<table>
<thead>
<tr>
<th>SM/110</th>
<th>Richard and Jacqueline Fortey</th>
<th>Lime Kiln Farm site</th>
<th>Concern about the environmental impact within the AONB, on the adjoining national important Hen Reedbeds - an important habitat for wildlife - and surrounding countryside. This site lies between two others already exploited in this way, and along a quiet country lane.</th>
</tr>
</thead>
</table>
|        |                                | **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;
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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.

**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.

It is expected that the site is far enough away from the hen reed beds that adequate mitigation can be provided.

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<table>
<thead>
<tr>
<th>SM/111</th>
<th>John Holmes</th>
<th>The location is wrong for from a conservation point of view. Also gravel pits make an awful lot of noise. The traffic in the summer would be disruptive to holiday makers.</th>
</tr>
</thead>
</table>

**Ecology**
The County Council recognises the ecological interests of this site including the protected hen reedbed habitat, 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.

**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.

**Quarry Traffic**
Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated.

<table>
<thead>
<tr>
<th>SM/113</th>
<th>DS Rajan</th>
<th>Wangford Lime Kiln Farm - dont agree with development in an AONB - should be protected</th>
</tr>
</thead>
</table>

*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.
SM/114  David Douce  Destruction of the area of reed beds at Reydon (described incorrectly as Wangford in documents). This is a huge site, and one vital to the birds of the area. Given the levels of attrition of wild birds currently suffered in the UK, this is the wrong moment to be destroying such vital habitat, as well as wrecking a beautiful ANOB. The area between the A12 and Southwold deserves to be protected, and the creeping urbanisation of Southwold is bad enough without this industrial imposition.

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.

It is expected that the site is far enough away from the reed beds that adequate mitigation can be provided. No reedbeds would be damaged in the extraction of the mineral.

SM/115  Jennifer Plummer  I don’t agree with this kind of development in an AONB.

Suffolk Coast and Heaths Area of Outstanding National Beauty
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SMWLP, Responses to Preferred Options Consultation, March 2018

Assessment Suffolk County Council
Page 535

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| SM/116 | Julia Johnson | Proposed Gravel Pit near Hen Reed Beds, Reydon. As a local resident I am very concerned about the effect on a large new gravel pit 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. |

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Suffolk Coast and Heaths Area of Outstanding National Beauty
pit in an AONB. I often go the Hen Reed Beds, both alone and with my grandchildren. I value the efforts that have been made by so many conservationists over the years to provide areas for wildlife to flourish. It is not clear to me that the case for this development has been made, taking into account the impact on the wildlife and the local roads.

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At this stage it is not expected that the development would be detrimental to the hen reed beds due to the distance of the site from this habitat, however this will be determined at the planning application stage.

SM/127 Charlotte Du Cann I am objecting to the Lime Kiln Farm proposed quarry extension at Wangford. I cannot find a map of the fields you/Mexican corporation are considering layng waste to but if they are adjacent to the

Site Maps
Maps of the site are available in the Suffolk Minerals and Waste Local Plan...
existing site in Mardle Lane and beyond towards Southwold they will ruin the land as well as impact on all the creatures and plants and trees in that area. What is the point of being an AONB when you have no respect for the beauty of the land? Curlews which feed here on these fields are on the Red List. As your own site has listed: Potential impacts upon nature conservation interest including Suffolk Coast & Heaths AONB, Minsmere-Walberswick SPA, Minsmere-Walberswick Heaths & Marshes SSSI, Wangford Marshes CWS, Suffolk Coast NNR, Hen Reedbeds (SWT Site), Reydon Wood (SWT Site), Groundwater Source Protection Zone (River Wang, Wolsey’s creek, River Blyth), European Protected Species (Otters, Bats), Priority Species (Bittern, Water Vole, Barn Owl), other protected Species (Badger), Priority Habitats (REEDBEDS, Grazing Marshes) need to be adequately assessed and where necessary mitigation proposed. I am a resident and writer in nearby Reydon.


Suffolk Coast and Heaths Area of Outstanding National Beauty

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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, will also help to minimise the impact on stone curlew as well as other wildlife and the landscape.

**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/128</th>
<th>Katherine Hamilton</th>
</tr>
</thead>
</table>
| I object to the proposed site of Gravel pits at the Hen reed beds near reydon. The proposed site is on AONB land and is protected by law, tourists visit this area specifically because it is unspoilt, this project would seriously threaten the local economy. The size of the proposed gravel pits would devastate both the natural environment and habitats of this already fragile landscape. The infrastructure of roads in this area is not adequate for this type of development. | **Suffolk Coast and Heaths Area of Outstanding National Beauty**
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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, 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.

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Site phasing should minimise the impact of the operations on ecology and

| SM/129 | Adam Robertson-Young | Wangford Lime Kiln Farm. I write to object to the proposed Gravel Pit near the Hen Reed Beds, Reydon. This would impact on both tourism and the natural habitat and therefore threaten the local economy. It would destroy the beauty of the area forever and have a negative impact, |
landscape, by ensuring only part of the site is extracted at one time as other wildlife and the landscape.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

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. 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.

It is expected the site will be restored to agriculture and nature conservation, similar to its current use. Some inert waste materials (e.g. excavated soils, construction material, etc...) not
| SM/130 | Alexander Bateman | Wangford Lime Kiln Farm. The proposed site is to be developed in a very fragile ecosystem which has already been declared an ‘AONB’. There is particular concern across the community as regards to the impact this will have on an area that is known to provide a refuge to numerous species of birds. I hope the concerns of the community are raised and addressed before any work is approved for the site - however, at this stage I would strongly object to any development proposed. | Household or commercial waste) will be used in order to aid in site restoration. As the site will not be household or commercial waste landfill will be no issues with landfill related contamination, gas emissions or pests from the extension site. **Local Economy** The quarry itself does contribute to the local economy, however the potential for impacts on other aspects of the economy are recognised. For this reason the next draft of the plan will have a reduced site area. **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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Ecology and Landscape
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| SM/132 | Annabel Gault | I strongly object to the proposed gravel pit at Reydon. It is shocking that the plan was going to be pushed through without residents knowledge. This is a beautiful area of Suffolk and a unique habitat for birds. Please be responsible for protecting our wonderful landscape and reject this. |

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

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Public Consultation
The ways that the County Council used to inform residents and the wider 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
The Parish Council. Social media was also used to promote the consultation events.

Suffolk Coast and Heaths Area of Outstanding National Beauty

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### Cecily Ross

The historic home of 19th century literary legends Agnes and Susanna Strickland is just 500 metres from the site of the proposed Wangford Lime Kiln. The house, Reydon Hall, is a historic treasure. Agnes Strickland wrote a series of biographies of England’s queens. Her sister Susanna Strickland Moodie emigrated to Canada in the 1830s and wrote a bestselling book (on both sides of the Atlantic) called Roughing it in the Bush. She is also the subject of a novel, The Lost Diaries of Susanna Moodie, by Canadian author Cecily Ross published this year by HarperCollins.

### Mark Watson

Objection to the proposed new gravel pit behind Lime Kiln Farm (between Mardle Rd and Halesworth Road) in Reydon. I wholeheartedly object to this proposal. Here are some of the many reasons: This 27.7 hectare site is both a Suffolk Coasts and

### Historic Environment

It is expected that the distance between the site and historic assets and other mitigation measures such as bunds and bands of vegetation will prevent significant impact on nearby historic assets.

### Suffolk Coast and Heaths Area of Outstanding National Beauty

The National Planning Policy Framework paragraph 116 states that planning
Heaths Area of Outstanding Natural Beauty (AONB) and a feeding ground for curlews - these birds are on the red list for endangered species (those requiring urgent conservation action). It lies very close to the Hen Reedbeds, an environmentally sensitive site and refuge for wildlife and plantlife. It will harm the local environment and do damage to the AONB contrary to planning policies both local and national. It will degrade the quality and beauty of the landscape and destroy wildlife habitat, including many vital trees. It will ruin and scar the landscape of the AONB, and render an area that is now peaceful and lovely to visit both noisy and ugly. This AONB needs to remain fully protected, and the proposal for the Lime Kiln Farm gravel pit firmly rejected and removed from the Suffolk Minerals and Waste Local Plan.

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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, 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.

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.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

Field boundaries which include hedge rows and mature oak trees would need to be retained for their biodiversity and landscape value.

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.

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.
<table>
<thead>
<tr>
<th>SM/136</th>
<th>Kathy Collins</th>
<th>Wangford lime kiln site</th>
<th>Too near to important wildlife reserve Hen Reed beds</th>
<th><strong>Ecology and Landscape</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
<tr>
<td>SM/138</td>
<td>Dr Caroline Hyde</td>
<td>Wangford Site: 1. Heavy vehicles should not be allowed to access the site via either the A1095 (already a dangerous road) or Mardle Road (single track). 2. The SWT Hen reedbed reserve is a valuable habitat and the water table and aquifers upon which the reed bed depends must not be disturbed by quarrying. 3. Ideally an alternative site which is not an Area of Outstanding Natural Beauty and such a valuable habitat for rare species should be chosen for quarrying.</td>
<td><strong>Proposed Lorry Route</strong></td>
<td>The proposed lorry route is directly to the A12 via Hill Road. Lorries should not use the A1095</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Ecology and Landscape</strong></td>
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</tr>
</tbody>
</table>

**Proposed Lorry Route**

The proposed lorry route is directly to the A12 via Hill Road. Lorries should not use the A1095.
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.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

**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.

SM/139 Mrs Elizabeth Hunter Wangford Lime Kiln Farm. I do not agree with this kind of development in an AONB 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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- 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;
SMWLP, Responses to Preferred Options Consultation, March 2018

<table>
<thead>
<tr>
<th>SM/147</th>
<th>Robert Newell – Waveney and District Ramblers</th>
<th>The Waveney Ramblers object on the grounds of irreparable damage to an area of natural beauty and the damage to the byway 1627, resulting in a loss of the only walking route down to the Hen Reed Beds from the North.</th>
</tr>
</thead>
</table>

- 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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- 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. Important landscape feature such as hedgerows and mature oak trees will be retained throughout the operation of the quarry.

Public Rights of Way
The public rights of way team at Suffolk County Council were consulted and no disturbance to public rights of way were raised. We are not sure what byway 1627
<table>
<thead>
<tr>
<th>SM/148</th>
<th>Simon Meadows</th>
<th>We wish to object to the potential siting of a gravel pit near Reydon/Wangford. Our family love Southwold. We cycle on the lanes, one cannot cycle on the main road it is too dangerous, but more lorries around Wangford will make this worse. Along with our young children we have often visited the hen reed beds, a unique, quiet site that must be preserved and protected. This is an AONB and we believe the council should do everything it can to respect this.</th>
</tr>
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<tr>
<td></td>
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<td>refers to, however the County Council will be pleased to received more information if you are will to provide.</td>
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<tr>
<td></td>
<td></td>
<td>Quarry Traffic</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated.</td>
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<td>Ecology and Landscape</td>
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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 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
<table>
<thead>
<tr>
<th>SM/151</th>
<th>Mr Gerell</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objection to Proposed site at Wangford, A, Construction of the site destroying more countryside site. B, Damage that would be done to the ancient site and the wildlife that live on the area. C, Destruction of the local reed beds and local footpaths D, The use of road by large vehicles. E, The road often floods and will require redeveloping. All of the above will contribute to the destruction of the local area.</td>
<td></td>
</tr>
</tbody>
</table>

**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, 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.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of...
<table>
<thead>
<tr>
<th>SM/152</th>
<th>John Barry Waters</th>
</tr>
</thead>
<tbody>
<tr>
<td>Caller is worried the site will become a waste site. Also gas from the site will drift across premises as what even cover is put over the area the smell still pererates. Also asked if there will be a limit to the number of lorries using this site. Caller says he has worked in similar areas for 30 years so is aware of the issues. If this does become a waste site caller is worried about contamination as the area could poison the water courses even when clay lined, therefore a issue with damage to nature. Caller is also worried that if this does become a waste site this will caused debris outside of the area.</td>
<td></td>
</tr>
</tbody>
</table>

them from the site, however this will be determined at the planning application stage.

**Quarry Traffic**

Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated.

**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.

**Site Restoration and Post Extraction 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. 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. The Suffolk Waste Survey
identifies that there is sufficient landfill capacity within this plan period so the plan is not allocating any sites for this use.

**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, 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 it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

**Noise Pollution**

County Noise Consultants state that a standoff in addition to standard mitigation (such as planted earth bunds) 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.
<table>
<thead>
<tr>
<th>SM/154</th>
<th>James Forrester</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>The proposed site close to Reydon Hall on the Wangford Road at Reydon Lane would not only destroy the rural landscape, but would deplete the ground water and depreciate this magnificent historic property. The Strickland family resided here during the early 19th century and there are connections to Reydon Manor in Lakefield, Ontario CANADA which was constructed by a related member of the family.</td>
</tr>
</tbody>
</table>

**Quarry Traffic**

Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated.

**Landscape**

A restoration scheme and 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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

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. 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.

It is expected the site will be restored to agriculture and nature conservation, similar to its current use. Some inert waste materials (e.g. excavated soils, construction material, etc… not household or commercial waste) will be used in order to aid in site restoration. As the site will not be household or commercial waste landfill will be no issues with landfill related contamination, gas emissions or pests from the extension site.

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 the flood risk, underlying aquifer and Ground Water Source Protection Zone any planning application submitted for this site will need to take account of potential ground water implications.

Historic Environment
It is expected that the distance between the site and historic assets and other mitigation measures such as bunds and
SM/157  Sarah Groves

I am writing to object to the extension of the existing gravel pit site at Wangford which already is sited far too close to several important wildlife habitats and has already destroyed what was once Wangford Common. Whilst I am pleased that the two other suggested extensions have been ruled out of the plan, it is deeply worrying that the Lime Kiln Site remains a potential site. The site lies in an area of outstanding natural beauty and it is incomprehensible that this is being considered as an option for a quarry extension. It is right next to the Suffolk Wildlife Trust's Hen Reedbeds reserve. I have several objections: 1. Landscape character  The existing quarry is not only visually upsetting, it also is totally destructive to the natural habitat of the suffolk coasts and heaths. The free draining sands and gravels form a unique habitat that make this part of the Suffolk coast so appealing. Once this is removed and the natural topography reshaped, this cannot be replicated.  2. Contamination  As well as dust, vehicle fumes and noise, I am worried about water contamination. The River Wang runs close by, which is already under threat from the current quarry and the landfill site.  3. Designated wildlife sites  Wangford and Reydon are part of the Suffolk AONB and have two nationally important sites close by, the nearest is the Hen Reedbeds, which is home to otters, marsh harriers, kingfishers, bittern, bearded tits, curlews, warblers and the winter roost of thousands of starlings, all of which are threatened by shrinking habitats and land use changes. It is imperative that these habitats are preserved and that the wildlife remains undisturbed.  4. Impact on the Suffolk AONB  As outlined above, the glacial and alluvial sands and gravels create a unique landscape that makes Suffolk such an attractive area and

| bands of vegetation will prevent significant impact on nearby historic assets. |
| 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, must be submitted as part of the planning application for the site.

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 at this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

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...
one that is much cherished by visitors and residents alike. The proposed site may make money for its parent company, Cemex, but it will do nothing to promote tourism or add any meaningful value to the local economy which is largely tourism based. 5. Geology and archaeology The Westleton beds are important geologically and this unique landscape has been found to have been occupied since paleolithic times. Previous investigations following the opening of the existing quarry has revealed prehistoric, roman and medieval occupation. A quarry will permanently remove all of these fascinating deposits which can tell us so much about past environments, natural history and archaeology. Our area is incredibly important not only to its residents and visitors, but to many species. Wildlife does not have a voice, and cannot object to its destruction. It is our duty to protect what little space we have left for wildlife, and to improve its lot where we possibly can. I cannot see how a quarry can improve the environment in this area of outstanding natural beauty to say nothing of the noise, dust and traffic that will impact local residents and visitors.

stone curlew as well as other wildlife and the landscape.

5. Local Economy
The quarry itself does contribute to the local economy, however the potential for impacts on other aspects of the economy are recognised. For this reason the next draft of the plan will have a reduced site area.

6. 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.

7. Noise Pollution
County Noise Consultants state that a standoff in addition to standard mitigation (such as planted earth bunds) 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**

A restoration scheme and 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.

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.

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It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of...
| SM/160 | Richard & Denise West | Proposed New Gravel Pit In Reydon. Our objections are simple. Why would any Council/Local Authority wish to give the go ahead to a disruptive and noisy gravel pit which is located a) very close to a 55 hectare nature reserve (Hen Reedbeds), b) Close to one of the most tourist/tourism driven towns in the East of England (Southwold) which in turn relies on that tourism, second home and holiday home visitors for its income and security, c) is located in an area of outstanding and natural coast beauty and d) in an area them from the site, however this will be determined at the planning application stage.  

*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  

*Archaeology*
Any planning application submitted for this site must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork that demonstrates the impacts of extraction on archaeological remains including deposits with Palaeolithic potential. The application must also propose how these impacts will be managed.  

*Ecology and Landscape*
At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage. |
where the A12 is already over burdened with excessive traffic and heavy lorries and does not have the access roads required for the constant flow of heavy vehicles and construction plant. The placement of such a development is ill thought out, does not take into account any of the above issues and flies directly in the face of common sense, a very poor choice of actual location for the reasons stated above and negative impacts on the local people who live here (us included), countless visitors, nature lovers and bird watchers and future generations, and the environment and local species, latterly, some of which are under great threat. This proposed development should be refused on all counts.

determined at the planning application stage.

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.

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

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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• 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.

Quarry Traffic
Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic
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.

Wildlife

Disruption to current wild life and migrating birds. To sum up, the proposed plans will destroy an Area of Outstanding National Beauty.

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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- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
Natural Beauty, there is a serious risk to the health of local residents, smells and noise levels will be high which in turn will have a disastrous effect on property values.

- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

NPF 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 NPF 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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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.

Site Restoration and Use After Extraction
This site will not be used as a landfill for household or commercial waste once extraction is completed. The Suffolk Waste Survey, used as evidence in the plan, identifies that there is enough landfill capacity within Suffolk to last the duration of the plan period, so no new
Landfill sites are being identified as part of the plan. It is expected that inert wastes (e.g. waste soils and construction waste) will be used to backfill the void and aid restoration of the site, which is expected to return to agricultural use following restoration. As such there should be no issues with methane gas emissions, leachate to groundwater or smells from waste.

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.

**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**
County Noise Consultants state that a standoff in addition to standard mitigation (such as planted earth bunds) 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.

The current proposals state that the existing plant site will remain in its current location, so noise from processing of extracted materials should remain similar to current levels.

**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, must be submitted as part of the planning application for the site.

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.

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

| SM/169 | Liz Muniandy | Wangford/ Reydon - Lime Kiln: possible site for quarry | this is an area of outstanding natural beauty and it may well be the thin end of the wedge if a site like this is used for a quarry. The noise and Suffolk Coast and Heaths Area of Outstanding National Beauty |
disruption will destroy the pleasure of cycling and walking in this area as well as adversely affecting the wildlife

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;
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**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, must be submitted as part of the planning application for the site.

Site phasing should minimise the impact of the operations on ecology and
| SM/175 | Jenny Newhouse | Wangford Lime Kiln Field is a proposed over development of an ANOB which by definition states that is an area of distinctive character and natural beauty that should be preserved in the National interest. This huge site will disturb wild life, human inhabitants and tourists who visit. All use it for its tranquility and beauty and the unique quality of the habitat. The dirt, noise of lorries and digging and the extra road usage will destroy the area permanently. As is shown elsewhere the landscape can never be restored to its previous condition. There will be no new jobs, only different ones, as the tourist trade will be badly affected with a big loss of jobs. It would be more suitable to dig gravel in less important geographical and ecological sites. It is to hoped that these considerations will be taken into account when looking at the application and that it will be rejected. | landscape, by ensuring only part of the site is extracted at one time | 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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At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

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. There are good examples of quarry restorations within Suffolk: Layham quarry is a good example of an agricultural restoration and Park farm Quarry in Timworth is a good example of an ecological restoration.

Noise Pollution
County Noise Consultants state that a standoff in addition to standard mitigation (such as planted earth bunds) 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.
<table>
<thead>
<tr>
<th>Reference</th>
<th>Name</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/178</td>
<td>Marianne Ackerman</td>
<td>I strongly oppose proposed gravel pit on the Wangford Line Kiln Farm. This property is very near an historic site, the Strickland family home. You will be harming a major international historic site, risking potential tourism, and ruining a very worthy literary monument. Please resist!!</td>
</tr>
<tr>
<td>SM/187</td>
<td>Mrs Pamela Cyprien</td>
<td>Site: Lime Kiln Farm I object to this site being worked because it is further encroachment into an AONB and there is no overriding need for the mineral it contains. There are, I understand, nine other</td>
</tr>
</tbody>
</table>
sites in Suffolk, with similar grade material and which are not in an AONB. Heavy vehicles would need to cross Mardle Road which is a quiet, narrow road used by local traffic and walkers. I understand that the area would be worked in three phases over thirty years which will have an adverse impact on those who live nearby and on wildlife. I am concerned that the workings will adversely affect Hen Reed Beds.

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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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.

Other Sites Within Suffolk
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. A mentioned previously, this site material is not of a similar grade to other sites included in the plan; there is a much
higher percentage of gravel in comparison to other sites in Suffolk, which tend to contain more sand.

**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.

**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, must be submitted as part of the planning application for the site.

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.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be
| SM/189 | Andrew Eastaugh | I have a strong objection to the proposed site at Wangford which is part of the Suffolk Heritage Coast, and an area of outstanding natural beauty. It is also close to the Wren reed beds which are an important natural habitat for wildlife. Extracting gravel here would be against ecological principles and the whole purpose of creating an AONB. | determined at the planning application stage.  

**Suffolk Coast and Heaths Area of Outstanding National Beauty**  
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Wangford lime kiln site  This is a fragile AONB. The proposed scheme will threaten the countryside and wildlife for many years and a full assessment should be made of the impact of this scheme. An area that isn't in an AONB should be used for such a large and disruptive development.

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<th>SM/190</th>
<th>Ruth Pigneguy</th>
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<th>SM/191</th>
<th>John Pigneguy</th>
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<td></td>
<td>The plans to open an enormous quarry in Reydon are totally unacceptable. The proposed site is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and the plans should be rejected for that reason alone. It is also unacceptable that almost no public information was made available, and that no possibility of public consultation was allowed. In these more enlightened times regarding environmental matters in general, the plans for the Reydon quarry should be abandoned and the whole project should be publicly reconsidered.</td>
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**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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Public consultation
The full plan and supporting evidence documents were available on the County Council website since the beginning of the consultation period at https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/minerals-and-waste-local-plan-consultation/
This included the full proposal sent by the mineral extraction company, which is in the site selection report.

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), and email
| SM/192 | Pamela Morris | Wangford AONB Wildlife Site Nuisance to neighbours over a wide area: noise, dust, traffic, appearance Loss of farmland Loss of livelihoods |

notification to Parish Councils. Social media was also used to promote the consultation events

*Suffolk Coast and Heaths Area of Outstanding National Beauty*

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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, must be submitted as part of the planning application for the site.

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.
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.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

**Noise Pollution**

County Noise Consultants state that a standoff in addition to standard mitigation (such as planted earth bunds) 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.

**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**

Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated.

**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.

**Loss of Farmland and Site Restoration**
The site will be extracted in a phased manner, which will minimise the amount of land lost during extraction. Minerals extraction is a temporary land use and the County Council expects the land to be restored to an agricultural use, similar to its current use. There are good examples of site restoration throughout Suffolk, with a good agricultural example being Layham Quarry.

<table>
<thead>
<tr>
<th>SM/194</th>
<th>Sally Skinner</th>
</tr>
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<tbody>
<tr>
<td>I object to the proposal to create a quarry at Lime Kiln Farm, Reydon. This site is in an Area of Outstanding Natural Beauty and close to the nationally important Suffolk Wildlife Trust Hen Reedbeds Nature Reserve. The projected future demand for gravel is not high enough to merit ignoring all of the environmental protection that covers this important site.</td>
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<td>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</td>
</tr>
<tr>
<td>SM/195</td>
</tr>
</tbody>
</table>
| SM/197 | Mike Thompson | I strongly disagree with this kind of development in an AONB. Additionally the draft plan documents are seriously flawed:- * fields | Quarry Traffic
Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated. Mardle Lane will be crossed by quarry vehicles, but they should not travel up and down this road, which should reduce the impact on this road.

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, must be submitted as part of the planning application for the site.

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*Suffolk Coast and Heaths Area of Outstanding National Beauty*
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<td>Having appraised the proposed site within the context of the NPPF and other material considerations it was considered</td>
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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 Name**
The County Council did mean to cause confusion as to the location of the quarry extension. The reason it is called Wangford in the plan is because the quarry is called Wangford Quarry and this site is an extension to that.

| SM/200 | Geoffrey Berridge | Wangford Lime Kiln Farm | This development should not be permitted in an AONB | Suffolk Coast and Heaths Area of Outstanding National Beauty |
|--------|------------------|------------------------|-----------------------------------------------------|
|        |                  |                        | This development should not be                       |
|        |                  |                        | permitted in an AONB                                 |
|        |                  |                        | **Suffolk Coast and Heaths Area of Outstanding National Beauty** |
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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.

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Any Area of Outstanding Natural Beauty should be protected and no development should take place either in or near one if it will impact on the wildlife and environment.

Suffolk Coast and Heaths Area of Outstanding National Beauty

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**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, must be submitted as part of the planning application for the site.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the
when reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

<table>
<thead>
<tr>
<th>SM/224</th>
<th>David Cheshire</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand &amp; Gravel extraction Wangford. We were delighted when the tipping of rubbish at the site in Mardle Road ceased. Since then a new gravel extraction site has opened up opposite, we can hear the machines working from time to time. Now there is a proposal to open another large site nearer to our property, this extraction will carry on for how many years? What will happen when the gravel extraction is completed, how will this be dealt with?</td>
<td></td>
</tr>
</tbody>
</table>

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.

Lifetime of Site
The estimated lifetime of the site is 30 years, however it is important to note that the site will be extracted in phases, so only a section of the whole area is extracted at one time. This will contribute to minimising amenity effects on local residents and the environment.

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/233</th>
<th>V Weston</th>
</tr>
</thead>
<tbody>
<tr>
<td>I object to the proposal for extracting sand and gravel Wangford Lime Kilns site nr Reydon Hall owing to its impact on the countryside in an AONB area</td>
<td>It is expected the site will be restored to agriculture and nature conservation, similar to its current use. Some inert waste materials (e.g. excavated soils, construction material, etc... not household or commercial waste) will be used in order to aid in site restoration. Important landscape features such as field hedgerows and mature oaks will need to be retained as these are important ecological and landscape features.</td>
</tr>
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</table>

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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.

SM/236  Annie Jerman  Wangford Lime Kiln Farm. I don't agree with this kind of development in an AONB. These areas are precious and should be protected.

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SM/238

John and Barbara Carter

Proposed 70 acre gravel pit and waste disposal project at Lime Kiln Farm. Located near the Hen Reedbeds Nature Reserve (Suffolk Wildlife Trust), inside the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) overlooking the Blyth estuary. It is an important habitat for migratory birds such as curlews which are a threatened species. Development of the proposed site would degenerate a particularly attractive and sensitive portion of this AONB. Extracting the minerals would obviously result in noise and unhealthy and unpleasant dust being discharged into the atmosphere. When the extracted areas are then used for waste disposal, it is likely to attract pests such as rats and seagulls. When it rains dangerous chemicals, toxic liquid waste from the materials deposited could leach into the surrounding ground and water courses with detrimental effects. Toxic gasses discharging from the site could also be a health risk to local residents. Such an operation would require heavy vehicles transporting gravel from the site and at a later stage transporting waste to the site using roads which are at peak times already heavily used.

**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, must be submitted as part of the planning application for the site.

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.

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.

It is expected that features such as hedgerows and mature oak trees will be

designations could be moderated to an acceptable extent.
retained due to their biodiversity and landscape value

At this stage it is not expected that the development would be detrimental to the reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

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.

Noise Pollution
County Noise Consultants state that a standoff in addition to standard mitigation (such as planted earth bunds) 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.
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
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.

It is expected the site will be restored to agriculture and nature conservation, similar to its current use. Some inert waste materials (e.g. excavated soils, construction material, etc… not household or commercial waste) will be used in order to aid in site restoration. As the site will not be household or commercial waste landfill will be no issues with landfill related contamination, gas emissions or pests from the extension site.

Quarry Traffic
Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated.

*Suffolk Coast and Heaths Area of Outstanding National Beauty*

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<th>SM/245</th>
<th>Richard Dann</th>
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<tr>
<td></td>
<td>Wangford Lime Kiln Farm</td>
</tr>
<tr>
<td></td>
<td><strong>Ecology and Landscape</strong></td>
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It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

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| SM/246 | Ian Collins | This area of countryside is so very precious and will be all the more so as our coastline recedes and natural habitats are forced back. |

Ecology and Landscape

A restoration scheme and ecological mitigation that satisfies the County Council, based on appropriate surveys.

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and back and back. We need long-term thinking and also the greenest possible solution. Save Our Suffolk.

and taking account of statutory and non-statutory designations, must be submitted as part of the planning application for the site.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

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/247 Gavin Richards

This is a terrible plan to defile an AONB, and it cannot be allowed to proceed.

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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
| SM/248 | Claire Tuddenham | Wangford lime kiln farm. Extremely concerned at loss of habitat including Heath land crucial for bird life. This is a key location for specific bird life including curlew. | **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, must be submitted as part of the planning application for the site.

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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value. |
| SM/249 | Caroline Spinks | This site is important for the critically declining curlew population. We hold approx 25% of their population in the UK & according to robust science from BTO their population is on the brink of collapse. I urge you to look for alternative extraction/waste deposition sites. Have a look & listen to some videos of curlew to see & hear why they are such evocative & brilliant birds. Thank you |
| 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, must be submitted as part of the planning application for the site. 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 |
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| It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value |
| SM/252 | Simon Clack | I would like to register my objection to the proposed new gravel pit at Lime Kiln Farm, Wangford. In particular, given the number of other potential sites I believe that there is absolutely no justification |
| Suffolk Coast and Heaths Area of Outstanding National Beauty | |
for breaching the national and local policies protecting the AONB. Furthermore, developing this site will lead to the creation of an almost unbroken line of industrial development through AONB land from the A12 to Reydon as it will "fill in" the gap between the existing quarry/dump, the Adnams distribution centre, and the new solar farm in Quay Lane. This industrialisation of the local landscape risks diminishing its appeal to visitors and could therefore have a detrimental impact on tourism, which is a major source of employment in the area.

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**Cumulative Impacts**
The County Council recognise there may be cumulative impacts with this extension in combination with other development or activities and have specifically identified the landfill operation next to the site in this regard. A full assessment of the cumulative impact must be part of any planning application for this extension. Policy MP6 in the plan addresses cumulative impact issues with sites.

<table>
<thead>
<tr>
<th>SM/260</th>
<th>Lucy Neal</th>
<th>Because of the Wangford Lime Kiln Farm</th>
<th>The reason is that birds really matter @Visit_Suffolk @curlewcalls</th>
</tr>
</thead>
</table>

**Ecology and Landscape**
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<thead>
<tr>
<th>SM/262</th>
<th>Julia Crook</th>
</tr>
</thead>
</table>
| Wangford Lime Kiln Farm. Proposed site is in an AONB area, next to Hen Reedbeds Nature Reserve. These are supposed to be protect sites, not to be ruined forever by huge quarry works that could last 30 years. Land is unlikely to be returned to agricultural use when quarry is finished, will the area then be developed on like other old sites such as Adnams Distribution site and Lakeside Drive in Reydon? | 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, must be submitted as part of the planning application for the site.

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.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be
determined at the planning application stage.

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. The County Council expects that this land will be returned to agricultural use. An example of an effective agricultural restoration in Suffolk is Layham Quarry.

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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;
• 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.

E/10 Mary Winterbotham

I wish to object to the above devopement. AONB's are under threat all over the country. There are nine other sites. What is the point of AONB's if they are flouted. Yet another part of our beautiful country will be destroyed.

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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• it is considered that in the impact upon the wider AONB, recreation within the area, and the nearby residential
| E/13 | Robert Jellicoe | I am writing to object to the proposal to develop a 70+ acre gravel extraction site at Lime Kiln Farm, Reydon. My principal objection is that site lies within an ANOB. As you know development within an ANOB is illegal unless there are exceptional circumstances. I do not accept that the exceptional circumstances cited—the quality of the sand and gravel—are sufficient to justify the proposal. What will be lost is far greater than what will be gained. The Hen Reedbeds which lie just below the site are an important habitat for recovering species such as bitterns and otters and threatened species such as curlews and lapwings. I have seen the latter two species on the proposed fields in the last few days. The loss of this habitat will further stress species already in peril or just recovering from it. Non-human species, which cannot speak for themselves, nevertheless enrich our human lives through their bio-diversity. Any proposal that diminishes their lives diminishes ours in the long run. Short term human interests are being prioritised here. Moreover the beneficiaries of the proposal are international capitalists. Any profits are highly unlikely to find their way into this community. I also note that the Historic Buildings officer raised no objection to the site. However I recently attended a seminar at Reydon Hall in my capacity as archivist at Southwold Museum. This was attended by a Professor from Trent University in Canada and one from Leeds in the UK plus local writers to consider the legacy of the Strickland family who had lived at Reydon Hall in the early 19th C: Agnes and Elizabeth who became celebrated as the first historians of key women in British and European history, and Susanna Moodie and... | properties and ecological designations could be moderated to an acceptable extent. | Suffolk Coast and Heaths Area of Outstanding National Beauty
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NPPF paragraph 144 states that when determining planning applications local authorities should as far as practicable... |
Catherine Parr Traill who emigrated to Upper Canada and are considered the founding mothers of Canadian literature. I understand that Canadian tourists regularly call at Reydon Hall given these associations with Canada. The Southwold Museum holds a number of archives of this important family and their correspondence across the Atlantic from the 1830s until the end of the Century. It was discussed that we would all make efforts to develop these cultural links and there are plans for further such seminars to be held at Reydon Hall. Council officers appear not to be aware that Reydon Hall is a historic house which would be adversely affected by a project of the scale of the proposed quarry at Lime Kiln Farm. Noise, transport and landscaping issues are also involved in this proposal. People will be alienated from the landscape as it stands. The language used to describe it will also change from the language of the natural world to that of industry and capital, further depleting our connections with nature. No further jobs will be created but transferred which undermines the exceptional circumstances argument. I also note that there is a suggestion that after extraction the site could be used for land fill for a possible 35 years. Nature cannot recover from this therefore for about half a century, and this an AOB. Moreover this proposal should not be seen as isolated but within the existing subversion of the ANOB at the nearby solar farm and the proposed housing developments up the road at and opposite St Felix. The existing approach to Southwold and Reydon is therefore being lined up for major development which, if it goes ahead, will alter it radically. In my view this proposal should be rejected as being of benefit only to capitalists at the expense of the rest of us which rightly includes those non-human species whose landscape this also is.

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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**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, must be submitted as part of the planning application for the site.

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.
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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

**Historic Environment**

It is expected that the distance between the site and historic assets and other mitigation measures such as bunds and bands of vegetation will prevent significant impact on nearby historic assets.

**Noise Pollution**
County Noise Consultants state that a standoff in addition to standard mitigation (such as planted earth bunds) 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.

**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.

It is expected the site will be restored to agriculture and nature conservation, similar to its current use. Some inert waste materials (e.g. excavated soils, construction material, etc… not household or commercial waste) will be used in order to aid in site restoration. Good examples of agricultural and ecological restorations exist in Suffolk. These would be Layham Quarry and Park farm Quarry in Timworth, respectively.

**Cumulative Impacts**

The County Council recognise there may be cumulative impacts with this extension.
### Proposed Gravel Pit site at Lime Kiln Farm

The inclusion of this site in **Suffolk County Council’s Draft Minerals and Waste Management Plan** is contrary to Government Planning Guidelines and to the stated Aims and Objectives of the Council itself. It would be hugely detrimental, both to the Area of Outstanding Natural Beauty in which it lies and to the economic well-being of this area of Suffolk, which is heavily dependent on tourism, including visitors to sites such as the Hen Reed Beds, which lie immediately adjacent to the proposed site. The proposal is so flawed and the process has also been so badly mismanaged that it may well give rise to legal challenge. The grounds for such objections are detailed below.

