponds to offset loss of seasonably damp ditches.

**Proposed Changes**

Include the potential to impact the northern water courses in the plan and will include the potential need for a buffer and woodland planning to mitigate these potential impacts. Include potential need for permanent ponds to replace any seasonally damp ditches lost.

| E/116 | Fiona Cairns, Suffolk Preservation Society | Archaeology
Belstead (para 10.10), the archaeological approach is ambiguous and needs to be clarified to ensure archaeological evaluation is carried out prior to the granting of consent.

**Listed Buildings**

Belstead – the Society notes that the allocation may have an impact on the setting of grade II* listed Bentley Old Hall. However the document fails to note grade II listed Charity Farmhouse and Crope Hall immediately to the east of the site.

Archaeology

For the Belstead site a programme of Archaeological work will be required through condition.

This information will be added to the plan

**Listed Buildings**

These buildings were not omitted because they were only grade II. These sites were assessed and it was concluded there would not be significant impacts at this stage. Both sites site in a landscaped setting. Charity Farm faces away from the minerals working and there is a screen of trees.
These are closer than Bentley Old Hall and we can only presume that their exclusion is due to their lower grading. However we would remind you that all listed buildings are of national significance and are afforded the same statutory weight. This is a significant omission and we question whether the other allocated sites have been similarly treated which would render this consultation exercise incomplete by failing to identify these important constraints.

between the site and the building. Crope hall also has a screen of trees between it and combined with the site and the distance from the building it is considered that the setting would not be compromised at this stage. However the County Council can ensure that this explanation is included in the next draft of the plan.

**Proposed Changes**
- Include more details for the archaeological approach for this site
- Include Crope Hall and Charity farm Grade II listed buildings in the next draft of the plan.

<table>
<thead>
<tr>
<th>E/72</th>
<th>The Stour &amp; Orwell Society</th>
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<tr>
<td></td>
<td>This is a strange site to include; we assume the result of a recent sale by the longstanding farming owners. It forms part of a highly attractive and visible mosaic of farmland and ancient woodlands on the southern approach to Ipswich and its working for minerals would set a highly undesirable precedent.</td>
</tr>
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<td></td>
<td>It is unclear what level of discussion there has been with Babergh DC about its recently canvased housing options on the other side of the A12.</td>
</tr>
</tbody>
</table>

**Ecology and Landscape**
- Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts.

**Site Restoration**
- A site restoration scheme must be submitted with a planning application. The county council would expect this site to be restored to agriculture and nature conservation purposes. Restoration may require inert soils to backfill the site.
<table>
<thead>
<tr>
<th>E/78</th>
<th>James Meyer, Suffolk Wildlife Trust</th>
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<tbody>
<tr>
<td></td>
<td>Belstead</td>
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<tr>
<td></td>
<td>As recognised in the ecology section for this site (section 10.11), this area is known to support hazel dormice (a European Protected Species). The site is partly bounded to the south and east by woodland which is known to support hazel dormice and the site contains a number of hedgerows which are likely to provide habitat for them. The adjacent woodlands are also designated as County Wildlife Sites (CWSs) as they are ancient woodlands. Given the potential adverse impacts on species and habitats which could arise from the proposed development it is important that assessments are undertaken to determine these likely impacts. Should it be determined that extraction in this location is acceptable it must be ensured that any site allocation policy secures all necessary ecological mitigation and compensation measures. Sites should not be allocated which would result in any adverse impacts on designated sites, or on protected or Priority Endangered Species.</td>
</tr>
<tr>
<td></td>
<td><strong>Ecology and Landscape</strong></td>
</tr>
<tr>
<td></td>
<td>A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby county wildlife sites), must be submitted as part of the planning application for the site. Woodland and ancient woodland around the site and wooded tracks are expected to be retained as landscape features, with mitigation on wildlife impacts. Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time.</td>
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</table>

*Housing Proposals in the Babergh Mid Suffolk Joint Local Plan and Planning Applications.*

The County Council are aware of the proposals in the Babergh Mid Suffolk Joint Local Plan and will work with the District Councils as both plans progress.
species or habitats. It must also be ensured that should any extraction be allocated in this location, that the site restoration plan maximises the area’s value for the UK Priority habitats and protected UK Priority species recorded.

E/155 Andrew Watson

In reference to the Minerals and Waste Plan Consultation 2017 and the inclusion of the Barnham site. The proposed site for mineral extraction has been farmed by my family since 1963. In 1988 and 1989 many test digs were carried out by our landlord (Elveden Estate) to ascertain potential sand and gravel workings. Eventually leading to an application for a borrow pit to aid the construction of the A11 bypass of Elveden. Permission was granted with little opposition, indeed why would local people obstruct to the building of the A11 bypass around Elveden? Mitigation was put in place to avoid infringing on the stone curlew nesting season and post extraction land was to be restored to natural heathland. There was even agreement that additional land would also be restored to heathland between landlord and tenant farmer because it was to aid the construction of the A11 improvements. Natural England were happy there would be an ‘environmental gain’. The A11 improvements were finished but no material was extracted from the borrow pit. A variation on the planning permission was granted in 2015 to allow sand and gravel to be extracted to the

Current Planning Permission

While material has not been extracted from the site the land has planning permission as a sand and gravel quarry. This means that in planning terms the current proposal, submitted to the County Council by Elveden Estates and Mick George, is an extension of an existing permission.

With regard to importation of inert waste in the plan is not a contradiction, as reference to replicating the existing site was with regard to the Stone Curlew mitigation.

Lorries

Planning permission would not be granted if an application for this site proposed access to the C633. Sand and gravel lorries would likely exceed the weight restriction on this road.

Estimated Sand and Gravel

2.57 million tonnes was arrived at through the site investigations carried out by Mick George, which are presented in Appendix 2 of the Barnham site selection report, which is available on the plan consultation web pages. It is accepted that a lower figure will be extracted due to constraints within the site, including
Lignicite works in Brandon. A borrow pit in all but name. Unfortunately, this variation broke the agreement between landlord and tenant so the restoration plan so heralded by Natural England can’t be delivered.

In Suffolk County Council’s own minerals policy 5.14 it states “Crushed rock is used primarily in the production of asphalt for road maintenance and construction due to its strength and roughness”. It is therefore clear that both the Planning Authority and the land owner knew that material from the Barnham borrow pit wouldn’t be needed for the purpose permission was originally granted. Local people and other stakeholders have been deliberately misled because of the Landowners greed and the Planning Authorities clamour for a minerals plan deep into the future. The original application was clearly a cynical, opportunistic, abuse of the planning system by the Landowner aided and abetted by the county planning authority. It is now clear that there was always an ulterior motive for the original application, ie a long-term sand and gravel quarry over a wider area as is now proposed in the SCC plan. It seems ironic that if, local residents make comments within the planning system they aren’t allowed to speculate on any future plans an applicant or local authority may have but a wholly misleading, speculative planning application is allowed and indeed, in this case, has regrettably been granted just to get the Barnham site included in the proposed plan.

Water and Floods

Ground water and flooding has been considered as part of the site selection process. An assessment of the hydrology and ground water and flood risk will need to be submitted as part of any planning application as the site is within a Groundwater Source Protection Zone.

Ecology, Landscape, and Restoration

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. The site will be restored to nature conservation, primarily. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (such as the SSSI and SPA), must be submitted as part of the planning application for the site.

Additionally, policy MP7 gives preference to planning proposals that include biodiversity net gain, which could improve biodiversity in the area in the long term.
The preferred options draft paper says that the proposed development of the Barnham site is an extension to an existing quarry and that soil has been stripped from the surface. Again, this is a deliberately misleading statement. The only soil that has been stripped from the surface was used to construct the bund. The vast majority of the topsoil remains in place and no material has left the site. The haul route has not been prepared and indeed most pre-extraction planning conditions haven’t been met. Noxious weeds haven’t been controlled and the bund hasn’t been maintained. **This is not an existing quarry.**

The proposal claims that workings would replicate the existing permission by only extracting material from October to March but then contradicts itself by saying that inert waste would be imported back into the site. It also claims the haul route would be used for the duration of the extraction and that lorries won’t have direct access from the site to the C633. It seems all too easy to make such claims now, get the site in the minerals plan giving the green light for a new planning application and then seek a minor amendment to vary any planning application once permission is granted.

The geology of the site suggests a resource of 2.57 million tonnes of sand and gravel. How is this figure arrived at? The existing 14.9 ha has permission for up to 400,000 tonnes. The existing area is limited by significant infrastructure to the north and south of the dig area. In fact, the high pressure gas main will have a significant impact on the recoverable Good examples of both agricultural and ecological restorations can be found in Suffolk. Two examples of these respectively are Layham Quarry and Park farm Quarry in Timworth.

**Storage of Materials**

The storage area is less than the overall proposed output of the quarry, however it is down to the quarry operator to manage this. If additional material is stored outside the area with planning permission granted for minerals storage then the Count Council could take enforcement action.

**Bringing inert materials into Site**

It is expected that inert materials would be brought into site using the same route that they are removed from site.

**Where Sand and gravel is Sold**

The County Council would not be able to put a condition on the site limiting where the material could be sold, as this is determined by the market for sand and gravel, but also such a condition would likely be unenforceable. It is acknowledge that there is cross boundary movement with sand and gravel both in and out of Suffolk and this would likely continue.

**Elveden School**

Planning conditions can be used to enforce when lorries use the old A 11 to access the highway network in order to cause the least impact possible on the school, such as preventing lorries passing
tonnage of the proposed site. The two power lines will also impact on the site as will the existing private borehole and surrounding network of underground irrigation pipework. The site is also the source of a small seasonal stream. Mitigation of the stream extents to the digging of channels and sumps to keep the workings dry as the Environment Agency have said that de-watering shouldn’t take place. At no point has any on-site research been done on the potential seasonal flow of this water course or any records taken from the existing boreholes to ascertain the level of the water table at certain times of the year. The geology map shows a seam of clay in two areas of the proposed site. Both areas can be seasonally waterlogged and one regularly has artesian water flows. The Northern edge has chalk at or near the surface and so is unsuitable because of contamination risk in the sand or gravel. It seems the, majority of workings will take place in the lower lying areas of the proposed site near to the water table. Proposed working of the site through the winter months coincides with higher water levels. The suitability of the site is flawed. There could be months of any given year that extraction has to stop because of a high water table. The site has been designated SSSI and is in a SPA. It sits above a principle chalk aquifer and is in a SPZ2 flood zone. It is home to Stone Curlew and as such the land is of high environmental value. Added to that the land grows a range of high value crops including onions and potatoes. The preferred option the school during when pupils are arriving or leaving the school. This condition has been implemented on a former application on this site (planning reference F/14/2324).

The ways that the County Council used to the inform the public of the consultation and consultation events were: letters to residents and businesses within 250m of the site; advertisements in the local press (East Anglian Daily Times and the Newmarket Journal), and email notification to Parish Councils. Social media was also used to promote the consultation events.

Residents of Elveden village were able to take part in the consultation. Elveden parish council were informed of the proposal.

Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

The number of lorry movements currently expected from this site would not exceed the threshold IAQM and EPUK guidance (100 lorry movements), so a significant increase in local pollution concentrations is not expected.
sustainability appraisal suggests the Barnham site is grade 4 land with little or no intrinsic value. Clearly the way land is graded and valued is wholly outdated but is still used in this instance to score points limiting the sustainability impact. The land has been farmed traditionally using animals and their waste to replenish nutrients and, also considerately due to the recognized environmental importance of the area by growing spring crops to allow Stone Curlew to nest. There is, little point major stake holders designating these areas to be ecologically important if they are then not protected from local council plans. In these turbulent economic times, we shouldn’t take up to 105ha of productive land out of environmental and agricultural use. Equally importantly, we cannot wait 30 years to see a half-hearted restoration plan put in place once inert waste has been imported onto a site that will be an environmental catastrophe from the beginning.

It is claimed that 100,000 tonnes of material will be extracted each year but that could rise to 130,000 tonnes if demand increases. The plan suggests that all this material will be transported along the haul route of the original planning application and stored at Contract Farm as the extraction will only take place for six months of the year. The Contract Farm application suggests that 40,000 tonnes can be stored there. Where will the remaining material be stored even if just 100,000 tonnes are extracted? There is no plan on how inert waste will be returned

<table>
<thead>
<tr>
<th>Noise Pollution</th>
<th>County Noise Consultants state that a standoff in addition to standard mitigation may be required. An assessment of noise impacts must be carried out at the planning application stage to provide detailed information on these impacts and inform the mitigation measures required and protect nearby residents and businesses.</th>
</tr>
</thead>
</table>
to the proposed site. Where will that be stored? 200,000 tonnes in total will require a significant new storage area or is the plan as suggested before to simply vary conditions once planning consent has been granted?

The council plan states that it requires a sustainable level of mineral resources of about 1.158m tonnes per year. To achieve this, it recommends that as existing quarries reach the end of their life new ones take their place. If it is assumed that this happens how can the claim of 20 new jobs be accurate? Surely new jobs are only created if demand increases and Suffolk requires more than the predicted 1.158m tonnes. It is suggested that 85% of the sand and gravel from the Barnham site will remain in Suffolk. This is pure speculation as the material will be sold regardless of where the end use is. The limiting factor of where the material ends up will be purely cost driven. The best road out of Elveden is the recently improved A11 which crudely runs north to Norfolk and Southwest to Cambridgeshire. There won’t be a condition of planning enforcing where the material goes.

The improving of the A11 road has transformed the village of Elveden from a dusty, noisy thoroughfare to a quiet rural village. The ‘outstanding’ village school has made use of this freedom and now utilises the front of school space once out of bounds because of traffic. Children attending the school today have little knowledge of the noise and pollution that once plagued this village. And yet the Suffolk Councils plan is to impose significant lorry
Predicted lorry numbers range from 60 to 74 per day based on 100,000 tonnes annually for 30 years. Many more if demand increases. The proposed plan didn’t acknowledge that the residents of Elveden would be affected at all. They haven’t been invited to comment on the plan. Another generation of local children will be left to suffer the consequences of pollution and unnecessary noise impeding their education.

The visual impact of living near the proposed quarry will also be significant. The building of screens or bunds to mitigate the visual impact will have little effect. Much of the proposed site is low lying ground of a classic shallow, Breckland valley. The C633 on the Northern boundary overlooks the site and the byway on the Western boundary has greater elevation allowing users of it a splendid view of the valley. Better still is the view from the open access nature reserve (Thetford Heath). Looking South from there allows views to Dukes ride and Barrow Corner, to the East the former Nuclear Bomb store. In fact, the whole vista gives an excellent insight into our local history and how the environment has been shaped and is used by us. Much of this could be lost, the tranquillity destroyed by the constant drone of excavators digging, grading machines crunching and squealing and the roar of articulated dump trucks racing along the haul route cutting great ruts into the soil and polluting our air with noxious gases.
In conclusion, the proposed site shouldn’t be included in the minerals plan. Simply jumping on the back of an opportunistic existing plan and extending it in size from 15ha to 105ha and from an 18mth extraction to 30 years but still claim little or no environmental or social impact is flawed. The proposal contains maps that are incorrect and out of date, local people who will be affected by the proposals haven’t been notified. The plan contains misleading, contradicting information claiming to be an existing quarry. The proposed tonnages in and out of Contract Farm imply there is insufficient storage space there but no other site is proposed. The claim of 20 new jobs is speculative and there is no mention of potential job losses. There are no assurances that current planning (use of the haul route and not direct on to the C633 and 6 months/year extraction) will be adhered to. There is already a history of misleading planning applications leading to further applications to change planning conditions just to suit both the local authority and the landowner.

The site has been designated a Special Protected Area and is a SSSI. It sits on a Principle Chalk Aquifer. The whole consultation process is flawed. The council has already spoken, the preferred options published. It has effectively become a pre-planning process. Inclusion within the plan can only mean one thing. It is a green light from the Council to approve any planning application.
| E/135 | Iain Pockock | Proposed Site will further increase pressure on A12/A14 intersection which already experiences 1 mile tailbacks. Will displace traffic through Copdock which is unsuitable for large HGVs due to number of lorries proposed. Absence of screening will create a blot on the landscape. Incompatible with draft local plan for housing levels in Copdock due to traffic. | **A12 Congestion**  
We recognise the potential for congestion and if the site were permitted mitigation could take place in the form of planning conditions. For example, it is possible to implement conditions which determine the direction which lorries turn upon leaving a site. This would prevent lorries using the Old London Road. Or, conditions could be placed to prevent lorry movements to and from the site at certain times. Traffic impacts and possible mitigations must be fully assessed at the planning application stage.  

**Traffic**  
There should be no lorries from the site going through Belstead or Copdock, with the exception of local deliveries. It is possible to implement conditions which determine the direction that lorries turn upon leaving a site. This would prevent lorries using the Old London Road.  

**Visual Impact**  
Earth bunds, planted with vegetation and a standoff should provide appropriate mitigation of the visual impact. It is expected that any established woodland bordering the site, including vegetation along the road will be retained, as this provides an established barrier. This mitigation will also be implemented for the plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with |
9. **CAVENHAM**

<table>
<thead>
<tr>
<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/68</td>
<td>Richard Stevens</td>
<td>I write to support the inclusion of the Cavenham site in the Minerals &amp; Waste Local Plan</td>
<td>Noted</td>
</tr>
<tr>
<td>SM/117</td>
<td>Jonathan Worsley, PDE Consulting Ltd</td>
<td>Suffolk Minerals &amp; Waste Local Plan, Preferred Options Consultation, December 2017 Extraction Area 1 With reference to the above, we at PDE Consulting are writing to you on behalf of our client Allen Newport Limited and specifically in regard to their existing operations at Cavenham Quarry. We write in support of the inclusion of Area 1 at Cavenham Quarry within the Local Plan for the purpose of mineral extraction and subsequent restoration</td>
<td>Noted</td>
</tr>
<tr>
<td>SM/118</td>
<td>Jonathan Worsley, PDE Consulting Ltd</td>
<td>Suffolk Minerals &amp; Waste Local Plan, Preferred Options Consultation, December 2017 Extraction Area 3</td>
<td>Noted</td>
</tr>
</tbody>
</table>
| SM/119  | Jonathan Worsley, PDE Consulting Ltd | Suffolk Minerals & Waste Local Plan, Preferred Options Consultation, December 2017  
Extraction Area 4 
With reference to the above, we at PDE Consulting are writing to you on behalf of our client Allen Newport Limited and specifically in regard to their existing operations at Cavenham Quarry. 
We write in support of the inclusion of Area 4 at Cavenham Quarry within the Local Plan for the purpose of mineral extraction and subsequent restoration. | Noted |
| SM/120  | Jonathan Worsley, PDE Consulting Ltd | Suffolk Minerals & Waste Local Plan, Preferred Options Consultation, December 2017  
Extraction Area 5 
With reference to the above, we at PDE Consulting are writing to you on behalf of our client Allen Newport Limited and specifically in regard to their existing operations at Cavenham Quarry. | Noted |
<table>
<thead>
<tr>
<th>SM/121</th>
<th>Jonathan Worsley, PDE Consulting Ltd</th>
<th>Suffolk Minerals &amp; Waste Local Plan, Preferred Options Consultation, December 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Inert Waste Disposal Area</strong>&lt;br&gt;With reference to the above, we at PDE Consulting are writing to you on behalf of our client Allen Newport Limited and specifically in regard to their existing operations at Cavenham Quarry.&lt;br&gt;We write in support of the inclusion of the Inert Waste Disposal Area at Cavenham Quarry within the Local Plan for the importation and final disposal of inert waste residues.</td>
<td></td>
<td>Noted</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SM/122</th>
<th>Jonathan Worsley, PDE Consulting Ltd</th>
<th>Suffolk Minerals &amp; Waste Local Plan, Preferred Options Consultation, December 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Inert Waste Recycling and Treatment</strong>&lt;br&gt;With reference to the above, we at PDE Consulting are writing to you on behalf of our client Allen Newport Limited and specifically in regard to their existing operations at Cavenham Quarry.&lt;br&gt;We write in support of the inclusion of a permanent Inert Waste Recycling and Treatment Area at Cavenham Quarry within the Local</td>
<td></td>
<td>Noted</td>
</tr>
<tr>
<td>SM/161</td>
<td>Christopher Flack</td>
<td></td>
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<td>--------</td>
<td>------------------</td>
<td></td>
</tr>
<tr>
<td>Having just attended a consultation meeting at Tuddenham St Mary village hall we believe the proposed additional sand &amp; gravel extraction between Tuddenham and Cavenham is just too extensive and reaches far too close to residential &amp; commercial properties. Also the roads used by the lorries are clearly not adequate for that purpose and increasing their number has to be detrimental if not dangerous to village life. Residents of Tuddenham have been patient with the impact of gravel extraction on their doorstep but the proposed plans will push matters over the edge. So far extraction has been a reasonable distance from residential properties and my wife I would urge that you re-design the proposed extraction area so that this remains the case.</td>
<td></td>
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</tbody>
</table>

**Extent and Proximity of Site**

While the extent of the whole site is large it is important to note that it will be required that implementation of the site is phased, meaning that only a small area of the site will be extracted at one time before being restored. Alan Newport have proposed 5 phases, which can be viewed as part of the site selection report, however this will be finalised as part of the planning application. A minimum distance of 100m from nearby residences or businesses, with a vegetated, earth bund in order to screen the site for visual, noise and air quality impact is standard mitigation which will prevent the quarry activity from being considered a nuisance. The closest property to the quarry boundary is approximately 170m. A band of trees sits on the western site boundary, which could be retained to provide an established barrier between Tuddenham and the quarry.

**Quarry Traffic**

The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this.
<table>
<thead>
<tr>
<th></th>
<th>Glenn Loveday</th>
<th>I wish to make an objection about the site between the villages of Cavenham and Tuddenham St Mary. After hearing that the operations could potentially create a further 80 lorry movements per day I wish to object on the grounds that Tuddenham St Mary High Street is already over used by HGVs (and other vehicles) as a rat run between the A11 and the A14 - many of whom do not adhere to the 30 mph limit. As a volunteer on our speedwatch program I can attest to witnessing vehicles (of all sizes) routinely travelling between 40 and 50 mph through the village. Adding a further 80 lorry movements a day will only compound this problem. I live on the High Street, and when the lorries pass my house I can literally feel the vibration from the heavier ones in the floor. Before granting any permissions I would suggest that further traffic surveys are carried out in the villages. If anything the Council needs to look at ways of reducing the traffic through the village rather than making it worse.</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/167</td>
<td>Rob Gray</td>
<td>I don't support or totally object, I can see the sense in extending the Cavenham Quarry with reservations. Firstly I think the proposed extension is too large, taking it too close to the Longwood Organic Farm. Our home is next to said farm and at present has an unprotected view</td>
</tr>
</tbody>
</table>
| SM/183 | | Quarry Traffic
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham) |
| | | Visual Impact
Earth bunds, planted with vegetation and a standoff should provide appropriate screening to mitigate the visual impact. This mitigation will also be implemented for the
of the gravel works. This is not a problem at present but would be if their works move closer. We are also concerned of the possible effect of the water table and would like guarantees that our properties would not be under threat. Also with the increase in heavy traffic, on an already unsuitable road, the local communities would undoubtedly suffer unduly.

Plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with restoration required as one part becomes exhausted and a new part is started.

Water and Floods

Any planning application submitted for this site will need to take account of potential ground water implications as the site is affected by a Ground Water Source Protection Zone

Quarry Traffic

The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)

SM/188 Patricia Gray Cavenham Quarry Extension for sand and gravel extraction. The red line indicating the area to be

Extent and Proximity of Site
| Excavated is right on top of the borders round the NNR of Cavenham Heath, Longwood, the organic farm and the surrounding village of Tuddenham - a decent buffer zone should be incorporated to protect the residents of Tuddenham from at least some of the noise and disturbance. The quantity of lorries in and out of the site is practically doubling to unacceptable levels. Quarrying is going to be taking place near trees and these need to be protected from damage by diggers, therefore a buffer zone should also be enforced around wooded areas. | A minimum distance of 100m from nearby residences or businesses, with a vegetated, earth bund in order to screen the site for visual, noise and air quality impact is standard mitigation which will prevent the quarry activity from being considered a nuisance. The majority of properties in Tuddenham are more than 250m away from the proposed site boundary with the closest property to the quarry boundary being approximately 170m. A band of trees sits on the western site boundary, which could be retained to provide an established barrier between Tuddenham and the quarry. **Quarry Traffic** The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham) |
| SM/199 | Dr Adrian Lucas | I live on the north-east edge of Tuddenham which will be close to the proposed site. I strongly object to the site mainly because of noise (site, traffic, etc.), effect on water table, effect on landscape, habitat, etc. | Noise Pollution  
Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.  
Water and Floods  
Any planning application submitted for this site will need to take account of potential ground water implications as the site is affected by a Ground Water Source Protection Zone  
Ecology and Landscape  
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve), must be submitted as part of any planning application for the site. |
| SM/203 | Joanne Feely | I live in Tuddenham with my three children. I am concerned about the increases pollution and the impact this would have on health. I am also aware that Tuddenham high street has a relatively high car accident rate. I object to this site on the grounds of increased pollution which will affect my family. Prior to any planning application being submitted, I would like a detailed pollution risk assessment of the proposed site. | Noise Pollution  
Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.  
Water and Floods  
Any planning application submitted for this site will need to take account of potential ground water implications as the site is affected by a Ground Water Source Protection Zone  
Ecology and Landscape  
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve), must be submitted as part of any planning application for the site. |
rate and am not aware that any transport adjustments are planned.

acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

**Quarry Traffic**
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)
Huge increase in lorry traffic through both Tuddenham and Cavenham resulting from the proposed 6-fold increase in existing site, and as a consequence a detrimental effect on both noise and air pollution from vehicle fumes.

**Quarry Traffic**
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham).

**Noise Pollution**
Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses,
and it is expected that adequate mitigation can be provided, which includes dust management.

Although the exact number of lorries from this site are not known, if more than 100 per day are expected then an assessment of the air quality impact from additional traffic will be required.

<table>
<thead>
<tr>
<th>SM/205</th>
<th>Alison Butcher</th>
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</thead>
<tbody>
<tr>
<td>Increased traffic through Cavenham and Tuddenham village, the lorries do not abide by the speed limit. Increased light and air pollution and waste</td>
<td></td>
</tr>
</tbody>
</table>

**Quarry Traffic**

The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)

**Light pollution**

The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.
Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

Quarry Traffic
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)

Noise Pollution
Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites.

SM/206
Daniel Gower
Re Cavenham pit expansion plans: As a resident of Tuddenham of almost 50 years total I am used to the stream of traffic that uses our village as a rat-run for the A11 to A14. Any increase in this will, I feel severely impact on the quality of life for all the people living in Tuddenham and serious thought should be given to all the implications for our village. The roads throughout our village are already under strain due to the volume and weight of traffic that uses it. Impacts will also arise from the site itself such as noise and air pollution. This could have a negative impact on wildlife on Cavenham Heath which is adjacent to the proposed site. Therefore I object to the proposal.
which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

**Ecology and Landscape**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve), must be submitted as part of any planning application for the site.

<table>
<thead>
<tr>
<th>SM/208</th>
<th>Thomas Spalding</th>
<th>I am objecting on the Cavenham pit expansion</th>
<th>Noted</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/210</td>
<td>Liz and David Goodman</td>
<td>The scale of the operation is too large. There are no local roads suitable for HGV movements on the scale suggested. The noise and traffic pollution would</td>
<td>Quarry Traffic</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a</td>
</tr>
<tr>
<td>SM/211</td>
<td>John Hellard</td>
<td>Tuddenham St Mary. this site is between two villages on a C Road as the owner of the land owns land the other</td>
<td></td>
</tr>
</tbody>
</table>

materially affect quality of the air and general living conditions locally. The roads would become unsafe. Inert waste fill is difficult to manage and site security to prevent general dumping would increase the feelings of insecurity locally. We fully object in every way to this expansion planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

Although the exact number of lorries from this site are not known, if more than 100 per day are expected then an assessment of the air quality impact from additional traffic will be required.

**Quarry Traffic**

The site access is directly onto the Suffolk Lorry Route Network onto what is
<table>
<thead>
<tr>
<th>SM/212</th>
<th>Martin Soons</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SM/212</strong></td>
<td><strong>Martin Soons</strong></td>
</tr>
<tr>
<td><strong>Regarding Cavenham site, our objections relate to The Old Rectory Tuddenham and Rectory Cottage Tuddenham, both of which we own and are extremely close to the proposed site. They are:- 1. That the level of lorries currently is 50 + 50 movements, intended to increase by 80 per cent to an additional 40 + 40. Neither Tuddenham High Street not Higham Road junction can safely take these extra movements of laden lorries. They need to ONLY turn left out of Cavenham and go straight to the A14, and a condition must be to avoid Higham Road which already sees accidents. 2. The level of noise and dust is clearly not going to be attenuated sufficiently and will make life of those in the extreme vicinity miserable. 3. In making life so difficult, it will reduce the values of both properties and others. 4. The proposal of the inert waste site is NOT part of the designated local access lorry routes. This has been assessed by Suffolk County Council Highways which has determined that it is acceptable. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham).</strong></td>
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</table>

### Quarry Traffic

The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham).

### Noise Pollution
<table>
<thead>
<tr>
<th>SM/213</th>
<th>Simon Baker</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Previous planning consents have always suggested that this is a temporary facility with the long term vision being to return the site to a more natural state with an element of public amenity including reinstatement of any historic access rights of way. The revised proposals extend this life by a further 20+ years and change the designation to become a permanent rather than temporary site. Though the proposals detail site remediation, there are no timelines and no reference to whether if any any public</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Site Timescales and Restoration**

In planning terms the site is still temporary and the current planning permission will be required to be restored in line with the timescales set out in it’s planning permission. At this stage it is expected that the site will be restored to agriculture and nature conservation. While it cannot be confirmed at this time additional public amenity is possible. |

| **Government’s national strategy, instead simply a commercial opportunity added in under cover of the waste plan. 5. The additional 6 jobs this might create are contractors, not necessarily even local people, so job creation is outweighed by the misery it will create. 6. Bringing this application to residents at a time just before Christmas, and so quietly, is absolutely not reasonable. Further proper consultation and a less sympathetic planning stance is required.** |

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management. |

**Property Prices**

Property prices are not a planning consideration |

**Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.**
amenity rights may be granted or reinstated. As a secondary concern, site 2, 3 and 4 involve encroachment of the site to immediately alongside the Tuddenham to Cavenham Road. This would change the nature of the area from one of an agricultural nature to an enclosed bunded site to limit the visual impact. It would also bring the riskier parts of the site much closer to where members the public may seek access and encounter a high risk environment. Finally, though the plans refer to maintenance of similar or only slightly higher vehicle movements, it should be recognised that existing movements and routes are not ideal but have probably been based at least in part by the concept that the site is none permanent. The vehicle access route (for up to 100 truck movements per day) passes immediately through Cavenham which is a linear strip village. The road concerned is mainly straight but is narrow. There are only limited footpaths which are extremely narrow and unlit - alongside which the nature of a number of houses in the village necessitates on street parking which increases the impact of the narrow road and footpaths. In addition, the routes to the A14 in this direction reduce in width to a level that allows for two passenger cars to pass but are too narrow for an HGV and a Car to pass in safety on roads that have no footpaths whatsoever but are used extensively by cyclists and other leisure users. If consideration is given to making this site permanent then a revised access plan should be considered to ensure greater safety and minimise the impact on local residents. This could for instance include a road linkage.
<table>
<thead>
<tr>
<th>SM/214</th>
<th>Sarah Brownie</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cavenham Quarry.</td>
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<td></td>
<td>Proposed substantial extension to the existing site is far too close to villages therefore the area to be quarried should be reduced.</td>
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<td>To ensure screening is fully effective landform should be combined with appropriate planting (a replication of other local areas such as Cavenham to Kentford Rd or West Stow) - I propose a band of hardwood trees, backed by pine and then bunds.</td>
</tr>
<tr>
<td></td>
<td>The existing haul track to the sewage plant should be used and extended to the Higham Rd so lorries are rerouted to avoid Tuddenham and where possible Cavenham</td>
</tr>
</tbody>
</table>

**Extent and Proximity of Site**

While the extent of the whole site is large it is important to note that it will be required that implementation of the site is phased, meaning that only a small area of the site will be extracted at one time before being restored. Alan Newport have proposed 5 phases, which can be viewed as part of the site selection report, however this will be finalised as part of the planning application. A minimum distance of 100m from nearby residences or businesses, with a vegetated, earth bund in order to screen the site for visual, noise and air quality impact is standard mitigation which will prevent the quarry activity from being considered a nuisance. The closest property to the quarry boundary is approximately 170m. A band of trees sits on the western site boundary, which could be retained to provide an established barrier between Tuddenham and the quarry.

**Sewage Plan Access**

While a logical suggestion, the sewage plant access is not part of the public highway and use of this road would require the permission of the landowner to use and extend.
| SM/215 | Sonia Plume | As a new resident of cavenham I am opposed to the expansion of the quarry. Firstly the traffic. Already the increase in heavy goods vehicles as a result of the a14 closure is noticeable and this would be permanent. They do not abide by the speed limit and will impact on the condition of the roads. The road and path is narrow so dangerous for anyone walking nearby or parking on the street. Not all our properties have driveways. It's an historical village with no street lighting. Impact on the wildlife. The area is a site of special scientific interest. The expansion will not add to the development of either villages or their economy just line the owners pocket. |
| SM/217 | Adrian Bertie & Jayne Neal | The Cavenham Pit expansion plan. Our main concern is the potential for a large increase in heavy vehicle traffic. |

**Quarry Traffic**

The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham).

**Ecology and Landscape**

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the Site of Special Scientific Interest), must be submitted as part of any planning application for the site. At this stage it is expected that appropriate mitigation can be provided.
through the village of Tuddenham, and Cavenham Rd in particular. As residents of Cavenham Rd, we are used to regular heavy traffic, both farm and pit related. However the proposed expansion will greatly increase the movement of trucks, with consequent noise, inappropriate speed, and in some cases inconsiderate poor driving. Bearing in mind the small children and domestic pets in the immediate locality, as well as vehicles parked legitimately in the road outside residents houses, the elements and situations for a potential collision are clear to evaluate. A situation exacerbated when two large vehicles are attempting to pass each other at the village end of Cavenham Rd. Another important consideration is the adjacent nature reserve, and impact on wildlife. Despite mitigations about how proactive and wildlife friendly Allen Newport are, (we have no reasons to disbelieve them), stone curlew in particular are notoriously fickle about where they nest, and the extensive noise and movements implicit in mineral extraction could have a severe impact on them. Any assurances that they and other Breckland specific species, and wildlife generally in the area will remain unaffected, are unproved and cannot be tested. In addition the potential for an increase in noise levels and other environmental nuisances are likely to be unavoidable, bearing in mind the scope of the plans. They will be certainly be more than at present. A relief road to the pit, utilising Frederick Hiam's own land should be considered, bearing in mind all the benefits will accrue

The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve and Site of Special Scientific Interest), and protected species (such as stone curlew) must be submitted as part of any planning application for the site. At this stage it is expected that appropriate mitigation can be provided.

Noise Pollution
<table>
<thead>
<tr>
<th>SM/216</th>
<th>Kurt von Bussmann</th>
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<tbody>
<tr>
<td>to Allen Newport Ltd, and F Hiam Ltd, certainly not the village residents who will have to put up with the fallout.</td>
<td>Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.</td>
</tr>
</tbody>
</table>
| I object to the increase in traffic that will result through the Cavenham and Tuddenham. The current traffic level is already very disturbing and the lorries often travel well above the 30 mph speed limit. Our small hamlet cannot cope with any greater increase in lorry traffic. | **Quarry Traffic**  
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham). |
| SM/218 | Helen Kerridge |
| I live in Tuddenham St Mary and have done for the last 21 years. There are far too many lorries travelling through the village at the moment. I do not want more lorries travelling through the village to an extended quarry and do not want the village I live in to become a lorry depot. The resulting pollution as a direct result of the proposed increase to the quarry will have a direct | **Quarry Traffic**  
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is |
affect on the people living in our beautiful village, spoiling it and extending the quarry directly into the path of those who live in the village.

| SM/219   | Trevor Kerridge          | I do not want the quarry extended further into Tuddenham St Mary village. The quarry is close enough to the village already and I am concerned about the additional traffic (lorries) through the village, as there is already too much at the moment. I am concerned about the additional pollution that will be created in an area of natural beauty, so near to the Cavenham Heath nature | expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

Although the exact number of lorries from this site are not known, if more than 100 per day are expected then an assessment of the air quality impact from additional traffic will be required.