**It is contrary to Government Planning Guidelines**

**Government Planning Guidelines for Minerals** (Paragraph 008, ref ID: 27-008-20140306) states that it is ‘appropriate for mineral planning authorities to rely largely on policies which set out general conditions against which applications will be assessed.’ In other words, there is no presumption of ‘overriding need’. Under the heading **Assessing Environmental Impacts from Minerals extraction** the guidelines make this obligation quite clear – ‘As stated in paragraphs 120 and 122 of the National Planning Policy Framework this includes ensuring that new development is appropriate to its location – taking into account the effects of pollution on health, the natural environment or general amenity. . . In doing so the focus of the planning system should be on whether the development itself is an acceptable use of the land and the impact of those uses.’

**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.
Amongst the environmental issues to be addressed by planning authorities the policy guidelines include:

- Landscape character
- Risk of contamination to land
- Designated wildlife sites, protected habitats and species, and ecological networks
- Impacts on nationally protected landscapes [including] Areas of outstanding Natural Beauty

In the section on **Natural Environment / Landscape** the policy is even clearer. 'One of the core principles of the National Planning Policy Framework is that the planning should recognise the intrinsic character and beauty of the countryside. Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside.'

The proposed gravel pit at Lime Kiln Farm breaks all these policy guidelines. It is in an Area of Outstanding Natural Beauty. It lies next to a major nature reserve which is a breeding ground for Bittern (one of Britain’s shyest and rarest birds) and it provides some of the important ‘ecological networks’ mentioned in the guidelines (amongst other things, as a winter feeding place for Curlews – a protected species, one the UK’s most endangered birds). It forms part of a classic Suffolk landscape that would be irretrievably destroyed if this proposal were to go ahead. It poses a serious risk of contamination to underground water networks.

**It is contrary to Suffolk County Council policy**

**Suffolk’s Draft Minerals and Waste Local Plan** includes clear policy statements that directly contradict the arguments for including Lime Kiln Farm in the list of proposed sites. Under the heading ‘Vision’ the document states that ‘minerals and waste management sites will only be permitted in appropriate locations.’

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

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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Aim 1, Objective 3 of the Plan is "Identifying environmentally appropriate sources of sand and gravel." Aim 2 is 'to minimise the impact of minerals and waste development on the environment', and Object 5 of that Aim is to include 'environmental policies for the consideration of minerals proposals that make reference to the impact upon nature conservation.' Yet the Draft Plan also acknowledges that Lime Kiln Farm is 'inside an Area of Outstanding Natural Beauty': that 'there is the potential for impacts upon nature conservation' (and then lists a variety of sites and species that may be affected); and that 'There are statutory designated habitats near the site.’ So why has a site that so clearly needs protection been designated as appropriate for a vast gravel pit, contrary to the Aims and Objectives of Suffolk County Council's own policy?

**Local consultation.** The Draft Minerals Plan identifies the site as being in Wangford, whereas it actually lies within the parish of Reydon. This significant error has been compounded by the fact that Suffolk County Council neither informed Reydon Parish Council nor offered a drop-in consultation meeting for residents, as it was obliged to do and as has been done for other sites listed in the Plan.

**An important precedent.** In 1997 an Inspector’s Report rejected inclusion of this site in an earlier Minerals Plan. 'To comply with Government and Suffolk County Structure Plan policy it could only be justified on grounds of exceptional circumstances. By definition, schemes which can only be justified under exceptional circumstances cannot be a development plan policy or proposal.' So the argument of 'exceptional need' is null and void if the proposal contradicts basic planning policy.

**No overriding need.** Suffolk County Council is obliged to plan forward, to cover anticipated mineral needs over the next 20 years. It is not obliged to plan for an excess of 32% over anticipated demand, as it has done in its Draft Plan. To do so by including an AONB within its list of proposed sites is to flout all the 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 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, must be submitted as part of the planning application for the site.

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.
guidelines that have helped to preserve Suffolk as a place renowned for its natural qualities – its landscape, its wildlife, the cultural creativity that has sprung from this special county - and the tourism that responds to these attributes.

**Conclusion**
The only beneficiary of this proposal, if it were allowed to go ahead, would be Cemex, part of a Mexican conglomerate that operates the existing Wangford site. Their commercial imperatives should not be allowed to override the compelling environmental considerations, embedded in National and Local planning policy, which are designed to protect sites such as this. To proceed with this proposal would be to bring the entire planning process into disrepute and would undoubtedly provoke serious legal challenges. It must and will be resisted.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

**Public consultation**
The County Council did not intend to cause any confusion in calling the site Wangford, which we did because it is an extension to Wangford Quarry. We do recognise that the extension is in Raydon.
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), and email notification to Parish Councils. Social media was also used to promote the consultation events.

A consultation email was sent to Reydon Parish Council at the same time as all other relevant Parish Councils were informed of the plan. This is confirmed in Reydon Parish Council's representation to the plan.

A consultation event regarding this site was held at Wangford Community Centre on the 8th of November 2017.

**Precedent**
The precedent which you have referenced took place before the adoption of the National Planning Policy Framework. See the County Council’s justification for including the site in the plan in the context of the NPPF above.

**Calculation of Mineral Need**
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/18 Richard Griffiths

I am writing to object to the shortlisted inclusion of the site of Lime Kiln Farm as a site being considered for a designated 30 year gravel pit. The site is situated in an AONB, and should therefore never have been identified on the long list either, being contrary to national and local policy on every ground. The process of consultation has been mishandled, the analysis flawed, and any attempt to take the matter forward will be met by a judicial review challenge. I attach a copy of Simon Loftus' paper setting out the legal framework. (attachment contains representation E/17 above)
I would ask for updating on progress of the matter.

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.

*Updates and Further Consultations*
Another period of public consultation is scheduled to take place in June/July, which will include local drop-in sessions for each site. If the plan is adopted with the Wangford site still in the plan the applicant will still need to submit a planning application with detailed environmental (including air quality, noise, wildlife impact etc...) assessments, mitigation measures to deal with impacts and a restoration scheme. If an application is submitted this will also have a period of public consultation.

<table>
<thead>
<tr>
<th>E/19</th>
<th>Hugh Brody</th>
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| I am dismayed to learn of this Management Plan. This is an area long since declared to be an Area of Outstanding Beauty; and it seems to me that for this reason alone it should not be viewed as a potential gravel pit. Legal and environmental considerations would seem to rule it out of any such form of development. This is an area I know very well. As a keen amateur ornithologist I have spent a great deal of time watching birds just where this gravel pit is being proposed. I am sure others have alerted you to the remarkable value of the area to many important and endangered species. I have watched Bewick Swans, Curlew, Greenshank and several species of geese at or very near to that site. I have seen Black-Tailed Godwit there in late spring in full breeding plumage - this is one of the very few places in the UK where this species may at last be nesting. To allow a gravel pit to be located on this land would constitute an extraordinary and, I suspect, illegal disregard for its environmental importance. I would like to add that the consultation process has left everything to be desired. I am sure that this note is one of many cries of alarm and Indignation that Lime Kiln Farm could ever have found its way onto a list of possible gravel pits. I trust that the many objections to this Plan will ensure that it can go no further. | Suffolk Coast and Heaths Area of Outstanding National Beauty
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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, must be
| E/20 | Jean Brown on behalf of Reydon Parish Council | I am writing on behalf of Reydon Parish Council which agreed unanimously at our meeting on 23rd November to oppose the proposal for a new gravel pit in our Parish. We were shocked to learn of this proposal from a resident notified as a neighbour rather than by formal notice to us as a Parish Council until 30th October. By calling the Lime Kiln Farm proposal submitted as part of the planning application for the site. 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. It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value. **Updates and Further Consultations** Another period of public consultation is scheduled to take place in June/July, which will include local drop-in sessions for each site. If the plan is adopted with the Wangford site still in the plan the applicant will still need to submit a planning application with detailed environmental (including air quality, noise, wildlife impact etc…) assessments, mitigation measures to deal with impacts and a restoration scheme. If an application is submitted this will also have a period of public consultation. | Parish Council Notification | All Parish Councils with proposed plan allocations in or adjacent to their parish were contacted by email on 30th of October, the beginning of the consultation period. Local residents notified. |
Wangford, your consultation was significantly misleading and has caused much upset among the parishioners of Reydon who feel that the plan was being pushed through behind their backs. We have other, arguably more serious, concerns about the process and quality of the consultation with regard to this proposal. Because the site was not one of those originally proposed by either landowners or mineral companies, it has not been given the same quality and depth of assessment in the evidence as, for example, the other two sites originally proposed for extensions to the Cemex quarry in Wangford. Likewise, there is scant reference to mitigation and landscaping plans in the documents relating to this proposal despite the fact that this is a site of 27.7 hectares in the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty (AONB) and close to the very sensitive environment of the Hen Reedbeds. The site itself is a winter feeding ground for curlews. The draft plan documentation is also highly misleading in that it suggests this site will be worked for around five years whereas it was stated at the consultation event held in Wangford that it would be worked for up to 30 years and be a deep extraction which would leave a very large excavation hole in the environment.

At 27.7 hectares, this quarry, if allowed, will be 3-4 times the size of the existing quarry. The transport of material from the site will involve regular dumper truck crossings of Mardle Road which is a quiet local lane much used by walkers and cyclists. The direct impact of extraction works on the residents of neighbouring and nearby properties will be significant, especially in terms of noise and loss of visual amenity. Indeed the large bunds proposed to reduce noise impact will, of course, further impact on the views and sense of open space from these properties.

The test for permission for industrial developments of this kind in the AONB is that there are exceptional circumstances and that the benefits of the development meet the national interest. We cannot see how this test is met by this proposal. Overall, the draft plan allows for a surplus of 32% of mineral against assessed within 250m of the site were sent letters, so that they would arrive for the start of the consultation, which could have arrived slightly earlier than this.

Site Name
It was not he County Councils intention to be misleading with the name of the site. It was called Wangford as it was an extension of Wangford Quarry and we do recognise the extension is in Reydon.

Available Evidence
The Minerals and Waste Local plan is a high level document and inclusion in the plan is subject to high level assessments to identify whether a site can be made acceptable with appropriate mitigation. In order for extraction to occur a planning application will still be required and this will need to include detailed assessments regarding landscape, ecology, amenity and other factors. The onus is on the applicant to prove that appropriate mitigation can be provided to make the site acceptable. The planning application will also be subject to public consultation. The Council accepts that further detailed assessments may lead to the conclusion that the site can not be made acceptable. Based on this the County Council is of the opinion that there is appropriate evidence and justification to include the site in the plan.
need and, indeed, 50% of mineral extracted in Suffolk goes outside the County. There are plenty of other sources of mineral in the county which are outside the AONB as evidenced by the fact that all the other proposals in this draft plan are, indeed, not in AONB areas and offshore mineral extraction is a well used and viable source of mineral locally and will be used in the Sizewell development. We accept that there is a national need for mineral but we do not agree that this can only be met by taking this resource from this site in the AONB. The national need can be met elsewhere and there are no exceptional circumstances justifying this proposed breach in the national and local policies protecting the AONB.

As a Parish Council, we are always mindful of the need to retain and create local employment when we respond to Planning Applications. In this case, however, we were told at the consultation event that only three direct employee posts would be safeguarded by this proposal. We cannot see how this offers any benefit to the community which outweighs the harm to our landscape and environment which would be caused. Indeed, as wildlife tourism is a significant contributor to our local economy, it is possible that the employment and economic effects of this proposal would be negative.

In conclusion, therefore, our Parish Council is wholly opposed to this proposal. It will do significant harm to our local environment and damage the AONB contrary to national and local planning policies. It will create loss of views, landscape quality, wildlife habitat and quiet during the thirty years of working. It will leave a permanently altered landscape which will not be in keeping with the largely flat landscape of this part of the AONB. It does not meet the required tests of exceptional circumstance or national interest to be exempt from the protection afforded to the AONB. It should be struck out from the next draft of Suffolk’s Mineral and Waste Plan.

Site Size and Length of Working
The extension is large, however it should be noted that extraction will be broken up into phases, which will minimise the amount landscape impacted. Restoration of phases typically begins concurrently with the beginning of a new phase in a rolling process. The initial proposed lifetime of the site (as stated in appendix 3 of the Wangford Site Selection Report), however during discussion with the site operator it became apparent the working of the site would be longer, which is why there was different information at the consultation drop in events.

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, must be submitted as part of the planning application for the site.

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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

_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.

_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.

Sizewell
It is the County Councils understanding that the source of sand and gravel for sizewell is not yet known. Additionally the delivery timetable of Sizewell has yet to be confirmed and could be beyond the life of the plan

Additional Mineral Provision in the Plan
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.

**Quantity of Minerals leaving the County**

It is acknowledged that it is expected that this site will supply a market area that goes beyond Suffolk, however this highlights the importance of the site. Due to the high proportion of course aggregate at this site, it is used to supplement a number of quarries throughout the region, which typically have finer deposits.

<p>| E/21  | Kerry Holmes | I am writing to strongly object to the inclusion of a proposed gravel pit in Reydon in the Suffolk draft plan. This is an area of outstanding natural beauty overlooking the Suffolk Wildlife Trust’s Hen Reed beds, with its resident populations of Bittern, Otter &amp; Marsh Harrier. A quiet and special place. Where on earth is the benefit or ‘amenity’ to the local community from this proposal? There is none. This development is large and intrusive and would add heavy lorries travelling to and from the quarry on a narrow lane (Mardle) and the busy B road to Southwold and the A12. It would also leave a permanent visual impact on the land. Agreeing a development of this type and scale, in this sensitive environment, beggars belief and has nonational or local benefit. It |
|-------|--------------|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, must be submitted as part of the planning application for the site. 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 |</p>
<table>
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<tr>
<th>would be hard to see what the mitigation could be that would allow this proposal to go forward. It should be taken out of the draft.</th>
<th>It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value. At this stage it is not expected that the development would be detrimental to the reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.</th>
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<td><strong>Quarry Traffic</strong></td>
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<td>Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated. Trucks will need to cross Mardel Road in order to access the quarry processing plant, however the access to the A12 will likely need to be improved in order for access to be acceptable to Highways England.</td>
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| E/22   | Michael and Cara Peterman | 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.

There are good examples of quarry restorations in Suffolk which have returned sites to agriculture or been restored to benefit ecology. Good examples of these respectively are Layham Quarry and Park Farm Quarry in Timworth.

---

| E/22   | Michael and Cara Peterman | Historic Environment  
It is expected that the distance between the site and historic assets and other mitigation measures such as bunds and bands of vegetation will prevent significant impact on nearby historic assets.

Landscape  
A restoration scheme and 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.

Site phasing should minimise the impact of the operations on ecology and... |
| Reydon Hall. Professor Rosemary Mitchell of Leeds-Trinity was also present and spoke informedly about the elder Strickland daughters, Eliza and Agnes, who became the leading royalist historians of mid-century England and Scotland. In effect, then, we were able to discuss in some detail and celebrate the extraordinary literary output of the five Strickland sisters who became professional writers. In her biography of Agnes Strickland (1940), Una Pope-Hennessey deemed the collective work of the Stricklands at Reydon Hall “unique” in English literary history and a triumph for their father, Thomas Strickland, who was unshaken in his belief that girls could write books as well as men; he effectively educated his daughters to meet that challenge. I am delighted to see that Reydon Hall is gaining a new life and is poised to assume an enhanced and better-informed reputation within the worlds of nineteenth-century English and Canadian Literature. The Southwold Museum is also ready to assume a larger role as a centre for Strickland family books, letters, and memorabilia. As well, new academic projects and connections between Suffolk and Lakefield, Ontario, Canada are beginning to take hold. Against this background we are concerned to hear about a proposal to develop a large and substantial quarry only two fields away from Reydon Hall. I write from my own point of view as a Canadian literary scholar to make you aware that Reydon Hall is a house of significant historical and literary interest both in England and Canada, and that such interests are growing apace. I hope that this developing attention, which has, among other things, fresh prospects for Suffolk in terms of literary tourism, might be borne in mind when the County assesses the merits of opening a large-scale quarry close by. The pastoral grounds and quiet ambience of Reydon Hall ought to be carefully preserved for the future. | landscape, by ensuring only part of the site is extracted at one time. It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value. 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. 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. It is expected the site will be restored to agriculture and nature conservation, similar to its current use. Some inert waste materials (e.g. excavated soils, construction material, etc… not household or commercial waste) will be used in order to aid in site restoration. As the site will not be household or commercial waste landfill will be no issues with landfill related contamination, gas emissions or pests from the extension site. |
| E/26 | Hugh Brody  
(Related to response E19) | Further to my note of 27th November, in relation to the proposed gravel pit at Lime Kiln Farm, I am sending herewith some additional concerns. These are a result of taking a look at the regulatory regime in place, designed to protect areas of special environmental or national value from potentially damaging developments. That National Planning Policy Framework and the principles that inform AONB protection both affirm the importance of defending landscape of value. They are based on the notion that this defence is a matter of the national interest. The underlying objective here is that such landscapes should maintain their existing qualities. The proposed gravel pit at Lime Kiln Farm would of course transform the landscape. To comply with the spirit and purpose of the existing regulations, therefore, this proposed project should be stopped in its tracks. The Blyth Estuary and its adjacent lands constitute an astonishing, rare and precious environment. There is an abundance of birdlife here that is of great national, and indeed international, importance. To allow a gravel-pit development to take place within this area would be to proceed without regard to the stated priorities of all the agencies charged with protection of this habitat; would be to ride roughshod over the principles that underly the regulatory systems in place to secure protection; and would be to ignore the big environmental picture in favour of the short-term and, it would seem, questionable need to take gravel from this area. Protection of a landscape must be about just that - and therefore oppose any developments that would result in its transformation. So, even if we allow that in the long term (and it is a very long term - I'll come back to this) a gravel pit might become a habitat where a significant range of wildlife can do well, a gravel pit on that site, in those fields, within the AONB that is the Blyth Estuary and adjacent farmland, is a violation of the principle and the terms of the systems of protection. |
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<td>The County Council understands and sympathises with the environmental and landscape concerns that are raised by this proposal. We also recognise the potential impacts, particularly in the short term. However in the long term minerals sites can have a positive impact on biodiversity due to the opportunity they present for habitat creation during the restoration phase. The plan encourages this with policy MP7 which gives preference to proposals that incorporate biodiversity net gain. As part of this consultation we have received representation from the RSPB, who have expressed interest in working with the operator (Cemex) if the site were progressed, although this would be subject to an agreement with Cemex. The County Council also wish to retain certain features of the landscape, such as field boundaries containing hedgerows and mature oak trees, due to their landscape character and wildlife value. It is possible to restore sites to similar condition to pre extraction and the County Council would expect a restoration scheme to be presented which is in line with the AONB. Good examples of both agricultural and ecological restorations can be found in</td>
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that are in place. And it is to disregard the value of this particular landscape to the very remarkable, precious and, in many cases, rare species that rely on it. Impacts of development have to include assessment of construction and access, as well as the thing itself. The actual gravel pit is at the centre of, but is not coextensive with the impacts it will have, especially in the short and medium term.

Roads, heavy vehicles on those roads, disturbance during construction and then during the extractive life of the pit - these are also matters of concern. It is important to pay attention to both immediate and cumulative impacts, at the site and in adjacent areas. The idea that a gravel pit can be expected to have long-term benign or even beneficial environmental impacts is flawed at many points. To reshape the landscape is to fail to safeguard this particular environment. But the short term impact may be what counts most when it comes to red-listed bird species. The urgent need, as just about all ornithologists are saying, is to protect vulnerable species now. In the long term - indeed, in the medium term of a few years, if present trends are allowed to continue unchecked - the species of concern will have disappeared from their UK core habitats. The environmental issue, from the birds point of view, is now, not ten or twenty years from now. By then protective measures may well be too late. Some might say that a gravel pit can in due course create habitat for other important species, even if this is only 50 years after its development, But it is absurd to suggest that the loss of one species can be offset by the enhancement of some other species - this view depends on a self-serving disregard for what is of value and of concern now. It is also naively optimistic: who is going to predict the environmental outcome of a development of this kind across a 50 year period? No such predictions could be much more than risky guesswork or, worse still, wishful thinking. I urge you to bring these considerations to bear on the decision you will have to make.

Suffolk. Two examples of these respectively are Layham Quarry and Park farm Quarry in Timworth.

The justification to include the site in the plan has been outlined in the response to your initial representation (Number E/19 in this document) so we shall not repeat it here, however the County Council does not believe it is an unnecessary site.

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>
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<tr>
<th>E/27</th>
<th>Joy West</th>
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<tr>
<td>Remarkable importance, must be our legacy - not its transformation in the short term interests of an unnecessary gravel pit.</td>
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The plan does address cumulative impacts with Policy MP6. The cumulative impacts would be assessed at the planning application stage and if they were found to be unacceptable it is possible that the quarry could be granted permission provided that it is extracted following the restoration of the current extraction or lifetime landfill site adjacent.

**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, must be submitted as part of the planning application for the site.

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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

**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.

E/29 Julia Johnson I would like to express an objection to the proposal to open a 70 acre site for gravel extraction in Reydon. My concerns are that there has been insufficient research into the effect of the excavation on wildlife in an AONB, or on the impact on the local roads and traffic flow. I live in Reydon Smere and enjoy regular visits to The Hen Reed Beds, by myself and also with my grandchildren.

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, must be
Over the years many dedicated people have laboured to enhance the area for the enjoyment of people from far and wide and to provide a safe environment for wildlife. It would be shocking to think that this was threatened. Thank you for your consideration

submitted as part of the planning application for the site.

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

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

Quarry Traffic
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<th>E/33</th>
<th>Helen and Michael Hall</th>
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| **Regarding Suffolk Minerals & Waste Local Plan- Wangford Site**  
We are the owners of 2 Cave Cottages, Halesworth Road, Reydon, IP18 6SQ. We have been notified by you of the Suffolk Minerals and Waste Local Plan as it might affect our property. We are concerned that a site inside an AONB should be considered. The site is very close to the Hen Reedbeds SWT Site, and occupies higher ground. We are concerned that any disruption to aquifers could impact on the Reedbeds and Grazing Marshes below, and possibly our property. We see from your notes 14.19 that the site is at high risk of ground water flooding. There is a pumping station at the lower level too which we believe is relevant to the local mains water. We see also in 14.19 that the site falls within Groundwater Source Protection Zones, which is presumably relevant to the pumping station. The Hen Reedbeds are home to various species that use the surrounding area for food. Barn Owls regularly nest at the top of our land, and hunt over the farmland behind which is included in the proposed site. Point 14.15 is very relevant. We do not know if it is proposed that the existing quarry is to be used for landfill, but to have lorries coming in with waste to Wangford Quarry and lorries going out from Lime Kiln Farm Quarry at the same time would make excessive traffic. We are also concerned that the proposed Quarry would be used for landfill. All the points raised already regarding quarrying would be even more relevant to landfill. We think that the above points should be carefully considered.  
**Water and Floods**  
Due to the flood risk, underlying aquifer and Ground Water Source Protection Zone this any planning application submitted for this site will need to take account of potential ground water implications. Thank you for the information regarding the local pumping station.  
**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, must be submitted as part of the planning application for the site. 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.  
It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value. | Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated. |
At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

**Site Restoration and after Use**
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.

It is expected the site will be restored to agriculture and nature conservation, similar to its current use. Some inert waste materials (e.g. excavated soils, construction material, etc... **not household or commercial waste**) will be used in order to aid in site restoration. The Suffolk Waste Survey, which is used as evidence in the plan, identified that there is sufficient landfill capacity in Suffolk until the end of the plan period, so the County Council is not allocating any more landfill sites in the plan.

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<th>E/34</th>
<th>Dr FD and Mrs SJ Campbell</th>
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<td>Thank you for your email (copied below), however I have not yet sent you my response to the Suffolk Minerals Plan. I believe Councillor Matthew Hicks has forwarded correspondence which I sent to him and you have presumed it to be my response to the Minerals Plan.</td>
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**Ecology and Landscape**
A restoration scheme and mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory
I would be grateful if you could ensure that the correspondence sent from Councillor Hicks is deleted as it does not contain all that I wish to express. I attach a pdf which is my response to the Suffolk Mineral Consultation Plan and is dated 04 Dec 2017. Please confirm that you have deleted the Matthew Hicks comments and replaced it with my formal response. I look forward to hearing from you.

Dear Sir/Madam,

Thank you for your representation made in respect of the Suffolk Minerals and Waste Local Plan Preferred Options Draft. Please see attached your acknowledgment letter.

[Contents of attachment below. Attachment also contained photographs and maps which could not be included here]

We strongly oppose the inclusion of an Area of Outstanding Natural Beauty (AONB) into the above plan. “By definition, schemes which can only be justified on grounds of exceptional circumstances cannot be a development plan or proposal” (Minerals Local Plan Inquiry Inspector 1997).

The inclusion of an AONB into the Suffolk Minerals & Waste Local Plan is clearly contrary to Government Planning Guidelines, and the stated aims of Suffolk County Council. This is no “NIMBY” response to the proposal to include the Lime Kiln AONB site as a preferred option into the Local Options Plan. We are indeed conscious of the privilege we designations, must be submitted as part of the planning application for the site.

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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

Local Economy
enjoy, living within an AONB and delight in enjoying and sharing the area with the hundreds of tourists; walkers, cyclists, horse riders, and nature lovers, many of whom visit the area to spend time observing the many disparate species in the nearby Hen Reedbeds, so ably tended by Suffolk Wildlife. We also share the proposed Lime Kiln AONB site with many species of birds who frequent the site, such as Culews, Jays, Pheasants, Geese, Barn Owls and many others. Curlews in particular visit the Lime Kiln site as part of their wintering habitats.

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

DEFRA in partnership with the RSPB recently published “International Single Species Action Plan for the Conservation of the Eurasian Curlew”.

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

para 1.6.3 Winter Habitat Selection. Outside of the breeding season, the species frequents a variety of coastal and inland habitats.

The quarry itself does contribute to the local economy, however the potential for impacts on other aspects of the economy are recognised, such as tourism, including the nearby self catering business. For this reason the next draft of the plan will have a reduced site area.

Cumulative Impacts
The plan does address cumulative impacts with Policy MP6. The cumulative impacts would be assessed at the planning application stage and if they were found to be unacceptable it is possible that the quarry could be granted permission provided that it is extracted following the restoration of the current extraction or lifetime landfill site adjacent.

Consultation Documents
The contents of the consultation documents were not altered during the consultation period.

Site Appraisal
The Site Selection reports contain the appraisals of each site. Appraisals were performed by County Council officers, through desk studies and site visits.

Surplus Mineral
The need calculated by the County Council to ensure a land bank until 2036
The majority are found in coastal areas........ Substantial numbers also forage in adjacent grasslands at high tide. *Curlews would be lost to the area in perpetuity.*

The approach adopted thus far in the consultation documents towards AONB planning policy betrays a fundamental misunderstanding of the purpose of paras 115 and 116 of the NPPF. It is clear from the Framework that major development in an AONB should be regarded as damaging per se. Para. 115 states that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty”. Any major industrial development in an AONB must therefore be regarded as wholly inappropriate and undesirable in such a designated area, thus the requirement of meeting not just the threshold of exceptionality, but also that of demonstrating that such development is in the public (as opposed to a company’s) interest.

The Lime Kiln site is estimated at 2.400 Mt sand and gravel, an amount expected to take 30 years @ 0.08 Mtr/year. Should quarrying begin in 2021, (the suggested date) and run for 30 years, until 2051 with shall we say a further 2 years to restore the site, 2053. Followed by shall we say 5 years to establish; 2058. *There can be no argument whatsoever in proposing beneficial biodiversity for the absolute loss of the AONB to wildlife for some 37 years.*

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.

*Alternative Supply of Minerals*

It is correct that it is not necessarily possible to predict the supply of recycled or martine aggregates in Suffolk throughout the life of the plan, that is why the plan seeks to secure a land bank. Some marine aggregate is landed in Suffolk however it is a small amount compared to the available licence area. It is not possible for the plan to require more use of marine aggregates as where this aggregate is sold is is determined by the market.
The exceptional depth of excavation creates a moonscape pit about 18 metres deep with surrounding steep banks over an area of some 70 acres, in sharp and aggravating contrast with the rolling topography of the wider AONB. A visit to the already quarried Wangford Covert site, restored around 2006, which is some 75% less in area than the Lime Kiln site, will undoubtedly and effectively validate this point. “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the **highest status of protection in relation to landscape and scenic beauty**”

It is our grandchildren and their children who will in 35 years, witness and live with the outcome of such bespoiling of this Area of Natural Beauty.

There can be no argument in favour of the local economy as the loss of tourist expenditure into the Wangford Village store and Village Farm shop for supplies in self catering accommodation and daily evening meals in the local Inn’s; The Angel and The Plough, which goes to support the already fragile local economy and employment, would be lost from the 170 + guests who currently stay at Wangford Farm in self catering accommodation, which borders the proposed Lime Kiln site. Many modern day tourists tend to view prospective holiday area’s on Google Earth or similar prior to booking their accommodation. There are no other accommodation development opportunities within the

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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. 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.

It is expected the site will be restored to agriculture and nature conservation, similar to its current use. Some inert waste materials (e.g. excavated soils, construction material, etc... **not household or commercial waste**) will be used in order to aid in site restoration. As the site will not be household or commercial waste landfill will be no issues with landfill related contamination, gas emissions or pests from the extension site.
area near to Wangford Village and it’s local economy which could replace the loss.

Our employment and expenditure policy is focused on the local economy; employment of local residents, artisans and casual workers, all of which are put at immediate risk. The development of an approved 2 bed self catering barn conversion which was to have been converted over the winter in readiness for June 2018 has been suspended. This employment is now lost.

Visitors and tourists in general are unlikely to choose an area being excavated, putting at risk the Wangford Farm Barns accommodation business. There will be an immediate loss to the local economy and those who are dependant upon the income generated and from employment created. Substantial sums have been invested in the Wangford Farm self catering development to date with a further self catering unit having been approved (and now postponed) and a further 2, subject to planning. The ongoing benefit of supporting the local economy through local guest expenditure, maintenance, services and locals employment outweighs any potential loss of jobs within the quarry, notwithstanding that there is a severe shortage of drivers and operators such as they who are unlikely to find themselves unemployed. *There is simply no case.*
At the Public Enquiry held in 1998 into plans to excavate both the Lime Kiln site and a site bordering the rear of Wangford Farm (Mardle House) and Toad Hall, the Inspector ruled that:

“As the area was one of Outstanding Natural Beauty. No further extensions to quarrying should be allowed other than in area P170”

National Planning Policy Framework (NPPF) paragraph 144 is clear:

“...and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality”.

The Wangford quarry has been excavating since 1950. Quarries are never envisaged as being active for such long periods; in this instance to 2053.

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

(Suffolk Coast & Heaths Countryside Management Project)

With utter disregard to the Public Enquiry Inspectors findings, advance tree screen planting was undertaken along the southern border of a further extension to the east just above the Hen Reedbeds nature reserve, which was subsequently the subject of a planning application on the current extension.

The inclusion of the Wangford Covert area in the Plan was ultimately justified by the willingness of CEMEX UK to give up it’s planning permission for mineral working at Westleton which adjoined an AONB and a SSSI which was also designated a special protection area, Special Area of Conservation and a Ramsar site. Planning permission was subsequently granted for sand and gravel extraction in 2002.
The current Wangford Extension, for which planning has been extended up to 2021 is within the AONB and was included in the last Minerals Local Plan and considered by the Minerals Local Plan Inquiry Inspector in 1997 who concluded that the site, within an AONB, should not be included in the plan because; “...to comply with Government and Suffolk County Structure Plan Policy it could only be justified on grounds of exceptional circumstances. By definition, schemes which can only be justified under exceptional circumstances cannot be a development plan policy or proposal”.

To comply with Government policy of “exceptional circumstances and in the public interest”, CEMEX UK offered revocation of a mineral planning permission at Holton St. Peter with public access to the site. CEMEX UK further undertook not to pursue further quarrying in the Wangford area. This was accepted as meeting Government Policy, satisfying the council members and the application was approved in 2006. Mineral extraction was to have ceased by September 2013 and the site restored by December 2014. However, extraction has not ceased, and has some distance to go. Permission has been granted to extend to 2021, with restoration thereafter. CEMEX UK and the land owner (the farmer), undertook advance planting of tree screening along the eastern side of the proposed 70 acres Lime Kiln Farm site as it borders the A1095 to Southwold. This planting was undertaken as far back as 2005. A presumptive forward planning regarding this area of AONB and Suffolk Council determining exceptional circumstances and in the public interest. The Mexican multinational CEMEX cannot be faulted for it’s advance planning and lobbying, regardless of it’s impact upon the character of the British landscape. However it
is, along with the landowner, the principal beneficiary of any
development rather than the public.

“The continued cumulative impact on the AONB from ongoing
local development detracts from it’s National Importance.”
(Suffolk Coast & Heaths Countryside Management Project)
The already quarried areas have resulted in a significant change
in the AONB landscape character of the surrounding area. Any
consideration should recognise the cumulative and permanent
effect that further extension to the existing quarry would have
upon the area. The resulting landform that would be created
would be at odds with the gentle slopes of the AONB
and represent a permanent adverse change to the landscape
character of this part of the AONB.
A landscape that could not be farmed unless landfilled, nor
enjoyed and is therefore clearly
not in the public interest today or for many years into the future.
It is noted in the planners Q&A leaflet handout, paragraph 144 of
the NPPF is referred to and
arguments are made in support of the selection of the Lime Kiln
AONB site.
We would point out that para 144 of the NPPF relates to
determining planning applications
and not the inclusion of sites within the Minerals Local Plan. The
answers provided are
without question rejected and pure supposition, unless planners
have already engaged in
detailed discussions with CEMEX UK.

We also note that the on-line consultation plan has been altered
and added too since the
original on-line publication, depriving earlier consultees of the
ability to respond in full.
para 7.5 of the draft policy document:
“having appraised” on what basis?, there is no supporting documentation whatsoever. “considered justified”. Again, on what evidence? none has been produced for consultation.

7.5 a.
“The existing quarry has been in operation since 1950 and is an important part of the local economy.”
Not so. There is no evidence to support this statement. Moreso, any benefit to the local economy does not equal the reality of local expenditure and employment support which benefits from tourism. The quarry has long since outlived it’s life in Wangford. No quarrying is expected to enjoy 100 years plus.

7.5 b.
“There is a shortage of gravel in the market area served by this quarry and the proposed extension contains an unusually high percentage of gravel compared to most other quarries”.
There are other quarries with an equivalent percentage. The plan provides for a 32% surplus. Over 50% of production is exported out of the County, some to Norfolk which has a surplus (reviewed 2016). There is a substantial over supply. The recovered gravel content is a matter for commercial consideration and not one of “exceptional circumstances” and is certainly not “in the public interest”.

7.5 c.
"The market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area". This is purely a commercial consideration and not one for the taxpayer to underwrite through the forfeiture of the AONB and the loss of endangered species within the AONB.

7.5 d.
"Processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds". This is purely a commercial consideration. No evidence is offered for demand (extending to 35 years) or other sources if the product were not available locally for filter beds. There is without doubt no “exceptional circumstance” or “public interest” here.

7.5 e.
"there are no other acceptable proposed sites within the north-east area of Suffolk". This claim is ingenuous. Certainly not a 70 acre site (27.7 hectares) providing a 35 years supply but nonetheless there are smaller more suitable sites. The market area is far wider; Norfolk is a matter of 10 miles, with over capacity and there are sources along the Waveney Valley, Ipswich etc. This is clearly not a difficult commercial matter for CEMEX to resolve.
7.5 f.
“Alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability”.
Pure speculation. It’s simply not possible to predict the availability of recycled materials for 10 years hence let alone 35 years. The pace of change within the recycled market is quickening. Marine dredged aggregate supply about 20% of the UK demand and are used in Suffolk. As for the economic viability; We do not consider the commercial economics are the responsibility of Suffolk County Council. This is a £15bn p.a. multinational, not a taxpayer subsidised concern.