Air Quality

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation.
reserve. I am also concerned about the level of noise pollution.

- can be provided, which includes dust management.

Although the exact number of lorries from this site are not known, if more than 100 per day are expected then an assessment of the air quality impact from additional traffic will be required.

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve), must be submitted as part of any planning application for the site. At this stage it is expected that appropriate mitigation can be provided.

Noise Pollution
Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.
<table>
<thead>
<tr>
<th>SM/221</th>
<th>Gavin Hughes</th>
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</table>
| Objections to Cavenham quarry expansion: 1. The proposed expansion is anticipated to increase heavy goods vehicle traffic through the villages of Tuddenham St Mary and Cavenham by 80%. Both villages have narrow roads, and houses dating from the 19th Century and significantly earlier that do not have sufficient areas to park, thus requiring the occupants to park on the road. The increase in vehicle traffic will cause significant traffic problems, in particular for agricultural traffic in what is a predominantly agricultural area. The roads in both villages are already deteriorating from the current level of HGV traffic, and this increase will only lead to further deterioration. How will this be effectively dealt with on a regular basis, and has Suffolk County Council sufficient funds to maintain the roads as required? 2. The proposed expansion is very close to the villages of Tuddenham St Mary and Cavenham. Both are historical villages and predominantly rural and agricultural. Much if the land and environment is designated as SSSI, and Cavenham Heath is of regional and national importance. It is difficult to understand how a significant expansion of quarrying cannot have a negative impact upon these landscapes and the environment. 3. This proposal does not appear to bring any benefit to anybody, apart from Frederick Haim and the quarrying company. There is no clear rationale as to what the quarried material will be used for, where it will be used, and why the material should be taken from this land. There is no rationale other than money for the destruction of a historic Quarry Traffic The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham) The number of lorry movements to and from the site are expected to be similar to current levels. Ecology and Landscape Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve), must be submitted as part of any planning application for the site. At this stage it is
4. Following on from the above, this proposal brings no benefits to the villages of Tuddenham St Mary and Cavenham. What will Suffolk County Council, Frederick Haim and the quarrying company do to reduce the impact on both villages and recompense for the significant impact and destruction both villages will suffer?

expected that appropriate mitigation can be provided

Restoration

It is expected that the site will be restored to an agricultural and nature conservation use, similar to its current use. The plan shows preference to site applications that propose a net gain in biodiversity.

Need for Quarry Sites

The current permitted land bank of sand and gravel in Suffolk will last until 31st December 2027 (as of 31st December 2016). However as the plan period lasts until 31st December 2036, so there is a shortfall of 9 years supply, or approximately 10.422 million tonnes. The County Council needs to identify sites which will ensure a land bank until the end of the plan period. So, while there are sand and gravel quarries currently operating through Suffolk, more sites need to be identified.

SM/222  J Baker

I object to the planned expansion of Cavenham Quarry. This will increase the volume of about 80% of trucks/lorries through the village. We have a narrow road, narrow footpaths which is already dangerous with the current lorries speeding through.

Quarry Traffic

The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or
<table>
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<tr>
<th>SM/225</th>
<th>Jocelyn Blakey</th>
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<tr>
<td>Re Cavenham Pit expansion plans</td>
<td>I wish to express my firm objections to the proposed expansion of the pit, the importation of substantial quantities of construction waste and the extension of the life of the quarry for another 25 years. This proposal would have a seismic detrimental affect on our local community. There would be an 80% increase of lorries going through our village. This on already small local roads. It would increase the noise, light and air pollution to our villages and thus have a negative affect on both the local residents and wildlife.</td>
</tr>
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</table>

**Quarry Traffic**

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**Noise Pollution**

Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.
**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

Although the exact number of lorries from this site are not known, if more than 100 per day are expected then an assessment of the air quality impact from additional traffic will be required.

**Light pollution**

The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

**Ecology and Landscape**

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and...
<table>
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<tr>
<th>SM/227</th>
<th>Vickie Lack</th>
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<tr>
<td><strong>Cavenham Pit Expansion Plans.</strong> I object because there are no sufficient arrangements to cope with the extra traffic (an 80% increase in the number of lorries). Tuddenham is a small village with a narrow High Street which is bottle necked by parked cars. It is already a 'rat run' for HGVs heading to the A14 from the A11. Motorists speed through the village. Emergency vehicles use the village to get from A11 to A14 and vice versa. Extra traffic due to increased quarrying will increase the noise, light and air pollution in a small village for many years to come. It makes no environmental sense to increase pollution and traffic until road infrastructure is dealt with. As it is, a bypass is needed to prevent existing HGVs from rattling through the village - to add more will be disastrous to such a small village and the surrounding narrow country roads.</td>
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<tr>
<th><strong>Quarry Traffic</strong></th>
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<th><strong>Air Quality</strong></th>
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<tr>
<td>SM/230</td>
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<tr>
<td>Cavenham quarry</td>
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### Alternative Route

We are currently not sure what alternative route you are suggesting. Please indicate a specific route for our consideration.

### Ecology and Landscape
support additional lorries using the village to access main routes through the villages of Cavenham or Tuddenham and therefore do not support the expansion unless the traffic does not impact on the village.

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve and Site of Special Scientific Interest), must be submitted as part of any planning application for the site. At this stage it is expected that appropriate mitigation can be provided.

SM/231  
Laurence Bickell

I am not in favour of the proposed expansion of cavenham quarry. We are a tiny village with enough traffic going through as it is. The lorries who come through here already struggle sometimes to get through as some of us have no off road parking not to mention the speed they and other passers through do. Expanding the quarry and raising the through traffic of lorries by 80% will just make it all the more worrying for the safety of vehicles parked outside our houses, not to mention the quality of life being reduced because of all the noise. I love living here in the countryside and relative peace and quite. Please take on board my point of view along with many more objections I’m sure you will get. Thank you

Quarry Traffic

The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)
<table>
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<tr>
<th>SM/232</th>
<th>Vanessa Selwyn</th>
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<tr>
<td>I am contacting you here re the proposed increase in size of the gravel and sand extraction site on the outskirts of Tuddenham, as a resident of Cavenham. The noise and visual effect of the increased size of the quarry will adversely affect our quality of life. The lights at the site are a major cause of light pollution in the area, and the buildings and extraction are quite clearly visible from Cavenham heath. The site is proposing to move closer to the heath thus making the noise and the visual impact worse. There are also plans to bring waste to the site to backfill the land that has been excavated. This, we are informed, is likely to increase the lorry traffic by 80%. Quite clearly, the roads through Tuddenham and Cavenham are not in the least suitable for this weight of traffic. Not only to the current lorries cause pot holes and the destruction of the curb, but there is not enough room for two of these vehicles to safely pass in the village. Neither is it safe for pedestrians to walk through the village whilst lorries pass through. The lorries cause vortices which are strong enough to unbalance the young and the old and those who are unsteady on their feet. We do not have pavements throughout the village. It should be possible to extend the lane, grid ref. TL 74353 70771, post code IP28 6SE through to Higham Road and bypass both Cavenham and Tuddenham. This would negate any quarry traffic damaging the roads through the village and the ensuing danger of coming into unnecessarily close proximity of the villages' inhabitants.</td>
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**Quarry Traffic**

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**Other Routes**

The County Council are not aware of any other adopted roads that could be used for lorries to access the wider lorry network. Other roads may be under private ownership and as such use of these roads would be subject to an agreement from the land owner, which cannot be guaranteed.
<table>
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<tr>
<th>SM/235</th>
<th>Phil Morley</th>
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<tbody>
<tr>
<td></td>
<td><strong>Cavenham Pit</strong> - The increase of lorries through the local villages, current lorries coming and going from the quarry have little regard for the speed limit, so the future prospect is scary for a father of two children living on Cavenham Road in Tuddenham. Also, the potential environmental impact of the expanded quarry on the rare nesting stone curlews on the neighbouring Cavenham Heath cannot be underestimated.</td>
</tr>
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**Ecology and Landscape**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve and Site of Special Scientific Interest), and protected species (such as stone curlew) must be submitted as part of any planning application for the site. At this stage it is expected that appropriate mitigation can be provided.
<table>
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<tr>
<th>SM/237</th>
<th>Denise Alexander</th>
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<tbody>
<tr>
<td><strong>Highways</strong></td>
<td>I am objecting to the increase of large vehicles through the village of Cavenham. We have a blind corner where vehicles of all sizes cut close to the pavement, the pathway is narrow and pedestrians are at risk of being knocked down. An increase in larger vehicles will place pedestrians in more danger. Environment</td>
</tr>
<tr>
<td><strong>Quarry Traffic</strong></td>
<td>The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)</td>
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<td><strong>Air Quality</strong></td>
<td>Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.</td>
</tr>
<tr>
<td><strong>Public Consultation</strong></td>
<td>The ways that the County Council used to inform the public of the consultation and consultation events were: letters to residents and businesses within 250m of the site; advertisements in the local press</td>
</tr>
<tr>
<td>SM/242</td>
<td>Andrew Jarratt</td>
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<tr>
<td>I am not opposed to the expansion of the quarry in principle. However I object strongly to the manner in which it will be carried out in the following respects: -the vehicle exit/entry routes via Tuddenham and Cavenham use roads that in many places are completely unsuited to the volume and size of traffic. The road between Tuddenham and Cavenham is not wide enough to allow two HGV's to pass safely. Current road traffic is already excessive to village residents. Pedestrian traffic in Cavenham is put at risk by HGV traffic due to the poor state of repair of its pavements. -the proposed import of inert waste will be lead to an 80% increase in lorry traffic and is completely unacceptable. In the planning application granted for the western extension of the quarry (DC/13/1072/CR3) the import of such waste is expressly not granted. This sets a precedent that should be upheld. -If HGV traffic is to be maintained at its current levels for at least another 25 years then an alternative entry and exit route should be sought and paid for by the quarry. Using the existing concrete track (East Anglian Daily Times and the Newmarket Journal), email notification to Belstead Parish Council. Social media was also used to promote the consultation events. There will be more opportunities for you to comment on the proposed sites. Another consultation period will take place in June and July 2018 and if a planning application for the site comes forward then you will also have the opportunity to comment on that.</td>
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Quarry Traffic
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Use of Inert Waste
With regards to inert waste on this site the County Council received the following response from the Environment Agency: “Some of the restoration of the existing
to the Anglian Water sewage works and extending it for quarry traffic to the Tuddenham/Barrow road would massively alleviate traffic in the villages at no cost to the public purse. - quarry activity already imposes a heavy burden of noise, light and dust pollution on the neighbouring villages. Development of the site up to the very edge of Tuddenham would have a huge impact on the quality of life of residents. Mitigation can not be expected to reduce this to acceptable levels unless a minimum distance of at least 400m or more is respected between the western extremity of the proposed workings and house in Tuddenham - There is currently no indication of how the landowners, F. Hiams, would require the land to be restored once the proposed workings are exhausted. This is completely unacceptable. A detailed and public plan of proposed remediation works should be a condition of any planning permission.

Other Routes
The County Council are not aware of any other adopted road that could be used for lorries to access the wider lorry network. Other roads, such as the Anglian Water road you have suggested, may be under private ownership and as such use of these roads would be subject to an agreement from the land owner, which cannot be guaranteed.

Noise Pollution
Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.

Light pollution
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be
enforced by planning conditions, if planning permission were to be granted.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

**Site Restoration**
A site restoration scheme must be submitted with a planning application. The County Council would expect this site to be restored to agriculture and nature conservation purposes. Restoration may require inert soils to backfill the site.

<table>
<thead>
<tr>
<th>SM/243</th>
<th>Robert Brittain</th>
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<tr>
<td>I strongly object to all aspects of this hideous application: Excess use of village roads with HGVs. Adverse impact on wildlife and nature. Danger to public and vehicles at road junction by the Tuddenham church. The excess use of underground water above which is declared and which is unpolicied. The noise pollution that will obviously disturb village communities. Spillage from the lorries that will make the surface to our small roadways lethal. The obvious ugly eyesore to our beautiful Breckland countryside that this will cause.</td>
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</table>

**Quarry Traffic**
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other...
<table>
<thead>
<tr>
<th>SM/244</th>
<th>Mr and Mrs C Farrant</th>
</tr>
</thead>
</table>
|        | **Cavenham Quarry:** We strongly object to the expansion plans at Cavenham Quarry for the following reasons:  
- Expansion plans bring the quarry far too close to the village of Tuddenham St Mary. Current plans bring the quarry right to the edge of the village, as well as putting it next to Cavenham Heath Nature Reserve and Longwood Organic Farm. The increased noise and air pollution are of major concern, as well as water leaching/pollution, and ground vibration as possible causes of subsidence if the quarry is brought near to residential properties, the value of which is likely to diversely affected if right next door to a quarry.  
- Increase in rate of production, and therefore increase in the volume of HGV activity is not suitable for the roads leading to the villages as well the narrow streets and paths of the villages, raising the question of safety of vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)  
**Extent and Proximity of Site**  
While the extent of the whole site is large it is important to note that it will be required that implementation of the site is phased, meaning that only a small area of the site will be extracted at one time before being restored. Alan Newport have proposed 5 phases, which can be viewed as part of the site selection report, however this will be finalised as part of the planning application.  
A minimum distance of 100m from nearby residences or businesses, with a vegetated, earth bund in order to screen the site for visual, noise and air quality impact is standard mitigation which will prevent the quarry activity from being considered a nuisance. The closest property to the quarry boundary is approximately 170m. A |
village residents, both young and elderly. This will cause more noise & air pollution, as well as congestion.

| band of trees sits on the western site boundary, which could be retained to provide an established barrier between Tuddenham and the quarry. |

**Subsistence of nearby property**
The distance between the quarry and nearby properties should not cause subsistence issues. This is not an issue typically associated with sand and gravel quarries.

**Ecology and Landscape**
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve), must be submitted as part of any planning application for the site. At this stage it is expected that appropriate mitigation can be provided.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses.
and it is expected that adequate mitigation can be provided, which includes dust management.

**Noise Pollution**
Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.

**Water and Floods**
Any planning application submitted for this site will need to take account of potential ground water implications as the site is affected by a Ground Water Source Protection Zone.

**Property Prices**
Property prices are not a planning consideration.

**Quarry Traffic**
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this
<table>
<thead>
<tr>
<th>Reference</th>
<th>Name</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/250</td>
<td>Dr J Dekkers</td>
<td>Road infrastructure is not sufficient to support an expansion of the current site. Both the proposed increased volume of traffic and the size of the vehicles will have a significant impact on residents in Tuddenham and Cavenham and on their properties and make this site unsuitable for expansion.</td>
</tr>
<tr>
<td>SM/264</td>
<td>Victoria Dickson</td>
<td>Object to the Cavenham Pit Expansion Plans</td>
</tr>
<tr>
<td>DR/26</td>
<td>Esme Murfitt</td>
<td>This appears to be the largest proposed extension &amp; I am concerned about the impact on Tuddenham village &amp; Cavenham heath. The National Nature Reserve is an asset to our community &amp; the activity &amp; noise would affect the wildlife in the area of the proposed extension. Also, the amount of lorries, the speed of &amp; the weight of them is already a worry for residents. I am disappointed that consultation was not more widely advertised in our area.</td>
</tr>
</tbody>
</table>

**Quarry Traffic**
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham).
<table>
<thead>
<tr>
<th>E/141</th>
<th>Gill Peters</th>
</tr>
</thead>
<tbody>
<tr>
<td>Being a Tuddenham resident and having attended the presentation in the village hall, my comments are as follows:</td>
<td>Noise Pollution</td>
</tr>
<tr>
<td>1. The enlarged site is too close to Longwood Farm. Quite apart from the disruption to the lives of those living there, this is an Organic Farm which has to abide by many stringent conditions, all of which should be considered in relation to this enlargement</td>
<td>Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.</td>
</tr>
<tr>
<td>2. Being so close to the village, there would be increased noise, dust and pollution problems to be resolved.</td>
<td>Air Quality</td>
</tr>
<tr>
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</tr>
<tr>
<td>3.</td>
<td>There should be no lorry and associated movements along the Icknield Way Trail.</td>
</tr>
<tr>
<td>4.</td>
<td>There are already 50 lorry movements in &amp; out of the existing Quarry area each day causing problems for Tuddenham and Cavenham residents as 'C' roads are being used and these were never intended for the weight or size of heavy lorries.</td>
</tr>
<tr>
<td>5.</td>
<td>The proposal to include the Recycling of Inert Waste will result in a further 40 lorry movements in &amp; out of the existing Quarry area every day which will almost double the number of lorries already using the roads on a daily basis and this cannot be acceptable.</td>
</tr>
<tr>
<td>6.</td>
<td>Consideration should be given to strengthening the track leading off the Cavenham Road (very close to the Quarry exit) which skirts the Sewage Works and emerges on to the Higham Road. Turning left there the lorries would reach the A14 approx 2 miles ahead.</td>
</tr>
<tr>
<td>7.</td>
<td>Both the Cavenham Road and Higham Road are classified as C roads but the traffic would no longer be going through Tuddenham and Cavenham.</td>
</tr>
</tbody>
</table>

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management. Air quality assessments will also consider the effects of pollution and dust deposition on nearby landscapes, which would likely include Longwood Farm.

### Quarry Traffic
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham).

### Other Routes
The County Council are not aware of any other adopted road that could be used for lorries to access the wider lorry network.
Other roads, such as the Anglian Water track you mentioned, may be under private ownership and as such use of these roads would be subject to an agreement from the land owner, which cannot be guaranteed.