7.5 g.
“It is considered that 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”.
The impact upon tourism without doubt will be felt; walkers, cyclists, riders. visitors to the nature reserve, self catering holidaymakers in accommodation which borders the Lime Kiln site. Quarrying will banish for years all forms of wildlife, eventually returning the area as a vast 70 acre 18metre deep moonscape, linked to the already quarried AONB current site and then further into the covert and finally into area P170. Doubtless
impressive plans will be submitted to restore the area with little expense spared, however, unless landfilled, CEMEX will be unable to restore 2.4million tons of soil and return the site to farming. According to the planner, any impact could be moderated by screen planting and bund building. It must be noted that any visual change or obstruction of view of an AONB is both contrary to government guidance on AONB’s and represents the complete loss and benefit to the public of the AONB. 
*If it cannot be seen it's not an Area of Outstanding Natural Beauty.*
There is no case whatsoever to justify the inclusion of the Lime Kiln site into the Suffolk Minerals & Waste Local Plan.

E/35 John Morton

I am writing to object to the proposal in Suffolk County Council's Draft Plan for a 70 acre gravel pit and quarry at Lime Kiln Farm, Reydon. Quite apart from the specifics of the Lime Kiln Farm proposal, which I'm sure will be addressed in detail elsewhere, there is a vital point of principle at stake here which goes to the heart of the purpose and the future of the country's 34 existing current Areas of Outstanding Natural Beauty.

The Government's *Guidelines for the Designation and Management of Areas of Outstanding Natural Beauty* is unequivocal about the responsibilities of local authorities: "...the relevant local authority must make sure that all decisions have regard for the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty."

In Suffolk County Council's *Suffolk Minerals and Waste Local Plan, Preferred Options Draft, October 2017* the Council appears...
to dismiss its responsibilities in this area with respect to Lime Kiln Farm almost routinely in a single short sentence (Section 14.5): "The site is inside the Area of Outstanding Beauty however it is accepted that there is an overriding need to work the mineral." The Preferred Options document contains the following list (Section 14.10) of twelve separate nature conservation interests potentially impacted by the proposal. Suffolk Coast & Heaths AONB, Minsmere-Walberswick SPA, Minsmere-WalberswickHeaths and Marshes SSSI, Wangford Marshes CWS, Suffolk Coast NNR, Hen Reedbeds SWT Site, Reydon Wood SWT Site, Groundwater Source Protection Zone (River Wang, Wolsey's Creek, River Blyth) European Protected Species (Otters, Bats), Priority Species (Bittern, Water Vole, Barn Owl), other Protected Species (Badger), Priority Habitats (Reedbeds, Grazing Marshes).

That this is the longest single paragraph in the relevant section of the document is telling and unbelievable in equal measure. If this is what a Preferred Option looks like what on earth does a non-preferred option look like? Either Areas of Outstanding Natural Beauty mean something in our national life or they are window dressing.

In the case of Lime Kiln Farm it's hard not to conclude that Suffolk County Council's attitude to its responsibilities in this area are at best casual if not actually negligent. I urge you strongly to re-consider.

- 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 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, must be submitted as part of the planning application for the site.

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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.
<table>
<thead>
<tr>
<th>E/39</th>
<th>Helen Atkinson Wood</th>
<th>I am writing to object to the proposal of Suffolk County Council’s Draft for a 70 acre gravel pit and quarry at Lime Kiln Farm. Suffolk’s greatest asset is its Outstanding Natural Beauty. It is our, if not the Government’s, responsibility to preserve just that, otherwise the AONB designation becomes a worthless principle. Please do not let what has been happening to our High Streets continue to repeat itself in our countryside. Shops may be replaceable. Nature becomes extinct. Suffolk County Council are in danger of killing the goose that laid the golden egg. Please stop this excavation from proceeding.</th>
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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 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
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<tr>
<th>E/40</th>
<th>Kevin West</th>
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<tr>
<td><strong>Proposed Gravel Pit site at Lime Kiln Farm</strong></td>
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<tr>
<td>I must very strongly object to this proposal. It is within an Area Of Outstanding Natural Beauty and right next to the Hen Reed Beds. This Suffolk Wildlife Trust reserve is home to the rare Bittern (breeding on the sight) also Otter, Water Vole, Wasp Spider and many other rare and protected flora and fauna. This area of classic Suffolk landscape is hugely reliant on tourism and thousands of people visit this reserve throughout the year. It is a popular site for people to witness the spectacular Starling murmurations in late autumn/early winter. The surrounding countryside, including Lime Kiln Farm, the site of the proposed gravel pit, provides a network of habitat for wildlife. The land provides important winter feeding grounds for Curlew, one of the UK’s most endangered birds and a protected species. Allowing the proposed gravel pit to go ahead would see a very significant part of this network destroyed for ever and poses a serious risk of water contamination throughout the reserve. The size of the proposed pit, 27 hectares, is even larger than the already existing quarry on the other side of the road, allowed before current protection was put in place. The increase in size would mean a serious threat to this network.</td>
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| 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, must be submitted as part of the planning application for the site. 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. 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... |
in heavy traffic would also be detrimental to the area causing substantial erosion and added pollution. Cemex is part of a large Mexican conglomerate and their financial gain must not be allowed to take place at the expense of this nationally important and wildlife rich landscape. It would be an ecological disaster if this plan went ahead and it will continue to be fought and strongly resisted.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

**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. 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.

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<th>E/41</th>
<th>Bill Irving</th>
<th>1. Summary</th>
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**Surplus Mineral**
The need calculated by the County Council to ensure a land bank until 2036
This note refutes the arguments for the Lime Kiln Farm extension to Wangford Quarry within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) proposed in the Draft Suffolk Minerals & Waste Local Plan, September 2017. The essential point is that the aggregates industry is well capable of supplying the forecast demand without the need to destroy the AONB, hence meeting the overwhelming requirements of the local population and visitors to the area, and the requirements of Suffolk County Council to produce a Minerals & Waste Local Plan, while following the guidelines in the NPPF. There have been no material changes in circumstances since the Lime Kiln site was excluded from the Local Minerals Plan in 1997, so there is no reason to include it in the current Plan.

2. Introduction

In drawing up this note I have researched as much published material as possible in the limited time allowed, while liaising with local councillors and SCC Planning Staff, as well as various experts in quarrying, landscape assessment and geology.

3. Objection to the draft plan (The paragraph numbers below - eg 7.4.b.i) – refer to the paragraph numbers in the Draft Minerals & Waste Plan)

7.4.b.i) “NPPF paragraph 116 indicates that planning permission for major development (which would include sand and gravel extraction) should be refused except in exceptional circumstances and where it can be demonstrated that it is in the Public Interest. It states that such proposals should be considered in the light of an assessment of: i) the need for the development, including in terms of 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.

Other Sources of Minerals

While there are other potential deposits in the region, including in the north west of Suffolk, The County Council can only consider sites in the plan that were put forward by landowners, landagents, and minerals sites operators during the call for sites.

It is accepted that there is already cross boundary movement of sand and gravel in both directions between counties, however paragraph 145 of the NPPF...
of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;”

There is no over-riding need, as

i There is a 32% surplus in the Plan.

ii Both professional geologists and quarrying specialists have confirmed that there are plenty of aggregate deposits available in Suffolk and adjoining counties.

iii The sand and gravel could be provided from any one or a combination of a number of sources:

• Elsewhere in the Westleton Beds, which contain extensive gravel bodies in the Halesworth – Southwold – Sizewell area (including Wangford Quarry).

• From other sand and gravel deposits in East Suffolk and the Ipswich and Norwich areas, for example:

1. In the Waveney Valley area – mainly the glacial age Bytham River deposits.

2. In the Lowestoft and Great Yarmouth area – Bytham River and Wroxham Crag deposits.

3. Around Norwich.

4. Around Ipswich – Kesgrave sands and gravels deposits formed by the River Thames during glacial times.

• From marine dredged aggregates (see also 7.5.f. below) – The actual amount of sand and gravel dredged off the East Anglian states “Minerals planning authorities should plan for a steady and adequate supply of aggregates by... making provision for the maintenance of landbanks of at least 7 years for sand and gravel and at least 10 years for crushed rock, whilst ensuring that the capacity of operations to supply a wide range of materials is not compromised. Longer periods may be appropriate to take account of the need to supply a range of types of aggregates, locations of permitted reserves relative to markets, and productive capacity of permitted sites”

The plan aims to maintain a landbank based on the past 10 years sales until the end of the plan period, so it cannot necessarily rely on other authorities to do so. We also can’t rely on marine aggregates. While a some marine aggregate is landed in Suffolk the plan cannot guarantee an increase in supply from marine sources as where the aggregate is finally sold is dictated by the market.

Local Economy
The quarry itself does contribute to the local economy, however the potential for impacts on other aspects of the economy, such as tourism including the self catering business nearby, are
coast is below the licensed quantity. The amount of gravel proposed to be taken from Wangford Quarry is a very small fraction of the total sand and gravel abstraction licensed off the East Anglian coast. So to use marine dredged aggregate instead of excavating in the AONB would have a very insignificant effect on the current marine dredging operations.

The three jobs at Wangford Quarry would still be required to produce the same amount of aggregate to supply the demand in Suffolk. These jobs might then be elsewhere in East Suffolk, and possibly working for a different aggregate supplier.

If the proposal to extract aggregate from Lime Kiln Farm were implemented, then it would very badly affect the self-catering holiday accommodation business at Wangford Farm, as people would not want to spend their holidays living across the road from a gravel pit. This would very likely result in the closure of this holiday letting business, leading to the loss of the jobs of the two people running the business. The holiday let customers at Wangford Farm spend freely in local shops, restaurants and pubs. So the gravel pit extension would have a further deleterious effect on the local economy.

In addition, the unsightly tree screens and the sight of the gravel workings would put people off visiting the Hen Reedbeds Nature Reserve area and the AONB generally in this area, as well as providing an eyesore for people driving along the main A1095 road into Southwold, which would put people off visiting the Southwold recognised. For this reason the next draft of the plan will have a reduced site area.

Ecology and Landscape
A restoration scheme and 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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

Market Area and Local Demand
While the market area is expected to extnd to Norwich and Ipswich, this is due to the sites function which supplements the typical sandier deposits of the area.
area generally, and so have an adverse effect on the important tourist industry in the Southwold area.

Taking the above points together would indicate that there would very likely be a negative effect on the local economy if the proposed quarry extension were implemented.

7.4.b.ii) “the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and”

Other aggregate companies as well as Cemex (e.g. Brett Aggregates, Tarmac-Lafarge) are supplying the area now anyway, without using Wangford Quarry. So either these other companies would supply the demand in the same way as they do now, and/or Cemex would supply the demand in a different way to how it does at present. This comment is consistent with the Completion Commission’s ‘Aggregates, cement and ready-mix concrete market investigation’, 2014 report finding that:

“24. ... (b) Most customers had a choice of several different aggregates suppliers, and the extent of high concentration in local markets was limited.”

See also 7.4.b.i) above.

7.4.b.iii) “any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated, and;”

The Reydon Village Plan (2014), which is based on a comprehensive survey of the population of Reydon, notes that:

with gravel. Additionally, there is a drive to increase house building and the Waveney Local Plan draft is proposing increasing the district’s annual completions to 374 houses up to 2036.

Noise Pollution
County Noise Consultants state that a standoff in addition to standard mitigation (such as planted earth bunds) 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.

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.

Public consultation
The ways that the County Council used to the inform the public of the consultation and consultation events were: letters to
“The protection and maintenance of Reydon’s natural assets received a huge level of support. Footpaths, bridleways, river walls, Reydon Wood, Reydon Marshes, The Hen Reedbeds … are highly valued.”

Mardle Road, together with the bridleway running northwards from the B1126 Wangford Road to Reydon Wood, form an important tranquil and scenic link from the Blyth Estuary and Hen Reedbeds to Reydon Wood. Local people and tourists use this route for walking, cycling and enjoying the scenery of small fields with views over the Blyth Estuary (from the southern part of Mardle Road).

This precious landscape resource would be destroyed by the proposed quarrying and dumper trucks crossing Mardle Road. Any screening by belts of planted trees and earth bunds would just destroy the views across the fields and Blyth Estuary. The noise and dirt of quarrying would put people off visiting the area, hence depriving the local and tourist communities of this precious natural asset.

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

There are plenty of sources of sand and gravel outside of the AONB, as outlined in 7.4.b.i) above.

7.5.a) “the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy;”

The NPPF talks about improving the environment. Wangford Quarry started before the AONB’s were introduced. Given the 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 (including Reydon Parish Council). Social media was also used to promote the consultation events.

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. 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.

It is expected the site will be restored to agriculture and nature conservation, similar to its current use. Some inert waste materials (e.g. excavated soils, construction material, etc… not household or commercial waste) will be used in order to aid in site restoration. The Suffolk Waste Survey, which is used to evidence the waste policies of the plan, identified that there is sufficient landfill capacity in the county until the end of the plan period, so no new landfill sites are
general increased importance attached to conserving the environment over the last few decades, it would appear to be highly unlikely that planning permission would be granted for Wangford Quarry to start from a 'greenfield site' in an AONB today.

Since the people of Wangford have been putting up with the nuisance of Wangford Quarry and landfill site for about 70 years already. This proposal would extend the period of this inconvenience to at least 100 years. Surely it is time to free the local population from this burden.

Important part of the local economy – not really. Gravel can be sourced elsewhere (see 7.4.b.i) above). The net effect on the local economy of the proposed Wangford Quarry extension at Lime Kiln Farm on employment and the important tourist industry in the area would appear to be negative.

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

Gravel can be sourced elsewhere and is currently supplied to the market area by other suppliers in addition to Cemex (see 7.4.b.i) and 7.4.b.ii) above).

I understand that the following points regarding the makeup of the aggregate at Wangford are relevant:-

1. Rounded stones are not at all necessarily the best for making concrete, as angular and elongated particles make stronger concrete. So it would appear that the gravel particles at Wangford are perhaps not really particularly suitable for making concrete.

being designated. This can be read in paragraph 6.7 a) and b) in the plan.
2. The greatest demand for aggregate for house building is for sand, especially soft sand, not gravel. So it would appear that the aggregate from Wangford is not particularly suitable for house building.

3. No major construction projects are proposed in Suffolk, except Sizewell C. I understand that it is proposed to use marine dredged aggregate for Sizewell C, so Wangford Quarry is not required to supply Sizewell C, or any other major construction projects.

See also 7.5.d) below.

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

Gravel can be sourced elsewhere and is currently supplied to the market area by other suppliers in addition to Cemex (see 7.4.b.i) and 7.4.b.ii) above).

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

Gravel for filter beds is a specialist low volume market, so it will be a national market. The demand for filter gravel will be low in East Suffolk compared to the rest of the UK, since there is a low population, and also because a large proportion of the water supply in Suffolk is from underground, and so generally speaking does not require filtration. The UK demand for filter gravels will be concentrated in large cities, especially, where the water supply is from river and lake/reservoir sources, where the water requires
filtration to remove suspended particles. The water from the groundwater sources of Suffolk has already been naturally filtered by the soil and rocks, so does not need any filtration. Similarly, the demand for filter gravels in sewage treatment works will be concentrated in high population areas. There are other suppliers of filter gravels capable of meeting the demand (just look at AI’s website), or it could be sourced elsewhere in the Westleton Beds or locally elsewhere generally.

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

Most of the demand for aggregates locally will be in and around the population centres of Norwich and Ipswich. The demand the area around Wangford will be low, because the population is low. So the most economical and logical way to supply the demand will be from centres of supply near Ipswich and Norwich. In addition, there are other pits locally to Wangford, for example Earsham, which are not in Suffolk, but are close to Wangford. Please see 7.4.b.i) and 7.4.b.ii) above.

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

Why not use marine aggregates. 20% of the UK’s demand is met from this source. Cemex, Brett and Lafarge already land marine aggregates at Ipswich. A report prepared by URS for Leeds City Council in 2014 states that:-
“The recession in construction activity seen in the last few years has reduced prices and profit margins on aggregates generally - such that the question of a significant increase in marine aggregate landings and related infrastructure in the region is not considered by the industry to be viable in the short term. However, recent assessments by various parties have concluded the difference in the production cost of land won against marine won has narrowed and is currently in the order of £2/tonne.”

So it would appear that the cost of marine aggregates in relation to land won material may not be so high now. This would especially be the case for those aggregate companies who already have wharves in Ipswich (Cemex, Brett and Lafarge-Tarmac), since the start up costs would be low, especially for Cemex, who also operate a fleet of aggregate dredgers.

Approximately 50% of the licensed quantity of marine dredged aggregates was actually extracted from the area off the coast of Suffolk. The annual quantity dredged is of the order of 4 million tonnes (Mt). A considerable proportion of the aggregate dredged was supplied to the continent (Holland, Belgium and Germany), as well as to the London area. A small amount was used in Suffolk. To replace the 80,000 tonnes per year from Wangford Quarry with marine dredged aggregate would only mean either diverting about 2% of the total currently dredged or increasing the total dredged by about 2%.

Long term, the approach has to be to reduce gravel consumption where possible by improved civil engineering and building design, as well as by recycling waste building materials.
7.5.g) “it is considered that in the impact upon the wider AONB, recreation within the area, and the nearby residential properties and ecological designations could be moderated to an acceptable extent.”

Based on the noise, dirt and destruction of view from the existing quarrying operations, the effect on residents and visitors could not be moderated to an acceptable extent. Please see 7.4.b.iii) and other sections above.

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<th>4. Other Points from the NPPF</th>
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<tr>
<td>i  Ministerial Forward</td>
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<td>“Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations.”</td>
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</table>

We should be protecting the AONB for future generations. The short term expedient of destroying the landscape is not necessary. We can use alternative sources of aggregates (see 7.4.b.i) above) and aim to avoid extracting this gravel at all in the future by recycling aggregates, improving construction techniques to minimize the demand for aggregates.

“This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this.”

The comprehensive survey of the citizens of Reydon upon which the Reydon Village Plan is based shows the overwhelming concern
of local people for their environment in general, and the AONB and nature reserves in particular. The level of consultation with the people and community of Reydon seems to have fallen well short of the Minister’s expectations.

i  ii) Natural Environment

Paragraph: 004 Reference ID 8-004-20140306 states, in referring to National Parks and AONB’s, that:

“. The Framework is clear that great weight should be given to conserving landscape and scenic beauty in these designated areas irrespective of whether the policy in paragraph 116 is applicable.”

This statement seems to reduce the weight of any attempt to provide justification for development using paragraph 116.

i  iii) Clause 115

In referring to AONB’s:

“The conservation of wildlife and cultural heritage are important considerations ..”

The wildlife in this area is very diverse, due to the wide range of different habitats in close proximity to each other, for example the estuary, fresh water marshes, heath land, woodland, hedges, open fields, pastures and so on all within a very short distance of Mardle Road. An important part of this system is that the wild creatures can move between these habitats. For example Chinese water deer and muntjac deer come into our meadow, presumably from the
marshes near the Hen Reedbeds, to graze, especially when the grass has recently been cut for hay/silage. I doubt whether they would move around so freely if there was a huge working gravel pit to cross.

The area around Wangford has been painted by Stanley Spencer, and many other artists, both past and present, while the Blyth Estuary has been the subject of many paintings.

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<th>iv) Clause 123</th>
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“Planning policies and decisions should aim to: identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”

Mardle Road is a relatively tranquil area which is used by tourists and local people for walking, cycling and enjoying the countryside and nature generally, while forming a link between the SWT Nature Reserves at the Hen Reedbeds and Reydon Wood. A gravel pit would destroy both the tranquillity and the scenery, and so destroy the recreational and amenity value of the area around Reydon Wood and the Hen Reedbeds.

### 5. Planning History

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<th>1997 Planning enquiry</th>
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The Inspector concluded that the Plan should not include development which is contrary to Government Policy and can only be justified as an exception. The inspector ruled that no extension...
to Wangford Quarry should be included in the County Minerals Plan.

i 2002 Planning Application

RMC/Cemex argued that exceptional circumstances applied because they were giving up their planning permission for a quarry in Westleton, in exchange for permission to excavate at Wangford Covert.

i 2006 Planning Application

Planning permission was granted at this time for excavation at Wangford Covert extension, in return for Cemex giving up a planning consent for excavation at Holton St Peter. This decision, by the Planning Committee, was contrary to the recommendation by the Council Officers to refuse permission.

Cemex verbally undertook not to pursue further quarrying in the Wangford area at the planning application meeting.

6. Consultation Procedure

There are concerns that all the people who should have been notified of the content of the draft plan were not aware of it. In particular, when I received a letter notifying me of the proposals, Col. Chater of Toad Hall, which is within 250 metres of the proposed excavation site, had not received a letter, and the Chairman of Reydon Parish Council was not aware of the proposals for excavation in Reydon.

A further concern is that this is a ‘Minerals & Waste Plan’, not just a minerals plan. Although there are said to be no proposals for
waste disposal at the site at the moment, if the plan is adopted in its present format, then it will be a plan for Waste Disposal at the Site. If it is in the Plan, planning permission should be granted easily.

So, there could be a waste disposal site there without any proper consultation with the local people, almost by default.

7. Conclusions

• The demand for aggregates in Suffolk can be easily supplied by the aggregates industry without the proposed Wangford Quarry extension at Lime Kiln Farm.

• There is no need to include the Lime Kiln Farm extension to Wangford Quarry in the Suffolk Minerals & Waste Local Plan.

• There are no exceptional circumstances which would merit allowing this development under clause 116 of the NPPF, nor would the development be in the public interest. There is no national need for development. The net effect on the local economy of allowing the development would probably be to harm the economy. The need for aggregates could easily be met from elsewhere. The detrimental effects of the development on the environment, landscape and recreation could not be moderated satisfactorily.

• Quarrying has been taking place in Wangford for about 70 years. This proposal would extend the period of quarrying to 100 years. The people of Wangford have put up with this nuisance for too long anyway, even without the 30 extra years proposed in the Plan.
• No further extensions to Wangford Quarry should be allowed, in order to protect the AONB and meet the requirements of the residents of Reydon and Wangford, and visitors to the area.

8. Recommendation

E/42  Aileen Irving

I wish to object strongly to the proposal to extend gravel working from the existing site in Wangford into the Lime Kiln Site for the following reasons:
It is an Area of Outstanding Natural Beauty (AONB). The area on the Reydon side of the Blyth Estuary is already becoming damaged and degraded by the insensitive spread of development (e.g. the solar farm off Quay Lane and the Adnams Distribution Centre). It seems that the concept of an AONB is being deliberately ignored, and in the fullness of time there will be nothing in this area worth conserving.
It is important to see the Blyth Estuary in its entirety. It is wonderful to look from one side to the other and enjoy the integrity of the landscape. Already the open rolling landscape is becoming despoiled by the unnatural effect of the screening which has been planted on the Reydon side to disguise the Adnams Distribution Centre. The farmer at Lime Kiln Farm and Cemex have already planted additional screening some time ago in anticipation of permission for further gravel workings being granted. This is not acceptable.
I would refer you to the National Planning Policy Framework 27 March 2012 chap. 11 para. 109, which emphasises ‘the need for protecting and enhancing valued landscapes’ and in particular para. 115 ‘great weight should be given to conserving landscape and scenic beauty in AONB’s’, planning permission being granted in such areas only in ‘exceptional circumstances’ (para. 116).

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
Para. 118 goes on to state ‘if significant harm resulting from a development cannot be avoided (through locating to an alternative site with less harmful impacts) …. Then planning permission should be refused.’ This paragraph mentions the possibility of mitigating the harmful effects (screening etc. presumably). Again, this kind of ‘solution’ is not acceptable, being at odds with the natural landscape. Moreover, what is the point of living in an AONB if one is not able to enjoy the view? The ‘screening’ we have already seen evidence of is an eyesore, and is only slightly preferable to being confronted by brick walls.

It is anticipated that the Lime Kiln Farm site would be worked for c. 30 years, and that following this period, the excavated area would be landscaped, providing a good habitat for wildlife. However, for the duration of this period our heritage will consist of a bleak moonscape. When, and if, the ‘fabled’ landscaping eventually takes place, the result would be inconsistent with the traditional appearance of the countryside.

There is also the question of noise. The Lime Kiln Farm site is very close to the Hen Reedbeds. It seems anomalous that the level of working proposed should take place in the vicinity of a valued amenity where it is possible to hear the ‘booming’ of the bittern. In the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty & Special Qualities Indicators 21 Nov 2016, the report makes much of a multiplicity of factors which are important, whether visual, aural or sensory stimuli enhanced by qualities of light/space (the big ‘Suffolk Skies’) … and sounds such as those of curlews and geese.

In addition to the noise generated by the work itself, there would be the added nuisance of additional traffic crossing Mardle Road. Instead an attractive and peaceful place to walk to and from the Hen Reedbeds, the lane would be cacophonous and dusty.

To return to the Planning Policy Framework 27 March 2012, para. 123, ‘planning policies and decisions should aim to identify and protect areas of tranquillity which have remained relatively undisturbed by noise 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;
are prized for their recreational and amenity value for this reason’. I would refer you to the Reydon Village Plan Nov 2014, in which, in response to a questionnaire ‘with a good return rate’, ‘the protection and maintenance of Reydon’s natural assets received a huge level of support.’ and wished to ‘ensure the Planning Authority (Waveney District Council) and Environmental Agencies are aware of local concern for the environment, in particular the importance local people place on our wide range of natural assets.’

The proposed development of the Lime Kiln Farm site would have a deleterious effect on wild life in general and birds in particular in the locality. It is a mistake to think that these interests can be adequately served by the provision of the Hen Reedbeds. Instead such sites cannot be isolated from their wider environment. For example, the arable fields earmarked for development are an important autumn and winter feeding site for flocks of curlews. The curlew is an endangered species (see DEFRA/RSPB document and red listing etc.). The sound of these birds is one of the most evocative in nature and residents of and visitors to this area should not be denied the privilege of experiencing these sounds in their locality. It is a travesty to suggest that this inheritance should be replaced by the sound of diggers’ engines and beeping. It is not acceptable to argue that the kind of biodiversity created by old gravel pits is advisable. It is essentially artificial in this particular situation – a man-made ‘theme park’.

What about the oak trees? The threatened fields are bordered by numerous old oak trees. It is a wonderful spectacle. I have been informed that these trees will be saved if the development goes ahead. Practically this seems unlikely, as the trees run criss-cross over the site and would render working difficult. Even those which would remain after the onset of development would ultimately be shored up in ridges, their roots eroded and damaged. Add this factor to the light soils and it seems inevitable that these beautiful trees would soon die. If this is not a 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 and Landscape
A restoration scheme and 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.

Site phasing should minimise the impact of the operations on ecology and
bad enough prospect, consider the fate of the ecosystem and creatures which depend on the habitat the trees provide.

I object also on the grounds that the development would be deleterious to the local economy. I understand that the proposed site will provide 3 jobs. By contrast the residents of Wangford Farm have for some years been running a successful business letting out holiday cottages. These units are of high standard and were constructed by local firms. They continue to use local services to maintain these properties. Additionally the many guests that they accommodate make full use of the local shops (Wangford Store and the Farm Shop on Wangford Road) and all the other facilities (pubs, restaurants and shops etc.) in Wangford, Reydon and Southwold.

The gravel. I appreciate that gravel and other aggregates are required for the construction industry, but it would appear from all the guidelines that AONB’s should be at the very bottom of the list when sites are chosen. There are numerous deposits of high quality gravel in East Anglia and offshore. There are no exceptional circumstances to justify the creation of a further site in this AONB, and the only beneficiaries of such a scheme would be the Mexican-owned multinational Cemex and the farmer they have been dealing with. Since there is no ‘national need’ to extract gravel specifically from the Lime Kiln site, the proposal should be dropped from the plan.

There has been an arrogant abuse of the process of consultation. Given the scale and impact of the plan for the Lime Kiln site, it is deeply shocking that so few people were informed prior to the farcical ‘drop in’ held in Wangford. Brief articles in the Lowestoft Journal and Eastern Daily Press were supposed to suffice. They were not accurate in certain areas. For example, in stating that all three of the sites in the vicinity of the existing quarry were proposed to be in the plan. Later we were informed that two of these options had been abandoned, with the Lime Kiln site remaining. We soon discovered that virtually everyone we spoke to in Wangford, Reydon and Southwold were totally ignorant of landscape, by ensuring only part of the site is extracted at one time

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value. Your comments that this is not practically possible are noted, however working from field to field in phases, while retaining field boundaries, including hedgerows and trees, is common practice to retain important landscape and biodiversity features. The typical way this is done is to use a planning condition stating extraction must start no less than 10 meters from the edge of tree canopies.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be
the entire matter. How many people read the aforementioned newspapers? It has been left to those of us immediately affected by the proposal to advertise it to the wider public. In addition to this, it seems that the time allowed for the news of the proposal to be disseminated and digested by the general public before the drop in and the end of the consultation period on 11th December has been far too brief. It bears the hallmark of something being rushed through before anyone is really aware of what is going on.

From the outset, the matter has been presented to us as if the outcome has already been decided, and that we should content ourselves with the ‘mitigation’ measures which would be on offer. Do our opinions matter at all? This is not what we should expect in a democracy. We deserve better.

| determined at the planning application stage.

**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. 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.

The County Council recognises the short term affect that minerals sites have, however they are a good opportunity for habitat creation. This is encouraged with policy MP7 which gives preference to sites with restoration plans providing biodiversity net gain.

**Noise Pollution**

County Noise Consultants state that a standoff in addition to standard mitigation (such as planted earth bunds) 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, businesses and areas of tranquillity.
### Local Economy

The quarry itself does contribute to the local economy, however the potential for impacts on other aspects of the economy are recognised. For this reason the next draft of the plan will have a reduced site area.

### Need for Minerals Sites

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.

### Other Sites in the Wangford Area
There were other extensions to the quarry at Wangford proposed, however these sites were excluded as the environmental and landscape impacts could not be made acceptable and they were excluded from the Preferred Options draft of the plan. However they could be seen in representations made by Cemex UK in the appendix of the site selection reports.

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), and email notification to Parish Councils. Social media was also used to promote the consultation events.

There will also be an additional consultation in June, taking place over six weeks, with consultation events. The public will also be able to make representations at this consultation. Following this consultation there will be an examination in public, where an inspector will take all representations into consideration.

| E/45 | Neil Rattenbury | I am writing to object to the above proposed development on two grounds, firstly the area’s status as an AONB and secondly the Suffolk Coast and Heaths Area of Outstanding National Beauty |
likely adverse impact on our business (The Village Store Wangford) should the proposed development proceed. Like many people in the area we are shocked that such a development is even being considered given the area’s AONB status, if allowed to proceed it would clearly make a mockery of the term. This area is blessed with rare and dwindling birdlife (Marsh Harriers, Bitterns, Curlews, Barn owls to name a few), wonderful countryside views and walks and if allowed to proceed this development would lay waste to a large part of the AONB. There can be no justification for this to happen. As a direct result of being an AONB the area is a mecca for tourists who wish to enjoy the countryside, its wildlife and walks. A very large proportion of houses in the immediate area of the proposed development are second/holiday homes which become filled with tourists during school holidays and the week or so after when older people frequent the area. We live and work in a fragile rural economy and rely heavily on the trade this seasonal influx of visitors brings to the area. Our business is the Village Store, a small shop in Wangford which provides a living for myself, my wife and the seven people we employ on a permanent basis who are all local people. The shop is a vital local service for the many old and infirm people living in the area who are unable to travel any great distance to purchase food and other essentials. It is also a focal point of the community where people come to meet their friends and neighbours.

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

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- 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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- 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
negative impact it would have on the area’s desirability as a tourist destination. There is no doubt that without the income the tourists provide our business would be devastated, unemployment would follow and the area would lose a vital service. Accordingly we strongly object to this.

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;
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Ecology and Landscape
A restoration scheme and 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.

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.

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
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| E/82 | Annie Jerman | Local Economy
The quarry itself does contribute to the local economy, however the potential for impacts on other aspects of the economy are recognised. For this reason the next draft of the plan will have a reduced site area.

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.  |

<table>
<thead>
<tr>
<th>E/66</th>
<th>Shaun Denny, CEMEX</th>
<th>[In addition to specific plan comments CEMEX has submitted a number of supporting maps and documents for the Wangford Site.] Information in these supplementary materials is noted.</th>
</tr>
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<tbody>
<tr>
<td>E/82</td>
<td>Annie Jerman</td>
<td>I am contacting you to show my concern over the proposed gravel pit at Lime Kiln Farm, Reydon. (Not Wangford.) I am totally against this proposal as it will cause significant harm to the local environment and damage to the AONB contrary to national and local planning policies. These areas are precious and need protecting.</td>
</tr>
</tbody>
</table>
The area is a winter feeding ground for curlews, along with other species, and is in very close proximity to the sensitive Hen Reed Beds that are managed by the Suffolk Wildlife Trust. I cannot believe that such a vast industrial development is even being considered in this important AONB. Wildlife tourism is a significant part of our local economy and far outweighs the few jobs being created as a result or this proposal. Please reject this proposal as it has not been given due consideration regarding the impact this would have on the surrounding area due to noise, increased traffic, pollution, damage to tourism and the aforementioned wildlife. It is suggested this quarry would have a life of 5 to 7 years, but I can see it would be more like 30+. This beautiful site would lost forever.

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 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, must be submitted as part of the planning application for the site.

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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.
At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

The Following is the County Council’s justification for including a site within the AONB is as follows:

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

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<tr>
<th>E/98</th>
<th>Simon Amstutz, Dedham Vale AONB &amp; Stour Valley Project and Suffolk Coast &amp; Heaths AONB</th>
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</thead>
</table>
| **Summary** | The AONB objects to the inclusion of Lime Kiln Farm as an allocated site for mineral extraction because:  
- It fails to consider the National policy context relating to AONBs  
- The exceptional, national need case required to contemplate justification for over-riding the National policy has not been made  
- There is scant detail in relation to the likely impacts of the proposal on the Protected Landscape or Protected Sites within close proximity such that it is not possible at this stage to rule out likely adverse impacts. |

**National Policy and Guidance**

1. Areas of Outstanding Natural Beauty (AONBs) are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England, Wales and Northern Ireland are conserved and enhanced.

2. The primary purpose of AONB designation is to conserve and enhance the natural beauty of the area, as confirmed by Section 82 of the **Countryside and Rights of Way Act 2000 (CRoW Act)**.

3. The Government has confirmed that the landscape qualities of AONBs and National Parks have equal status in terms of protection, and the protection given by the land use planning system to natural beauty in both types of area should also be equal.
4. The AONB designation is also of international importance, recognised as a Category V Protected Landscape by the International Union for the Conservation of Nature (IUCN) and AONBs are defined within the Environmental Impact Assessments Regulations for specific consideration as a “sensitive area”.

5. Within Section 85 (1) of the CRoW Act 2000 there is a duty on all relevant authorities to have regard to this purpose in exercising or performing any functions in relation to, or so as to affect land in AONBs. This Duty of Regard requires all public bodies, down to parish council level, to consider the AONBs nationally protected status in any land use related decisions. This includes planning applications and the formulation of Local and Neighbourhood Plans.

Guidance on how the implication of this duty and how it may be discharged was issued by Defra in 2005. This includes the statement “Additionally, it may sometimes be the case that the activities of certain authorities operating outside the boundaries of these areas may have an impact within them. In such cases, relevant authorities will also be expected to have regard to the purposes of these areas”. The Guidance includes a list of relevant authorities, although this is not definitive.

1 Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Sufflok Broads. Defra (2005)

6. Sections 88 and 89 of the Act state that each Local Authority or Conservation Board shall prepare and publish a Management Plan for their AONB which should then be reviewed at intervals of no more than 5 years. Management Plans are adopted statutory policy of the Local Authority AONB and have been recognised as a ‘material consideration’ in the planning decision making process. Suffolk County Council are a signatory to both the Dedham Vale and Suffolk Coast & Heaths AONB Management

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;
### Plans. 6.1. The Suffolk Coast & Heaths AONB Management Plan (2013-18)

Particular attention is drawn to the following AONB Management Plan Objectives:

- **Objective 2.7** There is a consistently high standard of development control decision-making. This will prevent adverse impact on the landscape and natural beauty of the AONB, as set out in the NPPF.
- **Objective 2.8** The special qualities of the AONB are consistently taken into account and enhanced by the planning process.
- **Para. 3.5.5** AONBs feature high up in the hierarchy of protection, seeking to prevent inappropriate exploitation (e.g. minerals, development etc) while maintaining high quality renewable resources (e.g. water resource protection or food production).