<table>
<thead>
<tr>
<th>E/149</th>
<th>Annabel John</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>We wish to raise our serious concerns regarding site expansion proposals at the Breedan sand and gravel pits. This site lies next to a site of SSSI and would prove to be a negative influence on surrounding wildlife. At present there are substantial HGVs using this route and further use would be unacceptable through such a small village road. The road has already reached its peak in what it can sustain in the way of HGV traffic. Due to the nature of quarrying noise, light and chemical pollutants would all be raised. Activity at the plant has already increased resulting in more of the above pollutants which is already noticeable at the present level. Anymore would be detrimental to the neighbouring land, wildlife and residents of the surrounding villages. It seems ironic that Countryfile was recently filming at Cavenham Heath recently about conservation and these plans are a direct assault on any form of conservation. The area has been promoted by the council as an area of unique habitat for specialized and extremely rare wildlife so how hypocritical and shortsighted to then expand the quarry and to infill with so called inert waste. To quarry on this site for a further 25 years is unsustainable. Can we really rely on the integrity of all men to only deposit inert waste? What of the implications of pollutants entering water courses and land. Given the geological nature of the land this is a distinct possibility. Also the affect of continually blasting</td>
</tr>
</tbody>
</table>

To clarify, the proposed mineral extraction extension has been undertaken by Allen Newport. Breedon Aggregates operate the asphalt plant on the site. 

**Ecology and Landscape**

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve and Sites of Special Scientific Interest), must be submitted as part of any planning application for the site. At this stage it is expected that appropriate mitigation can be provided. Additionally policies within the plan favour proposals that feature net biodiversity gain as part of site restorations, which would have long term benefits for wildlife.

**Quarry Traffic**
and excavation of a site will destabilise land and water courses. Making flooding an very direct and imminent risk. Air pollutants caused by the industrial activities in the form of air and dust will be detrimental to all the surrounding wildlife, livestock and residents. We oppose all of the proposed plans.

The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham).

Noise Pollution
Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.

Light pollution
The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.
### Blasting

Blasting does not take place in sand and gravel quarries. The material is extracted using excavators.

### Water and Floods

Any planning application submitted for this site will need to take account of potential ground water implications as the site is affected by a Ground Water Source Protection Zone. The Environment Agency typically determines if there are any avoidance or mitigation works needed in relation to water courses.

### Air Quality

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

<table>
<thead>
<tr>
<th>M/19</th>
<th>Jonathan Worsley, PDE Consulting Limited</th>
<th><strong>Suffolk Minerals and Waste Local Plan, Preferred Options Consultation, December 2017</strong> Inert Waste Disposal Area</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>With reference to the above, we are writing to you on behalf of our client Allen Newport Limited and specifically</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Noted</td>
</tr>
</tbody>
</table>
| M/20 | Jonathan Worsley, PDE Consulting Limited | **Suffolk Minerals and Waste Local Plan, Preferred Options Consultation, December 2017 Inert Waste and Recycling Treatment**  
With reference to the above, we are writing to you on behalf of our client Allen Newport Limited and specifically in regard to their existing operations at Cavenham Quarry.  
We write in support of the inclusion of the Inert Waste Disposal Area at Cavenham Quarry within the Local Plan, Drawing Reference M16.135.D.035, for the importation and final dispersal of inert waste residues.  
Should you have any queries about the above, please do not hesitate to contact me.  
(see representation for map) | Noted |
| M/21 | Jonathan Worsley, PDE Consulting Limited | **Suffolk Minerals and Waste Local Plan, Preferred Options Consultation, December 2017 Extraction Area 3**  
With reference to the above, we are writing to you on behalf of our client Allen Newport Limited and specifically in regard to their existing operations at Cavenham Quarry.  
We write in support of the inclusion of the Area 3 at Cavenham Quarry within the Local Plan, Drawing Reference M16.135.D.023, for the purpose of mineral extraction and subsequent restoration. | Noted |
| M/22 | Jonathan Worsley, PDE Consulting Limited | **Suffolk Minerals and Waste Local Plan, Preferred Options Consultation, December 2017**  
**Extraction Area 5**  
With reference to the above, we are writing to you on behalf of our client Allen Newport Limited and specifically in regard to their existing operations at Cavenham Quarry.  
We write in support of the inclusion of the Area 5 at Cavenham Quarry within the Local Plan, Drawing Reference M16.135.D.031, for the purpose of mineral extraction and subsequent restoration.  
Should you have any queries about the above, please do not hesitate to contact me.  
(see representation for map) | Noted |
| M/23 | Jonathan Worsley, PDE Consulting Limited | **Suffolk Minerals and Waste Local Plan, Preferred Options Consultation, December 2017**  
**Extraction Area 4**  
With reference to the above, we are writing to you on behalf of our client Allen Newport Limited and specifically in regard to their existing operations at Cavenham Quarry.  
We write in support of the inclusion of Area 4 at Cavenham Quarry within the Local Plan, Drawing Reference M16.135.D.031, for the purpose of mineral extraction and subsequent restoration.  
Should you have any queries about the above, please do not hesitate to contact me.  
(see representation for map) | Noted |
<table>
<thead>
<tr>
<th>Ref</th>
<th>Name and Organisation</th>
<th>Response</th>
<th>Notes</th>
</tr>
</thead>
</table>
| M/27 | Jonathan Worsley, PDE Consulting Limited    | Suffolk Minerals and Waste Local Plan, Preferred Options Consultation, December 2017 Extraction Area 1  
With reference to the above, we are writing to you on behalf of our client Allen Newport Limited and specifically in regard to their existing operations at Cavenham Quarry.  
We write in support of the inclusion of Area 1 at Cavenham Quarry within the Local Plan, Drawing Reference M16.135.D.015, for the purpose of mineral extraction and subsequent restoration.  
Should you have any queries about the above, please do not hesitate to contact me.  
(see representation for map) | Noted |
| E83  | Natalie Gates, Historic England             | Inert waste tipping is proposed at this site next to a linear scheduled monument which is not identified in the chapter 11 summary. The scheduled monument should be identified and how the setting of the monument will be restored through the inert waste tipping should be set out in policy, as should a mitigation strategy for the next phase of sand and gravel extraction proposed.  
We find the proposals unsound given the lack of policy protection for designated heritage assets. | |
| E154 | Alison Collins, Natural England             | The proposed extension to this quarry lies entirely within Breckland Farmland SSSI/Breckland SPA. It is immediately adjacent to Breckland SAC, Cavenham-Icklingham Heaths SSSI and Cavenham Heath National Nature Reserve.  
The proposed extension represents a considerable increase in the area of the existing permitted quarry and without avoidance and mitigation measures would significantly impact on designated features, including | |
|      |                                             | The scheduled monument will be included in the summary of this proposal. It is currently identified on the map of the proposal. Full mitigation of the should be identified in any planning application submitted for the site as intended through the environmental criteria in GP4 and restoration policy MP7 | |
breeding stone curlew. However, in principle, at this stage we have no outright objection to the proposal subject to further information being provided which demonstrates that impacts to designated features have been avoided where possible and mitigation measures put in place for those impacts which cannot be avoided and monitoring to ensure the measures are effective. Ideally, the proposal should provide a net benefit to biodiversity, particularly notified features, following restoration.

In addition to potential (temporary) loss of habitat and disturbance to SPA breeding birds, an impact assessment will need to consider potential effects on the hydrology of Cavenham-Icklingham Heaths SSSI to ensure no detrimental effects on wetland communities. We suggest that the following avoidance and mitigation measures should be considered for the extension, for example, no quarrying or landfilling during the stone curlew breeding season, making the land available for breeding stone curlew during the breeding season, where appropriate temporarily sowing areas with crops to discourage stone curlew nesting and minimising vehicle movements. The impact assessment should also provide evidence that there will be no adverse effects on the nationally and internationally designated features from dust blow, changes to hydrology etc. We would like to be involved in discussions at all stages.

E/108 Charlie Christensen, The Environment Agency

The map on page 61 shows a large extension to the west and south of the existing Cavenham quarry. The site is adjacent to Cavenham and Icklingham heath SSSI’s. This is a wetland site and therefore relies on groundwater levels in the chalk and overlying sands and gravels. This GWTE (groundwater terrestrial ecosystem i.e. wetland) of Cavenham and Icklingham heaths is currently failing in the Water Framework (dust) and hydrology, with detailed plans for mitigation also being expected.

Natural England will of course be consulted at all stages of the planning process as a statutory consultee.

The potential objection to this site is noted. The County Council will make changes to the plan with the aim of making this site acceptable.

It is noted in the plan that this site will have implications for groundwater. The need for...
Directive (WFD) and is the reason why the WFD groundwater body (Cam and Ely Ouse chalk) is given poor status. The section of the SSSI that is currently failing is to the north-east of the existing quarry, however if sand and gravel extraction is allowed to the west of the current quarry there is a risk that it will impact on another part of the SSSI between the proposed extension and the River Lark. We would object to this site for mineral extraction unless the mineral is worked wet, with no dewatering taking place, and a significant buffer zone would be required between the mineral extraction site and the wetland SSSI to the north. It should be noted that the cells of the SSSI to the north of the proposed extraction may be less sensitive to groundwater levels than those to the East of the current workings, however this would need to be properly assessed.

Some of the restoration of the existing site is currently utilising inert material, and we would consider this appropriate for this potential extension. As the site is very sensitive regarding groundwater quality we would not consider hazardous or non-hazardous restoration appropriate.

A section in the north east of the sand and gravel extraction area is situated in flood zone 2. Half of the inert waste tipping area is also situated in flood zone 2. There are also some areas at risk from surface water flooding. A FRA would be needed to demonstrate the risk of flooding to those working onsite and to ensure that flood risk is not increased. It should also be demonstrated that the flood risk sequential approach has been applied within the site in order to direct development to the areas of lowest flood risk. If it is not possible to locate all of the development in flood zone 1, then the most vulnerable elements of the

a flood risk assessment can also be included, but to the proposal being within flood zones 2 and 3.

Proposed Changes
Consider how this site can be changed in order to adequately avoid or mitigate impacts on the Cavenham and Icklingham heath SSSI’s. Include the need for a flood risk assessment at this site.
development should be located in the lowest risk parts of the site. We would recommend that a flood plan is prepared for the development, which should include an appropriate method of flood warning and evacuation, to ensure the safe use of the development in extreme circumstances. Climate change should also be assessed to determine the risk to the site in the future. We would expect bunds and materials to be stored outside of the floodplain, however if this is not possible, we would expect flow paths to be considered to ensure there is no increase in flood risk and bunds would require gaps for flood water.

E/70 Mike Jones, RSPB Cavenham

We note the inclusion of this proposed site, which is within the Breckland SPA. We are concerned that the HRA supporting the plan does not appear to have investigated the potential impacts on the SPA of the allocation in any detail. Minerals extraction on these sites will result in adverse effects on the integrity of the SPA through displacement of nesting birds, and without adequate mitigation would not be permissible at the development control level, leaving the plan undeliverable.

We have set out our wider concerns with the HRA report elsewhere in our response. With specific reference to this proposed allocation, as an absolute minimum we recommend the following would be required to demonstrate that the proposal could avoid an adverse effect on the Breckland SPA.

- Provision of alternative habitat for displaced SPA features for the period of the extraction. Whilst the proposed allocation is temporary, it will result in a loss of SPA habitat for a significant period,

The plan is an in principle document and detailed assessment of each site is not feasible. The plan and the habitats regulation assessment outline potential impacts of the Barnham site, with detailed assessments and appropriate, avoidance, minimisation and mitigation details expected at the planning application stage.
and this should be mitigated for by provision of suitable nesting habitat elsewhere for the period of the works.

- Restoration to wildlife-rich habitats. In line with existing minerals consents in the SPA, restoration of mineral sites within the stone-curlew habitat of the SPA should be to Brecks grass-heath, the preferred habitat of stone-curlew, in order to maximise the likelihood of the SPA species returning to use the site after the minerals working.
- Given the proposed allocation’s location within the SPA, any allocation must be able to demonstrate that it will be able to avoid any significant increases in pollution to the surrounding site, from sources including (but not necessarily limited to) dust, noise, lighting, human and vehicle disturbance on site and on access routes and changes to the surrounding hydrology.
- We expect that such measures would also apply to any similar international designations (such as Ramsar sites and SACs) and also include similar measures to avoid adverse effects on Sites of Special Scientific Interest.
- If the above is possible and the sites are taken forwards in the plan, then they should be included as site specific policies in the submission stage of the plan, and accompanied by the appropriate level of detailed assessment in a revised HRA.

| E/73 | West Suffolk District Council | MP2(d) – Site M4 (map ref FH3) Areas allocated for inert waste tipping are within Flood zone 2. This area has a major groundwater vulnerability classification. | The Groundwater Source protection Zone has been noted by the County Council and any planning application at this site must take this into account. |
This is a very sensitive area for landscape and ecology and we have significant concerns with the allocation without details of the mitigation and restoration plans, due to the size of the site and its land coverage. It is recommended that Natural England is fully engaged.

**E/78**  
James Meyer, Suffolk Wildlife Trust  
Cavenham  
This site is within the Breckland Special Protection Area (SPA) and the Breckland Farmland Site of Special Scientific Interest (SSSI), these sites are designated for internationally important numbers of breeding stone curlew. The site is adjacent to Cavenham-Icklingham Heaths SSSI and Cavenham Heath National Nature Reserve (NNR), Cavenham is also a component of the Breckland Special Area of Conservation (SAC). Whilst the ecology section (11.16) identifies that there is the potential for adverse impacts on stone curlew, no avoidance, mitigation or compensation measures are suggested. Potential impacts on the SPA and SAC must be assessed as part of the Habitats Regulations Assessment (HRA) for the Local Plan and sites should not be allocated which would result in an adverse impact on the designated sites. It must also be ensured that should any extraction be allocated in this location, that the site restoration plan maximises the area’s value for the species for which the SPA and SSSI are designated.

Natural England have been engaged and requested more information regarding this site, which the County Council will provide.

It is expected that the issues can be mitigated against. Suffolk County Council will work to provide additional information regarding avoidance and mitigation measures, which has been requested by Natural England.

At the planning application stage it is expected there will be full assessments of ecology, landscape, air quality (including dust) and hydrology, with detailed plans for mitigation also being expected.

**SM/220**  
Robert Ayers  
As I resident of Cavenham village I have a concern over the proposed expansion of Marston's pit at Cavenham and the backfilling of quarried areas, which I understand will lead to a near doubling of the current volume of large lorries through Cavenham and Tuddenham villages. I am concerned about the impact this will have and would urge planners to seek alternative routes for the lorries. Perhaps an extension/re-surfacing of the track that currently runs

_Quarry Traffic_  
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is
from the Cavenham road to a sewage works, which could be connected to the Higham Road, eliminating the need for lorries to enter Tuddenham or Cavenham, and giving access to the A14 with limited impact. expected the applicant will agree to this request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham).

**Other Routes**
The County Council are not aware of any other adopted road that could be used for lorries to access the wider lorry network. Other roads may be under private ownership (such as the road to the sewage works) and as such use of these roads would be subject to an agreement from the land owner, which cannot be guaranteed.

| SM/259 | Lindsay Hargreaves | I wish to support the proposal to extend the existing Cavenham site as set out in the preferred options paper. | Noted |
| SM/223 | Terence & Josephine Nicholls | We object to the proposed extension of the Cavenham Pit. The extension is too excessive. The Street at Cavenham is not fit to take any increased heavy traffic load. The highway drainage is inadequate, prone to flooding. The pavements are poor or almost non-existent causing danger to pedestrians. Standing water gets sprayed up, damaging property and affecting pedestrians. Suffolk Highways have not or will not maintain the infrastructure. Speeding lorries are a |

**Quarry Traffic**
The site access is directly onto the Suffolk Lorry Route Network onto what is designated local access lorry routes. If a planning application were submitted for this site the County Council would request a voluntary vehicle movement agreement or a lorry management plan, which it is expected the applicant will agree to this.
constant problem. The extension would seriously damage wildlife habitat, particularly Stone Curlews, along with others. Noise from the pit can be heard in Cavenham now, it does not need to get worse.

request. Precise details of such a plan or agreement would be decided at the planning application stage. This would help to manage the impacts of lorries and other vehicles associated with the quarry on nearby villages (i.e. Tuddenham and Cavenham)

Ecology and Landscape
Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which include the nearby National Nature Reserve and protected species such as Stone Curlew), must be submitted as part of any planning application for the site. At this stage it is expected that appropriate mitigation can be provided

10. LAYHAM

<table>
<thead>
<tr>
<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/88</td>
<td>Sarah Partridge, Clerk to Kersey PC</td>
<td>Kersey PC are generally content with these proposals. Councillors did raise concerns about increased work taking place at the Hadleigh quarry</td>
<td>Noted. The Hadleigh and Pyeyton Hall farm proposals are not part of this consultation. If planning applications are made for these</td>
</tr>
<tr>
<td>SM/174</td>
<td>Jim Marshall and Sarah Cook</td>
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<tr>
<td></td>
<td>We are commenting on the Layham Site - proposed extension. If the site is extended: 1. The site is in an agricultural area, and should be returned to agriculture after extraction. 2. A full biological survey survey should take place prior to extraction and rare species given adequate protection. Every effort should be given to preserving ancient trees and hedgerows. 3. Adequate provision should be given to reduce noise and dust, particularly protecting neighboring houses 4. The existing processing &amp; facilities site should be used. 5. The existing exit route from this side of the quarry (across the lane between Popes Green Farm and Lower Layham) should be used. And the current, specially constructed road, used for lorry access to take away the final materials 6 Quarry lorry access should not be allowed in any of the surrounding lanes</td>
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</table>
|        | Site Restoration A site restoration scheme must be submitted with a planning application. The County Council would expect this site to be restored to agriculture. Ecology and Landscape Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations, and protected species must be submitted as part of any planning application for the site. The County Council are aware of a number of priority species and priority habitats with the potential to be impacted however, at this stage it is expected that appropriate mitigation can be provided. Air Quality Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected
<table>
<thead>
<tr>
<th>SM/263</th>
<th>Catherine Louise Allen</th>
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<tr>
<td>I am commenting on the proposal to include Layham Quarry in the plan. My concerns are regarding the following: 1. Traffic movements from the planned new area to processing and across Popes Green Lane. Popes green Farm is now being redeveloped and consideration must be given to traffic movements along the public highway when transferring mineral from extraction to processing. 2. Dust from processing. Due consideration must be given to ensure that dust fall out from processing complies with current legislation with respect to the houses along Rands Road that are within the local vicinity of the processing plant at all times. 3. Noise Air Quality</td>
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<td>that adequate mitigation can be provided, which includes dust management. It is expected that an assessment of the air quality impact from additional traffic will be required.</td>
</tr>
<tr>
<td></td>
<td>Noise Pollution</td>
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<td></td>
<td>Earth bunds with vegetation may be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites which should be sufficient. A detailed noise assessment is required as part of any planning application for this site.</td>
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<td></td>
<td>Quarry Access</td>
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<td>The existing access is acceptable and it is expected that this will be used.</td>
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from processing. Again due consideration must be
given to ensure that noise transfer from processing
complies with current legislation with respect to the
houses along Rands Road that are within the local
vicinity of the processing plant at all times. 4. Traffic
movement - processed mineral exiting from the site.
The current requirements regarding lorry
movements up and down Rands Road and the
timings there of much be complied with or tightened.
There have always been issues with lorries parked
up waiting for the plant to open, disregarding the
weight limits on the lower section of Rands Road
and a lack of due care and attention for other road
users by some drivers - this is a rural area and
consequently has rural traffic and livestock
movements. When the pit was previously
operational there have been instances of
pedestrians and horses being 'run off the road' by
inconsiderate drivers. Please consider a speed limit
on the road. 5. Areas of regeneration. The areas
of the pit which have been worked out and are now
undergoing regeneration are developing extremely
well. The flora and fauna are returning and the area
is now a green corridor allowing bio diversity to
return to the area. Any return to working must make
consideration for protecting this and ensure that the
regeneration is not interrupted or causes a
retrogressive step.

| M/34 | Steven and Alison Blakeley | Suffolk Minerals and Waste Preferred Options Draft October 2017 |

required in order to reduce noise to within
acceptable levels. A detailed noise
assessment is required as part of any planning
application for this site.