6.2. The Dedham Vale AONB and Stour Valley Management Plan (2016-2021)

Particular attention is drawn to the following Management Plan Policies relevant in this case include:

- Lobby for national and local planning policies to reflect the significant of the natural beauty and special qualities of the AONB and Stour Valley.
- Support development that contributes to appropriate economic development and contributes to the conservation and enhancement of the AONB and Stour Valley.

- 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

This will be stated within the next draft of the plan along with as much detail as can be provided at this stage regarding potential impacts and mitigations.

**Proposed Changes**

*Provide detailed justification of why a site is being proposed in the AONB.*
• Protect the area, including its setting from developments that detract from its natural beauty and special qualities, including relative tranquillity.
• Maintain the local distinctiveness of the Dedham Vale and Stour Valley.
• Ensure Local Plans reflect the need to conserve and enhance the AONB and Stour Valley.
• Support development that contributes to the conservation and enhancement of local character.

7. Natural England’s published spatial planning position2 considers in Position 5 the protection and enhancement of protected landscapes: “Spatial planning policies and decisions should ensure the highest levels of protection and enhancement for England’s protected landscapes, habitats, sites and species.” The explanatory text states “Natural England interprets the protection and enhancement of all sites, habitats and landscapes widely. This includes safeguarding their character, qualities and features, including where appropriate, their settings...”


8. The NPPF identifies the three dimensions of sustainable development, as being economic, social and environmental. Paragraph 14 of the NPPF promotes “a presumption in favour of sustainable development” but then highlights the position for plan makers and for decision makers areas where this policy may be restricted. Footnote 9 in the NPPF specifically identifies AONBs as such areas where restrictions may apply to the above presumption. The Consultation fails to address Footnote 9 in its interpretation of para. 14. We consider this to be a serious omission.
9. Paragraph 113 of the NPPF states that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Clarity on the County Council’s position in relation to the allocation of Minerals and Waste sites within the AONBs or their setting would be improved with the inclusion of a specific policy relating to the matter.

10. Paragraph 144 NPPF (bullet points 2 & 3) states:

• 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.

There is no evidence in the Consultation to address the above. We do not consider that it is possible to allocate sites within the AONB or its setting without addressing the question of whether unacceptable adverse impacts would ensue.

11. Paragraph 115 of the National Planning Policy Framework (NPPF) provides specific planning guidance for plan makers and decision takers in relation to AONBs and confirms that great weight should be given to conserving landscape and scenic beauty in National Parks and AONBs, which have the highest status of protection in relation to landscape and scenic beauty. Para. 115 NPPF states that: "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty."
The inclusion of the Wangford Quarry in the Plan fails to address the requirements of para. 115. Major development is likely to result in an adverse impact on the statutory purpose of the AONB designation: to conserve and enhance natural beauty. No evidence has been submitted to suggest that this would not be the case. An extension to the existing operations at Wangford Quarry would prolong activity which has a detrimental impact on the landscape character and special qualities of the AONB. See bullet point 13 for further comment on major development.

12. Paragraph 116 of the NPPF states that “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest. Consideration of such applications should include 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 can be moderated.”.

Taking each of the above considerations in turn with specific reference to Wangford Quarry:

• There is no accompanying evidence to demonstrate that quarrying at the site is of national significance. We note that there is an anticipated protection of 3 jobs and that 50% of the workings would be destined for areas outside Suffolk. This is insufficient evidence to suggest that it is of national significance or of particular note for the local economy.
The Plan clearly identifies sites which would yield in excess of the required quantities and therefore the demand can be met by utilising sites outside of the designated area.

There is a significant risk of causing detrimental effects on the environment given the plethora of designated sites within less than 1km and the fact that the site is within a nationally designated AONB landscape. Likely impacts on landscape character and special qualities associated with the AONB, including tranquillity have not been fully identified or addressed in the Consultation. The site is also within an important area for the local tourism economy. The Plan fails to consider the extent to which these effects can be avoided or moderated.

13. Major development within the AONB, or within its setting is likely to have an adverse impact on the purposes of the designation. Whilst each proposal should be considered on its own merits, the allocation of sites for mineral extraction pre-empts any assessment of potential impacts on the AONB. Examples of adverse impacts we anticipate would result from mineral extraction within the AONB or its setting include:

- Development not appropriate to the landscape setting of the AONB
- Blocking or interference of views out of the AONB particularly from public viewpoints
- Blocking or interference of views of the AONB from public viewpoints outside the AONB
- Loss of tranquillity through the introduction of lighting, noise, or traffic movement
- Introduction of an abrupt change of landscape character
- Where development may be classified as temporary but would have long term (10-25 years) or medium term impact as defined by Guidelines for Landscape and Visual Impact Assessment 3
14. In addition to the over-riding Policy advising against the inclusion of Lime Kiln Farm, we consider the site to be wholly unsuitable in landscape terms. Even if a case were to be successfully made to demonstrate that it is in the national interest to work minerals at Lime Kiln Farm, we maintain that substantial harm to the AONB would result. Whilst no landscape and visual appraisal has been submitted by Cemex for the Lime Kiln Farm site, from the limited information provided and our knowledge of the site, we do not consider that this likely adverse impact can be effectively mitigated throughout the operational phase of workings or as part of restoration. Any scheme on this site would need to successfully minimise harm to the AONB in terms of landscape character and detrimental impacts on tranquillity. In practical terms, this could only be addressed through retention of the characteristic features of the site, such as hedgerow boundaries and screening of the operational areas of the site during extraction. We fail to see how an appropriate landscape screening scheme could be successfully established within a reasonable timeframe to be effective in minimising harm to the AONB. Following operation, restoration of the site to pre-extraction landform would be required in order to minimise the residual harm to the AONB. Anything other than restoration to the pre-extraction land levels would result in a permanent change to the landscape character of the AONB. The restoration approach seen elsewhere in the AONB, namely at Wangford Common Covert, would be wholly unacceptable at Lime Kiln Farm, given the exposed nature of the location.
15. Further comment on the detail of the Minerals and Waste Local Plan Consultation

15.1 Planning Practice Guidance
We note that there is reference to the Minerals Planning Practice Guidance within the Consultation. We draw attention to the following extract: “Furthermore, in exceptional circumstances, such as where a local authority area is largely made up of designated areas such as Areas of Outstanding Natural Beauty, it may be appropriate for mineral planning authorities to rely largely on policies which set out the general conditions against which applications will be assessed.”
In terms of the AONB, this reinforces the requirement for a policy which clearly sets out the position in relation to allocations within the AONB or its setting.
We also note that the PPG advises that the following issues should be addressed by mineral planning authorities:
• internationally, nationally or locally designated wildlife sites, protected habitats and species, and ecological networks;
• impacts on nationally protected landscapes (National Parks, the Broads and Areas of Outstanding Natural Beauty)
We do not consider that this has been addressed in the Consultation documents.

15.4.3 Wangford
“Landscape 14.5 The site is inside the Area of Outstanding Natural Beauty however it is accepted that there is an overriding need to work the mineral.”
We request further information in relation to the above statement that it is ‘accepted’ that there is an overriding need to work the mineral. We can find no evidence within the Plan to
substantiate this assumption. **The AONB does not accept that there is an overriding need to work the mineral.**

Attention is drawn to our comments above in relation to the National Policy context in relation to AONBs.

**Site Selection Report**

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

This statement underplays the national significance of the AONB landscape within which the site is located. We consider the assumption that the site is capable of mitigation fails to address the permanent change to landscape character likely to result from mineral extraction. It is not possible to pre-empt the potential of an unknown restoration scheme to be successful at mitigating for the loss of landscape character associated with the AONB. There is no evidence to prove that there would be no adverse landscape and visual impact on the AONB as a result of allocating this site.

“Ecology 14.10 There is the potential for impacts upon nature conservation interest including Suffolk Coast & Heaths AONB, Minsmere-Walberswick SPA, MinsmereWalberswick Heaths & Marshes SSSI, Wangford Marshes CWS, Suffolk Coast NNR, Hen Reedbeds (SWT Site), Reydon Wood (SWT Site), Groundwater Source Protection Zone (River Wang, Wolsey’s creek, River Blyth), European Protected Species (Otters, Bats), Priority Species (Bittern, Water Vole, Barn Owl), other protected Species (Badger), Priority Habitats (REEDBEDS, Grazing Marshes). These need to be adequately assessed and where necessary mitigation proposed.”

Clearly there are significant conservation interests within very close proximity of the site. It is not possible to rule out significant adverse effects upon these features without proper assessment. We consider the risk of allocating sites prior to understanding
### Site 14 – Lime Kiln Farm Extension at Wangford Quarry

Lime Kiln Farm is a proposed eastward extension of the existing Wangford Quarry. Although it is identified as an extension to Wangford Quarry the Lime Kiln Farm site is in fact located in the parish of Reydon. This site is located to the east of the processing plant and landfill site and was selected in preference to the Hill Farm extension to the north. The justification for this selection is that extension at Lime Kiln Farm would have less impact on the Area of Outstanding Natural Beauty (AONB). Nonetheless there is significant concern about the selection and working of this site.

Suffolk County Council acknowledges the impact that the proposed Lime Kiln Farm extension will have on the surrounding area: the extension would impact upon the AONB, European sites, Suffolk Wildlife Trust Sites a County Wildlife Site and priority species and habitats. The proposal will also impact upon an area of archaeological potential.

National Planning Policy Framework paragraph 116 states that development within a protected landscape should only take place if it is in the overriding public interest. There is no evidence to suggest that the proposed extension is in the overriding public interest. While it has been proven that there is a need to expand the likely impacts on these designations and the wildlife associated with them to be unacceptable.

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<tr>
<th>E/118</th>
<th>Ian Johns, Suffolk Coastal and Waveney District Councils</th>
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<tbody>
<tr>
<td><strong>Suffolk County Council Minerals and Waste Local Plan Preferred Options Consultation</strong></td>
<td>Waveney District Council and Suffolk Coastal District Council welcome the opportunity to comment on the Suffolk County Council Minerals and Waste Local Plan Preferred Options Consultation. The two District Councils operate a shared planning service and the comments below relate to both the Waveney District and Suffolk Coastal areas. Overall Waveney and Suffolk Coastal District Council are both supportive of the Minerals and Waste Local Plan but specific issues of concern are highlighted below.</td>
</tr>
<tr>
<td><strong>Site 14 – Lime Kiln Farm Extension at Wangford Quarry</strong></td>
<td>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:</td>
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<td>• the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and</td>
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<td>• any detrimental effect on the environment, the landscape and</td>
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existing sand and gravel facilities there is no evidence to demonstrate that this could not be achieved in a location outside of the AONB. It is difficult to understand from the information submitted what the consequences of permitting the Kiln Farm extension will be or what measures will be put in place to mitigate impact. This is particularly important with regard to landscape and habitat protection. It is therefore suggested that more work is needed to justify mineral working on this site and to provide more information about the mitigation of the effects of quarrying.

Proposed extension to Wangford Quarry also raises concerns about the potential impact upon the road network. It is therefore questioned whether Suffolk County Council intends to use the Suffolk County Transport Model to assess the effect of this proposal upon the transport network in combination with planned Local Plan growth.

**Suffolk Coast and Heaths**

Paragraphs 19.7 and 19.11 refer to Suffolk Coasts and Heaths AONB. Use of the word ‘coasts’ rather than ‘coast’ indicates that there is more than one stretch of coastline within the AONB. This is erroneous because there is only one coast within this protected landscape.

I hope that the above comments are of use but please contact me if you haven any questions.

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.

Proposed Changes
Provide clear details of justification for extraction in the area of outstanding natural beauty.

We object in the strongest terms to the inclusion of the Wangford Lime Kiln Site (“Lime Kiln”) in the Suffolk Minerals and Waste Local Plan (the “Plan”).

We disagree with the statement in the corrected draft Wangford Site Selection Report Wangford Quarry Extensions Paragraph 7.3.

Public consultation
The first consultation stage (known as the Issues and Options stage) was open to the public for comment. However there are no minerals sites at this stage of the plan. The Issues and Options consultation was accompanied by a call...
| response contained tables and pictures which could not fit in this document) | that “Kiln farm could subject to a proven case for working within the AONB be included in the draft Plan”.

Development of Lime Kiln would cause material and long term harm to landscape, wildlife and tourism, damaging endangered bird species and the local economy.

Lime Kiln should NOT be included in the next draft of the Plan and assurances given that quarrying will cease at Wangford in 2022.

Our objections fall into five main areas. These are summarised below and addressed individually in the following sections: consultation; supporting documentation; history of the Wangford Quarry (adjacent to Lime Kiln); AONB statutory protections; and Site specific issues.

1. Consultation process

1.1 We consider that GP1 and MP2 should be redrafted to provide appropriate protections for those affected by proposed developments

1.2 Reydon residents have not been properly consulted. This invalidates inclusion of Lime Kiln

1.3 The SCC is not protecting the interests of the communities of Wangford and Reydon

1.4 It is NOT accepted that there is an overriding need to work the mineral

2. Supporting documentation

for sites, which is when site submissions were received.

Projections of need over the plan period are calculated using Local Aggregates Assessments. Data for these assessments is collected through a surveys sent to minerals operators and includes landwon aggregates, marine aggregates and aggregates imported by rail. The document titled “Local Aggregates Assessment 2016 data”, which included trends over the previous ten years, were included in the consultation as plan evidence.

Policy GP1 was written to align with paragraph 14 of the National Planning Policy Framework which states:

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
2.1 There is minimal supporting data on Lime Kiln

2.2 The evidence is inadequate for a proper assessment of a site of this significance within the AONB and for purposes of public consultation

3. History of the Wangford Quarry (adjacent to Lime Kiln)

3.1 Quarrying has been taking place at Wangford and could continue until 2060. This is not reasonable

3.2 SCC should give assurances to the local community that a trade with operators regarding other sites to create exceptional circumstances to override AONB protections at Lime Kiln will not be considered or permitted

3.3 Undertakings to residents have been broken

3.4 Wangford quarry should not be allowed to extend its life indefinitely. Quarrying must end in 2022 as promised when the 2013 extension was granted

3.5 Full historic information must be made available to the public before any future consultation

4. AONB protections

4.1 No AONB site should be included in a Plan – this is illegal. Lime Kiln should be excluded from the next draft Plan

4.2 Creation of a new quarrying site at Lime Kiln overriding AONB protections would be neither justified by exceptional circumstances nor in the public interest

4.3 – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

4.4 – specific policies in this Framework indicate development should be restricted.

If the plan did not align with this statement the plan would not be compatible with national planning policy.

While the County Council accepts that AONBs do indicate that development should be restricted, the Council is of the opinion that there are exceptional circumstances that comply with paragraphs 116 and 144.

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), and email notification to Parish Councils. Social media was also used to promote the consultation events.

Policy MP2 is subject to other policies within the plan including policy GP4, which includes the need to adequately
4.3 The "detrimental effect" of the quarry on the environment would be permanent and cannot be moderated "to an acceptable extent"

4.4 Lime Kiln should be protected from creeping development and quarrying ruled out permanently

4.5 Inclusion of Lime Kiln in the Plan would create a wholly unjustified precedent for other AONB development and is therefore contrary to the public interest

5. Site specific issues

5.1 There is overwhelming local opposition that SCC must recognise

5.2 There would be permanent loss of local landscape

5.3 Quarrying at Lime Kiln would damage the local economy

5.4 Impact on tranquillity has not been properly assessed 5.5 Quarrying at Lime Kiln would threaten the future of red listed curlews and other species important for the biodiversity of the area

5.6 Heavy traffic movements would damage Mardle Road, an important recreational route, beyond repair

5.7 Historic buildings and their settings would be damaged, in particular Reydon Hall

1. Consultation

The process of consultation has been flawed, slipshod and undemocratic. The current process came out of the blue, only

address issues such as public health and amenity, environmental issues, and landscape issues, so it is considered that the plan provides the appropriate protections to those affected by developments.

The County Council did mean to cause confusion as to the location of the quarry extension and does accept the extension is in Reydon. The reason it is called Wangford in the plan is because the quarry is called Wangford Quarry and this site is an extension to that.

A drop in session was available for this site, as for all sites in the plan, on 8th November 2017 at Wangford Community Centre and local residents of Reydon were welcome to attend.

Regarding your comment about 100 meter distances; 100m is seen as the minimum acceptable distance (usually with other mitigation measures such as bunds and vegetation screens) that minerals works can be from residences and business. Site specific factors can mean the distance is increased. The closest residences/ business to the Lime KilnFarm site is approximately this distance away according to the boundary in the consultation document. The area for this is to is planned to be reduced in the next draft of the document, meaning
notified to a small number of individuals, and Lime Kiln was ascribed to the wrong parish.

1.1 The earlier consultation

We have serious concerns at the lack of wider notification at the earlier consultation in late 2016. This was critical in setting the policy and does appear to have favoured operators rather than the public. It is difficult to quantify responses but aggregates companies were, as might be expected given their interest in maximising the supply of aggregates for profit, prolific commentators, shaping eg the base data on which projections have been made to ensure high demand targets and an unrestricted roads strategy.

The resultant GP1 and MP2 imply that SCC will put its weight behind operators' applications rather than be objective. Given the number of occasions in which the Suffolk County Council (“SCC”) or Waveney District Council (“WDC”) have overridden local and Suffolk County Council’s own executives’ advice at Wangford and more recently at the Reydon solar farm, this causes us great concern. We consider this conduct to be against the public interest.

We consider that GP1 and MP2 should be redrafted to provide appropriate protections for those affected by proposed developments.

1.2 The wrong parish

The misallocation of Lime Kiln – into the wrong parish and wrong ward – has caused considerable confusion and has meant that people living in Reydon had until very late in the process (well after the distance will greater. At time of writing approximately 200m

It is accepted that the following statement does not adequately outline the County Councils reasoning for including a site within the AONB within the plan. “The site is inside the AONB however it is accepted that there is an overriding need to work the mineral”. Members of the public’s comments are being taken into account and the plan is being changed accordingly. The detailed outline of the County Councils justification for including the site in the plan is in the site selection report paragraph 7.4 and 7.5. This detailed explanation will be moved into the plan.

Supporting Documents

The document that states the estimated operational life was 5-7 years was submitted by Cemex, without an estimated rate of working. As stated, further information was sought and the 30 year figure was calculated after further information as collected from the operator. There is an estimated 2.4 million tonnes of mineral in the site and Cemex informed the county council that this would be extracted at a rate of 80,000 tonnes per year, which gives an extraction time of 30 years, As previously stated it is expected that the next draft of
the 6 week statutory commencement of the public stage of 'consultation') been totally unaware of the prospect of a new quarry. We live less than 500m away from Lime Kiln Fields but unless we had been notified by our neighbour and personally active in informing people and the Parish Council itself, the consultation might have gone unnoticed locally. This should really have required 1) reissue of documentation that clearly states that this is a possible development in Reydon; 2) public correction of statements from 10 October onwards identifying the site as in Wangford. https://www.suffolk.gov.uk/council-and-democracy/the-council-and-its-committees/cabinet/#tab4; and 3) a well-publicised public drop-in opportunity in Reydon as with all the other sites.

Reydon residents have not been properly consulted. This invalidates inclusion of Lime Kiln.

1.3 The Council meeting on 10th October

Apparent absence of consideration for those potentially affected (the suggestion by Council officer Mr Graham Gunby, during the Cabinet discussion on 10th October, that 100m was a distance that people could live happily adjacent to a quarry) gave no comfort that the views of the local people will properly be taken into account.

We were also interested to note that during that same discussion several Councillors spoke up with concerns about certain other sites showing an awareness of the local issues. The misallocation of the Reydon site may have been a factor, but in all this Wangford and Reydon have been too often taken for granted. Given the huge scale of the site (36 football pitches!) and the fact that it is the only site proposed within an AONB, something SCC are statutorily

<table>
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<tr>
<th>SMWLP, Responses to Preferred Options Consultation, March 2018</th>
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<tr>
<td>the plan will contain a reduced site area. Cemex have informed the County Council that this smaller area will contain approximately 1 million tonnes and will be worked at a rate of 90,000 tonnes per year. Estimated extraction rates will be outlined in the next draft of the plan.</td>
</tr>
<tr>
<td>The Council can confirm that lime kiln farm will not become a landfill for household or commercial waste, as the plan does not anticipate there is any more need for this type of facility, as indicated in paragraphs 6.7 a) and b). Inert wastes (clays and waste soils) may be required as part of the site restoration. This will be stated in the plan.</td>
</tr>
<tr>
<td>It is correct to say that the lorry estimate is related to lorries leaving the site to use the wider Suffolk lorry network, rather than to transfer from the extraction area to the processing plant. This will be clarified</td>
</tr>
<tr>
<td>Thank you for highlighting the typographical error in paragraph 6.42. This will be corrected.</td>
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</table>

**Historic Information**

Regarding previous decisions and committee meeting minutes, meeting minutes for the Development and regulation comitee can be found here.
obliged to protect, we consider that this should have been drawn to Councillors’ attention in the Chairman’s opening introduction.

The SCC is not protecting the interests of the communities of Wangford and Reydon.

1.4 The Wangford drop-in

At the meeting at Wangford on 10th November (wrong parish, poorly publicised) a resident was assured that Suffolk County Council will take any objections about encroachment into AONB seriously.

However the Preferred Options Draft, October 2017 Para 14.5 makes a statement with regard to Lime Kiln that is not supported by documentation and does not suggest that other views are being properly taken into account.

“The site is inside the AONB however it is accepted that there is an overriding need to work the mineral”

This statement should be withdrawn and residents’ concerns taken into account. It is NOT accepted that there is an overriding need to work the mineral

2. Supporting documentation

Consultation documentation contains a number of errors, inconsistencies and omissions of such magnitude as to make the consultation invalid.

In the Wangford Site Selection documentation


The quote from the 2006 planners report indicates that the specific development that was being considered at that time did not adequately address certain issues, including the restoration of the landscape. This does not mean there is no development proposal that can do this and the County Council expects that the site to 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.

Size of Quarry

The size of the quarry, including quantity of material and area of land it covers, are defined in paragraph 14.2 of the plan.

Ecology and Landscape

A restoration scheme and 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.

Site phasing should minimise the impact of the operations on ecology and
### 2.1 Lack of proper documentation

The sites at Wangford Hill Farm and Wangford Southern Extension are accompanied by Outline Landscape and Visual Appraisals prepared by consultants for Cemex. Appendix 3 for Lime Kiln has only borehole log sheets from 1982.

There is minimal supporting data on Lime Kiln – merely a footnote that further information is being sought.

### 2.2 Conflicting and materially misleading information

#### 2.2.1 Life of the proposed site at Lime Kiln

The covering data sheets (p82 and 83) contain summary information. These state Estimated operational life to be 5-7 years. This conflicts with the Q&A sheet handed out at Wangford which states that the site will be operational for 30 years. Only those (17) people who attended the Wangford drop in were made aware of the very significant scale of the proposed site relative to the current site.

This is a material discrepancy that invalidates the consultation on Lime Kiln.

We were told categorically by Mr Gunby in a telephone conversation on 20th November that the site would NOT be used for landfill (other than clays and waste soils). This statement should have been made clearly in the documentation.

#### 2.2.2 Traffic Movements

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

*Local Economy*

The quarry itself does contribute to the local economy, even though there are a small number of permanent jobs, there are wider supply chain issues for the local area to consider, such as construction local construction companies that use the site.
Although no information was provided on this topic in the documentation further enquiry from the Waste and Minerals Office reveals a proposal for dump trucks to move material from Lime Kiln across Mardle Road to the existing quarry site in Wangford for loading and despatch.

No figures are given for this but we estimate a minimum of 20 movements per day.

The Site Selection document para 5.44 states that

“Traffic generation is anticipated to be the same as for the existing Wangford Quarry.”

This statement is false and misleading and should be qualified.

2.2.3 Careless and misleading drafting in documentation under Lime Kiln Farm.

Site Selection Report under Lime Kiln section, Landscape, states:

“6.37 The Southern Extension is potentially acceptable within the Area of Outstanding Natural Beauty provided that appropriate mitigation is provided and the case for working within the AONB is justified.”

This error has subsequently been corrected at our request.

‘Public Amenity’ in the same document, Paragraph 6.42 contains the statement that

“the levels of noise generated will be within ‘excepted’ guidelines.”

material from the site. However, the potential for impacts on other aspects of the economy, such as tourism, are recognised. For this reason the next draft of the plan will have a reduced site area.

Historic Environment

It is expected that the distance between the site and historic assets and other mitigation measures such as bunds and bands of vegetation will prevent significant impact on nearby historic assets.

Proposed Changes

Provide a more detailed explanation as to why the Lime Kiln Farm Site is subject to exceptional circumstances and should be included in the plan.

Ensure that estimated mineral quantity, working rate and period of operation are stated in the plan.

Clarify that the anticipated traffic generation relates to lorries leaving the site and accessing the lorry network.

Correct error in paragraph 6.42 (“excepted guidelines”)
This statement is meaningless.

The quality and depth of the documentation is inadequate for a consultation of this importance. Given that this site is in an AONB this is doubly unacceptable.

The evidence is inadequate for a proper assessment of a site of this significance within the AONB and for purposes of public consultation.

3. The Wangford quarry – a history of broken promises by SCC

The history of the Wangford site is one of effectively permanent quarrying and broken promises to the community.

The quarry pre-dates the AONB but has twice been extended since AONB was designated, and both times AONB protections and objections from local residents have been overruled.

3.1 Past permissions

• In 1998 the site was included in the Suffolk Minerals Plan on the grounds that the operator offered to surrender a site at Westleton, outside the AONB. This was against the 1997 Inspector’s judgement that a Plan by definition could not be exceptional.

  o Planning permission was granted in 2002.

• In 2006, against Council Officers’ advice, Councillors again overruled AONB protections and granted permission for the Wangford Extension when the operator offered to surrender a dormant site at Holton, also outside the AONB.
That second extension was to last for seven years, yet with no apparent consultation with local residents was twice extended to finish only in 2022.

In both cases other parts of Suffolk benefitted at the cost to Wangford and the AONB.

Undertakings to limit quarrying have been broken.

Council officers’ advice has been overruled.

It has not been possible to trace full documentation justifying SCC past decisions.

3.2 Permanent quarrying

Quarrying has continued on the Wangford site for almost 70 years to date, and the current proposal is for the new much, much larger 27 hectare site (possibly as large as all three sites quarried to date combined) to operate for a further 30 year minimum. This will mean a century of quarrying - around 80 years from the date that the area was designated as an AONB in 1970. This record is completely contrary to the spirit of the contract between the quarrying industry and the countryside that quarrying should be temporary, measured in years, even short decades but certainly not whole lifetimes.

Quarrying has been taking place at Wangford and could continue until 2060. This is not reasonable

3.3 Expansion through “deals” benefitting other communities

Given this background of broken promises we understand that many residents of Wangford are becoming very impatient with the
presence of the quarry. On 14th November 2017 Wangford Parish Council voted unanimously to object to its extension into next door Reydon. SCC should expect justified outrage if, as we fear, Cemex, or another operator, pulls another rabbit out of the hat and offers some sort of deal (whether another site or eg as a trade for concessions at Sizewell) to provide grounds for overruling AONB protections for a third time.

SCC should give assurances to the local community that a trade with operators regarding other sites to create exceptional circumstances to override AONB protections at Lime Kiln will not be considered or permitted.

3.4 Decisions against the advice of Council Officers

In addition to decisions against the advice of the Inspector in 1998 (see 4.1 below), in 2006 Suffolk County Council’s Countryside Manager’s rejection of the proposed planning application for the Wangford Extension was overruled by Councillors. This incidentally also happened when Waveney District Councillors overruled Officers’ recommendations at the Reydon 10 hectare solar farm in 2013.

The 2006 Planners’ report (quoted in Development Control Committee, DC06/02, 26 January 2006 para 61) states:

‘The application fails to recognise the cumulative effect extending the quarry would have. The Visual and Landscape Assessment concedes there would be temporary adverse impact of high/very high significance for Green Lane, and medium significance for Mardle Road. The development would result in a permanent change in the landscape character of the site. The landform that
would be created would not echo the gentle slopes that currently exist and represents a permanent adverse change to the landscape character of this part of the AONB.’

No-one at the Council has yet been able to produce minutes of the discussion that led to the overturn in 2007 of Planning Officers’ recommendation to reject the application to extend the Wangford quarry.

Undertakings at the time of that decision that the current site would be restored and public access granted by 2013 have been broken as extensions have twice been approved, and have proved worthless.

It is the distinctive character of our corner of the AONB that we are seeking to safeguard, albeit one shaped by farming over hundreds of years but therefore a haven for our curlews and smaller birds in winter – open fields and hedgerows. There is plenty of biodiversity metres away in the adjacent Reed Beds and estuary.

Council officials in 2006 also recognised that there is no way deep quarrying can hope to return the landscape to anything like its current distinctive character.

Wangford quarry should not be allowed to extend its life indefinitely. Quarrying must end in 2022 as promised when the 2013 extension was granted.

3.5 Lack of historic documentation

We have been frustrated at the lack of available historic information on the quarry on either District or County websites, which has given us little opportunity or time to fully understand the background of
the site and in particular the 1997 Inspector’s Report that appeared categorically to rule out the possibility of exceptional circumstances arising in any Plan (as opposed to a specific planning application).

Neither Waveney nor Suffolk County Council has uploaded comprehensive documentation to their planning websites and so it has been impossible to gain a complete picture of the history of this site in the time available.

Full historic information including all prior consultation responses and legal advice taken by SCC and WDC in reaching decisions must be made available to the public before any consultation.

4. AONB statutory protections

SCC is statutorily required to protect the AONB in which this site is located.

4.1 The 1997 Inspector’s Report

In 1997 an Inspector’s Report was published into the Suffolk Minerals Plan then being debated. His conclusion categorically ruled out the possibility of exceptional circumstances that might overturn AONB protections arising in any Plan (as opposed to a specific planning application).

“to comply with Government and Suffolk County Structure Plan policy it could only be justified on grounds of exceptional circumstances. By definition, schemes which can only be justified under exceptional circumstances cannot be a development plan policy or proposal.”
This judgement was overturned by SCC in 1998 on a basis that as far as we can judge failed to recognise the point of the ruling.

We did on 29th November get a copy of the Inspector’s report from Mr Gunby to enable us to understand the context of this judgement and are satisfied that the above quoted statement is unequivocal, and not qualified by any conditions. However, no-one at SCC seems able to lay their hands on the subsequent discussion that resulted in it being ignored, or legal advice that it was proper to do so.

Initial feedback from a planning QC suggests that the statement remains correct and therefore that potentially the 1998 SCC decision was in error and even illegal.

On this basis no AONB site should be included in a Plan – this is illegal. Lime Kiln should be excluded from the next draft Plan.

4.2 Conditions for overriding AONB protections

SCC appear to have already taken the view quoted above that

“The site is inside the AONB however it is accepted that there is an overriding need to work the mineral”

The arguments cited in support of this statement are either irrelevant, inadequate or unsupported by sufficient data for a reasonable judgement to be made.

Our comments on these are set out in Appendix 1. These include

a) Mineral surplus of over 30% in the Plan
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<td>b) Availability of sand and gravel elsewhere</td>
<td>c) Confusion over market being addressed</td>
<td>d) Lack of supporting evidence generally</td>
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<td>e) Unsubstantiated conclusions</td>
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Creation of a new quarrying site at Lime Kiln overriding AONB protections would be neither justified by exceptional circumstances nor in the public interest.

4.3 Permanent loss of landscape.

As noted above SCC officers have in the past conceded that the landscape will not return to its original state and so this area of the AONB will be permanently lost.

The “detrimental effect” of the quarry on the environment would be permanent and cannot be moderated “to an acceptable extent”.

4.4 Scale

Nowhere is the size and life of the quarry properly disclosed or discussed.

The scale of the site is vast – we believe the second largest proposed development in an AONB in the last decade apart from Sizewell. It now emerges that quarrying would last for 30 years. It would also mean an almost continuous stretch of industrial development of AONB land between Reydon and the A12.

The history of the quarry however suggests that incremental extension is a habit. A smaller application should not be entertained.
as the behaviour of operator and SCC would mean development of the full site would be guaranteed irrespective of undertakings from operator or SCC.

Lime Kiln should be protected from creeping development and quarrying ruled out permanently after 2022

4.5 Precedent

Each time AONB protections are overturned the next application becomes easier. This happened with the Reydon Solar Farm when the applicant submitted an aggressive threat to go to appeal based on precedents in other AONBs elsewhere. Including (and effectively approving) Lime Kiln given the weakness of the case for overriding AONB protections would add one more precedent with consequences nationally.

The arguments put forward to justify this massive incursion into the AONB are hopelessly inadequate and SCC should be embarrassed by this section of the documentation and the risk they are opening up to AONB nationwide.

Inclusion of Lime Kiln in the Plan would create a wholly unjustified precedent for other AONB development and is therefore contrary to the public interest.

5. Site specific issues

5.1 Local opposition

There is overwhelming local opposition that SCC must recognise from residents and both parish councils by unanimous vote.
This area could be blighted for years by the threat of a new quarry. Residents in the immediate vicinity should be given assurances that it will not be put forward again.

5.2 Permanent loss of local landscape

As noted above the proposed site risks obliterating this area of the AONB permanently. This will have consequences that have not been taken into account, below.

5.3 Damage to local economy

No evidence is offered for the statement in Wangford Site Selection para 7.5 a) that the existing quarry is an important part of the local economy. It is likely that if quarrying is extended there will be long term losses of jobs in tourism, accommodation and the local shops as visitors are deterred. These would outweigh the three jobs “safeguarded” that are in any event dependent on the level of quarrying activity across the county.

5.4 Impact on tranquility

As noted in 1.3 and 2.2.2 and Appendix 1 para 7 no evidence has been submitted regarding potential damage to tranquillity of the area and impact of noise on the surrounding flat landscape.

5.5 Protected birds

Curlews are a declining, a red listed species whose population is entitled to protection and whose habitats should be preserved. Lime Kiln Fields are a winter feeding ground for these birds.
Therese Coffey, MP for the local area and Under Secretary of State for the Local Environment stated in a House of Commons debate on 17th October 2017 “My right hon. Friend will understand that we need to undertake an appropriate mix of actions, including protecting important sites, working with farmers and other land managers to manage these habitats carefully, and targeting legal predator control to halt, and then reverse, the decline of this iconic species. The curlew is too important to be lost from our world’s biodiversity.”

Other threatened species such as bitterns live in the adjacent Hen Reed Beds nature reserve which may also be affected by the prolonged presence of large scale mineral extraction workings.

This is in addition to other species that live in the hedgerows and oak trees of Lime Kiln Fields. Together they form important parts of the biodiversity of the area. Quarrying at Lime Kiln would threaten the future of red listed curlews and other species important for the biodiversity of the area.

5.6 Recreation

Mardle Road is an important link between Reydon Woods and the Hen Reed Beds: the only access north to south from Wangford Road to the Blythe estuary between the A12 and Quay Lane. Judging by the state of Green Lane (between the current quarry Extension and Landfill) this would be damaged beyond repair by heavy traffic movements – which as noted above have not been acknowledged in the Site Report or Q&A sheets.
Heavy traffic movements would damage Mardle Road, an important recreational route, beyond repair.

5.7 Historic Landscape

Reydon Hall, 500m to the north, was the home of the Strickland family celebrated for their contribution to literature in Great Britain and Canada. The landscape of Reydon surrounding the house – woods and fields – features frequently in their writings. Two sisters became famous historians of women (Agnes Strickland is specifically mentioned in Reydon Hall’s Grade II listing entry), and two emigrated to Canada to become the founding mothers of Canadian literature, in which focus on nature owes much to the influence of these writers (modern writers such as Margaret Atwood acknowledge this debt). Tourists from Canada are regular visitors to Reydon Hall as a consequence and there are plans in preparation to develop these cultural and literary links. A quarry 500m to the south that destroys this landscape is not compatible with SCC’s other objectives to protect the cultural as well as natural landscape and promote tourism.

Dame Una Pope-Hennessy in her 1940 biography of Agnes Strickland wrote [about Agnes’s upbringing at Reydon Hall] “History hung like a vapour over the Suffolk scene and from the mists activated by the Strickland imagination rose wraiths from the past.”

Para 5.36 of the Wangford Site Selection document states that there is no objection regarding historic buildings. As residents of Reydon Hall for the above reasons we object to this statement.
<table>
<thead>
<tr>
<th>E/137</th>
<th>Martin Nicholls</th>
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<tr>
<td>Historic buildings and their settings would be damaged, in particular Reydon Hall</td>
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<tr>
<td>Development of Lime Kiln would cause material harm to wildlife and tourism, damaging endangered bird species and the local economy.</td>
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<td><strong>5.8 Visualising the impact</strong></td>
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<tr>
<td>We attach as Appendix 2 photomontages (as would have been required to be submitted by the applicant in any planning application) showing the potential impact of the quarry on the site.</td>
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<td><strong>Ecology and Landscape</strong></td>
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<td>A restoration scheme and 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.</td>
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<tr>
<td><strong>1.</strong> The environment impact in an established Area of Natural Beauty in the Suffolk Coasts and Heaths Areas. There is little or no attention to mitigation or landscaping in the plan. In particular there is nothing on the impact of the Hen Reedbeds. There is also no indication that the site itself is recognised a feeding ground for Curlews.</td>
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<td><strong>2.</strong> There has been scant proper consultation with local residents. This may be because of the confusion caused by the wrong designation of Wangford rather than Reydon or because the site was not proposed by either the landowners or mineral companies.</td>
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<td><strong>3.</strong> This is a long-term project and the volume of proposed extraction would seem to indicate that it would take some 25 years to fully extract the products. It is certainly not a short (5 year) project.</td>
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<td><strong>4.</strong> The impact on local traffic. The access, Mardle Road, is currently a quite by way principally used by walkers and cyclists</td>
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would be turned in a major highway used by large and heavy dumper trucks. The proposed mitigation measures (bunds) will provided scant protection against the noise pollution caused by these vehicle movements while at the same time be a true blot on the landscape. Property prices while inevitably crash.

5. There is no credible argument on the grounds of National Interest. Suffolk produces far more minerals than are consumed. This situation is forecast to remain unchanged regardless of the Sizewell development.

6. There will be no significant increase in employment associated with this development. Thus this proposal will not only cause serious and permanent damage to an AONB but bring no tangible benefits. It should be removed from Suffolk County Council's Mineral and Waste plan.

will also help to minimise the impact on stone curlew as well as other wildlife and the landscape.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

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), and email notification to Parish Councils. Social media was also used to promote the consultation events.

The County Council did mean to cause confusion as to the location of the quarry extension. The reason it is called Wangford in the plan is because the quarry is called Wangford Quarry and this site is an extension to that.
Extraction time
The document that states the estimated operational life was 5-7 years was submitted by Cemex, without an estimated rate of working. As stated, further information was sought and the 30 year figure was calculated after further information as collected from the operator. There is an estimated 2.4 million tonnes of mineral in the site and Cemex informed the county council that this would be extracted at a rate of 80,000 tonnes per year, which gives an extraction time of 30 years. The next draft of the plan is expected to contain a reduced site area, which will also have an effect on the extraction time.

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
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<th>E/139</th>
<th>Dr Anthony and Beverley Silverstone</th>
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|        | Further to Simon Loftus's crystal clear exposition as to why the Gravel pit mining should not go ahead, as local residents we also want to object, in the strongest possible terms. Either AONB means something or it doesn't, notwithstanding the ill conceived decision concerning Lime Kiln Farm, since this short sighted cynical and expedient decision creates a terrible precedent for the future. | 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. | 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.

| E/143 | William Haward | As a Reydon resident I am horrified to hear that this gravel extraction is planned in an Area of Outstanding Natural Beauty and close to Hen Reedbeeds Nature Reserve, operating for 30 years, when nine other sites in the district are available for this purpose and not designated in these ways. Is there no respect for these designations? I don’t think ‘exceptional circumstances’ (NPPF) is a good enough excuse to proceed with this. I also understand that Reydon Parish Council were not notified and no drop-in consultation has been offered by Ecology and Landscape A restoration scheme and 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. Site phasing should minimise the impact of the operations on ecology and... |
| **Suffolk County Council as it has with the other nine sites!!! The labelling of this site as 'Wangford Limekiln Farm' is also grossly misleading. One might be forgiven for thinking this was being slipped through in a minimal way to avoid any critical comment? I hope common sense will prevail and an alternative less sensitive site will be chosen for this purpose.** | **landscape, by ensuring only part of the site is extracted at one time**

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

**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), and email notification to Parish Councils, Including Raydon parish Council. Social media was also used to promote the consultation events.

A drop-in event for the Lime Kiln farm extension took place at Wangford Community Centre on the 8th of November 2017. |
<table>
<thead>
<tr>
<th></th>
<th>Patricia Davidson</th>
<th>I object very strongly to your plans to make a gravel pit near the Hen Reed beds, Reydon. This site appears to be the only site on your list within in an AONB and I understand should only be considered in exceptional circumstances. As I'm sure you already understand sites which come under AONB status need protecting and this area is particularly important because of the bird issue at Hen Reed Beds. It is a winter feeding ground for migratory curlews which are Red List for most endangered birds in the UK. This is apart for the other birds which use this beautiful site. I understand that you already dredge a large amount of sand and gravel off the Southwold coast of which a small is landed in Suffolk. Why not use this for building use locally? Have you even assessed the damage to animal and bird life? The environment? The tourist industry? Bird enthusiasts? Traffic? Where is the information for this? We were offered no public consultation in Reydon. I understand Reydon PCC were not notified and there has been little publicity. Not surprising when this amounts to an act of vandalism on the environment by a council which should be protecting this beautiful area. Please pay attention to the concerns expressed and think of the damage you may do to this AONB.</th>
</tr>
</thead>
<tbody>
<tr>
<td>E/146</td>
<td>Site Name</td>
<td>The County Council did mean to cause confusion as to the location of the quarry extension. The reason it is called Wangford in the plan is because the quarry is called Wangford Quarry and this site is an extension to that.</td>
</tr>
<tr>
<td></td>
<td>Suffolk Coast and Heaths Area of Outstanding National Beauty</td>
<td>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:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 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;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</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.

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 and Landscape_

A restoration scheme and 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.

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.
It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

Local Economy
The quarry itself does contribute to the local economy, however the potential for impacts on other aspects of the economy, such as tourism, are recognised. For this reason the next draft of the plan will have a reduced site area.

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), and email notification to Parish Councils, Including Raydon parish Council. Social media was also used to promote the consultation events.
A drop-in event for the Lime Kiln farm extension took place at Wangford Community Centre on the 8\textsuperscript{th} of November 2017.

<table>
<thead>
<tr>
<th>E/147</th>
<th>Philip O’ Hear, Southwold and Reydon Society</th>
<th>Lime Kiln Farm Proposed New Gravel Pit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>I am writing on behalf of the Southwold and Reydon Society. We are a consultee for local planning applications and our Committee has carefully considered the proposal in the draft Mineral and Waste Plan for a new quarry at Lime Kiln Farm in Reydon. We wish strongly to oppose this proposal. We would first like to point out that by calling the Lime Kiln Farm proposal Wangford, your consultation was significantly misleading and has caused much upset among our 350 members who feel that the plan was being pushed through behind their backs. We have other concerns about the process and quality of the consultation with regard to Lime Kiln Farm. Because the site was not one of those originally proposed by either landowners or mineral companies, it has not been given the same quality and depth of assessment in the evidence as, for example, the other two sites originally proposed for extensions to the Cemex quarry in Wangford. Likewise, there is scant reference to mitigation and landscaping plans in the documents relating to this proposal despite the fact that this is a site of 27.7 hectares in the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty (AONB) and close to the very sensitive environment of the Hen Reedbeds. The site itself is a winter feeding ground for curlews, a listed endangered species. The draft plan documentation is also highly misleading in that it suggests this site will be worked for around five years whereas it was stated at the consultation event held in Wangford that it would be worked for up to 30 years and be a deep extraction which would leave a very large excavation hole in the environment. At 27.7 hectares, this quarry, if allowed, will be 3-4 times the size of the existing quarry. The transport of material from the site will</td>
</tr>
</tbody>
</table>

Site Name
The County Council did mean to cause confusion as to the location of the quarry extension. The reason it is called Wangford in the plan is because the quarry is called Wangford Quarry and this site is an extension to that.

Site assessment
The Lime Kiln Farm site was given an equal assessment by the County Council compared to other sites proposed by the landowner and operator. The County Council’s assessment can be seen in the Site Selection Reports, which were available as part of the consultation.

The most detailed assessments are carried out at the planning application stage. These assessments will inform the full package of mitigation measures, which will include avoidance, minimisation and mitigation of impacts on landscape, ecology, public amenity and other impacts.

Ecology and Landscape
A restoration scheme and mitigation that satisfies the County Council, based on
involve regular dumper truck crossings of Mardle Road which is a quiet local lane much used by walkers and cyclists. The direct impact of extraction works on the residents of neighbouring and nearby properties will be significant, especially in terms of noise and loss of visual amenity. Indeed the large bunds proposed to reduce noise impact will, of course, further impact on the views and sense of open space from these properties. The test for permission for industrial developments of this kind in the AONB is that there are exceptional circumstances and that the benefits of the development meet the national interest. We cannot see how this test is met by this proposal. Overall, the draft plan allows for a surplus of 32% of mineral against assessed need and, indeed, 50% of mineral extracted in Suffolk goes outside the County. There are plenty of other sources of mineral in the county which are outside the AONB as evidenced by the fact that all the other proposals in this draft plan are, indeed, not in AONB areas. Additionally, offshore mineral extraction is a well used and viable source of mineral locally and will be used in the Sizewell development. We accept that there is a national need for mineral but we do not agree that this can only be met by taking this resource from this site in the AONB. The national need can be met elsewhere and there are no exceptional circumstances justifying this proposed breach in the national and local policies protecting the AONB.

As an amenity society we are acutely aware of the need to make our community as well as our environment sustainable which requires balancing the need to retain and create local employment with other aims, including the protection of the countryside. In this case, however, we were told at the consultation event that only three direct employee posts would be safeguarded by this proposal. We cannot see how this offers any benefit to the community which outweighs the harm to our landscape and environment which would be caused. Indeed, as wildlife tourism is a significant contributor to our local economy, it appropriate surveys and taking account of statutory and non-statutory designations, must be submitted as part of the planning application for the site.

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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.
is possible that the employment and economic effects of this proposal would be negative. In conclusion, therefore, our Society is wholly opposed to this proposal. It will do significant harm to our local environment and damage the AONB contrary to national and local planning policies. It will create loss of views, landscape quality, wildlife habitat and quiet during the thirty years of working. It will leave a permanently altered landscape which will not be in keeping with the largely flat landscape of this part of the AONB. It does not meet the required tests of exceptional circumstance or national interest to be exempt from the protection afforded to the AONB. It should be struck out from the next draft of Suffolk’s Mineral and Waste Plan.

<table>
<thead>
<tr>
<th>Sources of Minerals</th>
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<tbody>
<tr>
<td>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.</td>
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</table>

<table>
<thead>
<tr>
<th>Quantity of Minerals leaving the County</th>
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<tbody>
<tr>
<td>It is acknowledged that it is expected that this site will supply a market area that goes beyond Suffolk, however this highlights the importance of the site. Due to the high proportion of course aggregate at this site, it is used to supplement a number of quarries throughout the region, which typically have finer deposits.</td>
</tr>
</tbody>
</table>
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.

**Local Economy**
The quarry itself does contribute to the local economy, however the potential for impacts on other aspects of the economy, such as tourism, are recognised. For this reason the next draft of the plan will have a reduced site area.

<table>
<thead>
<tr>
<th>M/8</th>
<th>Jean Brown, Wangford with Henham Parish Council</th>
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<tbody>
<tr>
<td></td>
<td>SUFFOLK MINERALS &amp; WASTE LOCAL PLAN SITE SELECTION REPORT – WANGFORD QUARRY EXTENSIONS September 2017 KILN FARM</td>
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<tr>
<td></td>
<td>Wangford with Henham Parish Council objected to the inclusion of the proposed extension to Wangford Quarry at Lime Kiln Farm for the following reasons:</td>
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<tr>
<td></td>
<td>*unacceptable impact on the landscape within an AONB, on the local ecology, on the residential amenities of nearby properties by reason of noise, fumes and general disturbance, and on wildlife.</td>
</tr>
</tbody>
</table>

*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:
Paragraph 115 of the National Planning Policy Framework states that *Great weight should be given to conserving landscape and scenic beauty in......Areas of Outstanding Natural Beauty* and Paragraph 116 states that *planning permission should be refused for major developments in these designated areas except in exceptional circumstances....* The Parish Council see no exceptional circumstances here.

Paragraph 143 of the Framework states, inter alia, that *in preparing Local Plans local planning authorities should: set out environmental criteria, in line with the policies in this Framework, against which planning applications will be assessed so as to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic......* The Parish Council assert that, even with the most stringent of conditions attached to any planning permission the extraction of minerals from this site will still be unacceptable.

You have concluded that two other sites put forward (Hill Farm and Southern Extension) would be unacceptable due to the impact upon on the AONB. For that and other reasons Kiln Farm should also be excluded.

- 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 and Landscape

A restoration scheme and 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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

### Quarry Traffic

The access to the existing quarry is via the A12. Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated, therefore additional traffic impacts are not expected on the A12.

<table>
<thead>
<tr>
<th>M/10</th>
<th>Mrs Alice Bunbury</th>
<th>Massive Gravel Pit near Hen Reed Beds, Reydon</th>
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<tbody>
<tr>
<td></td>
<td>Thank you for ringing me up yesterday. I am concerned that there will be big lorries getting on to the A12 opposite the Henham Estate. At this point there is no speed restriction and the A12 is very straight. This could lead to bad accidents.</td>
<td></td>
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<td>I would be grateful if you could pass this on as requested</td>
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</table>

| M/12 | Emma Chapman | Cemex aggregates at Wangford have applied for an extension of land recently. I've read in the local papers a few people are objecting to it and wrongly calling it a new quarry when it's only an extension of land to where they've been working for over 50 years. I work for the logistics side of this firm and have always been impressed by the environmental care this firm exercises and the |
|      | Noted | |

Assessment Suffolk County Council
| M/13 | Tom Chapman | time and money put back into reinstating once the aggregate has been extracted. I think if the people who are objecting to these new plans had a look at Cemex’s work putting the old part of the quarry back to nature they would think again. I enjoy working for Cemex – they are a good firm.  
I am very concerned if Wangford didn’t get planning form yourselves that a lot of jobs would be at risk including myself – with the knock on effect.  
How the current climate in the local area is at the moment I don’t think a lot of us would find employment very easily.  
Thank you for taking the time to read my letter. |
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<tbody>
<tr>
<td>M/14</td>
<td>Lt. Col. R.K. Chater MBE (retd)</td>
<td>I would like to bring to your attention the effect on me and others of the closure of Wangford Quarry should the extension not go ahead. I have worked there for 24 years and have no knowledge of any other type of work. I would fear for my home and wellbeing should it close. In that time I have seen reinstatement of spent land to a very high standard and now see marsh harriers gliding and feeding over it. The pit employs 3 people plus other local contractors who would also suffer. This company has very strict rules – some of which involve and protect the environment. I would not work there if I thought the land would not be left in good order. I am hoping this letter would go some way to convincing you in favour of an extension.</td>
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<tr>
<td></td>
<td>Reference to your letter dated 26th October 2017</td>
<td>Note that paragraph 116 of the National Planning Policy Framework states that planning</td>
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</tbody>
</table>

**Suffolk Coast and Heaths Area of Outstanding National Beauty**

The National Planning Policy Framework paragraph 116 states that planning
the inspection by representatives of the relevant Ministry who ruled that there was to be no extension of the existing quarry towards Wangford. On the plan for the inspection the area in front of Lime Kiln House was marked in but was rejected. The latest plan gives this area as the main area for excavation. This area has suffered from far too much excavation over the years.

Quite clearly this area is within the Area of Outstanding Natural Beauty. The damage to the area is extremely depressing. It will now be dominated by a large quarry with its noisy machines and heavy transport which will be frequently crossing Mardle Road on its way to and from the A12 but the most serious effect will be the spoiling of the environment for those who live here and the reduced monetary value of their property. There are five major properties which will be devalued if the plan is implemented, as will be the interest of numerous tourists and loss to the local economy.

Should the plan be implemented the Suffolk County Council will have been involved for over 50 years in the reduction of an area of Outstanding Natural Beauty and it will be our descendents in 35/40 years who must live with the spoiled landscape.

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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Ecology and Landscape
A restoration scheme and 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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

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. 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.

**Local Economy**

The quarry itself does contribute to the local economy, however the potential for impacts on other aspects of the economy, such as tourism, are recognised. For this reason the next draft of the plan will have a reduced site area.

<table>
<thead>
<tr>
<th>M/38</th>
<th>Amanda Humphrey</th>
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<tbody>
<tr>
<td><strong>Site Name</strong></td>
<td>The County Council did mean to cause confusion as to the location of the quarry extension. The reason it is called Wangford in the plan is because the quarry is called Wangford Quarry and this site is an extension to that.</td>
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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 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... |

I write with reference to the proposed Lime Kiln Quarry gravel pit in the Suffolk draft plan, which is described as being in Wangford, though it actually would be in Reydon. I would like to object to this proposal in the strongest possible terms. This an AONB. Extraction on this site would have a catastrophic effect on the Suffolk Wildlife Trust Hen Reed Beds, where populations of Bittern, Marsh Harrier and Otters presently thrive. The landscape would be permanently changed and this peaceful part of our local environment would be gone forever.

The lorries would have to travel on a quiet rural lane (Mardle Lane) and would also add to traffic on the road down to Southwold and the already busy stretch of the A12.

I am also indignant that so little information was sent to Reydon residents – this included the fact that Reydon Parish Council were not notified directly of these proposals, even though the suggested gravel pit would be within our parish. Information has also been muddle, with initial reports saying the pit would be worked for 56 years, later information saying 30! The public consultation was held...
in Wangford, not well publicised, and was at short notice. Many Reydon residents were not even aware. Development of any kind in an Area of Outstanding Natural Beauty should not be permitted and I urge you very strongly to please remove this one from this list of proposed sites.

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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It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

*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. 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.

**Quarry Traffic**

While dump trucks would be required to use Mardle Lane to transfer minerals to the processing facility, levels of traffic onto the A12 generated by the quarry extension are expected to be the same as current levels, with no additional traffic generated.

**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), and email notification to Parish Councils (including Reydon parish Council). Social media was also used to promote the consultation events.

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<table>
<thead>
<tr>
<th>M/42</th>
<th>Mark Peel</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>I am writing to you with regard to Wangford Quarry. I work there full time and live in Reydon. I am very worried about all the negative press we are receiving and would, with respect, like to draw your attention to the following:</td>
</tr>
<tr>
<td></td>
<td>1 – It is not a new Quarry we are seeking, just an extension.</td>
</tr>
<tr>
<td>SM/31</td>
<td>Tony Casement</td>
</tr>
<tr>
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<tr>
<td></td>
<td>I strongly object to the proposed extension to the Wangford site (Mardle Road) as the development will make a considerable environmental and qualitative impact on the area and its residents.</td>
</tr>
</tbody>
</table>

2- Cemex UK go to great lengths to resinate the environment after quarrying.

3 – I personally work everyday amongst wildlife, squirrels, foxes, marsh harriers, rabbits and also sand martins

4 – All local builders use our quarry, and would have to travel a great deal further for a comparable product.

5- We have contractors work for us who would also lose out

6 – Even a previous quarry site at Reydon has been utilised by Adnams Brewery for a distribution centre. Many members of my family work there.

7- I have been a Reydon man all my life and consider myself a genuine local man with family and would like to keep my job working locally.

Please bear in mind the fact we are not here to upset, annoy or destroy any habitat. We work to the highest standards and are regularly audited. Thank you very much for your understanding

Ecology and Landscape
A restoration scheme and mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory
| SM/33 | Sara Farrands | I object to the starting of a new quarry on the Reydon side of Mardle Road. It is an AONB and therefore should be protected as such. The new working would have a significant impact on the area and views across the River Blyth. The existing workings are due to be landscaped and given to Suffolk Wildlife as part of the Hen Reedbeds where, amongst other things, Bitterns and Marsh... |

|  |  | 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. |

|  |  | designations, must be submitted as part of the planning application for the site. 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. It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value. |

**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.
Harriers nest. The noise and disruption from new working would be detrimental to this.

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
| SM/34 | Anne Eaton | I don't believe this sort of plan should be happening on or near an AONB |

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**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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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
| SM/35 | Anne Eaton | Wangford lime kiln farm: the objection is to developing this Area of Outstanding Natural Beauty. I don't believe it should be threatened by this plan. | Suffolk Coast and Heaths Area of Outstanding National Beauty
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<table>
<thead>
<tr>
<th>SM/36</th>
<th>Emma Williamson</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Wangford Lime Kiln Farm must remain protected as an AONB. Its value as such in terms of landscape and wildlife far outweighs the benefits of gravel extraction. Losing AONBs should be resisted at all costs.</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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<table>
<thead>
<tr>
<th>SM/38</th>
<th>Annabel Kingsman</th>
<th>Wangford Lime Kiln Farm - I don’t agree with this kind of development in an AONB</th>
</tr>
</thead>
</table>

*Suffolk Coast and Heaths Area of Outstanding National Beauty*

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Site phasing should minimise the impact of the operations on ecology and
It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

<table>
<thead>
<tr>
<th>SM/39</th>
<th>Charlotte de Rothschild</th>
<th>Wangford Lime Kiln Farm</th>
<th>I don't agree with this kind of development that is proposed for this AONB which will destroy precious wildlife habitat</th>
</tr>
</thead>
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Suffolk Coast and Heaths Area of Outstanding National Beauty

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<table>
<thead>
<tr>
<th>SM/40</th>
<th>Nicholas Chapman</th>
</tr>
</thead>
</table>
| This is in relation to Wangford Lime Kiln Farm - I do not agree with this kind of development in an AONB. AONB’s should be protected and this is a worrying development which will clearly have wide detrimental implications for the local environment. | Suffolk Coast and Heaths Area of Outstanding National Beauty
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<table>
<thead>
<tr>
<th>SM/41</th>
<th>Ben Hayward</th>
<th>Wangford Lime Kiln Farm as it is an AONB.</th>
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| SM/42  | Graham Fry                      | Wangford Lime Kiln Farm. The site is inside the Area of Outstanding Natural Beauty and next-door to the Hen Reedbeds Nature Reserve of the Suffolk Wildlife Trust. A place like this should be cherished, not developed. | Suffolk Coast and Heaths Area of Outstanding National Beauty  
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| SM/43 | Lionel de Rothschild | Wangford Lime Kiln Farm | It seems extraordinary and perverse to develop a site of this sort, with AONB status, when AONBs are so successfully enshrined in law, culture, popular perception of the environment and, if I may say so, protection by other councils. I understand there is a 32% surplus forecast within the 10 year plan, so this, the only AONB among the 10 sites designated, should surely be protected from this sort of needless and heedless predation. I am further given to understand that the facts were wrongly gathered and wrongly presented. The Suffolk Coast is:

**Suffolk Coast and Heaths Area of Outstanding National Beauty**

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At this stage it is not expected that the development would be detrimental to the reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.
special indeed: please do not ruin it so unnecessarily - indeed please do not ruin it at all!

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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
### Proposed Changes

<table>
<thead>
<tr>
<th>E/154</th>
<th>Alison Collins, Natural England</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The proposed extension is entirely within Suffolk Coast and Heaths AONB. It is about 380m from Minsmere-Walberswick SPA/Ramsar site, Minsmere-Walberswick Heaths and Marshes SSSI and Suffolk Coast NNR.</strong> In principle, we have no outright objection <strong>subject to</strong> further information being provided which demonstrates that impacts to protected landscape and designated features have been avoided where possible and mitigation measures put in place for those impacts which cannot be avoided and a programme of monitoring agreed to ensure the measures are effective. Note that it is not stated in the Plan whether there will be any landfill following extraction. The position of the proposed extension within the protected landscape means that the highest sensitivity must be afforded to the landscape; the landscape and visual impact of the proposal must be evaluated at all stages of the operation. The assessment of the proposal on nearby designated sites must include a consideration of likely changes to hydrology and increased disturbance of sensitive species from noise, lighting, vibration etc. Suitable mitigation might include avoidance of the breeding season, provision of screening etc. If there is any landfilling with 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.</td>
<td></td>
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</table>

| **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. Part of this should be that features important of landscape and biodiversity will be retained, such as mature trees and hedgerows.** It is not expected that this site will become landfill for local authority waste or commercial waste following extraction, however some inert materials may be used in the restoration of the site. It is expected that this site will be returned to agriculture or nature conservation. These details will be added to the next draft of the plan. |

**Proposed Changes**
<table>
<thead>
<tr>
<th>Reference</th>
<th>Name</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>material other than inert waste, the impact of attracting gulls and corvids into the area will also need to be considered. The impact assessment should provide evidence that there will be no adverse effects on the nationally and internationally designated features from dust blow, changes to hydrology etc.</td>
</tr>
<tr>
<td>E/108</td>
<td>Charlie Christensen, The Environment Agency</td>
<td>This site partly lies in a Source Protection Zone (SPZ) 1. We would likely have an in principle objection to this site if restoration by landfilling of wastes is proposed. Under our policy for groundwater protection, the location of landfill sites in SPZ1 would normally trigger an in principle objection due to the high risk of groundwater resources from the deposit of wastes, including inert wastes. Alternative restoration proposals would be encouraged, but if restoration by landfilling wastes is still considered to be the only practical option, then a comprehensive quantitative risk assessment would need to be provided. Early consultation with us is advised if landfilling is proposed. Additionally, the sustainability appraisal confirms that there is a high potential impact for ecology at this site, which will require further consideration.</td>
</tr>
<tr>
<td>E116</td>
<td>Fiona Cairns, Suffolk Preservation Society</td>
<td>Designated Landscapes - AONB  <strong>Wangford, Lime Kiln Farm site</strong>  This site is assessed at para 5.35 of the Site Selection Report as capable of mitigation if an overriding need for the development exists. This is reiterated at para 6.37 - Lime Kiln Farm is potentially acceptable within the Area of Outstanding Natural Beauty provided that appropriate mitigation is provided and the case for working within the AONB is justified. No detail is provided on what form the mitigation will take and therefore it is not possible to assess how the reasons the north east area is specified in the site selection report is 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.</td>
</tr>
</tbody>
</table>
appropriate or effective this will be reducing the impact of the development on this designated landscape.

The site selection report justifies the proposed site within the AONB at para 7.5. This includes at point e) there are no other acceptable proposed sites within the north-east area of Suffolk. The Society questions why the search area for alternative suitable sites is restricted to the north east area of the county. Detailed evidence is required to demonstrate that a 7 year supply of minerals cannot be supplied from the identified sites which are outside the AONB. Point g) of the report states that it is considered that 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. The Society is doubtful that it will be possible to adequately moderate all the harmful impacts. The site is adjacent to the A1095, the main access route to the Reydon and Southwold area, and the proposed significant change of land use is liable to be highly visible from this direction. Furthermore the impact of mineral extraction processes and associated transport movements on the tranquillity of the AONB will be significant. The tranquillity of this part of the AONB is one of its overriding special qualities which is protected by statute. Policy GP4: General environmental criteria requires at point c) that significant adverse impacts on landscape character, visual impact and protected landscapes is adequately addressed. Due to the site’s sensitive location within the AONB the Society does not feel that this is feasible.

**Ecology and Landscape**

A restoration scheme and 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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value, which will also help to screen the site from the A1095. Additional vegetated bunds will also likely be required.

**Quarry Traffic**

Levels of traffic generated by the quarry extension are expected to be the same as current levels, with no additional traffic generate, therefore impact on the tranquillity of the AONB from lorry traffic will be similar to the impact from the current site.
<table>
<thead>
<tr>
<th>E/70</th>
<th>Mike Jones, RSPB</th>
<th>Wangford Quarry Extension (Lime Kiln Farm)</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>Potential impacts on wildlife</td>
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<td></td>
<td>At this stage, we have not been provided</td>
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<td>with any ecological information specific</td>
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<td></td>
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<td>to the site of the proposed quarry</td>
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<td>extension, and therefore cannot comment</td>
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<td>on details of how wildlife currently</td>
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<td>using the site itself could be affected.</td>
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<td>Therefore, if proposals for this site are</td>
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<td>progressed and more information becomes</td>
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<td>available, we may need to comment further.</td>
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<td>However, we are concerned that the</td>
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<td>proposed quarry extension is less than</td>
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<td>350m from the nationally and</td>
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<td>internationally protected wildlife sites,</td>
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<td>the Minsmere-Walberswick Special Protection</td>
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<td>Area (SPA), Ramsar site and Site of</td>
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<td>Special Scientific Interest (SSSI). It is</td>
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<td>also close to Suffolk Wildlife Trust's</td>
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<td>Hen Reedbeds reserve. Given the</td>
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<td>proximity of the proposed quarry</td>
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<td>extension to designated sites,</td>
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<td>Habitats Regulations Assessment of the</td>
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<td>possible impacts of the proposals on</td>
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<td>these sites will be required. At present,</td>
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<td>the strategic-level HRA does not provide</td>
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<td>confidence that impacts can be avoided</td>
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<td>(see our comments above). The requirement</td>
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<td>for project-level HRA should also be</td>
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<td>recognised in the site specific policy.</td>
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<td>Particular consideration should be given</td>
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<td>to potential hydrological impacts,</td>
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<td>disturbance from quarry operations and</td>
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<td>vehicle movements, and deposition of dust.</td>
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<td>Should adverse impacts be likely, the</td>
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<td>site can only be considered suitable if</td>
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<td>robust measures to avoid or mitigate</td>
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<td>impacts can be proposed.</td>
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<td>Restoration</td>
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<td>This site is being proposed by CEMEX UK.</td>
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<td>The RSPB and CEMEX UK have a long standing</td>
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<td>national partnership, working together to</td>
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<td>help restore and manage sites for priority</td>
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<td>habitats and species. If proposals at this</td>
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<td>site can be progressed without negative</td>
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<td>impacts on important wildlife sites, we</td>
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<td>would be keen to work with CEMEX UK to</td>
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<td>create a restoration plan which would</td>
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<td>provide high quality wildlife habitat</td>
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<thead>
<tr>
<th>Ecology and Landscape</th>
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<tbody>
<tr>
<td>A restoration scheme and mitigation 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.</td>
</tr>
<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</td>
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<tr>
<td>It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value</td>
</tr>
<tr>
<td>At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.</td>
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<tr>
<td>Site specific policies are being included in the next draft of the plan which will require the potential impacts you have listed to be addressed.</td>
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</table>
the working of the site. 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."

E/78 James Meyer, Suffolk Wildlife Trust

Wangford
This site is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and is close to parts of the Minsmere-Walberswick SPA, Minsmere-Walberswick Ramsar site, Minsmere-Walberswick Heaths and Marshes SSSI, Suffolk Coast National Nature Reserve (NNR) and Wangford Marshes CWS. Parts of these designated sites also include Suffolk Wildlife Trust's Hen Reedbeds reserve. The wider area is also known to support a range of protected and/or UK Priority species and UK Priority habitats.

Extraction in this location has the potential to result in adverse impacts on the identified sites, species and habitats either through direct impacts (such as habitat loss) or indirect impacts (such as changes to the local hydrological regime). All such potential impacts must be assessed prior to any allocation of this site, in particular the potential impacts on the SPA and Ramsar site must be assessed as part of the Habitats Regulations Assessment (HRA) for the Local Plan (including any hydrological impacts) and sites should not

Ecology and Landscape
A restoration scheme and mitigation 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.

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.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of
<table>
<thead>
<tr>
<th>SM/277</th>
<th>Virginia Berridge</th>
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<tbody>
<tr>
<td>I do not agree with this sort of development in an AONB. The AONB should be protected and also the wildlife which it hosts.</td>
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</table>

I do not agree with this sort of development in an AONB. The AONB should be protected and also the wildlife which it hosts.

**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 and Landscape
A restoration scheme and 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.
<table>
<thead>
<tr>
<th>SM/278</th>
<th>Persephone Pearl</th>
<th>Wangford Lime Kiln is an AONB.</th>
<th>Noted</th>
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<tbody>
<tr>
<td>E/89</td>
<td>Therese Coffey MP</td>
<td>I am concerned about the proposed extension of Wangford Quarry to include the Lime Kiln Farm site. This is the only site proposed which sits in an Area of Outstanding Natural Beauty. This heavily impacts on the local ecology, not only the protected AONB but the Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest, the Minsmere-Walberswick Special Protected Area and the Suffolk Coast National Nature Reserve. Moreover, the scale of the proposed site compared to the current Quarry boundary is vast; I am not convinced that the extended site needs to be so large. I have been contacted by many residents of Wangford and Reydon who are concerned about the inclusion of Lime Kiln Farm, particularly those bordering the site who understandably will be most affected. I do not deem this a necessary erosion of the AONB or other protected designations</td>
<td>Wangford Quarry and Area of Outstanding Natural 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</td>
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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  It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value
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;
- 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 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, must be submitted as part of the planning application for the site.

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

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value

*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. 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.

*Wangford Quarry: Scale of Site*

While the quarry is a large extension it should be noted that it will be worked in phases, meaning it only a smaller area of the total extension will be extracted at one time before being restored. Additionally, the quarry operator, Cemex, have propose to remove one of the field areas of the quarry to reduce the impact on nearby holiday letting business at Wangford Farm. The northwest field of the site will be removed from the plan, reducing the overall site area considerably.
13. WETHERDEN

<table>
<thead>
<tr>
<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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</table>
|SM/22 | Mr S McNamara    | Re. proposed extension of Wetherden (Lawn Farm) quarry. I strongly object on the basis of: 1. Reduction of arable land and impingement upon boundary of Elmswell village, especially in context of proposed housing development also in this immediate area. 2. Increased fugitive dust emissions from site. 3. Increased vehicle (HGV) movements from the site and associated traffic risk + mud on local roads. 4. Increased light and noise pollution. I am a local resident who lives in Warren Close within view of the existing and proposed site. | 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.  
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. We are also aware of planning applications that were submitted during the plan consultation period. If these housing proposals |
were permitted, coming forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues.

**Air Quality**
Receptors of potential dust emissions have been identified to the north of the site. At the planning application stage an Air Quality Assessment will be required, if this risk can be made acceptable and will identify the measures necessary to protect nearby residents and businesses. At this stage it is expected that adequate mitigation can be provided, which includes dust management. Current proposals for the site show a standoff, increasing the distance between residences and the quarry workings and a vegetated earth bund could also be included in the standoff area.

**Lorry Traffic**
While there is an expected increase in lorry movements expected due to this extension, it is not expected that these will travel through Elmswell except in the case of local deliveries. It expected additional wheel washing facilities would need to be implemented to address mud on the road. This would be determined at the planning application stage and achieved through planning condition.
**Mud on the Road**

It is expected additional wheel washing facilities would need to be implemented to address mud on the road. This would be determined at the planning application stage and achieved through planning condition.

**Potential Alternative Sites**

During the previous stage of consultation on the plan (which did not contain any sites) a call for sites was issued and the Wetherden Quarry extension was one of the sites submitted. The County Council has included sites in the plan that it judges as being possible to mitigate the impacts they cause, while meeting the identified need of approximately 10 million tonnes of land won sand and gravel within Suffolk.

**Housing Developments on Wetherden Road and Warren Lane**

The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing standoff to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It is the county councils understanding that the current housing proposal
includes amenity land between the housing and the quarry extension boundary, which would provide an appropriate distance.