**Rands Road Lorry Movement**
It is expected that the same restrictions of
timing plant opening and lorry movements will
be the same. It is encouraged that any breach
of conditions or road restrictions is reported to
the County Council for enforcement.

**Areas of Regeneration**
Areas in the process of regeneration should
not be disturbed as their restoration is part of
the planning permission for extraction.
We refer to the above document and the consultation process which is currently ongoing and the purpose of us making contact with you is to raise objections against the proposal to include an extension of Layham Quarry as a preferred site for minerals extraction (the 'Site'). Our objection is as a consequence of us owning The Croft, Lower Layham, Hadleigh, Ipswich, IP7 5RD, the property most likely to be severely affected by the proposal.

In the first instance, we do not believe the proposal to include the extension in the emerging Plan is sound. Consequently, should your Plan proceed as it is then it will not, in turn be sound. Our logic for this is based upon a number of different matters included within the aforementioned Preferred Options Draft (POD) as well as the Site Selection Reported dated September 2017 ('SSR') as follows:

1 – Layham Quarry has not been operational for a number of years and, so far as we are aware, there are no proposals to bring the site back into production. Given this and the fact that the operator has not chosen to develop the Site during the life of the current plan, it begs the question as to whether it is likely that the Site will be worked within the Plan period. A case in point is site P25, Overbury Hall as defined in the Minerals Local Plan 1999 which still has not been worked and, if we are able to believe what is presented to us, has a reserve of 1.2Mt (saleable). Almost 20 years after inclusion in a Plan and for all intents and purposes this deposit at Layham remains in the ground. Expanding this argument further, if the saleable and planned reserves which remain are extracted at the forecast rate of 100,000tpa (as per the Site within the SSR) then operation would have to commence now in order for the Plan to be sound.

It is not unusual for a site, even one designated in a plan, to go unworked for a long period of time. It is the strategy of some companies to secure a number of sites, however only work those for which there is demand. This does not necessarily mean that the site is undeliverable and it can still contribute to the landbank.

**Quality of the Material**

While it does state that the material within the site is finer than the previous areas of Layham Quarry, it was indicated in the site selection report that the site could be viable depending on other costs.

**Effects on Mineral Demand**

Economic downturn did have an effect on the quantity of aggregates being sold within Suffolk. While housebuilding is increasing, it is expected to increase more as housing targets are not being met. A further expected increase in house building has the potential to make this site more viable.

**Site Restoration – Use of Waste Materials**

At present the County Council does not consider that the site needs waste in order to provide an acceptable restoration. In some circumstances, in order to return the landscape to an acceptable state, inert waste (typically soils, not household or commercial waste) are required to raise the land back to

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Assessment Suffolk County Council

Page 355
order for the Site to become operational by 2030 as per the representations made in support of this proposal. As can be seen, and by making reasonable assumptions based on the information provided by the operator, it is easy to form a conclusion that the most likely outcome for the Site is that it will not be worked within the Plan period.

2 – Further doubt is cast upon the likelihood of the Site being worked by the geological information provided with the SSP at Appendix 2. In that, it is confirmed that the material contained with the Site is fundamentally finer than the traditional materials to be found at Layham. It can be seen that 57.6% of the tested material passes the 600μm sieve or, in other words, 57.6% of the material is fine sand and silt. Given this exceptionally poor quality material at the Site, it begs the question if the material will ever be exploited and it further begs the question as to how accurate the quoted and estimated reserve figure is. These uncertainties are expressed by the Quality Control Manager in the appendix to the SSR.

3 – Additionally, while the operator cites the economic downturn for failing to pursue the Site within the current Plan period, it is more likely that the geographic remoteness of the site, the poor quality material, the significant amount of investment needed to the processing plant and infrastructure and better reserves held elsewhere by the operator are reasons for the quarry being left dormant. This is in the context of all other quarries within the County being very busy, with a record number of houses being built and with a government committed to built development.

4 - The representation made by the operator is also uncertain in respect to its ability to achieve a its original level. This is not thought to be necessary at this location.

**Full resrotation details would be expected at the planning application stage.**

**Ecology and Landscape**

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (Which Includes the Area of Outstanding Natural Beauty, Special Landscape Area and County Wildlife Sites), and protected species must be submitted as part of any planning application for the site. The County Council are aware of a number of priority species and priority habitats with the potential to be impacted however, at this stage it is expected that appropriate mitigation can be provided.

**Health and Amenity of Nearby Residents**

It is expected that mitigation measures can be put in place to ensure the amenity of nearby residents and businesses are not harmed. Vegetated earth bunds are standard mitigation at sand and gravel quarries, to reduce visual impact and attenuate noise and dust. It is also expected an additional stand-of will be required of this site. Full details of mitigation...
satisfactory restoration which is at odds with the view held by Suffolk CC. The operator states that an unspecified type of waste may need to be imported to achieve restoration but Suffolk CC state that no waste will be needed. How can this be a sound basis for planning if the operator is not sure what it needs to do and the planning authority holds a different view anyway?

5- An exceptional amount of land is required for areas of proposed environmental mitigation to make the development acceptable yet it is not stated what this may be. Bearing in mind its obvious importance, it cannot be sound to simply state that such an amount of mitigation will be required and then not know what that may be or the impacts of that mitigation on the environment. This is especially relevant to the SPA and the AONB, not to mention our property and our enjoyment of it.

On the basis of all of the above, we are of the opinion that the approach being taken in respect of this Site is not sound and the reality of the matter is that the material is of insufficient quality, is geographically removed from the market, there are uncertainties as to restoration and unknown and potentially material impacts on the environment which have not been considered in sufficient detail. Notwithstanding the above, if the Site is to be worked, then we believe that there are several issues which need to addressed in the form of planning conditions and other actions to protect our property and our enjoyment of it from the proposed extension of Layham Quarry.
A) In addition to earth bunds, advance planting of trees and hedges will be required in the standoff buffer area to protect the outlook from our property and to help protect the property from noise, dust and visual pollution and intrusion. To have any realistic chance of being sufficiently established to have an impact that planting realistically needs to take place now, or in any event, at least 10 years in advance of any development of the Site.

B) The draft plan refers to the creation of earth bunds as barriers as part of the noise mitigation measures. These bunds need to be at least 3 metres and possibly 5 metres in height.

C) All vehicles visiting the Site should be required to be fitted with white noise reversing alarms which respond to the environment. This must apply to vehicles used by all sub-contractors as well as the operator.

D) The Site Selection Report includes a plan showing that the operator intends to work the Site in two phases – the first from north to south and the second from west to east. The entire Site should be worked from north to south so that the operator’s (or its sub-contractor’s) equipment is hidden by the topography.

E) The separation distance from our property to the extraction area as shown in the draft plan is inadequate and should be extended on both affected sides of our property to no less than 150 metres.
F) We can see no justification for working the Site at a weekend or on a bank holiday. This should be forbidden.

G) To ensure our property is fully protected from air pollution, air quality modelling for the full range of particulate emissions arising from the Site during the life of the development must be carried out and assessed for compliance with all relevant regulations with appropriate mitigation being implemented.

H) Access to the Site should only be permitted through the existing access arrangements to Layham Quarry.

I) The washing, grading and processing of aggregates extracted from the Site should only be permitted in the location of the existing plant and infrastructure at Layham Quarry and no new facilities of this nature shall be established on the Site.

J) The draft plan refers to the potential for impacts upon nature conservation and underestimates substantially the number of species likely to be affected and makes no mention of the impact on plants. We are aware of the presence of dormice and stag beetle within the Site and, consequently, we question how much the presence of these species will affect the operator’s ability to work in any event.

We therefore submit that the proposed extension of Layham Quarry is excluded as a preferred site for minerals extraction from the Suffolk Minerals and Waste Local Plan. If it is included, however, we...
| E/154 | Alison Collins, Natural England | The proposed extension is situated about 380m from Dedham Vale AONB which means that it is in the ‘setting’ of the protected landscape. Consideration will need to be given to the landscape and visual impact of the proposal. We expect that the landscape design of the restored quarry will be in keeping with the local landscape character. | The County Council also expects any restoration to be in keeping with local landscape character. Full details of a restoration must be submitted with any planning application on this site. **Proposed changes:** Add reference to the nearby AONB. |
| E/108 | Charlie Christensen, The Environment Agency | We would like to see the ditches and accompanying hedgerows retained around this extension if at all possible as a connected wildlife and landscape network, or replaced with an adequate network of at least similar quality and quantity in mitigation of any loss. | The County Council also has the expectation that hedgerows will either be retained or that adequate mitigation can be provided. |
| E116 | Fiona Cairns, Suffolk Preservation Society | **Designated landscapes - AONBs**

Layham and Tattingstone sites

The proposed site allocations at Layham and Tattingstone are considered to be within the setting of AONB landscapes. Layham Quarry is within the setting of the Dedham Vale Area of Outstanding Natural Beauty and any proposal for expansion of minerals extraction at this site will need to be accompanied by an assessment of the likely impact of the development on the AONB. Consideration of the potential impact of the Tattingstone site on the setting of the Suffolk Coast & Heaths AONB is also required. | The County Council acknowledges that the extension at Layham is within the setting of the AONB and the county council expects any application that comes forward for this site to be accompanied by an assessment of the likely landscape impacts, as well as a detailed plan of appropriate avoidance or mitigation measures. The advice of the County Archaeologist is preferred. **Proposed changes:** Add reference to the nearby AONB. |
**Archaeology**

Layham (para. 12.9), the archaeological evaluation should be undertaken pre-consent. It cannot be assumed that the area to the north already investigated, referred to as 'low density and low complexity later prehistoric activity', is necessarily representative of any archaeological remains in the proposed large southern extension, which could be quite different in character and significance.

<table>
<thead>
<tr>
<th>E/78</th>
<th>James Meyer, Suffolk Wildlife Trust</th>
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<tr>
<td>Layham</td>
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We note that this site was previously included in the Suffolk Minerals Specific Site Allocations DPD, we also note the conclusions of the ecology section relating to this site (section 12.10).
As recognised in the draft Local Plan, the site has high potential to support hazel dormice (a European protected species) along with other protected and/or UK Priority species, including stag beetle and skylark.
Extraction activities in this location could therefore have an adverse impact on such species, and they may also impact on the UK Priority habitats around the site (in particular hedgerows). Given the potential adverse impacts on species and habitats which could arise from the proposed development it is important that assessments are undertaken to determine these likely impacts. Sites should not be allocated which would result in an adverse impact on these, or other, designated sites, or on protected or Priority species. Should it be determined that extraction in this location is acceptable it must be ensured that any

**Ecology and Landscape**

Ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations, and protected species must be submitted as part of any planning application for the site. The County Council are aware of a number of priority species and priority habitats with the potential to be impacted however, at this stage it is expected that appropriate mitigation can be provided.

Policy MP 7 of the plan gives preference to proposed sites which have restoration schemes that incorporate biodiversity net gain.
<table>
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<tr>
<th>E/87</th>
<th>Chris Hemmingsley, Brett</th>
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| Layham Hydrology - The sustainability appraisal notes that there is a negative impact within SPZ 3. We confirm that Layham Quarry is in a SPZ 3 or total catchment SPZ. The Environment agency has no definitive restriction on mineral extraction in SPZ3 designations.
Landscape - A negative impact as site within SLA and 300m to south east lies Dedham Vale AONB. Our specialist Landscape consultants have undertaken a baseline landscape character appraisal for the site and indicated the proposed site extension fall within a character area known as Ancient Rolling Farmlands. Our consultants confirm that no differing character areas are affected and therefore the outline restoration to agriculture is considered an appropriate outcome.
It is concluded that with appropriate, and site specific, restoration details there are no reasons relating to the consideration of effects upon landscape character why the mineral extraction processes would cause any lasting adverse effects.
Biodiversity - It has been raised that there will be a negative impact potential on County Wildlife Site. As the extension is across arable land it is considered that impacts can be suitably mitigated through appropriate stand-off/buffer zones which can be determined at the detailed planning stage. |
| Noted |

Site allocation policy secures all necessary ecological mitigation and compensation measures. Also, any site restoration plan must maximise the site's value for the UK Priority habitats and protected and UK Priority species recorded in the area.
15.4.1 Layham Landscape 12.7 “The resource is shallow and is capable of effective a sensitive mitigation without fill in this Special Landscape Area which is within the setting of “
This item is incomplete in the consultation documents. Layham Quarry is within the setting of the Dedham Vale Area of Outstanding Natural Beauty. We advise that any proposal for expansion of minerals extraction at this site will need to be accompanied by an assessment of the likely impact of the development on the Dedham Vale AONB. It would be useful to distinguish between the AONB boundary and Special Landscape Area boundary on the submitted plan.

Proposed changes:
Add reference to the nearby AONB.

11. TATTINGSTONE

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<thead>
<tr>
<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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<tbody>
<tr>
<td>SM/4</td>
<td>Peta Jessemey</td>
<td>The operators of the Tattingstone site do not adhere to current rules and laws regarding noise, limited road usage, speed limits or operation times. Any increase in site use will exacerbate these issues without benefiting the wider community.</td>
<td>Past Performance of Operator The County Council cannot take into consideration past performance of a site operator when considering potential use for land in an in principle document. This is because planning permissions (if granted) are applied to the land rather than individuals or organisations that apply for permission. However additional planning conditions could</td>
</tr>
<tr>
<td>SM/46</td>
<td>Stella Morland-Pearce</td>
<td>Minerals and Waste Local Plan 2017 Based on the waste hierarchy under the National Waste Management Plan for England, a key objective of government policy is to reduce the level of waste going to landfill. According to the waste management hierarchy, landflling is the least preferable option and should be limited to the necessary minimum. Where waste needs to be landfilled, it must be sent to landfills which comply with the requirements of Directive 1999/31/EC on the landfill of waste. Landfill or incineration without energy recovery should usually be the last resort for waste, particularly biodegradable waste. Best Practicable Environmental Option (BPEO) is a systematic and consultative decision-making procedure which emphasises the protection and conservation of the environment across land, air and water. The BPEO procedure establishes the option that provides the most benefits or the least damage to the environment as a whole, at acceptable cost, in the long term as well as in the short term. Principle objections • Noise and vibration • level of disturbance associated with primary resource extraction. • Air quality • Acoustic • Light pollution • Pollution • litter. This can be spread from poorly sheeted vehicles or purely from the surface of the landfill when windy. • Flood risk • Impact on historic site • This is a very anciently-settled area, with a be placed on extensions to help deal with existing issues, such as noise.</td>
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Waste Management
The proposed site extension will use inert soil waste as part of the site restoration and the current waste uses on the existing site (dry non-reactive hazardous waste landfill) will not be expanding beyond their current planning permission as part of this plan. The Suffolk Waste Survey, which is part of the plan evidence, shows that Suffolk currently has capacity for landfill to last until the end of the plan period.

Noise Pollution
Earth bunds with vegetation will be required around the boundaries of extraction areas, however additional standoff areas may also be required in order to reduce noise to within acceptable levels. A detailed noise assessment is required as part of any planning application for this site.

Air Quality
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust suppression measures. There currently a band of trees, which will be
substantial Neolithic ritual enclosure at Freston which is likely to be in the region of 5,000 years old.

- Mixed woodland with glades. Species include ancient woodland indicator species.
- Ancient oak woodland with hazel understorey. Some coppiced sections. Lime and hornbeam. A drainage ditch/stream runs through the middle of the site.

Ecology

- Habitats Regulation Assessment (referred to as an Appropriate Assessment) which is a requirement of the Habitats Directive on plans or projects affecting specific protected wildlife sites, referred to as 'European Wildlife Sites'. This requires an assessment process for any land use plan which may have an effect on a Special Protection Area (SPA), Special Area of Conservation (SAC)
- Concerns relating to the impacts on biodiversity associated with extraction
- The very act of building access roads for exploration purposes brings significant risks to biodiversity
- Contaminated land
- Soil erosion arising from the loosening of soil structure caused by digging and clearance of vegetation.
- The environmental impacts associated with raw material may include:
  - England’s historical sites require protection from damage and development.
  - General loss of biodiversity: reduction in habitats and species
  - Habitat loss and degeneration;
  - Emissions from facilities (in particular to air, water and soil) can also have a negative effect on local biodiversity and habitats.
  - Species disturbance and displacement;
  - Land clearance;
  - Hydraulic disruptions (alteration of retained and extended which will help to establish a barrier.