**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.

**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.

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<table>
<thead>
<tr>
<th>SM/70</th>
<th>Fred Cooke</th>
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| M8/IL1 Wetherden/Elmswell Proposed extension north towards Elmswell will bring the site too close to Elmswell and the planned new housing off the Elmswell/Wetherden road. This will cause many complaints month after month. Existing site controls causing considerable problems and extension will make the problems worse. (have you seen the dirt on the road - it happens every day with no prosecution!) Are there no alternative locations in Suffolk?? Could the site be extended? | **Housing Developments on Wetherden Road and Warren Lane**

The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and... |
west or south west if you have to continue to expand here?

other potential issues. Examples of such mitigation would be providing standoff to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It is the county councils understanding that the current housing proposal includes amenity land between the housing and the quarry extension boundary, which would provide an appropriate distance.

*Mud on the Road*

It expected additional wheel washing facilities would need to be implemented to address mud on the road. This would be determined at the planning application stage and achieved through planning condition.

*Potential Alternative Sites*

During the previous stage of consultation on the plan (which did not contain any sites) a call for sites was issued and the Wetherden Quarry extension was one of the sites submitted. The County Council has included sites in the plan that it judges as being possible to mitigate the impacts they cause, while meeting the identified need of approximately 10 million tonnes of land won sand and gravel within Suffolk.

<p>| SM/74 | Peter Dow, Elmswell Parish Council | Lawn Farm Quarry at Wetherden The proposal fails to take account of recent Planning permissions granted at Wetherden Road and Warren Lane in Elmswell which will place some 280 new dwellings within close proximity to the | Housing Developments on Wetherden Road and Warren Lane The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application |</p>
<table>
<thead>
<tr>
<th>SM/93</th>
<th>Mrs Jane Wooster</th>
<th>Extension of the quarry at Wetherden/Elmswell, on the grounds of unacceptable noise, dust, working outside of the contracted hours and the dreadful muddy condition of the road leading from the quarry.</th>
</tr>
</thead>
</table>

The clear lack of realistic enforcement on the existing operation can only worsen as SCC resources are cut back even further. The prospect of unfettered activity so close to two new housing estates is unacceptable and the extension should not be granted.

Air Quality
Receptors of potential dust emissions have been identified to the north of the site. At the planning application stage an Air Quality Assessment will be required, if this risk can be made acceptable and will identify the measures necessary to protect nearby residents and businesses. At this stage it is expected that adequate mitigation can be provided, which includes dust management. Current proposals for the site show a standoff, increasing the distance between residences and the quarry workings and a vegetated earth bund could also be included in the standoff area.

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 needed for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing standoff to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It is the county councils understanding that the current housing proposal includes amenity land between the housing and the quarry extension boundary, which would provide an appropriate distance.
<table>
<thead>
<tr>
<th>SM/124</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></td>
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<td>Lawn Farm Quarry, Wetherden Extension and Inert Waste Disposal</td>
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<td>With reference to the above, we at PDE Consulting are writing to you on behalf of our client Aggmax Transport Limited and specifically in</td>
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<td>required as part of any planning application for this site.</td>
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<td></td>
<td><strong>Mud on the Road</strong></td>
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<td></td>
<td>It expected additional wheel washing facilities would need to be implemented to address mud on the road. This would be determined at the planning application stage and achieved through planning condition.</td>
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<td><strong>Past Performance of Operator</strong></td>
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<td>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 be placed on extensions to help deal with existing issues.</td>
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<td>Noted</td>
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regard to their existing operations at Lawn Farm Quarry.

We write in support of the inclusion of an extension to Lawn Farm Quarry within the Local Plan for the purposes of mineral extraction and subsequent restoration.

<table>
<thead>
<tr>
<th>SM/137</th>
<th>Mr &amp; Mrs Sutton</th>
<th>Lawn farm quarry extension Elmswell We strongly oppose any extension as the current working conditions disregard the original planning consent with noise &amp; dust causing poor daily environment conditions. The concrete crushing machine no longer has a sound protecting barrier. The original sound barrier is now insignificant with machines working on the tops. The extension will bring these working closer to our housing compounding an already intolerable issue. This company seem to initially agree to conditions, then total disregard them. They cannot be trusted &amp; the council does not/cannot not enforce them so the residents suffer</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/149</td>
<td>A A Ball</td>
<td>Wetherden Quarry (Lawn Farm) I wish to object to the proposal to expand Wetherden Quarry as set out in the Suffolk Minerals and Waste Local Plan Preferred Options. We already suffer from</td>
</tr>
</tbody>
</table>

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 be placed on extensions to help deal with existing issues.

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.
a lot of noise and disturbance at the best of times but more so when digging and earth moving etc is going on at the current northern boundary. I am an emphysema sufferer and the dust created that drifts over my property particularly in dry weather adversely affects my breathing. There seems to be no real restriction on the times the quarry is active so these problems are unlikely to improve and to let this quarry operate even closer to houses can only increase the problems.

<table>
<thead>
<tr>
<th>SM/150</th>
<th>A Couzens</th>
</tr>
</thead>
<tbody>
<tr>
<td>OBJECTION to the inclusion of Lawn Farm Quarry Wetherden in the Suffolk Minerals and Waste Local Plan Preferred Options dated October 2017</td>
<td>Proximity to Residential Properties</td>
</tr>
</tbody>
</table>
| I believe that properties approx 375 Metres from the current Northern boundary will end up approx 140 to 160 metres from the proposed extended working area. The proposed extension will increase significantly the number of people affected by the activities at this site and even more when the recently approved housing development in Wetherden Road comes into being. It is difficult to identify exact numbers because the reports about the number of properties close to the various proposed sites are a bit vague e.g. "a number of properties". However looking at the site plans it seems to me that Lawn Farm Quarry at Wetherden will affect one of the highest number of residential properties if not now then when the recently approved

- **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. We are also aware of planning applications that were submitted during the plan consultation period. If these housing proposals were permitted, coming forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues.

- **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 be placed on extensions to help deal with existing issues.
housing mentioned above is built. Noise Even at the current operational distance neighbouring properties are subjected to frequent loud bangs and crashes, beeps from the HGVS and diggers, noisy materials being processed which can often be heard through double glazing and certainly makes having window open or trying to enjoy the use of gardens in summer an unpleasant and distressing experience. Dust and Air Quality The amount of dust generated especially in dry weather, despite the contention from expert opinion that it wouldn't travel beyond the current boundary, does already travel to neighbouring properties contaminating washing, window ledges etc. It is anyone's guess what affect this has on the medical condition of those with lung problems but it certainly can't improve their lot. Mud on the road There is a long history of complaints which despite the installation of several different sets of wheel washing equipment remains unresolved. After nearly three years of these complaints SCC have recently advised that they are unable to deal with the dangerous conditions this creates on the adjacent roads and issues should be reported to the Police. Residents representatives 2 residents representatives used to be on the liaison committee, giving an opportunity for areas of concern to be raised directly. However a vote was taken in October 2016 ( I think that is the correct meeting ) to exclude them from future meetings leaving those permissions (if granted) are applied to the land rather than individuals or organisations that apply for permission. However additional planning conditions could be placed on extensions to help deal with existing issues, including mud on roads, air quality and noise.
most affected with no voice. Failure to comply with Working Hours Workings have been seen and heard as early as 06:30 and as late as 21:00. These workings have also been seen and heard at weekends and it is not unusual to see and hear Saturday afternoon and Sunday working. To my knowledge over 100 reports of out of hours activity have been sent to Jo Lloyd (SCC planning enforcement) or County Councillor Andrew Stringer. Obviously these are only the incidents observed and people have taken time to report, doubtless there are many more. I understand some people who have reported issues in the past have given up as they felt they were banging their heads on a brick wall. Lack of control of activities on the site The County Councillor for Wetherden (Andrew Stringer) at a meeting of Wetherden Parish Council on 14 November felt that SCC did not get the planning conditions/permissions right in the first place which has left them with difficulties trying to enforce them. At a meeting of Elmswell Parish Council held on 20 November the Clerks report from the 17 November 2017 Lawn Farm Quarry liaison meeting states “The regulatory authorities, mainly SCC, do not have the resources to deal with the degree of monitoring and surveillance required to regulate activity on sites such as this. Given the proximity to the communities of Elmswell and Wetherden this is bound to lead to an unsatisfactory outcome.” This means there is inadequate
control over the operator at this site who, since at least 2014, has shown no signs of adhering to the current planning permissions / conditions. In Conclusion In my view the close proximity to an increasing number of residential properties, Noise, dust, mud on the road issues, together with the failure by the operator for the last three years to adhere to the current conditions and the inability of SCC to enforce compliance should make it unthinkable to even consider allowing expansion bringing it closer to a growing number of neighbouring residential properties.

SM/162 Philip and Joanna Gordon LAwn Farm Quarry, Elmswell - proposed extension. We object to this proposed extension as our home will be only 50m away (Warren Mill House) and right in the path of the prevailing south west/west wind carrying fine sand dust onto and into our home! We currently experience horrendous issues with this as we are located north of the site currently being worked when there is even the mildest of Southerly winds or still days. We have been having to spend most of the summer months with our windows closed let alone be able to sit in our garden. Deeply concerned as we both developed persistent coughs during the drier months. One of our concerns is of us developing "Silicosis" due to the poor air quality. Dust monitors have NOT been in place since work started in the current quarry.

Air Quality
Issues with dust have been recognised. At the planning application stage an Air Quality Assessment will be required, if this risk can be made acceptable and will identify the measures necessary to protect nearby residents and businesses. At this stage it is expected that adequate mitigation can be provided, which includes dust management. Current proposals for the site show a standoff, increasing the distance between residences and the quarry workings and a vegetated earth bund could also be included in the standoff area.
<table>
<thead>
<tr>
<th>SM/186</th>
<th>Mrs Christine Small</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Lawn Farm Quarry. I object to the proposed extension because they do not obide by the regulatons of working hours already. I also object to the extra noise and dust that will be very close to my property. Permission has been granted for 240 houses which will almost be on the boundary of the quarry. Elmswell already is a very busy village with the extra housing and extra lorries for the quarry will cause chaos on the already very busy little roads in the village.</td>
</tr>
</tbody>
</table>

**Past Performance of Operator**

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**Housing Developments on Wetherden Road and Warren Lane**

The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing standoff to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It is the county councils understanding that the current housing proposal includes amenity land between the housing and the quarry extension boundary, which would provide an appropriate distance.

**Lorry Traffic**
While there is an expected increase in lorry movements expected due to this extension, it is not expected that these will travel through Elmswell except in the case of local deliveries. It is expected additional wheel washing facilities would need to be implemented to address mud on the road. This would be determined at the planning application stage and achieved through planning condition.

<table>
<thead>
<tr>
<th>SM/196</th>
<th>Sonia Jewers on behalf of Wetherden Parish Council</th>
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<tbody>
<tr>
<td></td>
<td>Wetherden Parish Council strongly objects to the extension of Lawn Farm Quarry for mineral extraction. A detailed email has been submitted so in summary we believe: 1) The proposed site is too close to current homes and to the 240 homes that have been granted planning permission in Elmswell. 2) The operators of the existing site continually flout the insufficient conditions set by SCC and in so doing create an unsafe road and significant distress to neighbours by working out of hours with loud machinery and bright lights. Attempts to curtail this have proven unsuccessful and recently the group established to monitor and manage operations has banned members of public from attending. We cannot see that the current operators will change their modus operandi. Sites for mineral extraction should be sought far away from large conurbation areas.</td>
</tr>
</tbody>
</table>

_Housing Developments on Wetherden Road and Warren Lane_  
The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing standoff to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It is the county councils understanding that the current housing proposal includes amenity land between the housing and the quarry extension boundary, which would provide an appropriate distance.

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<table>
<thead>
<tr>
<th>SM/255</th>
<th>Mr Robert Coleman</th>
<th>Lawn Farm Quarry (Wetherden)Bury St EDMUNDS.. I object to this extension of this quarry due to the close proximity of already built residential housing and new housing that you have imposed on us .... Also noise pollution from heavy lorries and machines working 7 days a week on this site with no checks done. What's happening to the old site will this be a dumping ground for waste !!! Whatever we say the council disregards our concerns and do what they like along as there not living near this site.</th>
</tr>
</thead>
</table>
| | | Housing Developments on Wetherden Road and Warren Lane
The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing standoff to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It is the county councils understanding that the current housing proposal includes amenity land between the housing and the quarry extension boundary, which would provide an appropriate distance.

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
| DR/19 | J.S Barnes | WETHERDEN – the site provides local employment. There are VERY few properties affected by this site. I live 350 metres from the plant site, it is just possible to hear the machine plant on occasions, but this is normally drowned out by the road noise from the concrete section of the A14 |
| DR/20 | Steven McNamara | Re proposed Wetherden site – strongly object. In context of impingement on Elmswell boundary and also imminent building of new houses in this area. This will diminish green space substantially. Also concerned about HGV movements mud on road, fugitive waste, noise and light pollution all of which most with current operation |

**Lorry Traffic**

While there is an expected increase in lorry movements expected due to this extension, it is not expected that these will travel through Elmswell except in the case of local deliveries. It expected additional wheel washing facilities would need to be implemented to address mud on the road. This would be determined at the planning application stage and achieved through planning condition.

**Mud on the Road**

It expected additional wheel washing facilities would need to be implemented to address mud on the road. This would be determined at the planning application stage and achieved through planning condition.

**Noise Pollution**

Earth bunds with vegetation will be required around the boundaries of extraction areas, acceptable levels. A detailed noise assessment is required as part of any planning application for this site.
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.

_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.

_Past Performance of Operator_

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The new site will be close to the new developments on the south east of Elmswell and therefore effective monitoring of vehicle movement, noise and atmospheric pollution must be put in place. The need for minerals for main road and house construction is recognised.

Any planning application must be accompanied by assessments and appropriate avoidance, minimisation or mitigation measures for noise and air quality issues.
<table>
<thead>
<tr>
<th>DR/22</th>
<th>R. Crosfield</th>
</tr>
</thead>
<tbody>
<tr>
<td>When the wind is in the wrong direction the fine dust covers all over the cars, &amp; window sills. We have just had new windows put in cos the old ones couldn’t be cleaner properly also the noise at weekends is banging and crashing.</td>
<td></td>
</tr>
</tbody>
</table>

**Air Quality**
At the planning application stage an Air Quality Assessment will be required, if this risk can be made acceptable and will identify the measures necessary to protect nearby residents and businesses. At this stage it is expected that adequate mitigation can be provided, which includes dust management. Current proposals for the site show a standoff, increasing the distance between residences and the quarry workings and a vegetated earth bund could also be included in the standoff area.

**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.

<table>
<thead>
<tr>
<th>DR/23</th>
<th>Carol &amp; Peter Tricky</th>
</tr>
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<tbody>
<tr>
<td>We are objecting about the extension proposed for the Quarry at Wetherden. We live in Mill Gardens which is one of the closest residential properties to the proposed site. We already are affected by dust and noise from the quarry so I can't imagine the increase there will be if the extension is allowed to go ahead.</td>
<td></td>
</tr>
</tbody>
</table>

**Air Quality**
At the planning application stage an Air Quality Assessment will be required, if this risk can be made acceptable and will identify the measures necessary to protect nearby residents and businesses. At this stage it is expected that adequate mitigation can be provided, which includes dust management. Current proposals for the site show a standoff, increasing the distance between residences and the quarry workings and a vegetated earth bund could also be included in the standoff area.
| DR/24 | Miss Gloria Betts | I am not happy about the noise and dust coming closer to my house, as things are. These are not too bad at the moment. Also I have a lovely view across the Haughley Park, which would be spoilt if this plan goes ahead. |

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**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.

**Past Performance of Operator**

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**Air Quality**

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<table>
<thead>
<tr>
<th>E/30</th>
<th>Michael Friend</th>
<th>I <strong>VERY STRONGLY OBJECT</strong> to any further expansion to the Lawn Farm Quarry site on the following reasons: The proposed site is too close to the village of Elmswell. The proposed edge of the quarry will be 100 metres from Mill Gardens, Prescott drive and only slightly further from Cresmedow Way. **I was told by the SCC representative at the consultation that the ‘OUTLINE PLANNING’ consent for 240 houses adjacent to Mill Gardens was not relevant’’’. I submit that it is highly relevant as these homes are apparently desperately needed and they will be blighted. I understand we cannot claim loss of value, despite 240 home being on the edge of a deep hole This is unacceptable. Noisy, dusty, light polluting sites such as these should be very far from large conurbations. It is inevitable that children will form a significant part of this housing mix. Currently very few houses along the quarry boundary have children. I am concerned with safety as the bund and 3 strand wire fence is inadequate and often has huge gaps in it. I voiced my concern to the SCC rep who said ‘It was the parents responsibility to control children’ And him only recently out of short trousers</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<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 assessment is required as part of any planning application for this site.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Housing Developments on Wetherden Road and Warren Lane</strong> The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing standoff to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It is the county councils understanding that the current housing proposal includes amenity land between the housing and the quarry extension boundary, which would provide an appropriate distance.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Past Performance of Operator</strong> 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</td>
</tr>
</tbody>
</table>
himself!!!! I believe it should be the operators Health and Safety responsibility to remove such risk or reduce it to a minimum as per the law. Living in Mill Gardens as far as I can tell NO Residents have been individually consulted or notified of any possible extension plans. The current lax operating conditions, agreed by Suffolk County Council, and their interpretation and implementation by AGGMAX means that there is inadequate control over the operator and as such, the management of the site falls below acceptable standards. There is a detailed catalogue of concerns none of which have ever been addressed, and, as admitted by SCC, they have no real power and staff work social hours and a short working week – UNACCEPTABLE.

But to agree that

· There is continual mud on the road at the site exit which reduces stopping distances and increases the chance of skidding, making the road unsafe. I went this morning 22/11/17 at 1200 to photograph the VERY MUDDY road and got abuse off a Lorry driver and a small tipper truck leaving the site. The road is very muddy today and we have not had much rain. I saw no evidence of these two vehicles washing their wheels.

· It seems the Police are not interested as it is a SCC matter and beside which they have important stuff to do! I did call 101 and was told to put it in writing to SCC.

permissions (if granted) are applied to the land rather than individuals or organisations that apply for permission. However additional planning conditions could be placed on extensions to help deal with existing issues, such as noise, air pollution and mud on the road.

Mud on the Road

It expected additional wheel washing facilities would need to be implemented to address mud on the road, from current and future extraction works. This would be determined at the planning application stage and achieved through planning condition.
| · Frequent and persistent failure to comply with working hours. There are many and numerous reports. As the council’s enforcement officer works from Wednesday to Friday (3 days per week) we do not believe that spot visits have occurred outside these times and the right for the peace and quiet of residents continues to be disregarded. |
| · Dust, noise and bright lights frequently come from this site at unacceptable levels there are many documented complaints to this effect. In Mill Gdns we cannot open our windows in the summer as we are often filled with dust. The shovel loader is used all day and the operator ‘shakes’ the bucket to remove the last particles. This sounds like a huge clap of thunder (the only way I can describe it) and carries from the current workings to Mill Gardens, this happens every time the bucket is emptied. |
| · I understand that no dust monitoring has occurred since 2011 and since 2014 there has been no requirement to monitor these. |
| · The bunds installed to prevent the worst of noise and air quality pollution are insufficient. |
| · The fencing to prevent people from accessing the site is flimsy and in many places broken. As the proposed new site would back onto a playground there is huge safety concern. |
| · Such are the concerns of local residents that a Liaison Committee was set up to enable constructive discussions to take place. Members of the public have now been banned from this |
group meaning less transparency and options for raising concerns. Vehicles leaving the site do so slowly to join the old A14 single carriageway road, which is derestricted ie 60mph. The road conditions are such that now – Autumn and Winter the road may well have a frozen mud surface and a fatal accident is only a matter of time as vehicles are often maxing out the 60mph limit. AGGMAX and other huge tipper lorries have only one direction out of the site but approach the bend at Wetherden and its 30mph restriction at over limit speeds. Again it is a matter of time a fatal accident happens at the junction of the Elmswell road or a tipper overturns.

I understand that there is a maximum 36 vehicle movements per day - I think this is now stretched by AGGMAX to many, many more but there is no monitoring – be good to have sight of the vehicle logs. The conditions imposed on AGGMAX by SCC currently are insufficient to ensure the safety and health of local residents. There is every reason to assume that the persistent and flagrant flexing of the conditions by AGMAX will continue. Such a site should not be allowed to operate in such a highly populated area. The proposed closing and re-routing of the footpath from Warren Lane is unacceptable, the Mill Gardens footpath is used by probably 50 people a day, Moving the other path to use the top edge of this will make the path unusable due to heavier traffic breaking down the paths structure.

E/31 M & M.J. Sutton We are writing to strongly object to any further extension to the Lawn Farm Quarry on the Past Performance of Operator
following grounds. The current workings totally disregard the approval granted to them. The required noise barriers are inadequate with the concrete crusher exposed causing excess dust & noise issues for the surrounding houses. The machines work on top of the noise barriers. The permitted working hours are disregard. The proposed extension will bring the workings closer to our housing, how can this be right? This company flouts the council conditions & the council seems not or cannot enforce them. If the council granted this extension how would it propose to ensure conditions are adhered to, as currently you don't seem to have the resources to enforce the existing working standards. Please note the continuous noise from the plant is an issue as it is exaggerated by the prevailing winds.
I hope you take these issues into consideration.

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We object to the proposed extension of Wetherden Quarry for the following reasons:
1) I have lived at 16 Mill Gardens since 1973 at which time there was a landfill waste operation or "Tip" in use at the northeast part of the proposed extension. A mineral extraction operation would expose this and present risk of air-borne rubbish, dust and decomposition products including gasses to our environment. A wide range of waste was disposed of here (including vehicles) and high winds used to blow rubbish as far as Wetherden.
I find it astounding and disturbing that there is no record of this at Suffolk County Council.

Former Waste Site
The County Council accepts there is a waste site to the north west of the site, however that it is outside the boundary of the proposed extension. The site has been geologically tested and there is no evidence to suggest the proposed extraction area has been extracted and then refilled.

Air Quality
At the planning application stage an Air Quality Assessment will be required, if this risk can be made acceptable and will identify the measures necessary to protect nearby residents and businesses. At this stage it is expected that
2) The northern edge of the proposed extension is at my estimate only 150 metres from our property boundary and would present a significant noise intrusion not to mention altering the air quality within distance of our home. As my husband has COPD this is of great concern to us. I know we were told at the Blackbourne meeting that air quality tests had been taken and were proved to be within limits but how can we truly believe this when no-one seems to have done the correct investigations needed to have discovered that an old rubbish tip actually exists where they want to extract. I think this creates great doubt as to the authenticity of their so called quoted facts and figures trying to prove that it is a worthy site. If anyone has doubts as to the existence of this old tip they are welcome to contact us and I will willingly escort them to the place where it used to be before the land was filled back in again.!! Please can someone respond to this e-mail to answer our objections.

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.

E/36 Peter Dow, Elmswell Parish Council See attachment

Housing Developments on Wetherden Road and Warren Lane
The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such adequate mitigation can be provided, which includes dust management. Current proposals for the site show a standoff, increasing the distance between residences and the quarry workings and a vegetated earth bund could also be included in the standoff area.
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<table>
<thead>
<tr>
<th>E/37</th>
<th>Carole Curtis</th>
</tr>
</thead>
<tbody>
<tr>
<td>I wish to object to the proposed extension to the Lawn Farm Quarry workings. At the moment they have an active deep quarry which already causes dangerous conditions on the back road from the A14 to Wetherden from mud on the roads - especially in winter. How can they extend their workings very close to Elmswell - that is madness. There is already planning permission for 240 houses adjacent to their proposed new workings. Do they expect to have houses on the edge of a quarry. One doesn't even mention the noise and air pollution that will arise.</td>
<td></td>
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</tbody>
</table>
| **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 be placed on extensions to help deal with existing issues, such as noise, air pollution and mud on the road. |
disruption. Also no-one seems to have any concerns for the water table and its contamination from the workings. What will happen if they do ride roughshod over local concerns and go ahead. For how long will they be quarrying and then both quarries would become landfill sites and there would be years of lorries tipping all kinds of landfill into the site. People may be desperate for houses - but there is a limit. Another matter is the footpath from Kiln Lane to Wetherden. Its alright saying it will be stopped up but that footpath is regularly used by many people from Elmswell. It is a short-cut avoiding the Elmswell/Wetherden Road which has no facilities for footpaths between the villages. I think it would be the ultimate planning insult to the present/future inhabitants of Elmswell if the extension of the quarry workings is given permission to go ahead.

**Housing Developments on Wetherden Road and Warren Lane**

The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing stand-off to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It is the county councils understanding that the current housing proposal includes amenity land between the housing and the quarry extension boundary, which would provide an appropriate distance.

**Water and Floods**

Ground water issues are recognised for this site. Assessments of the risk to ground water will be required as part of the planning application as the site is within a groundwater protection zone.

**Site Restoration**

The current site has permission for restoration to agriculture, which includes landfill of inert wastes. This usually consists of soil and clays. The County Council expects a similar restoration for the extension.
## Public Rights of Way

The footpaths that constitute part of the public rights of way network, will require mitigation. This would be either retention, with a stand off area to protect the amenity of path users or a redirection of the path.

## Housing Developments on Wetherden Road and Warren Lane

The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing standoff to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It is the county councils understanding that the current housing proposal includes amenity land between the housing and the quarry extension boundary, which would provide an appropriate distance.

## 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

<table>
<thead>
<tr>
<th>E/38</th>
<th>Steve McNamara</th>
</tr>
</thead>
</table>
| I am a resident of Elmswell (Warren Close) and strongly object to the proposed quarry extension on the grounds of:  
1. This proposal takes no account of the (approved) housing development on the current boundary of Elmswell and would reduce green space between the current boundary and boundary of this proposal to virtually nil.  
2. The quarry already results in unacceptable levels of mud and sand on the road at the exit – this could only get worse.  
3. The quarry already emits nuisance dust and fugitive emissions.  
4. The quarry already causes light pollution, wherein the very bright floodlights are left on all night, every night for no good reason.  
5. Points 2-5 indicate to me that AGGMAX is already an unfit operator and does not have the wellbeing of local residents in mind.  
I believe that I have already complained about these points via your website but it is that imperceptible that I have no idea whether they have been registered properly.  
In summary I am astounded at the lack of joined-up planning (housing and minerals extraction converging on one village) and strongly object to the proposal. |

| | |
| E/49 | Jen Larner, Wetherden Parish Council | Wetherden Parish Council **VERY STRONGLY OBJECTS** to any further expansion to the Lawn Farm Quarry site on the following basis:

1. The proposed site is too close to the highly populated village of Elmswell, with **the edge of it approx. 140m -160m away from current homes**. The recently proposed development of 240 homes adjacent to the site will further exacerbate this and effectively puts the site in the village of Elmswell, rather than next to it. This is unacceptable. Noisy, dusty, light polluting sites such as these should be very far from large conurbations.

2. The current lax operating conditions, agreed by Suffolk County Council, and their interpretation and implementation by AGGMAX means that there is inadequate control over the operator and as such, the **management of the site falls below acceptable standards**. The following issues have been a persistent problem since AGGMAX began operating from this site.
   - There is continual mud on the road at the site exit which reduces stopping distances and increases the chance of skidding, making the **road unsafe**. This has been documented and evidence sent to SCC. Locals have now been advised to **contact the POLICE** for any action to be taken, as SCC is unable to enforce road safety under the current operating conditions.

|  |  | **Proximity To Elmswell**

The typical minimum distance that is considered acceptable for a minerals working to be to residences and business is 100m. This is with additional mitigation such as a vegetated earth bund and additional standoff distance. The proposal submitted to the County Council has increased standoff within the site boundary to the north, east and west of the extension, which would further increase this distance.

**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 be placed on extensions to help deal with existing issues and new issues that arise, such as noise, air pollution, mud on the road and safety issues.
<p>| | |</p>
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</table>
| • Frequent and persistent failure to comply with working hours. Reports of out of hour’s activity have been submitted to SCC planning enforcement and the district councillor along with evidence (see appendix 1 for examples). However, the conditions in the contract leave much wriggle room and make it difficult to enforce. As the council’s enforcement officer works from Wednesday to Friday (3 days per week) we do not believe that spot visits have occurred outside these times and **the right for the peace and quiet of residents continues to be disregarded.**  
• Dust, noise and bright lights frequently come from this site at unacceptable levels with over 100 documented complaints to this effect. This must be a **grave physical and mental health concern.** There is particular concern about early morning sleep loss and stress due to repetitive loud noise as well as the effects of particulates contained in the dust. No dust monitoring has occurred since 2011 and since 2014 there has been no requirement to monitor these. It is our view that AGGMAX are taking advantage of these lax conditions to reduce their standards of operation.  
• The bunds installed to prevent the worst of noise and air quality pollution are insufficient.  
• The fencing to prevent people from accessing the site is flimsy and in many places broken. As the proposed new site would back onto a playground there is **huge safety concern.**  
• Such are the concerns of local residents that a Liaison Committee was set up to enable |
| E/65 | Julie Hart | I live along Wetherden Rd and although the quarry noise is not too bad at the moment I think coming closer to the village over the view of the horizon will be much more disturbing. I am particularly concerned for if it becomes land fill as the previous landfill in the sand quarry caused infestations of flies and seagulls. I was forever swatting flies in the kitchen. Once the landfill was covered up this problem ceased, but it was absolutely disgusting. I would appreciate if you could put my views forward. What with all the planned building around us (we live at Cornfields at the end of the village) we are not looking forward to our quality of living in the future. |

|   |   | 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. |

|   |   | Site Restoration  
The current site has permission for restoration to agriculture, which includes landfill of inert wastes. This usually consists of soil and clays. The County Council expects a similar restoration for the extension. |

|   |   | constructive discussions to take place. Members of the public have now been banned from this group meaning less transparency and options for raising concerns.  
• The conditions imposed on AGGMAX by SCC currently are insufficient to ensure the safety and health of local residents. There is every reason to assume that the persistent and flagrant flexing of the conditions by AGGMAX will continue. Such a site should not be allowed to operate in such a highly populated area. |
| E/88 | Robert Barber, Pegasus Group on behalf of Endurance Estates | Please find attached representations in response to the Minerals & Waste Local Plan Preferred Options consultation, submitted on behalf of Endurance Estates Strategic Land Ltd. I would be grateful if you could acknowledge receipt of these. I look forward to hearing from you. |

**1. INTRODUCTION**

1.1 These representations have been prepared by Pegasus Group on behalf of Endurance Estates Strategic Land Ltd in respect of the proposed allocation of land at Lawn Farm Quarry, Wetherden, for minerals extraction use, through the emerging Suffolk Minerals and Waste Local Plan (SMWLP).

1.2 Endurance Estates has development interests in land directly adjacent to the proposed allocation site. Land adjacent to Wetherden Road, Elmswell, benefits from a resolution by Mid Suffolk District Council to grant planning permission for a development of up to 240 dwellings and public open space (LPA reference 4911/16). This resolution was made on 12 July 2017 and is subject to the successful completion of a Section 106 agreement, negotiations for which are well advanced and expected to conclude by the end of 2017.

**2. LAWN FARM QUARRY, WETHERDEN**

2.1 The SMWLP proposals the allocation of land north of Lawn Farm Quarry for minerals extraction use, thereby forming an extension of the existing quarry operating under planning permission PL/0395/08.

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**Housing Developments on Wetherden Road and Warren Lane**

The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals have come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing standoff to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It should also be noted that Aggmax have proposed a standoff area with vegetated bunds within the proposed extension boundary, which will also provide mitigation for noise, air quality and visual impact.

The next draft of the plan will contain site specific policies, highlighting site specific issues that must be taken account of if proposals are taken further including but not limited to air quality and noise impacts on nearby residents.
2.2 The proposed allocation will bring the northern extent of Lawn Farm Quarry directly adjacent to the boundary of the proposed residential development at Wetherden Road, Elmswell. Given the proximity of the proposed quarry allocation to new housing at the Wetherden Road site, it is essential that all impacts upon new and existing residents are capable of being mitigated in full. This is necessary in line with emerging Objective 5 which requires environmental protection policies to address effects on human health from noise, dust and air quality considerations (alongside a range of other matters). Furthermore, emerging policy GP4 requires minerals and waste development proposals to adequately address significant adverse impacts upon a range of environmental factors.

2.3 In this context, it is clear that the SWMLP must set a strong policy framework under which minerals development proposals, such as that for Lawn Farm Quarry, are required to provide sufficient mitigation for adverse environmental effects should they arise.

2.4 It is therefore surprising to see that the SMWLP makes little reference to the need for the proposed minerals allocation to mitigate its own impacts upon surrounding residential properties and instead appears to place this requirement upon the end developer of the Wetherden Road site. Paragraph 15.7 of the SMWLP states that:

*Housing developers are advised that they should provide adequate mitigation in respect of the permitted sand and gravel quarry and*
2.5 We do not consider this is a reasonable approach to take, particularly as the resolution to grant planning permission at land at Wetherden Road will shortly become an implementable planning permission. Although the residential development proposals take the existing quarry into account, it cannot reasonably be expected to provide mitigation for a subsequent extension of that quarry which does not yet benefit from planning permission and for which the allocation remains some time from adoption. By way of illustration, one might expect the first reserved matters applications for the residential development to come forward in late 2018, whilst the SMWLP is not expected to be adopted until mid 2019 at the earliest.

2.6 Furthermore we are concerned that the proposed allocation is based upon an incorrect understanding of the nature of the proposed residential development. Paragraph 3.8 of the Site Selection Report states that the residential scheme includes proposed buffer planting of more than 100m. This is not the case; this area will be landscaped as a parkland for community use and will therefore be largely open or sown as meadowland, with some tree planting around the boundaries. We recommend this position is reviewed as a matter of priority to ensure the SMWLP is based on a thorough understanding of existing and proposed development nearby.

2.7 **Moreover, the SMWLP should take a firmer policy approach to ensuring that any**
extension of the quarry mitigates its impact upon surrounding residential properties in full. For example, the supporting text suggests at paragraph 15.18 that a bund could be provided to the northern, western and eastern boundaries of the quarry extension. This should be expressed as a specific policy requirement. Similarly, paragraph 15.23 sets an expectation that stand-off noise buffers are required; this should also be set out as policy.

2.8 In a similar vein, a screening belt of trees is recommended at paragraph 15.9 to the western boundary of the expansion area. This should be extended to include the boundary with the Wetherden Road site and should be expressly required under policy.

2.9 We understand there is significant local concern about the operation of the quarry and its impact upon existing residents. The opportunity should therefore be taken to understand whether existing safeguards to residential amenity, such as controls on operating hours and working practices, are working effectively. For example it is noted that the SMWLP already explains at paragraph 15.8 that improved wheel-washing facilities are required for vehicles using the site.

3. SUMMARY AND CONCLUSION

3.1 Endurance Estates is concerned that the SMWLP as drafted does not provide an adequate policy framework to ensure that the extension of Lawn Farm Quarry, Wetherden, does not give rise to unacceptable amenity
impacts upon residents, new and existing, to the south of Elmswell.

3.2 It is unreasonable for the SMWLP to expect developers of land adjacent to Wetherden Road, Elmswell to mitigate against the impacts of the quarry operations. Reserved matters applications for the residential development are likely to pre-date the adoption of the SMWLP and developers would therefore be ‘second guessing’ the likely impacts of future quarrying operations.

3.3 Instead, the SMWLP should take the opportunity to plan positively to ensure that the environmental and amenity effects of minerals extraction at Lawn Farm Quarry are adequately mitigated. The application for the extension of the quarry will likely subject to Environmental Impact Assessment, allowing a proper understanding of the likely environmental and amenity effects, thereby making it possible to mitigate these in full. At this stage, the SMWLP should include specific policy criteria to ensure that appropriate mitigation against noise, air quality, dust and landscape impacts are secured.

M/5 Michael Moore  WETHERDEN  
Lawn farm extension  
Objection  Proposed Development  

Geology of Site  
The County Council are aware that there are waste sites in the area, however not the proposed extraction area.

Housing Developments on Wetherden Road and Warren Lane
<table>
<thead>
<tr>
<th>The road access will mean increased lorry movement both to and from the existing and proposed extension will bring a significant amount of movement to Haughley New Street and other minor roads which Aggmax use despite requests to the contrary, to sue the recommended route.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Geology</strong></td>
</tr>
<tr>
<td>The grading analysis does not show the site containing scrap material eg Scrapped Vehicles and such deposits as the site was previously used as a waste disposal.</td>
</tr>
<tr>
<td><strong>Development Plan and Planning Application</strong></td>
</tr>
<tr>
<td>There has been a proposal, agreed, for the construction of up to 150 (?) properties on the edge of this proposal on the north edge. This proposal would have a serious effect on the development and sale of the properties.</td>
</tr>
<tr>
<td><strong>Highways</strong></td>
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<tr>
<td>The current operation on Lawn Farm has no effective wheel wash on site. It has been in excess of 2 years that repeated request for this to be put in place. Despite promises by Aggmax this has NEVER been undertaken and completed. He SCC seem to have been powerless. The lack of an effective wheel wash has a major effect on the roadway particularly in bad weather.</td>
</tr>
<tr>
<td>The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing standoff to make sure there is suitable distance between residences and quarry workings and vegetated earth bunds for screening. It is the county councils understanding that the current housing proposal includes amenity land between the housing and the quarry extension boundary, which would provide an appropriate distance.</td>
</tr>
<tr>
<td><strong>Mud on the Road</strong></td>
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<tr>
<td>It expected improved wheel washing facilities would need to be implemented to address mud on the road. This would be determined at the planning application stage and achieved through planning condition.</td>
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<tr>
<td><strong>Landscape</strong></td>
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<tr>
<td>Mitigation that is expected for landscape issues would include an earth bund on the north, east, and west and a screening belt of trees along the western side of the site. Full details are expected at the planning application stage.</td>
</tr>
<tr>
<td><strong>Air Quality</strong></td>
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</table>
Landscapes

Landscape to the existing site has not been effective from a position along the top ridge, the proposed extension. Promises were made to screen part of the site looking towards Warren Lane.

Buildings

Whilst there are no historic buildings within the proposal, there are 2 oak trees that are the subject of tree preservation orders along the track between the proposal and existing site.

Archaeology

There has been no visual presence of any undertaking of an investigation exercise of this proposal. Whereas with the current operation investigation was visible but on the site south of this proposal.

Ecology

Air Quality

The current operation has not reported results of air quality. I was a member of a Liaison Group. Members of which included residents of Elmswell.

I live in a residential property on the north of the site. Within a maximum of 125 metres, and not the 250 meters as suggested. Many elderly and

At the planning application stage an Air Quality Assessment will be required, if this risk can be made acceptable and will identify the measures necessary to protect nearby residents and businesses. At this stage it is expected that adequate mitigation can be provided, which includes dust management. Current proposals for the site show a standoff, increasing the distance between residences and the quarry workings and a vegetated earth bund could also be included in the standoff area.

Archaeology

The potential for some prehistoric and historic activity is recognised and archeological work is expected to be secured through condition.

Ecology

A restoration scheme and 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.

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 be placed on extensions to help
| | infirmed residents live on the properties in Mill Gardens. Prescott Drive is to the north side of Wetherden Road. There is no reference to the properties in Cresmeadow Way and Prescott Drive. Both with 200 meters of the proposed boundary of the site, A bund is in place separating the current existing boundary and Warren Mill House, but this proposal is at a higher level and would give increased noise and pollution levels. Screening bunds would necessitate a significant height.  

**In summary**  
- This proposal would no doubt have a significant effect on value of property in the surrounding roads as indicated. The value of any sale would no doubt be affected.
- The current developers of the site has consistently ignored conditions of operation:
  - Operating outside restricted hours
  - Operating at weekend, Saturday afternoon and all day on Sundays
  - AGGMAX are completely oblivious to these restrictions
- SCC monitoring is not effective, with no action being taken for when the developer is operating, out of that which has been approved  | deal with existing issues, such as noise, air pollution and mud on the road. |
<table>
<thead>
<tr>
<th>Reference</th>
<th>Name and Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>M/24</td>
<td>Jonathan Worsley, PDE Consulting Limited</td>
</tr>
<tr>
<td></td>
<td><strong>Suffolk Minerals and Waste Local Plan, Preferred Options Consultation, December 2017 Lawn Farm Quarry, Wetherden Extension and Inert Waste Disposal</strong></td>
</tr>
<tr>
<td></td>
<td>With reference to the above, we are writing to you on behalf of our client Aggmax Transport Limited and specifically in regard to their existing operations at Lawn Farm Quarry. We write in support of the inclusion of an extension to Lawn Farm Quarry within the Local Plan, Drawing Reference M16.135.D.047, for the purposes of mineral extraction and subsequent restoration. Should you have any queries about the above, please do not hesitate to contact me.</td>
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<tr>
<td></td>
<td>(see representation for map)</td>
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<td></td>
<td>Noted</td>
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| M/44      | Peter Dow, Elmswell Parish Council |
|           | **Duplicate of E/36** |
|           | **Housing Developments on Wetherden Road and Warren Lane** |
|           | The County Council are aware of the planning applications on Wetherden Road and Warren Lane. As these proposals would come forward before the quarry expansion, then the application for the quarry would need to demonstrate how they would mitigate for the amenity of the residents that would be in that housing. This would include assessment and appropriate mitigation for noise, air quality, light pollution and other potential issues. Examples of such mitigation would be providing standoff to make |
| M/45   | R. Crosfield                                                                 | I am not happy about the quarry coming closer to my back garden. My bungalow has gone down in value due to the move also I found out recently that the waste tip in 1970 was full of old cars ect and waste rubbish so a waste of time digging, in my view, if it foes ahead how about a screen of trees or bushes to hide the view |

**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 be placed on extensions to help deal with existing issues and issues that arise, such as noise, air pollution and mud on the road.

**Nearby Waste Sites**

The County Council are aware that there is a waste site north west of the site area however not within the extension boundary. The proposed site has been geologically tested and there is no evidence suggesting the area has been extracted and refilled.

**Site Screening**

The proposal from Aggmax does include an earth bund with vegetation, which will screen the quarry from view.
<table>
<thead>
<tr>
<th>E/108</th>
<th>Charlie Christensen, The Environment Agency</th>
</tr>
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<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>
</tr>
<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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<table>
<thead>
<tr>
<th>E/116</th>
<th>Fiona Cairns, Suffolk Preservation Society</th>
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<tbody>
<tr>
<td></td>
<td><strong>Archaeology</strong></td>
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<tr>
<td></td>
<td>The County Council considers that dealing with archaeology by condition is appropriate for this site.</td>
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<tr>
<th>E/70</th>
<th>Mike Jones, RSPB</th>
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<tr>
<td></td>
<td><strong>Restoration</strong></td>
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<td></td>
<td>Wetherden (para 15.14), 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.</td>
</tr>
<tr>
<td></td>
<td>Paragraph 15.14 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.</td>
</tr>
<tr>
<td></td>
<td>The County Council will consider what site specific ecological restorations could consist of and consider adding these to the plan.</td>
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</table>
species and resources should be appropriately and sustainably incorporated into restoration proposals focused on flood alleviation, reservoirs, agriculture, forestry, amenity, or ecology.”
Enhancements could include provision of habitat for declining farmland birds, such as the turtle dove, which is known to be present in the wider area. Specific measures for turtle dove that could be employed both during quarry management and restoration can be found in Annex 1 to this letter.

E/78 James Meyer, Suffolk Wildlife Trust
Wetherden
We have no specific comments on this site or the potential for ecological impacts, beyond those identified in the ecology section (15.14). It must be ensured that should this site be allocated, the restoration plan maximises opportunities for ecological enhancements.
Policy MP7 of the plan gives preference to proposed sites which have restoration schemes that incorporate biodiversity net gain.

14. WHERSTEAD

| WHERSTEAD |
|------------------|------------------|------------------|
| **Number** | **Respondent** | **Representation** | **SCC Response** |
| DR/30 | Tim Hunter | As long as rights of way are preserved or diverted and lorries are kept out of villages | Public rights of Way |
| | | | The County Council will seek to preserve rights of way or divert them where they are within the boundary of the site. |
| E/154 | Alison Collins, Natural England | The proposed extension is about 800m from Freston and Cutler’s Woods with Holbrook Park SSSI. The impact assessment should provide evidence that there will be no adverse effects on the designated features of the SSSI from dust blow, changes to hydrology etc. The proposed quarry extension at Pannington Hall Quarry 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 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. | The potential impacts upon Freston and Cutlers Woods SSSI have been noted in the plan and the appropriate site assessments will be expected to take account of these as part of the planning application. The County Council will include reference to the expansion of the Area of Outstanding Natural Beauty in the Plan with regards to the Wherstead extension and consider this site as having potential impacts on the future AONB area which will need to be avoided or mitigated. |
| E/108 | Charlie Christensen, The Environment Agency | 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. An adequate buffer to protect against disturbance and damage must be made to the adjacent Local Wildlife Sites. | The County Council also has the expectation that hedgerows will either be retained or that adequate mitigation can be provided and that an adequate buffer will be in place to avoid/mitigate negative impacts on the adjacent local wildlife sites. |
| E/116 | Fiona Cairns, Suffolk Preservation Society | Archaeology | Thank you for highlighting this inconsistency. The County Council will |
Wherstead (para 16.11), again the document states that evaluation can be dealt with by condition. It is suggested that there is ‘near surface potential and Palaeolithic potential’ (16.13) which the Society considers must be established pre-determination. It is inconsistent to suggest that it is satisfactory to do this by condition at Wherstead but not at Wangford (14.9) which is also considered to have similar potential. This inconsistent approach is a fundamental weakness of the document.

<table>
<thead>
<tr>
<th>E/72</th>
<th>The Stour &amp; Orwell Society</th>
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<tr>
<td></td>
<td>This proposal is deeply disappointing and objectionable.</td>
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<td></td>
<td>This site is said to comprise an “extension” to an existing site. However, despite being allocated for nearly two decades, the adjoining land is not an “existing site”, because nothing of substance has ever happened there. A few mounds were dug to implement the decade old permission, but these have only been used by unlawful scrambling motorbikes to the great distress of neighbouring landowners, residents and riders on the adjoining bridleway. The police have been called out on numerous occasions.</td>
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<td></td>
<td>This reason that it has not been worked land is that it is simply not worth the candle as an aggregates site. The same is true of the “extension”. The deposit is of too poor a quality and too shallow to make it worthwhile allocating. 0.5Mt off 11 hectares is a very poor return for the blight and disruption caused.</td>
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<tr>
<td></td>
<td>This western “extension” lies right up against a highly attractive and valuable mosaic of ancient woodland, full of protected species. Indeed, protected species in this</td>
</tr>
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<td></td>
<td>ensure a consistent approach to archaeology between sites</td>
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<tr>
<td></td>
<td><strong>Proposed Action</strong></td>
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<tr>
<td></td>
<td><strong>Ensure consistency of archeological approaches between sites</strong></td>
</tr>
<tr>
<td></td>
<td>While extraction has yet to take place on this site, as it has planning permission that has been technically implemented it is still an exiting site in planning terms.</td>
</tr>
<tr>
<td></td>
<td>It is not uncommon for sites with planning permission to go unworked for a period of time. The depth of the material on the site is approximately 10m which is relatively deep for a sand and gravel site.</td>
</tr>
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<td></td>
<td><strong>Ecology and Landscape</strong></td>
</tr>
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<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. 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</td>
</tr>
</tbody>
</table>
area were recorded in numbers on the land in question when the recent temporal extension of permission for the “existing” site was approved. This issue does not appear to have been considered in advance of now proposed allocation.

The whole area lies within the Babergh District Council’s designated Dodnash Special Landscape Area. It is highly attractive and much used by walkers and riders. If a very substantial “stand off” is intended, why show the boundary right up to the ancient woodland? A full and generous margin should be excluded. Indeed the land proposed for allocation includes a very popular and well used bridleway. How is this to be addressed?

Most disturbing is the suggestion that “some inert waste material might be required to aid restoration” (para.16.1). From where has this suggestion emerged? The “deposit” is extremely shallow, which has always been known. The topsoil is to be stripped and then replaced after working so that the land is restored to agriculture. Inert waste is NOT required and is NOT consistent with restoration to agriculture. This reference must be dropped.

As noted an additional standoff is required in order to protect the ancient woodland. The site boundary is shown as abutting the woodland as the standoff and earth bunds, which form part of the mitigation, need to be within the site boundary in order to be part of the planning permission.

**Public Rights of Way**

Bridleways that are adjacent to the site boundaries will need to be retained and unobstructed. The public footpath which runs partially within the site will need to be diverted. This is outlined in paragraph 16.20 of the plan.

**Use of Inert Waste**

It should be clarified that inert waste takes the form of waste soils, from excavation or construction materials. Not local authority collected waste, or commercial waste. Inert waste can be used as part of an agriculture restoration.

The County Council will ensure the extension will not conflict with existing measures that are in place and that restoration of the extension will

<table>
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<tr>
<th>E/78</th>
<th>James Meyer, Suffolk Wildlife Trust</th>
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<tr>
<td>Wherstead</td>
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<td>As recognised in in the ecology section (16.12) this site is bounded to the north and west by ancient woodland designated as a CWS. This woodland, and connected habitat such as hedgerows and scrub, are submitted as part of the planning application for the site.</td>
<td>The County Council will ensure the extension will not conflict with existing measures that are in place and that restoration of the extension will be carried out in a manner consistent with the approved plans.</td>
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known to support hazel dormice (a European protected species). The consent for the adjacent Pannington Quarry includes measures to mitigate adverse impacts on ecological receptors, including dormice. It must be ensured that any allocation at this site does not conflict with the consented measures and includes assessment of the likely impacts of the extension and adequate mitigation measures. It must also be ensured that the restoration plan for the site maximises the opportunities for ecological enhancements and compliments the existing restoration scheme for the neighbouring site.

It must also be ensured that the restoration plan for the site maximises the opportunities for ecological enhancements and compliments the existing restoration scheme for the neighbouring site.

| E/87 | Chris Hemmingsley, Brett Wherstead (Pannington Hall Quarry) | Landscape - The sustainability appraisal notes a negative impact as the site is within the SLA and stand off to Ancient Woodland is required. Our specialist Landscape consultants have undertaken a baseline landscape character appraisal for the site and indicated that the proposed site extension is within the Ancient Estate Farmlands LCT 2 and this same LCT also applies to the consented Pannington Quarry site. Thus, no other character types are directly affected and outline restoration to agriculture would represent a suitable outcome. It is therefore concluded that with appropriate site specific restoration details, there are no reasons relating to the potential effects on landscape character, why mineral extraction processes should not proceed and would not cause lasting adverse effects. Biodiversity - The sustainability appraisal notes a negative impact potential on SSSI and County Wildlife Site. The existing quarry site was the subject of detailed ecological assessment as part of a recent s73 condition variation application. The data gathered indicated that the main ecological issues will be the adjacent designated woodland and to a lesser degree the compliment restoration of the consented site. |

Your comments are noted.

Proposed Change
Correct mapping error
<table>
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<tr>
<th>SM/26</th>
<th>Clive Pearsons</th>
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<tr>
<td>Site M9 This proposed site is either side of the Belstead - Tattingstone Road, and does not show where the entrance/exit will be for site traffic. I object to the access being sited onto the road between Belstead village and the A137, as this road is a &quot;rat run&quot; at peak times, and is mainly single track with very few passing.</td>
<td>Judging by the description this representation is referring to Wherstead, but has highlighted Worlington, which is site M9. County Council’s response to representation is referring to Wherstead.</td>
</tr>
</tbody>
</table>

presence of dormouse and barbastelle bats. These will all be assessed thoroughly at the detailed planning application stage and suitable mitigation measures agreed.

Recreation and amenity - A negative impact has been indicated because of bridleways and footpaths traversing the site and around the borders. Suitable mitigation measures can be considered to protect amenity / views from the footpaths or suitable diversions put in place. These would all be considered at the detailed planning stage.

Highways - It has been bought to our attention that there are local concerns in regard to highways impact and in particular in relation to Belstead Village. From assessments undertaken by our specialist highways consultants, no HGVs are predicted to pass through the village of Belstead to the north west of the existing site, as there is no direct means of vehicular access to either the A 14 or the A 12 via Belstead. Therefore, only vehicles making local deliveries within the village would be envisaged.

Drawing Error - We would also wish to highlight a minor drawing error on the Suffolk County Council site allocation drawing for the Pannington extension site where the 'red line' extension area boundary does not match correctly to the 'orange' existing quarry boundary. The two lines need to be drawn abutting one another.
places and a number of blind bends. The additional traffic on this route is caused by congestion on the A137/A14 junction and the A12/A14 junction at the Copdock Mill Interchange. We should not allow any further commercial developments to increase vehicle movement, until a Northern ByPass for Ipswich has been constructed.

**Entrance and Exit for Site traffic**

There will be no additional traffic on The Street (the road which divides the site) caused by internal site traffic. Material from the north section of the site will be transferred under the road, via conveyor belt to the south section of the site, where the processing plant will be situated.

The site’s highways access will be onto the A137, which is a distributor road on the Suffolk Lorry Route Network.

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<tr>
<th>E/28</th>
<th>Samantha Barber, Belstead Parish Council</th>
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<tr>
<td><strong>Wherstead</strong></td>
<td>Although Wherstead may be seen as a more favourable option there are still concerns about the lorry movements and volumes of traffic and must stress again that lorries should not be permitted to use the village roads.</td>
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There will be no additional traffic on The Street (the road which divides the site) caused by internal site traffic. Material from the north section of the site will be transferred under the road, via conveyor belt to the south section of the site, where the processing plant will be situated.

The site’s highways access will be onto the A137, which is a distributor road on the Suffolk Lorry Route Network.
### 15. Worlington

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<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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| E/1    | W.J.Ranner            | Having looked at the plans, I have two concerns, firstly noise second traffic. With the five ways at Barton Mills being so busy I have noticed an increased amount of traffic using the Newmarket Road, Worlington to Red lodge, I live at the Oaks. If cars knew what 30 miles an was it wouldn't be so bad, is the plan 19 and 20 likely to increase with lorry’s going backward and forwards through Worlington?? Will there be any noise from digging and lorry from the pits, I know there quite away from me but noise can carry a long way. The three houses in my direct vicinity will not want you having a pit directly affecting the prices of our homes. | Traffic
There are an estimated 44 lorry movements associated with the quarry extension (22 in and 22 out). Traffic should go directly to the A11, which is the access for the current quarry. Lorries should only go to Worlington in the case of local deliveries.                                                                                                                                                        |
| E/154  | Alison Collins, Natural England | The proposed extensions of the existing workings to north and south do not fall within any buffer zone around Breckland SPA which is set to protect nesting stone curlew. The southern extension is about | Noise
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.                                                                                                                                                                                     |
|        |                        |                                                                                                                                                                                                            | Property Values
Property values are not a planning consideration and cannot be addressed in the plan.                                                                                                                                                                                                                       |
<p>|        |                        |                                                                                                                                                                                                            | The Breckland SPA has been noted in the plan; assessments and avoidance or mitigation measures will be expected to                                                                                                                                                                                                  |</p>
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<td>700m from Red Lodge Heath SSSI. The impact assessment should provide evidence that there will be no adverse effects on the SSSI designated features from dust blow, changes to hydrology etc.</td>
<td>take account if this a planning application is submitted.</td>
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<td>Red Lodge SSSI has not been mentioned in the plan, however this will be added. Assessments and avoidance or mitigation measures will be expected to take account if this a planning application is submitted.</td>
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<tr>
<td><strong>Proposed Changes</strong></td>
<td><strong>Add reference to the Red Lodge Heath SSSI.</strong></td>
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<tr>
<td>E/108</td>
<td>Charlie Christensen, The Environment Agency</td>
<td>This site is located within a principal aquifer, however we do not consider the site extremely sensitive. There are no significant hydrogeological receptors, but impacts on the local water environment should still be considered.</td>
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<td>The county council is aware of the principle aquifer and works must avoid, minimise or mitigate impacts on water environment</td>
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<td>E/116</td>
<td>Fiona Cairns, Suffolk Preservation Society</td>
<td>Worlington, again the document states that evaluation can be dealt with by condition.</td>
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<td>The County Council considers that dealing with archaeology by condition is appropriate for this site.</td>
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<td>E/73</td>
<td>West Suffolk District Council</td>
<td>MP2(i) – Site M9 (map ref FH4) 17.16 – this paragraph relates to impact on the PROW, and mentions that the area is potentially the future route for the Mildenhall bypass. There is no bypass currently planned for the town. This is an attractive countryside area. There are a number of County Wildlife sites in proximity suggesting that the area is sensitive for biodiversity. It is recommended that Suffolk Wildlife Trust is engaged. These concerns should be addressed prior to next stage of consultation – the proposed submission.</td>
</tr>
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<td>Reference to the Mildenhall bypass will be removed</td>
<td>Suffolk Wildlife trust has been consulted, and have made a representation. They will continue to be consulted through the plan making process.</td>
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<td></td>
<td><strong>Proposed Changes</strong></td>
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| E/78 | James Meyer, Suffolk Wildlife Trust | Worlington
This site is bounded to the north by Badlingham Lane CWS which is designated for its Breckland flora (not ancient woodland as identified in the ecology section (17.10)). Aerial photographs suggest that the site supports a range of habitats, potentially including some semi-natural habitats of ecological interest. As recognised in the ecology section the site may also support protected and/or UK Priority species and therefore assessment and suitable mitigation measures are required. 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 the restoration plan for the site maximises the opportunities for ecological enhancements and compliments the existing restoration scheme for the neighbouring site. | Remove reference to Mildenhall bypass in paragraph 17.16
Paragraph 17.10 will be corrected to reflect the presence of Breckland flora.

At this stage it is considered that ecological impacts could be mitigated, however a full assessment of impacts, which would inform mitigation measures is expected at the planning application stage. A site specific policy included in the next draft of the plan will identify what an application is expected to address, including ecological issues.

It is expected that any restoration of the extension will compliment that of the existing permission.

Proposed Changes
Correct description of county wildlife sites in paragraph 17.10 to Breckland flora. |
### 16. SIZEWELL A NUCLEAR POWER STATION

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<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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| E/78   | James Meyer, Suffolk Wildlife Trust | Proposed Waste Sites Sizewell “A”  
We note the contents of the ecology section (section 19.11), the area around Sizewell “A” is of considerable ecological value and this should be better reflected in the ecology section. The site is border by Sizewell Marshes SSSI and Suffolk Shingle Beaches County Wildlife Site (CWS), and is in close proximity to the 5 Minsmere-Walberswick SPA, Minsmere-Walberswick Heaths SAC, Minsmere-Walberswick Ramsar site, Sandlings SPA, Minsmere-Walberswick Heaths and Marshes SSSI and the Leiston-Aldeburgh SSSI.  
Habitats on and around the site are also known to support a range of European and UK protected species and UK Priority species. It is therefore important that any proposals for this site adequately assess the likely impacts on all ecological receptors and appropriately follow the mitigation hierarchy.  
It will also be necessary for any proposal for this site to be subject to an HRA to assess the likely impacts on European designated sites. | Exclusion of the sites you have reference was because county ecologists did not consider there would be significant impacts to these sites at this stage, however if any proposals were to come forward on this site there would need to be ecological assessmints that take about of these sites. |
| E/15   | Amec Foster Wheeler on behalf of National Grid | See attachment (representation refers to two sites and includes tables of information which will not fit in this box) | Overhead High Voltage Electricity Lines |
The presence of the high voltage overhead electricity lines adjacent to the site is noted.

This site is being allocated in the event that waste sharing with other nuclear facilities is proposed at Sizewell, although there are no proposals to do so at this time it is considered prudent to allocate this site.

**Proposed Change:**
Make note in the explanatory text that any proposals that come forward for shared waste facilities at Sizewell must take into account overhead high voltage power lines that should remain in situ.

| E/89   | Therese Coffey MP | **RE: Minerals and Waste Local Plan**  
I write in relation to the two sites proposed in Suffolk Coastal, Wangford Quarry and Sizewell A. Regarding the Sizewell A site, I understand this is precautionary and sits in a necessary place forming part of the nuclear campus. | Noted |
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<tr>
<td>E/83</td>
<td>Natalie Gates, Historic England</td>
<td>Sizewell has a high potential for significant archaeology. As noted previously, how this should be treated should be set out in a clear policy which is absent from the draft plan. 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</td>
<td></td>
</tr>
<tr>
<td>E/154</td>
<td>Alison Collins, Natural England</td>
<td>This site is entirely within Suffolk Coast and Heaths AONB and Suffolk Heritage Coast. It is immediately adjacent to Sizewell Marshes SSSI (designated for its wetland vegetation and assemblage of invertebrates) and in close proximity to Leiston-Aldeburgh SSSI (designated for birds, heathland, wetland and coastal vegetation and assemblage of dragonflies) which is a component of Sandlings SPA (notified for breeding woodlark and nightjar). The route of the England Coast Path may be located on the beach in front of Sizewell A and B following the existing Suffolk Coast Path. Without further information on the proposal to manage waste arising from the decommissioning of Sizewell A and some waste potentially arriving from sister stations, it is difficult to make a specific comment. This is a highly sensitive location environmentally and any proposal would have to take full account of any likely significant impacts to landscape, biodiversity and coastal access.</td>
<td>It should be noted that while there is currently no proposal for this sort of facility at Sizewell, the County Council sees it as prudent to allocate this site in case such proposals should arise. Should such a proposal arise Natural England will of course be consulted as a statutory consultee. Note of the SSSI will be added to the plan. Any proposal for this allocation should exclude area of need beach which includes the public footpath unless overriding need is demonstrated. Proposed changes Reference to the SSI will be included in the plan.</td>
</tr>
<tr>
<td>E/108</td>
<td>Charlie Christensen, The Environment Agency</td>
<td>Sizewell “A” is a decommissioning power station. As such it generates radioactive and other wastes for storage and subsequent disposal. The disposal of radioactive waste is regulated by us through permits issued under the Environmental Permitting Regulations 2016. Magnox has not engaged directly with us concerning Sizewell “A” and the Suffolk County Council consultation on the proposed Minerals and Waste Plan. However, enquiries at site have confirmed to us that as part of the consultation, Magnox through their</td>
<td>These comments are noted.</td>
</tr>
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</table>
legal representation, GVA, have responded to the initial issues and options consultation. We believe that the company involvement has been to ensure that the plan recognises and supports the strategy of the Nuclear Decommissioning Authority and any information held in the plan regarding Sizewell “A” is accurate. We would expect Magnox to consult us on any changes of radioactive waste strategy in the future especially if it involves radioactive waste from other Magnox decommissioning sites. We would also expect Magnox to consult local stakeholders.

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<tr>
<th>E/110</th>
<th>Owain Griffiths, GVA Grimley Ltd</th>
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|       | The NDA and Magnox are supportive of the proposed allocation of Sizewell A as a Waste Site underproposed Policy WP2, including the draft boundary shown on Page 89 of the consultation document (which follows correspondence between the Council and GVA). The supportive provision within Policy WP2 for ‘waste management’ proposals at the site is also welcomed. However, it is noted that Policy WP16 (discussed above) is the primary policy for assessing proposals for the management of waste at Sizewell A.

The Sizewell A site allocation is accompanied by supporting text (paragraphs 19.1 – 19.18 of the MWLP Preferred Options Consultation document). While the majority of the text is factually correct, there are some small points of clarification to be made:

- Paragraph 19.11 – AONBs are landscape designations and should therefore not be discussed in relation to ecology / nature conservation interests. |

**Proposed Changes**

Remove AONB reference in ecology section.
Paragraph 19.18 – refers to the site being at risk of surface water flooding in both 1 in 30 and 1 in 100 rainfall events, as well as being at high/intermediate risk of groundwater flooding. With regards to groundwater flooding, it should be noted that Sizewell A site was raised considerably over the surrounding land when it was built, in part because of the 1953 east coast flood event. Magnox’s own environmental monitoring finds that groundwater is always well below (by more than 7m) current site ground level at Sizewell A. Even at high tide, the site is not at any risk of flooding from groundwater. With regards to surface water flooding, the Environment Agency maps indicate that only a very small proportion of the site is at risk and these areas are restricted to access roads and hard standing. It is Magnox’s understanding that these predictions are based on topography only. This being the case, these predictions do not take into account the extant drains system on the Sizewell ‘A’ site and therefore over-state the risk of flooding from extreme rainfall events. Clearly, details of drainage/flooding will be submitted to the Authority with any forthcoming planning applications affecting drainage. Given the above, it is suggested that the wording of the supporting text is changed simply to require planning applications at Sizewell ‘A’ to be supported by appropriate flooding and drainage assessments.
| E/70 | Mike Jones, RSPB | We note that the Site Selection Report indicates that development required at this site may include new buildings and other required facilities, the need to manage waste *in-situ*, and potentially the need to manage land contamination. Due to the proximity of this site to Sizewell Marshes SSSI, potential impacts on ecological features will require careful assessment. We consider that this should be specified within the policy for this site. | The County Council is aware of the Sizewell Marsh SSSI, and it can add reference to this in the plan. | **Proposed Change**  
**Make reference in plan to Sizewell Marsh SSSI** |
| --- | --- | --- | --- | --- |
| E/118 | Ian Johns, Suffolk Coastal and Waveney District Councils | **Waste Treatment at Sizewell Nuclear Power Station**  
Policy WP16 states that low to medium risk nuclear waste could be processed and stored at Sizewell. Site 19 has been set aside for the purposes of processing and storing this waste but this site is located in the AONB. There is no evidence, either in the Plan or site assessment, to suggest that the use of this site for storage is in the overriding public interest. Furthermore no landscaping scheme has been submitted to explain how the effects of waste storage and processing on the landscaping would be mitigated. While the existing Sizewell A and B power stations already impact upon the landscape it is important to ensure that this landscape impact is not significantly increased. | The site has been allocated in the event that there are proposals for the sharing of waste facilities at Sizewell with other sister stations, from outside of Suffolk. This would be in accordance with national policy regarding waste management from nuclear power plants.  
In this case the public interest would be the safe and appropriate management of waste arising from nuclear power stations.  
There are currently no proposals for this, however the County Council considers it prudent to prepare for this eventuality. Policy WP16 states that any proposal must have the exceptional circumstances required of the NPPF for major development in the AONB. However landscape could be specified in part “c” to ensure that landscape |
impacts are considered as part of any proposal.

**Proposed Changes:**
Add “landscape” alongside environment and local community in part C of policy WP16.
Clarify national policy within the plan

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<th>17. APPENDICES</th>
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<tr>
<td><strong>APPENDIX 1. ACRONYMS &amp; GLOSSARY</strong></td>
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<p>| <strong>APPENDIX 2: POLICY MONITORING FRAMEWORK</strong> |</p>
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<th>Representation</th>
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<p>| <strong>APPENDIX 3: SAFEGUARDING MAPS</strong> |</p>
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<th>Representation</th>
<th>SCC Response</th>
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| E/79   | Malcolm Robinson, Hacheston Parish Council | 4. On map SC3, Parham Composting site (facility CF4) is shown in the wrong location. Its correct grid reference is TM318601. Please do not hesitate to contact me should there be any queries with regard to the above. | Identified Location of Parham
Thank you for highlighting this error, it will be corrected |

Proposed Changes
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<th>E/108</th>
<th>Charlie Christensen, The Environment Agency</th>
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We understand that Layham Quarry, Waldringfield Quarry and Darmsden Hall landfill site are all inert landfill sites, however they have also been included within the list of non-hazardous sites in the Local Plan. The status of these landfill sites is as follows:

- **Darmsden Hall**: Not accepting waste. This site was closed in accordance with the Landfill Directive and is in aftercare.

- **Layham Quarry**: Not accepting waste – Mothballed. This site is required to go through definite closure process in accordance with the requirements of the Landfill Directive.

- **Waldringfield Quarry (South)**: Not accepting waste. This site was closed in accordance with the Landfill Directive and is in aftercare.

- **Waldringfield Quarry (North)**: Not accepting waste – Mothballed. This site is required to go through definite closure process in accordance with the requirements of the Landfill Directive.

We trust this advice is useful. We would be pleased to provide you with further advice to contribute towards the Local Plan going forward. Please note this may fall under our planning advice service and there will be a charge for this. For more information please do not hesitate to contact us on the details below.

Thank you for these details. The County Council will update these maps accordingly.

**Proposed Changes**

Update safeguarding maps based on information provided.
18. **PROPOSALS MAP**

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19. **SUSTAINABILITY APPRAISAL**

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<td>SM/202</td>
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<td>E/108</td>
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| E/78 | James Meyer, Suffolk Wildlife Trust | Sustainability Appraisal (SA) Document  
Section 2.3.3 – As set out in our comments on the Issues and Options consultation draft) our letter of 6th February 2017, bullet point 1 describes the different types of nature conservation site designations. However, it appears to confuse the international designations. By way of clarification, Ramsar, Special Protection Area (SPA) and Special Area of Conservation (SAC) are separate designations with different qualifying criteria and designated under different legislation. Potential impacts on Ramsar sites, SPAs and SACs must all be assessed through the Habitats Regulations Assessment (HRA) process (see section below). We recommend that this bullet point is reworded to correctly identify the types of designations, the legislation they are designated under and their hierarchy.  
Section 3.2 (Table 4) – We query the statements under Objective 6 that there are no “statutory habitat sites within 250m” of the site options. A number of the preferred site options have statutory nature conservation sites (SPAs, SACs, Ramsar sites, NNRs or SSSIs) on or within 250m of them and therefore this statement is incorrect. It is also unclear why 250m has been used as the trigger distance for assessing impacts on statutory designated sites? Also, in relation to Objective 11 restoration to the original condition of the site would be a “Neutral” impact not a “Positive” one.  
Section 9.2.1 – It should be noted that the SSSI at this site is | The comments are noted and corrections will be made in the next draft of the plan.  
Proposed Changes  
Make corrections to sustainability appraisal as per comments. |
Having reviewed the Sustainability Appraisal, we wish to highlight some concerns with the results. This is mainly in the form of some inconsistencies in approach and also some typographical areas within the Sustainability Appraisal.

Dealing with the typographical errors first, with regard to Layham Quarry there are a number of errors within Table 40 on page 161 where the level of impact is not reflective of the individual assessment on page 179. For example, for Objective 1: Table 40 states no impact, where on page 179 it is stated the site will have a negative impact. Furthermore, the site at Wangford has three separate allocations for varying uses but when looking at Table 40 only one of the uses is included for comparison. To allow for an objective comparison to be made for the sites and to ensure that the most appropriate sites are allocated we would request that Table 40 be reviewed to ensure that the correct level of impact is stated and that all site allocations are included.

Our concerns on the inconsistencies in approach are between each Site Selection Report and the Sustainability Appraisal, of particular interest to Brett:

Barham Quarry

Within the Site Selection report the comments on landscape state that site is acceptable with recommendations for further working and restoration.
The Sustainability Appraisal states, however, that there will be a negative impact upon a Special Landscape Area. We suggest that the score within the Sustainability Appraisal be amended to having a neutral impact.

Grove Farm

Landscape: the Site Selection Report recommends that the extent of the site should be modified to make it acceptable with potential impacts on the Special Landscape Area. The Sustainability Appraisal states that the site will have a Significant Negative impact due to the Special Landscape Area. We consider that the impact at Grove Farm within a local landscape designation is being given greater weight than other sites that are being allocated that lie within national landscape designations.

Biodiversity: the Site Selection report identifies that the site lies in close proximity to County Wildlife Sites and Local Nature Reserve. The Sustainability Report states that Grove Farm will have a Significant Negative impact upon biodiversity. Again, the score seems disproportionate particularly when considered that sites have been allocated within and in close proximity to European and nationally designated sites.

SA Objective 23, Sustainable investment: the Sustainability Appraisal gives no recognition that Grove Farm is located adjacent to Poundfield Products, concrete products specialists. Circa 70,000 tonnes per annum of sand and gravel won from Grove Farm would
(if allocated and approved) be supplied direct to the Poundfield Products facility.

SA Objective 24, Promote efficient movement: as above the Sustainability Appraisal provides no consideration to the proximity to Poundfield Products and the positive impact that taking 70,000 tonnes per annum direct to site would have on HGV movements.

<table>
<thead>
<tr>
<th>E/87</th>
<th>Chris Hemmingsley, Brett</th>
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<tbody>
<tr>
<td>Barham</td>
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Water quality - It was noted within the sustainability appraisal that this site will have a negative impact within a SPZ. In response Brett confirm that Barham Quarry is in a source protection zone (SPZ) 2 or outer SP. There is no definitive restriction on mineral extraction or inert landfill in a SPZ 2. In specific regard to infilling, relevant SPZ criteria set out by the Environment Agency can be met by the use of inert waste and inert landfill.