Light pollution

The way the site is lit would be decided at the planning application stage. Forms of lighting exist that minimise light pollution and the impact this can have on wildlife and amenity. These forms of lighting can be enforced by planning conditions, if planning permission were to be granted.

Water and Floods

There is no significant risk of flooding on this site, however the operator must be mindful of the watercourse which runs through the site.

Archaeology

The County Council recognises the archaeological of the site, with Roman and Medieval finds in the area recorded in the County Historic Environment record. Prior to the granting of planning permission an archaeological field evaluation will be required.

Ecology and Landscape

A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations, and protected species must be submitted as part of any planning application
hydrology/hydrogeology conditions);  o Changes in water quality;  o Habitat changes that may promote invasive species colonisation;  o Noise and vibration;  o Movement-related disturbances;  o Dust;  o Landslides and collapses  o The landtake resulting from the construction of a facility (see Section 10.8 for more information) could also impact negatively on soils, by reducing soil biodiversity, and contributing to other impacts such as reducing potential for soil water storage, thus increasing run-off.  o Loss of biodiversity;  o Loss of landscape and recreational value;  o The very act of building access roads for exploration purposes brings significant risks to biodiversity, as the raised expectations of potential large-scale benefits often trigger rapid in-migration.  o Loss of palaeoecological and archaeological value; and  o Increased carbon emissions and loss of carbon reservoirs

for the site. The County Council are aware of a number of priority species and priority habitats with the potential to be impacted, as well as the Special Landscape Area the site sits in, however at this stage it is expected that appropriate mitigation can be provided. Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time.

Archaeology
The County Council recognises the archaeological of the site, with Roman and Medieval finds in the area recorded in the County Historic Environment record. Prior to the granting of planning permission an archaeological field evaluation will be required to allow from preservation in situ where appropriate.

Climate Change
Policy GP 2 of the plan sets out how proposals should deal with climate change issues, including emissions. Sites should be planned to minimise emissions of carbon dioxide and methane. Sustainable travel plans may also need to be included in proposals where appropriate.
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<tr>
<th>SM/126</th>
<th>Jonathan Worsley, PDE Consulting Ltd</th>
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<tr>
<td><strong>Shotley Holdings, Folly Farm – Extraction and Inert Waste Disposal Extension</strong></td>
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<td>With reference to the above, we at PDE Consulting are writing to you on behalf of our client Shotley Holdings Limited and specifically in regard to their existing operations at Folly Farm.</td>
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<td>Firstly, we are writing in support of the inclusion of the extension to Folly Farm within the Local Plan for the purposes of mineral extraction and subsequent restoration.</td>
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<tr>
<td><strong>Suffolk Minerals &amp; Waste Local Plan, Preferred Options Consultation, December 2017</strong></td>
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<tr>
<td>Shotley Holdings, Folly Farm – Extraction and Inert Waste Disposal Extension</td>
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<tr>
<td>We are writing to object to the failure of including the permanent retention of waste management operations undertaken by our client within the Local Plan, specifically the permanent receipt and treatment of wastes together with all the necessary ancillary infrastructure.</td>
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<td>While there is clear national planning policy support that would seek to safeguard this activity Suffolk Currently the waste management operation is ancillary to the mineals extraction a the waste is being used as part of the site resotoration. The County Council does not believe this development in the open countrysidewould be acceptable independent of the mineral extraction</td>
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have, as a county including District Councils, strong precedent for granting permanent waste management facilities on sites which have countryside designations.

We have undertaken a limited trawl of activities within the county which fit these designations which I discuss below:

**Shotley Holdings – Folly Farm, Tattingstone**

On 30 April 1999 Babergh District Council granted planning permission (reference B/99/00313/FUL) for the ‘continued use of agricultural buildings for the storage and maintenance of vehicles and skips (in association with waste collection and re-cycling business). Change of use of agricultural buildings to B1 business use and retention of aggregate storage bays’ etc etc. This is not a time limited consent and the land in question currently has planning policies which support a Special Landscape Area designation, despite the earlier grant of this consent.

**Shotley Holdings – Hollow Road Farm, Bury St Edmunds**

On 19 February 2001 Suffolk County Council granted planning permission (reference SE/00/3307/P) for ‘change of use of contractors depot to waste transfer site for dry, inert and commercial wastes, including the temporary storage
of bonded asbestos waste in skips, and the crushing, grading and screening of hardcore and concrete’ etc etc. This is not a time limited consent and the land in question currently has planning policies which support countryside designations, despite the earlier grant of this consent.

Steve Lumley Planning – Hollow Road Farm, Bury St Edmunds

Minerals and Waste Local Plan 2017

On 20 October 2015 Suffolk County Council granted planning permission (reference SE/15/1538/CMW) for ‘rationalisation of land through the demolition and reorganisation of a number of buildings, the extension to a workshop and the change of use of land to allow the relocation of a recycling facility and the distribution of aggregates’. This is not a time limited consent and the land in question currently has planning policies which support countryside designations. The consent follows on from a number of earlier ones granted by St Edmundsbury Borough Council.

Culford Waste – Balloon Barn Farm, Culford

On 12 May 2015 Suffolk County Council granted planning permission (reference SE/15/0257) for an ‘extension to existing waste transfer station’. This is not a time limited consent and the land in question currently has planning policies which support
countryside designations as well as it being located within an SPA. The consent follows on from a number of earlier ones granted by Suffolk County Council for an adjacent site and it allowed a significant extension to an already extensive series of waste management activities.

TD & AM Bugg – Harpers Hill Farm, Nayland

I do not know the date of the consent but Suffolk County Council granted planning permission (reference SCC/0178/16B) for the ‘change of use of land for the storage of empty skips and skip lorry parking’ following submission of a planning application dated 26 July 2016.

This is not a time limited consent and the land in question currently has planning policies which support countryside designations as well as it being located within the Dedham Vale AONB. The consent follows on from a number of earlier ones granted by Suffolk County Council for an adjacent site and it allowed a significant extension to an already extensive series of waste management activities.

As previously mentioned, this has not been a definitive trawl of consents within the County but I think it is sufficiently robust as to support our contentions for the site as advanced by us to be formally recognised in policy terms and this may be achieved by an appropriate designation within your emerging planning policies. Further, Folly Farm has
<table>
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<th>SM/181</th>
<th>Jane Connell-Smith – Clerk, Tattingstone Parish Council</th>
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<tbody>
<tr>
<td><strong>SMWLP, Responses to Preferred Options Consultation, March 2018</strong></td>
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<td>to my knowledge greater strategic value to the County as it is the only site capable of accepting and treating asbestos waste. It may be that it is the only one in the region which can do this as the only other operation which can accept this waste stream for a temporary period is at Hollow Road Farm.</td>
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<td>It may be that the area over which we have sought to achieve an appropriate policy designation is too extensive and that this may not sit comfortably with you, to this end we have considered a smaller area, specifically concentrating on the areas where waste is physically received and treated. You should receive a formal letter with a drawing of this proposed smaller area soon, Drawing Reference M14.209(c).D.001.</td>
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<tr>
<td></td>
<td>Tattingstone Parish Council are commenting on the site at Tattingstone which Shotley Holdings Ltd has applied to be included in the Plan. The Council objects to the proposed plan as the site comes very close to village houses on the A137. Already residents in this area of the village are greatly troubled by the noise, dust [prevailing wind from direction of workings] and the heavy vehicles from the site using the A137 which runs in front of their properties. Extraction of minerals which take the workings even closer to their homes would make this even worse. Although a bund and tree planting is promised to shield the area proposed, bunds in the past have not alleviated the noise problems. It would</td>
</tr>
<tr>
<td></td>
<td><strong>Visual Impact</strong> Earth bunds, planted with vegetation and a standoff should provide appropriate screening to mitigate the visual impact. This mitigation will also be implemented for the plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with restoration required as one part becomes exhausted and a new part is started.</td>
</tr>
<tr>
<td></td>
<td><strong>Noise Pollution</strong> Earth bunds with vegetation will be required around the boundaries of extraction areas, however additional standoff areas may also be required in order to reduce noise to within acceptable levels. A detailed noise</td>
</tr>
<tr>
<td>SM/207</td>
<td>Ms J Chambers</td>
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<tr>
<td>--------</td>
<td>---------------</td>
</tr>
<tr>
<td>I wish to object to the proposed extension of Collins mineral mining area at Folly Farm, Tattingstone. As a resident on The Heath, my house backs onto the present site and the proposed new site is going to be uncomfortably close to my property. Apart from the fact that this is likely to seriously depreciate the value of my house, the already constant noise is only going to increase and become even louder. No amount of bunding is going to dull the noise of working machinery and movement of lorries when in such close proximity. Of all the proposed sites, this is the only one so close to a residential area and therefore I firmly believe should not be allowed to go ahead.</td>
<td></td>
</tr>
</tbody>
</table>

| SMWLP, Responses to Preferred Options Consultation, March 2018 |
| Assessment Suffolk County Council |

screen the workings from sight. However these have to be built and residents fear that this also would cause unacceptable noise pollution. Council Members visited the site and talked with both the owner and with residents. Although the site is well run and adheres to current planning regulations the Council voted to object to this application on the above grounds.

**Air Quality**

Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust suppression measures.

**Proposed changes:**

*Reduce area of site by pulling in the eastern boundary of the site.*

**Amenity of Nearby Residents**

It is expected that mitigation measures can be put in place to ensure the amenity of nearby residents and businesses are not harmed. Vegetated earth bunds are standard mitigation at sand and gravel quarries, to reduce visual impact and attenuate noise and dust. It is also expected an additional stand-off will be required of this site, which will increase the distance of the extension from nearby properties.

**Property Values**

Property values are not a planning consideration.
<table>
<thead>
<tr>
<th>E/46</th>
<th>Billy Richmond – Shotley Holdings Ltd</th>
<th>Firstly, I apologise for being a little slow in responding a note of appreciation to you and your team for putting on the road show last week. We held the site meeting as planned. In terms of feedback, I was heartened that there were no new issues that emerged other those you might predict. I think the control elements that I would set out in a planning permission some way to soften such implications. I enclose a letter that has been distributed to households this week. (see attachment)</th>
<th>Noted</th>
</tr>
</thead>
</table>
| E/75 | Janet Ward | I wish to make the following comments on the above proposed site. This site is very close to the residential properties on The Heath (the A137). We already have a very busy landfill on this site which creates noise all day long from 6am to 6pm. Bunding and screening have been put in place but this does not completely alleviate all the noise because of a prevailing westerly wind. Dozens of heavy lorries use this site every day travelling along the A137 and any more movements would be completely unacceptable. The proposed site would be closer to the properties on the A137 and on these grounds I wish to object to this proposal. | Noise Pollution
Earth bunds with vegetation will be required around the boundaries of extraction areas, however additional standoff areas may also be required in order to reduce noise to within acceptable levels. There is an existing band of trees which provides an established barrier, which is likely to be extended to screen the whole site. A detailed noise assessment is required as part of any planning application for this site.

Lorry Movements
Lorry movements from this quarry are expected to be similar to the current level of lorry movements. |
| M/3 | Peter Drane | The site at Tattingstone seems very reasonable as long as there is sufficient tree and hedge planting outside the bund to reduce the noise as much as possible. The prevailing wind tends to be mainly from the south west which tends to make any noise effect to Tattingstone Heath area more than anywhere else. |
| M/26 | Jonathan Worsley, PDE Consulting Limited | **Suffolk Minerals and Waste Local Plan, Preferred Options Consultation, December 2017 Shotley Holdings, Folly Farm – Extraction and Inert Waste Disposal Extension**  
With reference to the above, we are writing to you on behalf of our client Shotley Holdings Limited and specifically in regard to their existing operations at Folly Farm. Firstly, we are writing in support of the inclusion of the extension to Folly Farm within the Local Plan, Drawing Reference M14.209(b).D.002, for the purposes of mineral extraction and subsequent restoration. Secondly, we are writing to object to the failure of including the permanent retention of waste management operations undertaken by our client within the Local Plan, specifically the permanent receipt and treatment of wastes together with all the necessary ancillary infrastructure. While there is clear national planning policy support that would seek to safeguard this activity Suffolk have, as a county, including District Councils, strong | **Noise Pollution**  
Earth bunds with vegetation will be required around the boundaries of extraction areas, however additional standoff areas may also be required in order to reduce noise to within acceptable levels. There is an existing band of trees which provides an established barrier, which is likely to be extended to screen the whole site. A detailed noise assessment is required as part of any planning application for this site.  
Support is noted. Currently the waste management operation is ancillary to the minerals extraction and the waste is being used as part of the site restoration. The County Council does not believe this development in the open countryside would be acceptable independent of the mineral extraction. |
precedent for granting permanent waste management facilities on sites which have countryside designations.

We have undertaken a limited trawl of activities within the county which fit these designations which I discuss below:

**Shotley Holdings – Folly Farm, Tattingstone**

On 30 April 1999 Babergh District Council granted planning permission (reference B/99/00313/FUL) for the ‘continued use of agricultural buildings for the storage and maintenance of vehicles and skips (in association with waste collection and recycling business). Change of use of agricultural buildings to B1 business use and retention of aggregate storage bays’ etc etc. This is not a time limited consent and the land in question currently has planning policies which support a Special Landscape Area designation, despite the earlier grant of this consent.

**Shotley Holdings -Hollow Road Farm, Bury St Edmunds**

On 19 February 2001 Suffolk County Council granted planning permission (reference SE/00/3307/P) for ‘change of use of contractors depot to waste transfer site for dry, inert and commercial wastes, including the temporary storage of bonded asbestos waste in skips, and the crushing, grading and screening of hardcore and concrete’ etc etc. This is not a time limited consent and the land in question currently has planning policies which support countryside designations, despite the earlier grant of this consent.

**Steve Lumley Planing – Hollow Road Farm, Bury St Edmunds**
On 20 October 2015 Suffolk County Council granted planning permission (reference SE/15/1538/CMW) for 'rationalisation of the land through demolition and reorganisation of a number of buildings, the extension to a workshop and the change of use of land to allow the relocation of a recycling facility and the distribution of aggregates'. This is not a time limited consent and the land in question currently has planning policies which support countryside designations. The consent follows on from a number of earlier ones granted by St Edmundsbury Borough Council.

**Culford Waste – Balloon Barn Farm, Culford**

On 12 May 2015 Suffolk County Council granted planning permission (reference SE/15/0257) for an 'extensions to existing waste transfer station'. This is not a time limited consent and the land in question currently has planning policies which support countryside designations as well as it being located within an SPA. The consent follows on from a number of earlier once granted by Suffolk County Council for an adjacent site and it allowed a significant extension to an already extensive series of waste management activities.

**TD & AM Bugg – Harpers Hill Farm, Nayland**

I do not know the date of the consent but Suffolk County Council granted planning permission (reference SCC/0178/16B) for the 'change of use of land for the storage of empty skips and skip lorry parking’ following submission of a planning application dated 26 July 2016. This is not a time limited consent and the land in question currently has planning policies which support countryside designations as well as it being located within the Dedham Vale AONB. The consent follows on from a
number of earlier ones granted by Suffolk County Council for an adjacent site and it allowed a significant extension to an already extensive series of waste management activities.

As previously mentioned, this has not been a definitive trawl of consents with the County but I think it is sufficiently robust as to support our contentions for the site as advanced by us to be formally recognised in policy terms and this may be achieved by an appropriate designation within your emerging planning policies. Further, Folly Farm has to my knowledge greater strategic value to the County as it is the only site capable of accepting and treating asbestos water. It may be that it is the only one in the region which can do this as the only other operation which can accept this waste stream for a temporary period is at Hollow Road Farm.

It may be that the area over which we have sought to achieve an appropriate policy designation is too extensive and that this may not sit comfortably with you, to this end we have considered a smaller area, specifically concentrating on the ears where waste is physically received and treated. I have attached a drawing of this proposed similar area, Drawing Reference M14.209(c).D.001.

Should you have any queries about the above, please do not hesitate to contact me.

(see representation for map)

<table>
<thead>
<tr>
<th>W/154</th>
<th>Alison Collins, Natural England</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The proposed extension at Folly Farm is within the setting of the proposed extension to Suffolk Coast and Heaths AONB. Although any proposal for designation as AONB does not take effect until confirmed by the Secretary of State, the Natural County Council will include reference to the expansion of the Area of Outstanding Natural Beauty in the Plan with regards to the Tattingstone extension and consider this site as having potential impacts on the future</td>
</tr>
</tbody>
</table>
England Board has approved its officers’ recommendations for an extension to Suffolk Coast and Heaths AONB boundary, subject to statutory/public consultation and to submission of a legal Order to the Secretary of State for confirmation. It would therefore be reasonable for your authority to treat this fact, and the detailed technical assessments that were considered by the Board prior to its decision, as a material consideration relevant in determining the potential impact of proposed developments on the area’s special qualities. AONB area which will need to be avoided or mitigated.

**Proposed Changes**
Include reference to future AONB boundary and note that the Tattingstone expansion may need to take this into account when proposing avoidance or mitigation measures.

<table>
<thead>
<tr>
<th>E/108</th>
<th>Charlie Christensen, The Environment Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>We would like to see the ditches and accompanying hedgerows retained in and around this extension if at all possible as a connected wildlife and landscape network, or replaced with an adequate network of at least similar quality and quantity in mitigation of any loss.</td>
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<tr>
<td></td>
<td>The County Council also has the expectation that hedgerows will either be retained or that adequate mitigation can be provided.</td>
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<tr>
<td></td>
<td><strong>Proposed changes:</strong> Add text referring to compensatory hedgerow and ditches to be included.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>E116</th>
<th>Fiona Cairns, Suffolk Preservation Society</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Designated landscapes - AONBs</strong></td>
</tr>
<tr>
<td></td>
<td>Layham and Tattingstone sites</td>
</tr>
<tr>
<td></td>
<td>The proposed site allocations at Layham and Tattingstone are considered to be within the setting of AONB landscapes. Layham Quarry is within the setting of the Dedham Vale Area of Outstanding Natural Beauty and any proposal for expansion of minerals extraction at this site will need to be accompanied by an assessment of the likely impact</td>
</tr>
<tr>
<td></td>
<td>The County Council acknowledges that the extension at Tattingstone is within the setting of the AONB and the county council expects any application that comes forward for this site to be accompanied by an assessment of the likely landscape impacts, as well as a detailed plan of appropriate avoidance or mitigation measures.</td>
</tr>
<tr>
<td></td>
<td><strong>Proposed Changes</strong> Include reference to future AONB boundary and note that the Tattingstone expansion may need to take this into account.</td>
</tr>
<tr>
<td>E/72</td>
<td>The Stour &amp; Orwell Society</td>
</tr>
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<tr>
<td></td>
<td>The Stour &amp; Orwell Society</td>
</tr>
<tr>
<td></td>
<td>The Stour &amp; Orwell Society</td>
</tr>
</tbody>
</table>
|      | The Stour & Orwell Society | Visual Impact and Local Amenity
Earth bunds, planted with vegetation and a standoff should provide appropriate screening to mitigate the visual impact, air quality impact and noise. This mitigation will also be implemented for the plant machinery. Site phasing will mean that only a part of the site will be extracted at a time, with restoration required as one part becomes exhausted and a new part is started. |
|      | The Stour & Orwell Society | The sand also contributes towards the identified shortfall in provision during the Plan period to 2036. |
|      | The Stour & Orwell Society | SOS has no issue with the existing operation which lies largely away from view on the lower contours, reasonably well set back from the road and properties at Tattingstone Heath and well screened by bunds and hedges. |
|      | The Stour & Orwell Society | However, this relationship will be fundamentally disrupted if workings are allowed to climb up onto the plateau. They will be highly visible from both the road and the village in an otherwise attractive landscape, protected as a Special Landscape Area. All for 0.9Mt of low grade sand to be used for “fill”. |
|      | The Stour & Orwell Society | Moreover, this intrusion is planned to last for 23 years! 23 years to extract 0.9Mt is completely unreasonable. |
|      | The Stour & Orwell Society | The County Council needs to face up to the reality that this allocation has been promoted in order to create a hole for backfilling and that it cannot properly be considered as a planning requirement to meet the County’s minerals needs. |
| E/78 | James Meyer, Suffolk Wildlife Trust | Tattingstone
As recognised in the ecology section for this site (section 13.13), this area is known to support a range of protected and UK Priority species and habitats. As well as the species identified, hazel dormice (a European Protected Species) have also been recorded in habitats close to the site and therefore may be found in suitable habitat on the site. Given the potential adverse impacts on species and habitats which could arise from the proposed development it is important that assessments are undertaken to determine these likely impacts. Should it be determined that extraction in this location is acceptable it must be ensured that any site allocation policy secures all necessary ecological mitigation and compensation measures. Sites should not be allocated which would result in any adverse impacts on designated sites, or on protected or Priority species or habitats. It must also be ensured that should any extraction be allocated in this location, that the site restoration plan maximises the site’s value for the UK Priority habitats and protected and UK Priority species recorded in the area. | Ecology and Landscape
Ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations, and protected species must be submitted as part of any planning application for the site. The County Council are aware of a number of priority species and priority habitats with the potential to be impacted however, at this stage it is expected that appropriate mitigation can be provided.

Policy MP7 of the plan gives preference to proposed sites which have restoration schemes that incorporate biodiversity net gain. |

| E/98 | Simon Amstutz, Dedham Vale AONB & Stour Valley Project and Suffolk Coast & Heaths AONB | **15.4.2 Tattingstone**
“Landscape 13.8 Particular care is required when the removing of the established screen bunding as it could potentially open up views of the existing minerals extraction and waste landfilling and recycling operations to neighbouring properties and the wider Special Landscape Area.”
There appears to be no consideration of the potential impact on the setting of the Suffolk | Proposed changes:
Add reference to the AONB in both the landscape and ecology sections of text. |
Coast & Heaths AONB with regards to the restoration and potential extension of the quarry workings to the east.

“Ecology 13.13 There are potential impacts upon nature conservation interest including Stour & Orwell SPA, Stour Estuary SSSI, Brantham Bridge Meadows CWS, watercourses, European Protected Species (Bats), Priority Species, Priority Habitats, that need to be adequately assessed and where necessary mitigation proposed.”

12. **WANGFORD**

<table>
<thead>
<tr>
<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/6</td>
<td>Mark Blackburn</td>
<td>I live at Barnaby Green (the settlement that contains the &quot;Plough Inn&quot; on the A12). The current Quarry Trucks serving Wangford Quarry are already a blight on our lives, they speed through as fast as they can, loaded/unloaded, with no thought for people who live close to the A12. The drivers are completely inconsiderate. I also say the same for the Waste Truck drivers, once the quarries have been mined, they are also completely inconsiderate. I therefore object to the proposed development/extension of the quarry unless we receive an A12 speed limit for Barnaby Green. Something we</td>
<td>The estimated lorry movements from the site would be approximately 30 per day (15 in and 15 out), which is similar to current levels. Your objections to the site are noted.</td>
</tr>
</tbody>
</table>

Your objections to the site are noted.
(the residents) have been lobbying Suffolk Highways for, for decades!

| SM/13 | Robert Farquharson | Any disturbance of the AONB through such invasive industrial activity for commercial gain is totally reprehensible. It is such a precious habitat full of wild life, that should continued to be preserved for future generations just as it has for us in the community. | **Suffolk Coast and Heaths Area of Outstanding National Beauty**  
The National Planning Policy Framework paragraph 116 states that planning permission for major development (which includes sand and gravel extraction) within an AONB should be refused except in exceptional circumstances 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:  
- 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;  
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and  
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.  

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

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:

- the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy;
- 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;
- 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;
- processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds;
• there are no other acceptable proposed sites within the north-east area of Suffolk;
• 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;
• 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.

Ecology
The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species, priority species and priority habitats, amongst others. A scheme of ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of all relevant ecological interests must be submitted as part of any planning application for the site.

Site Restoration
| SM/14 | Alex Winterbotham | As a bird and nature lover I must strongly object to this proposed site which falls within the Suffolk Coast and Heath AONB. It would irreparably damage a delicate ecosystem of animal habitats irreparably. |

The site must be adequately restored to standards in line with the AONB and a restoration scheme must be provided as part of an application before permission can be granted on this site.

*Suffolk Coast and Heaths Area of Outstanding National Beauty*
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<table>
<thead>
<tr>
<th>SM/15</th>
<th>Heloise Winterbotham</th>
<th>Strongly object to the Wangford proposed site as it is on AONB land and it will ruin the wildlife and quiet for the whole area.</th>
</tr>
</thead>
</table>

**Site Restoration**

The site must be adequately restored to standards in line with the AONB and a restoration scheme must be provided as part of an application before permission can be granted on this site.

**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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<table>
<thead>
<tr>
<th>SM/16</th>
<th>Kirsty MacPherson</th>
<th>I strongly object to the Wangford proposed site as it’s on AONB land and will affect the wildlife as its right next to Hen reed beds.</th>
</tr>
</thead>
</table>

**Site Restoration**

The site must be adequately restored to standards in line with the AONB and a restoration scheme must be provided as part of an application before permission can be granted on this site.

**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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<th>SM/17</th>
<th>Stacey Elliott</th>
<th>Strongly object to the Wangford site as it's on AONB land, and will affect the wildlife as it's positioned right next to Hen reed beds.</th>
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</tr>
</tbody>
</table>
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- there are no other acceptable proposed sites within the north-east area of Suffolk;  
- 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;  
- 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.

Ecology
The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species, priority species and priority habitats, amongst others. A scheme of ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of all relevant ecological interests must be submitted as part of any planning application for the site.
<table>
<thead>
<tr>
<th>SM/18</th>
<th>Leah</th>
<th>I strongly object to the Wangford proposed site as it is on AONB land</th>
</tr>
</thead>
</table>

**Site Restoration**
The site must be adequately restored to standards in line with the AONB and a restoration scheme must be provided as part of an application before permission can be granted on this site.

**Suffolk Coast and Heaths Area of Outstanding National Beauty**
The National Planning Policy Framework paragraph 116 states that planning permission for major development (which includes sand and gravel extraction) within an AONB should be refused except in exceptional circumstances 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:

- 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;
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NPPF paragraph 144 states that when determining planning applications local authorities should as far as practicable provide for minerals from outside of AONBs.

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:

- the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy;
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| SM/19 | Jonathan Minter | **Site Restoration**  
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- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. |

Re Wangford Lime Kiln Farm - It is unthinkable that any such proposal should be considered within an AONB. On a recent visit I counted in excess of 40 curlew in a nearby meadow. We used to have curlew here where I farm (within the Dedham Vale AONB). The Northern Gateway development in Colchester has resulted in a devastating loss of wildlife, particularly endangered species. This plan is mad, mad, mad! |
NPPF paragraph 144 states that when determining planning applications local authorities should as far as practicable provide for minerals from outside of AONBs.

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<table>
<thead>
<tr>
<th>SM/23</th>
<th>Richard Griffiths</th>
<th>Wangford Lime Kiln Farm - I do not think there should be mineral extraction in an AONB</th>
</tr>
</thead>
</table>

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<table>
<thead>
<tr>
<th>SM/44</th>
<th>Isobel Fraser</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>I don't agree with destroying an AONB site like this where rare species of birds live. This sort of development is not suitable for this area. It is important to think of the long term, not just the short term - this proposal seems very short sited and over looks the fact that this is an AONB site. Please reconsider</td>
<td></td>
</tr>
</tbody>
</table>

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**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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<table>
<thead>
<tr>
<th>SM/45</th>
<th>Laura Pirkis</th>
<th>Wangford Lime Kiln Farm</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>I don’t agree with this kind of development in an AONB, AONB should be protected.</td>
</tr>
</tbody>
</table>
NPPF paragraph 144 states that when determining planning applications local authorities should as far as practicable provide for minerals from outside of AONBs.

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<thead>
<tr>
<th>SM/47</th>
<th>M J G Fletcher</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wangford Lime Kiln Farm</td>
<td>I do not think this form of development could ever be appropriate in an Area of Outstanding Natural Beauty. Granting permission for this development would make a nonsense of designating the land as an AONB in the first place. Of the ten proposed sites in the Plan, this is the only one within an AONB. The law states that development in AONBs can only be approved in &quot;exceptional circumstances&quot;, and it cannot we do not believe it appropriate for the Council to argue &quot;exceptional circumstances&quot; in a Plan that looks forward 10 years, and already has a significant (32%) surplus of minerals built into forecast of need.</td>
</tr>
</tbody>
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**Suffolk Coast and Heaths Area of Outstanding National Beauty**
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**Surplus Mineral**
The need calculated by the County Council to ensure a land bank until 2036 is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable
sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive.

| SM/48 | Lawrence Mallinson | Wangford Lime Kiln Farm site - it is in an Area of Outstanding Natural Beauty (AONB) and is next to the Hen Reedbeds Nature Reserve and there are enough suitable alternative sites in Suffolk for its needs. | Suffolk Coast and Heaths Area of Outstanding National Beauty
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Ecology
The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species, priority species and priority habitats, amongst others. A scheme of ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of all relevant ecological interests must be submitted as
| SM/49 | Rupert Wise | Re Wangford Lime Kiln Farm - I profoundly don't agree with this type of development in an AONB |

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<table>
<thead>
<tr>
<th>SM/50</th>
<th>Caroline Wilson</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>I object most strongly to the proposal to include Wangford Lime Kiln Farm in the Plan. 1. The site is within the designated Area of Outstanding Natural Beauty. It is the only site proposed for which this is the case. AONB sites are specifically designed to be protected from this kind of development. 2. It is far too close to the Nature Reserve at the Henham Reed Beds and will have a</td>
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</tbody>
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*Suffolk Coast and Heaths Area of Outstanding National Beauty*

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deleterious affect on its wildlife 3. Its inclusion is unnecessary as the County is already forecasting a mineral surplus 4. The information provided in the consultation documents has been sufficiently erroneous to render the consultation null and void except in exceptional circumstances 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:

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Quarry Traffic
Levels of traffic generated by the quarry extension are expected to be the to the

SM/51  Andrew Deller  Wangford Lime Kiln Farm - the proposed gravel extraction would have disastrous impact on this area and bird wildlife. As well as adverse impact on traffic and quality of life for thousands of people passing into this area. Whether in tourist season of off-peak.

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Quarry Traffic
Levels of traffic generated by the quarry extension are expected to be the to the
current levels, with no additional traffic generated.

<table>
<thead>
<tr>
<th>SM/52</th>
<th>Lord and Lady Derwent</th>
<th>Wangford lime kiln farm</th>
<th>Objection to Wangford site noted</th>
</tr>
</thead>
</table>
| SM/53 | Lord and Lady Derwent | Wangford lime kiln farm. Strong objection to the proposal for a particularly damaging gravel extraction in an area which is not only an AONB but an important area for birds especially curlews. This part of Suffolk is important for tourism and this development would greatly deter visitors. | **Suffolk Coast and Heaths Area of Outstanding National Beauty**
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| SM/54  | Amy Wren  | WANGFORD LIME KILN FARM – I object most strongly to the proposal to include this area in the Plan. This proposed development in an area of outstanding natural beauty (AONB). To develop this land would not only be totally inappropriate and unsuitable (the size of the site alone is unnecessarily vast), but also incredibly short-sighted and very damaging. Development in AONB should only happen in exceptional circumstances. Currently there is no evidence such circumstances exist and anything about them potentially occurring in the future is pure speculation at this stage (and so cannot be sufficient to justify the exemption). What is undeniable is that the cost to wildlife and landscape will be devastating, horrific and irreversible. To summarise, my reasons for objecting to this proposal are: 1. The site is within the designated Area of Outstanding Natural Beauty. It is the only site proposed for which this is the case. AONB sites are specifically designed to be protected from this kind of development 2. It is far too close to the Nature Reserve at the Henham Reed Beds and will have a deleterious affect on its wildlife 3. Its inclusion is unnecessary as the County is already forecasting a mineral surplus 4. The information provided in the consultation documents has been sufficiently erroneous to render the consultation null and void. |

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Ecology
The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species, priority species and priority habitats, amongst others. A scheme of ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of all relevant ecological interests must be submitted as part of any planning application for the site.
### Site Restoration

The site must be adequately restored to standards in line with the AONB and a restoration scheme must be provided as part of an application before permission can be granted on this site.

### Surplus Mineral

The need calculated by the County Council to ensure a land bank until 2036 is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive.
<table>
<thead>
<tr>
<th>SM/57</th>
<th>James Boggis, Blythborough with Bulcamp and Hinton Parish Council</th>
<th>Blythburgh Parish Council supports the proposed sites in general and the one in Wangford in particular</th>
<th>Noted</th>
</tr>
</thead>
</table>
| SM/58 | Hugh Carson | I oppose the proposal. Wangford Lime Kiln Farm is situated within an AONB and it would be a dangerous precedent to threaten any such designated AONB in this way, either nearby or more generally throughout the country. I understand that the county already extracts over 30% more gravel than required by Government. | Suffolk Coast and Heaths Area of Outstanding National Beauty  
The National Planning Policy Framework paragraph 116 states that planning permission for major development (which includes sand and gravel extraction) within an AONB should be refused except in exceptional circumstances 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:  
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- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. |
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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:

- the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy;
- 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;
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**Site Restoration**
The site must be adequately restored to standards in line with the AONB and a restoration scheme must be provided as part of an application before permission can be granted on this site.

**Quantity to Extract Over the Plan Period**

Based on average annual sale figures over 10 years until 31st December 2016, which is 1.158 million per year, and the permitted sand and gravel land bank, which is 12.747 million tonnes as of 31st December 2016, current permitted reserves of sand and gravel are expected to last until 31st December 2027. However, as the plan period lasts until 31st December 2036, so there is a shortfall of 9 years supply, or approximately 10.422 million tonnes. The County Council needs to identify sites which will ensure a land bank until the end of the plan period. So, while there are sand and gravel quarries currently operating through Suffolk, more sites need to be identified.

| SM/59 | Gillian Harrison | Wangford/Reydon Proposal | I am very dismayed to hear that there is a proposal to extract gravel from an Area of Outstanding Natural Beauty. We visit the Hen Reed beds regularly, and it is a very 'special resource and adds to the attractiveness and character of Southwold for outside visitors. If there are other sites which are being considered, and the need is not urgent at present, it would

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**Suffolk Coast and Heaths Area of Outstanding National Beauty**

The National Planning Policy Framework paragraph 116 states that planning permission for major development (which includes sand and gravel extraction) within an AONB should be refused.
seem a mistake to destroy an environment which is so important to the natural world.

except in exceptional circumstances 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:

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<thead>
<tr>
<th>SM/60</th>
<th>S Laing</th>
<th>Wangford Lime Kiln Farm: I believe that Areas of Outstanding Natural Beauty (and this is one) should be protected.</th>
</tr>
</thead>
</table>

- **Properties and ecological designations could be moderated to an acceptable extent.**

- **Ecology**
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SM/61  Thomas Van Oss  Wangford Lime Kiln Farm  I object to this proposal because I feel very strongly that no mineral development should take place in an AONB. AONBs are set up to delineate where natural beauty should be protected. Please, please don't let this site be spoiled for years and years. Thank you.

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Duplicate of SM/61

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<thead>
<tr>
<th>SM/63</th>
<th>Jack Boyer</th>
</tr>
</thead>
<tbody>
<tr>
<td>re Wangford Lime Kiln Farm: I strongly object to AONB sites being made available for gravel extraction and/or commercial exploitation. WLKF lies in an area of particular sensitivity for migrating birdlife and should be preserved intact.</td>
<td>The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species, priority species and priority habitats, amongst others. A scheme of ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of all relevant ecological interests must be submitted as part of any planning application for the site.</td>
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### Site Restoration
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<tr>
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<th>Luke Rajah</th>
<th>Wangford Lime Kiln Farm - I object to this sort of development in an area of natural beauty.</th>
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*Suffolk Coast and Heaths Area of Outstanding National Beauty*

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<thead>
<tr>
<th>SM/65</th>
<th>Nicholas Ford</th>
<th>Wangford Lime Kiln Farm - I am highly concerned about a development on land which is used by highly endangered curlews as a winter feeding ground. In addition, I object to such a development on an AONB. I think that this proposed site would be highly detrimental to the local area and community.</th>
</tr>
</thead>
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| SM/66  | Rachel Wight  | It is madness to choose sites anywhere near our precious wildlife. The available habitats are already shrinking at a fast rate. | deposits from other quarries within the market area;  
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| SM/67 | Richard and Margaret Sax | Wangford Raydon site. I object to the inclusion of the Hen Reedbeds nature reserve part of the Suffolk Coast AONB. This is a very significant nature reserve particularly for birds and for the declining population of Curlew. In this respect it is of national importance. Once the Curlew's habitat is destroyed they will be gone for ever and future generations will miss out on a vital resource. There is no shortage of sites for gravel extraction and there is no need to destroy an AONB and a nature reserve for that reason. | ecological interests must be submitted as part of any planning application for the site. | Ecology  
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| SMWLP, Responses to Preferred Options Consultation, March 2018 |
|---|---|
| **SM/69** | John Scott |
| | Am worried about Wangford Lime Kiln Farm. Don’t like the idea of digging up an Area of Natural Beauty |

- 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.

**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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<th>SM/71</th>
<th>P.T.E. Massey</th>
</tr>
</thead>
</table>
| Wangford Lime Kiln Farm: 1. Within the Suffolk Coast & Heath AONB; 2. No 'exceptional circumstances' that warrant this development; 3. The current Plan looks forward 10 years and already has a significant (32%) surplus built in to its forecast of need; 4. No adequate local consultation, eg Reydon Parish Council not consulted; 5. Permanent damage that this development would do to the Hen Reed Beds and curlew breeding grounds. | Suffolk Coast and Heaths Area of Outstanding National Beauty
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Assessment Suffolk County Council

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Public Consultation
The ways that the County Council used to the inform the public of the consultation and consultation events were: letters to residents and businesses within 250m of the site; advertisements in the local press (East Anglian Daily Times and the Newmarket Journal), email notification to Parish Councils. Social media was also used to promote the consultation events.

Our records show that Reydon Parish Council was consulted, which is
confirmed by representation sent by the Parish Council. They were consulted at the same time as other Parish Councils and other statutory consultees.

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The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species, priority species and priority habitats, amongst others. A scheme of ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of all relevant ecological interests must be submitted as part of any planning application for the site.

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At this stage it is not expected that the development would be detrimental to the hen reed beds, however this will be
I strongly object to the proposed site of Lime Kiln Farm, as this is within an Area of Outstanding Natural Beauty, which should be preserved for future generations. It would set an extremely dangerous precedent if such areas were allowed to be used for new purposes in this way. It is the Areas of outstanding natural beauty which are a key feature in attracting so many tourists to the area, are bring much needed economic strength.

**Suffolk Coast and Heaths Area of Outstanding National Beauty**

The National Planning Policy Framework paragraph 116 states that planning permission for major development (which includes sand and gravel extraction) within an AONB should be refused except in exceptional circumstances 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:

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

- the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy;
- 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;
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- processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds;
- there are no other acceptable proposed sites within the north-east area of Suffolk;
- 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; 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.

**Site Restoration**
The site must be adequately restored to standards in line with the AONB and a restoration scheme must be provided as part of an application before permission can be granted on this site.

<table>
<thead>
<tr>
<th>SM/73</th>
<th>Mr J Nottage</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed extension known as Lime Kiln Farm to Wangford Quarry by Cemex. This proposal is located in an AONB, right beside the very successful Hen Reedbed reserve. The risks to the reserve by the extraction of gravel in this area greatly outweigh any benefit. You agree that the site is inside the Area of Outstanding Natural Beauty, but add that there is an overriding need to work the mineral. I suggest that when you build in a 32% surplus to your plans, there is no need to attack an AONB. There should be plenty of gravel available from the other sites. Please leave the Hen Reedbeds &amp; the adjoining AONB alone.</td>
<td></td>
</tr>
</tbody>
</table>

*Suffolk Coast and Heaths Area of Outstanding National Beauty*  
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- 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;

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Ecology
The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species,
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At this stage it is not expected that the development would be detrimental to the hen reed beds, however this will be determined at the planning application stage.

Surplus Mineral
The need calculated by the County Council to ensure a land bank until 2036 is 10.442 million tonnes and the current draft of the plan proposes 16.539 million tonnes. It is estimated that at least 2.9 million tonnes will not be extracted within
<table>
<thead>
<tr>
<th>SM/76</th>
<th>Mary Colwell</th>
<th>Important feeding site for wintering waders, including red listed curlews</th>
</tr>
</thead>
</table>

the plan period, based on start dates and levels of production at new sites. This leaves a safety margin of 31% which is not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive.

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| SM/77 | Hugh Williamson | The proposed site between Wangford and Reydon is in an AONB, including important wild life. Given that the whole slate of proposed sites provides for more than anticipate needs, it would be wise to delete this particular site from your list. |

**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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- any detrimental effect on the environment, the landscape and recreational opportunities, and
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SM/78 Annie Wootton
Wangford limekiln Farm in an area of outstanding beauty. Suffolk is famous for these precious areas of reed beds and important breeding grounds for some of our rarer wild waterfowl. Visitors, artists, naturalists flock to these unique places, watching, recording. We deeply need these unique places and there should be NO risk to their destruction.
<table>
<thead>
<tr>
<th>SM/79</th>
<th>P. G. Parke</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed pit for Wangford/Reydon  This abuts the Hen Reedbeds site, is in an AONB, and is not necessary. It is inconceivable that a pit of this size, with associated traffic on small rural roads and single track lanes, can be permitted in such an environmentally valuable, sensitive and supposedly protected area. Quite apart from the incalculable damage it will unnecessarily cause, even</td>
<td></td>
</tr>
</tbody>
</table>

not considered excessive when considering uncertainties in demand for sand and gravel. Planning constraints will also reduce the amount of extractable sand and gravel, such as preservation of field boundaries in sites for ecology and landscape reasons and the need to include standoffs for amenity reasons. There is also the possibility sites will be refused at the planning application stage in light of more detailed assessments. For these reasons the County Council feel the sites proposed are not excessive.

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The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species, priority species and priority habitats, amongst others. A scheme of ecological mitigation that satisfies the County
contemplating the permitting of such immediately creates a precedent, which will no doubt be invoked in future cases in this part of the County and elsewhere. It should NOT be permitted, or even contemplated.

Council, based on appropriate surveys and taking account of all relevant ecological interests must be submitted as part of any planning application for the site.

**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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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.

**Quarry Traffic**
Levels of traffic generated by the quarry extension are expected to be the to the current levels, with no additional traffic generated.

<table>
<thead>
<tr>
<th>SM/80</th>
<th>Alison McKay</th>
</tr>
</thead>
</table>
| Wangford lime kiln farm | I object most strongly to the proposal to include Wangford Lime Kiln Farm in the Plan. 1. The site is within the designated Area of Outstanding Natural Beauty. It is the only site proposed for which this is the case. AONB sites are specifically designed to be protected from this kind of development 2. It is far too close to the Nature Reserve at the Henham Reed Beds and will have a deleterious affect on its wildlife 3. Its inclusion is

*Suffolk Coast and Heaths Area of Outstanding National Beauty*
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unnecessary as the County is already forecasting a mineral surplus

4 The information provided in the consultation documents has been sufficiently erroneous to render the consultation null and void.

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:

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<table>
<thead>
<tr>
<th>SM/81</th>
<th>Nat le Roux</th>
<th>The Wangford Lime Kiln proposal is on a vast scale, within an important AONB. This is entirely unjustified when alternatives are available.</th>
</tr>
</thead>
</table>

could be moderated to an acceptable extent.

**Ecology**

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SM/82  Andrew Fuller  Area used for wintering of rare wading and other birds.  Ecology  The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species, priority species and priority habitats, amongst others. A scheme of ecological
| SM/83 | Andy Smedley | I understand that there are plans to put a 70 acre quarry on Wangfors Lime Kiln fields next to a bird reserve in an AONB. These fields are used by curlews, hedgerow birds with bitterns close by and any development, particularly of this sort is not acceptable in such a sensitive location. | mitigation that satisfies the County Council, based on appropriate surveys and taking account of all relevant ecological interests must be submitted as part of any planning application for the site. Possible conditions on planning permission (if granted) are to restore the site to a suitable condition that it can be used by stone curlew, or only extracting outside of the stone curlew nesting season. Site phasing, which means that only a smaller section of the site is worked at a time, before being restored, will also help to minimise the impact on stone curlew as well as other wildlife and the landscape. |

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| SM/84 | Wayne Jones | The area being proposed is an AONB and is a key nesting and site for endangered birds and other wildlife. This must be considered a priority to the importance of these species and therefore the suggested site should not go ahead. |

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Possible conditions on planning permission (if granted) are to restore the...
<table>
<thead>
<tr>
<th>SM/85</th>
<th>Paul Hegarty</th>
<th>will you leave the land fitting for an AONB after you have mined the place?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Site Restoration</td>
</tr>
<tr>
<td></td>
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<td>The site must be adequately restored to standards in line with the AONB and a restoration scheme must be provided as part of an application before permission can be granted on this site.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>SM/86</th>
<th>Sarah Jandu</th>
<th>Wangford Lime Kiln Farm: Gravel extraction will be very damaging to an Area of Outstanding Natural Beauty and both inappropriate and unnecessary in the circumstances.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Suffolk Coast and Heaths Area of Outstanding National Beauty</td>
</tr>
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<table>
<thead>
<tr>
<th>Reference</th>
<th>Name</th>
<th>Comment</th>
<th>Additional Information</th>
</tr>
</thead>
</table>
| SM/87     | Tim & Marylyn   | The proposed development of a gravel extraction site at Wangford Lime Kiln Farm in an ANOB sounds a very retrograde step. AONBs are very precious and should only be used in this way in truly exceptional circumstances. | The National Planning Policy Framework paragraph 116 states that planning permission for major development (which includes sand and gravel extraction) within an AONB should be refused except in exceptional circumstances 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:  
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<table>
<thead>
<tr>
<th>SM/89</th>
<th>PJ Mansfield</th>
<th>Wangford Lime Kiln Farm</th>
<th>The AONB must be protected, otherwise what is the point of having them.</th>
</tr>
</thead>
</table>

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

<table>
<thead>
<tr>
<th>SM/90</th>
<th>PJ Mansfield</th>
<th>Wangford Lime Kiln Farm. This precious area will be devastated by the noise, pollution, and traffic.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>Noise Pollution</td>
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<td>Earth bunds with vegetation will be required around the boundaries of extraction areas, however additional standoff areas may also be required in order to reduce noise to within</td>
</tr>
<tr>
<td>SM/91</td>
<td>PJ Mansfield</td>
<td>Wangford Lime Kiln Farm</td>
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|       |              |                         | **Air Quality**
|       |              |                         | Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust suppression measures. |
|       |              |                         | **Quarry Traffic**
|       |              |                         | Levels of traffic generated by the quarry extension are expected to be the to the current levels, with no additional traffic generated. |
|       |              |                         | **Ecology**
<p>|       |              |                         | The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species, priority species and priority habitats, amongst others. A scheme of ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of all relevant ecological interests must be submitted as |</p>
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<tr>
<th>SM/92</th>
<th>Ann</th>
<th>I do not agree with this kind of development on a site of outstanding natural beauty.</th>
</tr>
</thead>
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- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

At this stage it is not expected that the development would be detrimental to the fen reed beds, however this will be determined at the planning application stage.
NPPF paragraph 144 states that when determining planning applications local authorities should as far as practicable provide for minerals from outside of AONBs.

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:

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<thead>
<tr>
<th>SM/94</th>
<th>Richard Wells</th>
<th>Wangford lime kiln farm. Unbelievable that an AONB should be devastated and a red listed bird threatened by commercial development, once developed this area will not return for a generation, surely this goes against everything that we believe should be done to protect our beautiful natural countryside?</th>
</tr>
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**Suffolk Coast and Heaths Area of Outstanding National Beauty**
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| SM/95 | Francis Johnstone | Wangford Lime Kiln Farm. Developments of this kind should not take place in an area of outstanding natural beauty. | Suffolk Coast and Heaths Area of Outstanding National Beauty paragraph 116 states that planning |
permission for major development (which includes sand and gravel extraction) within an AONB should be refused except in exceptional circumstances 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:

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<table>
<thead>
<tr>
<th>SM/99</th>
<th>William Glynn</th>
<th>Wangford Lime Kiln Site and Southern Extension</th>
<th>The AONB should be protected. No detailed information is provided as to the impact of quarrying on noise, extra traffic on already congested roads, pollution, the threat to fragile wildlife species.</th>
</tr>
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**Ecology**

The County Council recognises the ecological interests of this site including the reedbed SSSI, protected species, priority species and priority habitats, amongst others. A scheme of ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of all relevant ecological interests must be submitted as part of any planning application for the site.

**Quarry Traffic**
Levels of traffic generated by the quarry extension are expected to be the to the current levels, with no additional traffic generated.

**Noise Pollution**
Earth bunds with vegetation will be required around the boundaries of extraction areas, however additional standoff areas may also be required in order to reduce noise to within acceptable levels. A detailed noise assessment is required as part of any planning application for this site.

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| SM/101 | Natasha Longman | I object to the proposal of creating a gravel extraction site on Lime Kiln Fields. It is an inappropriate site, as it is AONB land currently full of endangered birds and animals. It would destroy the landscape and it is not extenuating circumstances to do so. |

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Dear Sir/Madam

I want to raise my objections to your proposals contained within your document "Suffolk's Minerals and Waste Local Pan Preferred Options". In particular I am shocked to read that one of the proposed sites for mineral extraction and then landfill is Lime Kiln Fields. This is an area designated as one of Outstanding Natural Beauty and is home to lots of endangered Curlews, which are a 'red-listed' bird. So you seriously need to reconsider your proposals. I was also upset that you have done the bare minimum is informing local people of these proposals. This is not acceptable.

Suffolk Coast and Heaths Area of Outstanding National Beauty

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<table>
<thead>
<tr>
<th>SM/103</th>
<th>Sam Chadd</th>
</tr>
</thead>
</table>
| This is an area of outstanding natural beauty. Having actually lived in Mardle Lane for many years I know first hand what the noise of lorries and the mess caused by the plastic bags, paper and light rubbish blowing around. Our garden was always filled with mess and it was unsightly, unhealthy and frankly shocking that the | dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability; • 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. **Ecology**

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council promises to prevent this happening were never ever forfıled. It looked like a third world country!

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SM/104  Clive Tickner  

The idea of opening a new gravel pit over Lime Kiln Farm, Reydon, is completely unacceptable. This is working farmland as well as being entirely in the AONB. The rules and guidelines for protecting AONB's will have no meaning if private enterprise can ride roughshod over them for private (or even public) profit. Also, both noise and pollution will arise from proposed digging machinery and from transport vehicles, and these will be a blight on the only main road into and out from Southwold. As you know there are many other sites that are not in an AONB which must be considered as preferable. Why is it that plans for housing and this gravel pit are even allowed to be considered. No more short term thinking. Consider the needs of future people when thinking of intruding on national open spaces.

Suffolk Coast and Heaths Area of Outstanding National Beauty

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Site Afteruse
The minerals extraction area is not a
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Site Restoration
The site must be adequately restored to standards in line with the AONB and a restoration scheme must be provided as part of an application before permission can be granted on this site.

SM/106  Sue Taylor  Wangford Lime Kiln Farm. I object most strongly to this proposal because of: 1. the effect on the AONB and nature conservation, Suffolk Coast and Heaths Area of Outstanding National Beauty
especially native and migratory wildlife (such as curlews). 2. the potential effect on watercourses and the wildlife they support due to the site flooding risk, the underlying aquifer, and the consequent risk of mineral and other pollution. 3. the possible deposition over time of silt etc along the watercourses due to the run-off. 4. the failure to take account of the guidance in respect of AONBs in Paras. 114 and 116 of the National Planning Policy Framework. 5. the inadequacy of the virtually single-track road to manage the increased heavy goods traffic from the A12 to the site. 6. the disruption caused by the construction of the suggested bridge replacement on the access road from the A12; (as happened during a recent incident, traffic would have to use Hill or Mardle Roads, both completely unsuitable). 7. increased dust and pollutants affecting nearby properties and statutory habitats. 8. the cumulative impacts of the simultaneous operation of the existing quarry site, the adjacent landfill site, and the proposed new site. 9. the enormous size of the site, apparently bigger than the existing quarry and landfill combined, making it an unacceptably industrial site in that rural setting.

The County Council has taken into account national policy regarding the AONB. The National Planning Policy Framework paragraph 116 states that planning permission for major development (which includes sand and gravel extraction) within an AONB should be refused except in exceptional circumstances 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:

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Possible conditions on planning permission (if granted) are to restore the site to a suitable condition that it can be used by stone curlew, or only extracting outside of the stone curlew nesting season. Site phasing, which means that only a smaller section of the site is worked at a time, before being restored,
| Assessment Suffolk County Council | Page 521 |

will also help to minimise the impact on stone curlew as well as other wildlife and the landscape.

**Water and Floods**
The County Council is aware of the ground water flooding risk on the site and the presence of the aquifer. The site is within a Ground Water Source Protection Zone. Because of this any planning application submitted for this site will need to take account of potential ground water implications.

**Quarry Traffic**
Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated.

**Air Quality**
Potential receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.
| SM/108 | Elly Brindle | Wangford Lime Kiln Farm: I don't agree with this kind of development in an AONB, AONB should be protected. |

The site is far enough away from the statutory designated wildlife site (i.e. the RAMSAR) to be capable of mitigation.

**Cumulative Impacts**

Policy MP6 of the plan addresses issues surrounding cumulative impacts. Sites which produce cumulative impacts with other sites may be acceptable if one site follows another in sequence. Whether this is required at the Lime Kiln Farm site will be determined at the planning application stage.

**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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• the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich
| SM/109 | Deborah Bookman | Wangford Lime Kiln Farm is the relevant site. I object to this kind of development in an area of outstanding natural beauty. | deposits from other quarries within the market area;  
- processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds;  
- there are no other acceptable proposed sites within the north-east area of Suffolk;  
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