Landscape - A negative impact was noted in the sustainability appraisal, however, the report went on to suggest that with suitable mitigation; impact upon the Special Landscape Area (SLA) would be acceptable. Our specialist Landscape consultants have undertaken a baseline landscape character appraisal for the site and indicated that both extension areas of the site have characteristics comparable to the Ancient Estates Claylands Landscape Character Type (LCT). Therefore they confirm an agricultural restoration is appropriate in

Water Quality
The County Council accepts there is no definitive restriction to extraction or inert landfill in an SPZ. The plan is simply stating that this must be a consideration of any planning application.

Landscape
Noted. The County Council would expect restoration details alongside any planning application based on appropriate surveys.

Biodiversity
Noted. The County Council would expect avoidance, minimisation or mitigation of impacts detailed alongside any planning application based on appropriate surveys.

Heritage
Noted. The County Council would expect avoidance, minimisation or mitigation of impacts detailed alongside
this instance. With appropriate, and site specific, restoration details the consultants concluded that 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 - The sustainability appraisal indicates a negative impact to Burnham Pit SSSI and County Wildlife site. Brett are aware of the geological SSSI and note that this is incorporated into the current operational site permission. The need for further mitigation measures will be assessed at the detailed planning stage. In terms of ecology, this is an extension across arable land and as such, subject to an appropriate stand-off/buffer to the woodland to the north and east, ecology is not considered a constraint.

Heritage - Negative impact noted in regard to high potential for heritage assets with archaeological interest. Brett currently operate the existing Barham Quarry, the planning conditions of which require extensive archeological monitoring. It has been assessed that the extensions will carry a similar requirement and will be addressed at the planning application stage.

Flood Risk - The sustainability appraisal notes a negative impact due to large proportion within FZ2. Brett consider that Barham Quarry is in fact in Flood Zone 1 not Zone

| Flood Risk | Barham is in flood zone 1. Any reference to the site being in flood zone 2 is changed |
| Proposed Change | Ensure that Sustainability Appraisal states that the Barnham is in flood zone 1, not flood zone 2 |
2. Never the less, sand and gravel extraction and inert waste landfill are appropriate forms of development in either Flood Zone 1 or Flood Zone 2 as set out in Planning Practice Guidance to the National Planning Policy Framework on flood risk and coastal change.

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<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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| E/154  | Alison Collins, Natural England | We have some concerns with the HRA that has been submitted to accompany this Preferred Options consultation in that it is an incomplete assessment with regard to the site-specific information that has been provided. Strategic Habitats Regulations Assessment This document generally identifies international sites which may be affected and lists impact ‘pathways’ by which likely significant effects may arise from the plan. We suggest that ‘changes to air quality’ | The County Council propose the following changes to the HRA in line with your comments  

**Proposed Changes**  
Add ‘changes to air quality arising from fugitive dusts which may affect the functioning of plants’ and ‘changes to vegetation and**
arising from fugitive dusts which may affect the functioning of plants' and 'changes to vegetation and soils arising from the deposition of fugitive dusts' are added to the list of potential impact pathways. Note that the successful grant of planning permission means that consent is deemed to have been granted for potentially damaging operations within SSSIs and no additional formal consent from Natural England is required for potentially damaging operations covered by the planning application. Any operation likely to damage the special interest of a SSSI which is not included in the planning permission will require notice to be made to Natural England before that operation can proceed. Also, the term 'appropriate assessment' is misused in the HRA. The document submitted is not an appropriate assessment but rather a screening for likely significant effect. An appropriate assessment is required when likely significant effects cannot be excluded and is a detailed consideration of all the evidence and information to ascertain whether an adverse effect on the integrity of the site can be ruled out. We expect to see within the HRA document a summary of the results of the initial screening, i.e. which policies and which sites have been screened in and which have been screened out, with further consideration of those policies and sites which have been screened in as to whether avoidance and mitigation measures would be sufficient to achieve a conclusion of no likely significant effect, either alone or in combination with other plans and projects. This can be at a 'high' level, e.g. work would take place outside the bird breeding season to avoid disturbance to nesting birds. However, more soils arising from the deposition of fugitive dusts' to pathways. Ensure it is clear in the HRA that notice to Natural England is required before any operations that will likely damage a SSSI can begin. Change the term 'Appropriate assessment' to screening for likely significant effect' where necessary. Include a summary of results of initial site screening in HRA. Add site specific potential impact information to appendix 3 of the HRA.
<table>
<thead>
<tr>
<th>Appendix One</th>
<th>Appendix Two</th>
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<tr>
<td>No further comment.</td>
<td>The following policies need to be screened in for further assessment:</td>
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<td></td>
<td>Policy MP2: Proposed sites for sand and gravel extraction. (This policy is addressed by considerations of the sites listed.)</td>
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<tr>
<td></td>
<td>Policy WP2: Proposed site for waste management a) Site W1 Sizewell A Nuclear Power Station</td>
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<td></td>
<td>Policy WP16: Treatment and storage of radioactive waste at Sizewell nuclear power stations</td>
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</table>

We agree that the other policies in the Preferred Options consultation document are unlikely to have a significant effect on any international site and can be screened out from further assessment.

<table>
<thead>
<tr>
<th>Appendix Three</th>
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<td>With regard to Appendix 3, it is not sufficient for each proposed location to state that ‘This Objective is considered to have a Neutral Effect upon the Designated Sites until such time as a project-specific HRA screening process and Appropriate Assessment has been undertaken. The developers will need to undertake suitable survey work and prepare a detailed avoidance, mitigation, compensation and enhancement strategy. Thereafter, such information should be submitted to SCC where it will be considered by the Ecology Team and, if required, submitted to the Proper Officer at Natural England for approval.’</td>
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Since the Local Plan contains site-specific information, we expect to see a consideration of the likely significant effects on internationally designated site features for each of those proposed quarries/waste disposal sites which are either within or in the vicinity of international sites. The assessment of likely significant effect does not have to have the same level of detail that we would expect from a project-level HRA but should contain a consideration of whether there is likely to be an impact, such as direct loss of habitat, disturbance to breeding/wintering birds, hydrological change etc. and identify possible avoidance/mitigation measures that would be required. If a likely significant effect cannot be ruled out, then an appropriate assessment is required. This information is required at Local Plan stage even though applications will also require a project-level HRA.

E/70 Mike Jones, RSPB

Whilst we support the broad approach of the plan and offer supportive comments to ensure that the restoration policies reflect national planning policy. We also highlight significant concerns with the accompanying Habitats Regulations Assessment (HRA), which if unaddressed will leave the plan unjustified and unsound, with many allocations undeliverable in their current form, with consequent impacts on the wider delivery of the plan. Given the substantive nature of some of our comments, which relate to fundamental concerns we have with the plan in its current iteration, we would welcome further discussion with yourself and colleagues following the consultation.

The plan is an in principle document and the most detailed assessments will take place at the planning application stage. However desk based studies of designations, priority species and priority habitats have been made and site visits for each site has been undertaken to gain additional information. The results of these assessments are set out in the site selection reports and the County Council considers this to be appropriate assessment at this stage.

It is the responsibility of the Council, as the Competent Authority under the Habitats Regulations, to ensure that
the plan will not result in an adverse effect on the integrity of the Natura 200 network of European sites.

We have significant concerns with the conclusions of the strategic HRA produced by the Council in support of the Minerals and Waste draft plan, which defer any meaningful assessment on potential adverse effects on European sites to the project level. This approach does not demonstrate that the plan will not result in an adverse effect on any European sites, and therefore leaves the plan unjustified, contrary to the requirements of the Habitats Regulations and leaves the sites potentially undeliverable, rendering the plan unsounds.

The HRA states in Appendix 3 for all proposed allocations that there will be a neutral effect (i.e. likely negative significant effects would be avoided), typically noting ‘until such time as a project-specific HRA screening process and Appropriate Assessment has been undertaken’ and ‘there may well be other ecological constraints which will need to be assessed and the necessary mitigation strategies agreed’.

We disagree with the screening out of these sites in the HRA as no evidence has been provided to allow the Council to safely conclude that these allocations would avoid adverse effects on European sites. This approach effectively abdicates responsibility for determining if the allocations are able to avoid adverse effects on European sites until the development control stage, which is surprising given that assessments based on site locations and constraints can be made at this stage of the plan.
There is a real risk that sites which will not be deliverable will be included within the plan when relying on project-level HRA as the key mechanism to allow the site allocation plan to pass its own HRA and demonstrate its soundness. There is no guarantee that project-level HRAs would be able to demonstrate that adverse effects could be avoided and planning permission be granted. In addition, there are additional risks to the soundness of the plan through the plan becoming undeliverable if such sites cannot pass the tests set out in the Habitats Regulations. Sound planning requires that the Council not rely on the allocation of sites where delivery is uncertain. We seek clarification from the Council on this point and recommend that the allocations in the draft plan are assessed fully at this stage in order to determine the likely significant effects they may have on the Natura 2000 network. If adverse effects on site integrity are anticipated, the Council must evaluate if there are any avoidance or mitigation measures which may be applicable through policy to address the adverse effects. We are also concerned about the assertion made repeatedly in Appendix 3, that ‘developers will need to undertake suitable survey work and prepare a detailed avoidance, mitigation, compensation and enhancement strategy’. Notwithstanding our wider concerns about the unsuitability of deferring actions to later stages of the planning process, compensation measures as suggested should not be promoted like this. Compensation in a HRA has a strict legal definition and is only for the rarest of situations where avoidance and mitigation of the impacts is not possible, there are no alternative solutions and the proposal
is demonstrated to be of over-riding public importance and with the approval of national government. Any plan that proposed compensation as a means of resolving adverse effects on European sites would be unsound and so proposing it as a measure in the plan HRA would be to fundamentally fail the requirements of the Habitats Regulations.

E/78 James Meyer, Suffolk Wildlife Trust

Habitats Regulations Assessment (HRA)
We have read the documents which form the HRA for the draft Local Plan and we note their conclusions. We do not consider that the approach taken in the HRA is sound or legally compliant, particularly in the way that proposed site allocations have been assessed. We therefore must object to it at this stage. The HRA does not appear to follow the prescribed steps required of such an assessment (screening for likely significant effect; Appropriate Assessment) and does not provide any assessment of the potential impacts of the proposed developments on the identified designated sites. Without such consideration being undertaken it is not possible determine whether the proposals, either alone or in-combination, are likely to result in likely significant effects or adverse impacts on the integrity of the designated sites. It is not sufficient for the competent authority (in this case Suffolk County Council) to defer this level of assessment to the planning application stage. Also, in the absence of such assessment it is not possible to determine what mitigation measures are required to be secured as part of any site allocation policies.

Without a robust HRA we do not consider that the Local Plan could be found “Sound” at examination and we therefore strongly recommend that further assessment is undertaken prior to the production of the

The plan is an in principle document and the most detailed assessments will take place at the planning application stage. However desk based studies of designations, priority species and priority habitats have been made and site visits for each site has been undertaken to gain additional information. The results of these assessments are set out in the site selection reports and the County Council considers this to be appropriate assessment at this stage.
### E/55

**Caroline Jeffery, Norfolk County Council**

We have the following comment to make regarding both the Habitats Regulations Assessment and the Barnham Quarry site and Cavenham Quarry site in the Preferred Options Consultation document:

Norfolk County Council notes that two sites are proposed to be allocated for mineral extraction within the Breckland SPA at Barnham and at Cavenham. The Task 1 Screening Habitats Regulations Assessment, which has been carried out on the policies and specific site allocations of the Suffolk Minerals and Waste Local Plan, concludes that the allocation of these sites will “have a neutral effect upon the designated sites until such time as a project-specific HRA screening process and Appropriate Assessment has been undertaken”.

If sites were proposed for mineral extraction within the Breckland SPA in Norfolk, we would only consider making such allocations if a Task 2 Appropriate Assessment of the relevant Local Plan policies concluded that ‘no adverse effects are expected on the integrity of the SPA’ in order to have confidence that the sites would be deliverable. We consider that this approach would be in accordance with the Conservation of Habitats and Species Regulations 2010, unless Natural England advise otherwise.

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**Natural England Response**

Natural England have stated that they have no objection to the site in principle, provided more information is presented showing how impacts can be avoided, minimised or mitigated, which Suffolk County Council will be providing.

**Proposed Action:**

Provide more detailed information on avoidance and mitigation for Natural England.

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**EVIDENCE BASE**
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<th>Number</th>
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<th>Representation</th>
<th>SCC Response</th>
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| SM/98  | Daniel Jones | I can see from the consultation Draft V4 (I thinking the spelling needs to be adjusted for this document online!). Our concern is the continued traffic problems in Waveney, specifically Lowestoft town areas. I can see there will be proposed extraction from MELV4 & W3 on the above draft. How will Suffolk/Waveney ensure that there will be no impact on traffic at peak times during the working week and weekend? Other concerns in relation to contamination and destruction of wildlife areas to all the sites of the draft V4 document. | *MELV4 and W3*
MELV 4 and W3 are not proposed minerals extraction sites, but currently existing sites that the County Council seeks to safeguard within the plan. Site MELV4, operated by East Point Metal Trading Ltd, is a waste facility for Metals and End of Life Vehicles and W3, North Quay Lowestoft, is a landing facility for dredged marine aggregates. These sites will continue to operate and it is not expected they will have any additional infrastructure impacts as a result of the plan.

*Ecology and Landscape*
Restoration schemes and ecological mitigation that satisfy the County Council will be required for all proposed extraction sites. These must be based on appropriate surveys and taking account of statutory designations, non-statutory designations, and protected species and must be submitted as part of the planning application for any site.

Extraction on all sites will be phased, meaning only a smaller area of the site is extracted at one time and then restoration begins when should minimise the impact of the operations on ecology and landscape, by ensuring
only part of the site is extracted at one time

It is expected that features that are important to landscape and biodiversity, such as mature hedgerows and trees will be expected to be maintained.

| SM/274 | Graham Moxon | Brockley Wood, Belstead | I appreciate that mineral deposits can cover large areas but of the 10 recorded borehole locations, only borehole number 3 falls within the area of the proposed quarry. | The ten boreholes you are referring to were the geological investigations that took place as part of the investigations for the development of the A12. In addition to these an additional 9 boreholes were tested within the site, as outlined in the Greenfield Associates investigation report (Belstead site selection report, appendix 4 I and O consultation) This is the data used to inform the estimates of the resource throughout the site. |
## OTHER

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<th>Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
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<tbody>
<tr>
<td>SM/168</td>
<td>Jonathan Worsley - PDE Consulting Limited</td>
<td>Suffolk Minerals &amp; Waste Local Plan, Preferred Options Consultation, December 2017 Barton Mills Quarry – Inert Waste Disposal and Inert Recycling With reference to the above, we are writing to you on behalf of our client Needham Chalks Limited and specifically in regard to their existing operations at Barton Mills Quarry. We are writing to object to the failure to include Barton Mills Quarry in the draft plan. Since the report’s publication planning permission reference SCC\0182\17F was granted on 16 November 2017. With the granting of this planning permission it is clear that the development, as described in the Site Selection Report, aligns with Suffolk County Council’s planning policy on all accounts. Therefore it is clear that there should be no reason as to why this Site is not included in the draft plan.</td>
<td>The minerals site identified within the plan were new sites or extensions to sites to provide an appropriate landbank of sand and gravel. The application you have quoted is not a new site, but an application to continue working an existing site, so it is not appropriate to identify it as a proposal in the plan. No new waste sites (other than Sizewell A) have been identified in the plan as the Suffolk Waste Survey has not identified a need for new waste sites. However, the site is safeguarded as a minerals working in appendix 3 of the plan and can be seen on Map FH4.</td>
</tr>
<tr>
<td>SM/10</td>
<td>Kaye Brooks</td>
<td>Please ensure ancient woodland sites, veteran trees and areas of woodland are avoided, in line with the NPPF</td>
<td>Ecology and Landscape Restoration schemes and ecological mitigation that satisfy the County Council will be required for all proposed extraction sites. These must be based on appropriate surveys and taking account of statutory designations, non-statutory designations, and protected...</td>
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<tr>
<td>Ref</td>
<td>Organisation</td>
<td>Support</td>
<td>Notes</td>
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<tr>
<td>SM/56</td>
<td>Barking Parish Council</td>
<td>Support (no site named in representation)</td>
<td>Noted</td>
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<tr>
<td>SM/261</td>
<td>Cllr Rona Burt</td>
<td>When were notified that this consultation was happening? More time needed.</td>
<td>Forest Heath District Council were consulted at the very beginning of the consultation period, the 30th of October 2017, and we have received a representation. This is when all statutory consultees were notified.</td>
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<tr>
<td>SM/173</td>
<td>Nick Miller</td>
<td>Site around TL902416, this is between Newton Road and Valley Road, east of Sudbury, currently occupied by garden centre. If it is it correct what I have heard, that the site is 'scheduled as a strategic site for minerals' (I haven't been able to access a list or map of such sites), then I request that the County Council make efforts to have this site removed from such a list. I understand no developer is currently putting this site forward, because Brett Aggregates found it uneconomic. Also, in the recent Babergh 'call for sites' (SHELAA document in the draft local plan) the only reference is to the site's potential for housing or an extension of Chilton Woods industrial site. If I understand correctly, the deposit here is a small area of thin superficial drift deposit. I see the area is covered by 'Mineral Assessment Report 118' but I haven't been able to access that. I have been told that to make the site economic, Brett Aggregates would have</td>
<td>The site you describe is not a proposed minerals site. The plan consultation web page includes a draft of the plan document, where all proposed sites are listed, and maps of the proposed sites, as well as the documents used to evidence the plan can be found here: <a href="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/</a></td>
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<td>SM/198</td>
<td>Clare Williams</td>
<td>I have no objection to the mineral plan as it stands. However I understand that Brett Aggregates will be objecting during the current round of public consultation to the Creeting site not making it into the Preferred Option Draft Suffolk Minerals and Waste Local Plan. I do have concerns that mineral extraction at Creeting will cause noise, traffic and dust nuisance to me as a resident at Creeting Hall. I am also concerned that extraction on this site will interfere with the rural view across to the Gipping river. I understood that the Council wanted to preserve the separation between Stowmarket and Needham Market to maintain them as distinct entities. I feel industrial activity at Creeting would blur this distinction.</td>
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<td>SM/240</td>
<td>Amy Spurdens</td>
<td>I am aware that the site in question is disregarded however still want my comments taken into account that I object to the proposed site being Grove Farm in Creeting St Peter where Poundfield Products is currently. The road width does not support HGV’s, I have had many close encounters down Mill Lane where I have had to drive into the verge and come to a standstill while a lorry speeds past. Parts of this road are wider than others and the full length of the road is not consistently wide enough for the current volume of HGV’s, and would not be road-safe for an increased volume of traffic. The River Gipping backs on to Grove farm land, this area is a haven for local wildlife, the biosphere here would be</td>
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The Grove Farm site near Needham market and Creeting St Mary is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
significantly impacted as would the nature reserve down Fenn Lane, more so than other proposed sites due to the close proximity of the river, surrounding trees and natural areas of land. Grove farm is situated between a narrow bridge at one end of the road with ongoing drainage issues causing floods, and a sharp bend at the other end of the road which is just big enough for 2 cars, it is not wide enough for a car to travel safely when travelling next to the turning circle of a lorry. If Grove Farm became a proposed site again, it would have a large negative impact on the residents of Mill Lane, of Creeting St Peter and Creeting St Mary, Needham Market and Cedars Park in Stowmarket. There is just not the infrastructure in this area to support such a project, it is already stretched with the current level of activity of Poundfield Products.

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<thead>
<tr>
<th>SM/251</th>
<th>Lynne Jardine</th>
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| Grove Farm, Creeting St Peter, Stowmarket  I wish to support Suffolk County Council that the above site should NOT be included within the Suffolk Minerals and Waste Local Plan. The site is not suitable for the following reasons:  • Destruction of unspoilt area of the River Gipping Valley – The special landscape area comes up to the Creeting Hall Settlement and this forms a really beautiful area of the Gipping River Valley and is the only unspoilt area for some miles.  • Noise/Dust – this is an open landscape and any works would create an unacceptable level of noise and dust. Particular impact for us personally is in Phase 1 – this land surrounds the Creeting Hall Farm Settlement (8 dwellings). Living here we know the strong winds across the valley bring with
| The Grove Farm site near Needham market and Creeting St Mary is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |
them loose soil from farmland so the impact of sand/gravel excavation would be dreadful. Whilst this could be mitigated to some degree by bunding this would not prevent this occurring and the bunding would provide an ugly mess of weed ridden mounds spoiling what is currently a lovely view. • Long term destruction – the proposal is for 25 years from 2020 which is probably about the rest of my life – to put up with noise, dust and the ruination of our family home. The view will never be the same even after reinstatement. We are already blighted to the East with a large industrial concrete factory complex but have views to the West with beautiful sunsets going down behind woodland – we would lose this forever. • Historic Buildings as well as Creeting Hall which is Grade 2* there are other Listed buildings which would be impacted including Hill Farm (Grade 2) and Creeting St Peter Church (Grade We live next door to Creeting Hall and needed special roof lights being within the cartilage yet the Historic Building consultee response is “no objection”. A gravel pit surrounding the Hall will have greater impact than a couple of roof lights. • Public Rights of Way – many footpaths cross the site with local and visiting walkers taking different routes to the River Gipping Walk – I cannot see how these could be adequately safeguarded. • Mill Lane Development – the proposal seeks to take Lorries out through what is designated a wildlife habitat area – hardly conducive. I am appalled the applicants think this is a suitable site which I can only assume is driven by greed yet the wider community would have to suffer the consequences.
| SM/265 | Graham Dudley | “What happens next? Once the full plan is produced, it will then be submitted to the Planning Inspector and examined in public, and an approved plan is expected to be adopted in 2019. “ Well that says it all, job done. What a farce | The comments received during the consultation on the Preferred Options Draft are being taken into considerations and changes to the plan have been made based on representations. Before submission to the Planning Inspector there will be another consultation period during June/July 2018. This will be another opportunity for the public to make comments on the plan, which will be taken into account by the inspector. It is likely that the inspector will propose some changes to the plan as well. Additionally, sites that are included in the plan will still need to submit a full planning application, which will be consulted on and the public will be able to make comment. |
| SM/275 | Ruby Icke | This should not take place due to the wildlife deterioration and sustainability of the villages. | The survey monkey form you have submitted did not state what proposed site you were commenting on. Due to the address you have given it is assumed you are commenting on the Grove Farm proposed site. The Grove Farm site near Needham market and Creeting St Mary is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a |

Assessment Suffolk County Council
| E/2 | Griffin Holmes | It is very difficult/convoluted to find a particular site to view plans for. Please tell me how much notice will you take of comments made? | Apologies that you found it difficult to access the information you needed. If you have difficulties in future consultations you can phone Suffolk County Council for help. Comments are read and considered and changes to the plan are made based on them. These changes can be seen during the next phase of consultation during June/July 2018, where the public have another opportunity to make comment. |
| E/4 | Dave Crimmin – Little Cornard Parish Council | Little Cornard Parish Council would like to record this response to the above consultation: The councillors agree with the decision of SCC to remove the previously proposed quarry at Chilton from the revised Minerals sites in the current Preferred Options consultation. Would you please confirm receipt of this response. | Noted |
| E/5 | Dave Crimmin – Chilton Parish Council | Chilton Parish Council would like the following response to be recorded within the Preferred Options Consultation: The councillors agree with the decision of SCC to remove the previously proposed quarry at Chilton from the revised Minerals sites in the current consultation. CPC has always felt that the disruption | Noted |
caused to the area by the proposal in terms of traffic, noise and disturbance to the habitat were not acceptable for such a small deposit of minerals. Would you please acknowledge receipt of this submission.

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<thead>
<tr>
<th>E/7</th>
<th>Geosuffolk</th>
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<td>Firstly GeoSuffolk is not making any comments on individual sites here but upon the generic principles. GeoSuffolk not only supports protection of existing sites of geological and geomorphological interest such as SSSI s and County Geosites, but it also supports the continuing winning of minerals and other forms of excavation that create new exposures so providing potentially new opportunities for extending our knowledge and enjoyment. Secondly In our opinion, the documents are well set out and readable, particularly in the light of their formal nature which is tied to legislation. There are a couple of points that could benefit from amended wording:- 5.14 “no indigenous resources of rock” There may not be any current commercial exploitation of the Coralline Crag to supply customers but this rock type still exists in Suffolk and in theory it is available. (We are assuming that you are using the BGS definitions of Reserves as the practically/economically accessible quantities and Resources as the theoretical/total quantities). 5.19 The area off East Anglia is a vague description and the area presumably ends somewhere short of Holland. Perhaps it could be given a little more amplification eg say that it extends out to the 12mile fishing limit or whatever, or give its approx dimensions. We hope that our succinct e-mail and its comments are of use and as</td>
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<td>Thank you for these comments. They have been noted. Wordign in paragraph 5.14 could be changed to “no reserves of rock”. Referenceto East Anglia in paragraph 5.19 could be changed to “East Marine Plan Area”</td>
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**Proposed Changes**

Minor wording amendements in paragraph 4.14 and 5.19
| E/8 | Dave Crimmin – Great Waldingfield Parish Council | Great Waldingfield Parish councillors agreed with the decision of SCC to remove the previously proposed quarry at Chilton from the revised Minerals sites in the current Minerals and Waste consultation. GWPC has always felt that the disruption caused to the area by the proposal in terms of traffic, noise and disturbance to the habitat were not acceptable for such a small deposit of minerals. Will you please acknowledge receipt of this submission. | Noted |
| E/9 | Essex County Council | Terminology
Please note that all references to Waste Water Treatment Facilities should be changed to Water Recycling Centres to reflect current practice. hould be more specifically defined. | Noted. |
| E/12 | Dave Crimmin – Polstead Parish Council | After reviewing the consultation documents, Polstead Parish councillors resolved that they had no issues in relation to the proposals in the consultation. | Noted |
| E/58 | Richard Hitt | Hi Graham - further to our chat yesterday - please find attached my letter objecting to proposed development by Brett Aggregates / Poundfield Products in and around Creeting St Peter and Creeting St Mary.
Please do keep me abreast of any developments on this (see attachment) | The Grove Farm site near Needham market and Creeting St Mary is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |
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<th>E/59</th>
<th>Lauren Staples</th>
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<td>Ref: PPL/GF/111 Land at Grove Farm, Creeting St Peter, Suffolk put forward by Greenfield Associates in response to the Suffolk Minerals and Waste Local Plan call for sites on behalf of Mr W.H Jardine (Landowner) and Poundfield Products. I write in connection to the above proposal. I have examined the plans and I know the site well. I wish to object strongly to this development. The land that has been put forward surrounds a small settlement of houses and this development would completely ruin their outlook and change beyond recognition the environment, both visually and audibly, that surrounds these properties at present. The current Poundfield site already produces a lot of noise and light pollution which can clearly be heard from these properties, so I can only imagine what it would be like with the development moving so close to these houses. Due to the open land surrounding Creeting Hall, the noise pollution will be impossible to control, and I do not know of any possible solution to this? The increase in traffic surrounding the area will again add to the noise and light pollution as well as increasing the emissions in the area, something which is already undeniably high due to the close proximity to the A14. The lorries leaving the existing Poundfield site already cause problems to local residents as the roads are not designed for such heavy traffic. I understand that the proposal suggests the traffic will have direct access through the industrial site to the Tesco roundabout. Whilst this does go some way to reducing the number of vehicles on the small country roads it will do nothing to reduce the noise pollution they cause and the dust they will create. The proposed plans impact upon a number of Public Rights of Way. These footpaths are well used by many</td>
<td>The Grove Farm site near Needham market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.</td>
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| E/60 | Robert Jardine | **Grove Farm Quarry - Objection**  
I am writing to object to the proposal by Brett Aggregates to try to overturn the decision by Suffolk County Council.  

The Grove Farm site near Needham market, Creeting St Mary and Creeting St Peter is not included in the draft plan. | people from the local community and diversion would have an impact upon a number of people who use these footpaths twice daily, myself included. The development in this area would also change the nature of these Rights of Way as they would no longer be countryside walks which have a benefit for both physical and mental health, they would instead become Rights of Way through busy and noisy developments which would no longer be relaxing.  
Additional the proposed development will lead to further erosion and destruction of the River Gipping Valley, along with increased pollution, both to the river itself and to all of the properties at Creeting Hall. The landscape is open and the winds are often strong, dust pollution will be impossible to control.  
The proposal will increase urban sprawl and result in further destruction of the countryside, and once again the residents who live in these countryside villages will pay the price. This will of course be to the financial gain of the owner of Poundfield products but to the detriment of so many others. Perhaps it could be better understood if the demand for the product was there, but SCC Mineral Planning have already confirmed that the sand and gravel demand is already met by existing quarry developments with the addition of a further single more suitable site, therefore there is no requirement for this site.  
I understand that the many of the other residents in the village of Creeting St Peter share these concerns, along with all the residents of the properties surrounding Creeting Hall. |
County Council to reject the plan to extract sand and gravel from land adjacent to the dwellings at Creeting Hall Farm.

The proposed site is an unspoilt part of the Gipping Valley with grazed water meadows next to the Gipping Towpath. There are well used footpaths crossing the site giving access from Creeting St Peter down to the River Gipping. There is at least one ancient monument site on the land which was recently excavated to show a medieval village.

There are 8 dwellings at Creeting Hall abutting the proposed site and my paddock and indeed driveway down to Mill Lane forms the boundary of the site. The prevailing winds are from the west which would continually drive dust to our properties here, endangering our health. Noise levels would be unacceptable; we are supposedly living in a quiet tranquil area that would no longer be the case. The processing plant would again increase noise and dust levels. The proposed access road would be cutting through water meadows and the proposed ‘environmental area’ for the Stowmarket East Development site if it ever gets built, this appears to defeat the object of environmental mitigation.

The Suffolk Minerals and Waste Local Plan has already stated that for a number of varied reasons the Poundfield application is unsuitable. It also states that with existing sites and one additional there is enough sand and gravel for Suffolk until 2036 therefore I can see no logical reason to go back on what has been said.

I have lived at Creeting Hall Farm all of my life and remember farming the land which is proposed to be quarried. This is a beautiful area where I wish to continue to live and bring up our family. This is and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
(see attachment) | Mention of the Broads and highlighting of sites near the broads can be included in the plan.  
Thank you for the comments regarding consistency, clarity and errors. We will make sure these are addressed  
The County Council will also consider reviewing validation requirements as suggested.  
While there is no specific policy regarding landscape and minerals sites, landscape issues are covered in Policy GP4.  
The County Council will consider adding a policy outlining design principles for minerals sites, however the environmental criteria in GP4 will heavily inform how sites are designed in order to mitigate impacts.  
The County Council will include Broads authority documents in the sustainability appraisal.  
**Proposed Changes** |
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<th>E/63</th>
<th>Russell Stott</th>
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<td></td>
<td>Highlight the Broads covers part of the county and the sites near to the Broads Authority Area. Include Broads Authority documents in sustainability appraisal. Proposed Actions: Review validation requirements alongside local to bring them in line with policy changes. Address comments regarding consistency, clarity and errors.</td>
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<td>Although I know that the proposal submitted by Poundfield Products and Brett Aggregates for mineral extraction in the Gipping Valley has been excluded from the first draft of the Suffolk County Minerals and Waste Local Plan, the proposers may challenge the exclusion. This raises the possibility that their proposal (or a version thereof) will be included in the Plan, to be agreed in 2018. I object to any development for mineral extraction in the proposed area for the reasons noted below. <strong>No Requirement for this Development</strong> - SCC Mineral Planning confirm that sand and gravel demand is met by existing quarry developments with the addition of a further single more suitable site elsewhere. <strong>Accepted Objections to a previous application remain valid.</strong> An application for gravel extraction near the Poundfield plant was rejected 10 years ago for reasons that remain relevant and valid to this larger development and with no mitigation in the proposed plan.</td>
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<td>The Grove Farm site near Needham market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.</td>
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**Undermining years of effort on Environmental improvement** - The Gipping Valley has received considerable support and effort from local people and Agencies to create and protect a successful haven for wildlife. This development will destroy many years of work to create a special place.

**Impact on Residents** - The gravel pits will be intrusive, noisy, dusty and ugly for 25 years of operation and then for many years whilst the scars heal to some form of restoration. There are several residences close to the development that will bear considerable impact and the village as a whole will suffer. With regard to the noise and air pollution estimates, do they take in to account the combination with current and projected pollution from the A14 during different wind conditions?

**Traffic** – It is disheartening to note that Suffolk Highways have no objections to this proposed development. They took the same position on the Poundfield developments and they have left us to run a daily gamble with the vehicles running to and from the factory. It is obvious to anybody who uses the road that it is hazardous. Although a new route is proposed for this development to avoid escalation of this problem, the plans in the Appendices state the current access still remains an option and after stage 1 it appears site traffic may need to revert to the current road. Also the proposal states the number of truck runs to Poundfield will reduce because the pit will supply the plant. Those journeys will still need to take place on the current road in order to take the processed sand and gravel to Poundfield plant so there will be no reduction.

**Footpaths** – Many rights of way and footpaths will be obliterated and the proposals to maintain them...
are ineffective. I know that some of these objections are not relevant to planning criteria but they are relevant to those people who live in this area and whom our elected leaders and their officials need to be supportive, active and industrious members of society. We have been badly let down by our Council through their mystifying support for the development of a farm to become a substantial concrete products factory with offices and for the commercial development at the western boundary of the Parish, despite our objections to both. It is, therefore, offensive and patronising to see both of these developments presented by the proposers as good reasons for this further development. And all of this whilst we see no progress to improve our internet access. I hope that you are able to ensure this proposal is not included in the Plan and will follow progress with great interest.

E/67  Mike Norris  
I also would like to support SCC’s draft Minerals and Waste Plan, which excludes the Poundfield Products site.

Noted

The Grove Farm site near Needham market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.

E/68  Wendy Marchant  
I would like to support SCC’s draft Minerals & Waste Plan, which excludes the Poundfields site at Grove Farm, and should remain excluded.

The Grove Farm site near Needham market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include
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<th>E/69</th>
<th>Gay McBeth</th>
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<td>I write to support Suffolk County Council's decision not to include the proposal to extract gravel from the Grove Farm site on the Minerals and Waste Local Plan. To allow this proposal to be included would indicate that SCC would consider gravel extraction on this site an acceptable idea. It is not and I am sure that SCC’s decision has been based on the many obvious disadvantages of allowing such works on this site. These disadvantages amount to – and this is just a brief overview – a massively detrimental effect on the local area in visual, environmental and quality of life terms as follows; Further erosion and destruction of the Gipping River Valley Footpaths – the proposal will impact a number of public footpaths in the parish which are popular routes for local and visiting walkers leading down to the Gipping River Path Pollution – despite any mitigating steps there will be pollution to all the properties at Creeting Hall and surrounding areas. Noise – with the open landscape and prevailing wind this will bring noise pollution from the operations and vehicle movements – already noticed during test digging.</td>
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<td>Noted. The Grove Farm site near Needham market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.</td>
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<td>Outlook/Landscape – already blighted to the East of Creeting Hall due to Poundfield Products Factory the owners of which continually ignore any planning restrictions imposed despite local objection while Mid Suffolk / Babergh District Council do not have enough funds or manpower to monitor the site and reinforce agreed, but ignored, restrictions and caveats on the planning permission already granted. Urban sprawl – it is noted the proposal seeks to tie in with the Stowmarket East Mill Lane Development, which will result in urban sprawl and further destruction of the countryside. Traffic – the application proposes to develop a route through Stowmarket East in what is an area designated for wildlife. The roads leading to the proposed site from Creeting St Mary, Jack’s Green and Stowmarket are already becoming compromised and seriously damaged due to an increasing number of heavy vehicle movements resulting in the collapse of verges, flooding and near accidents on a regular basis. This proposal is to the detriment of many for the gain of a few. While SCC Mineral Planning have confirmed Sand and Gravel demand is already met by existing quarry developments with the addition of a further single more suitable site, there is no requirement for this site. Therefore it is to be hoped that SCC</td>
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**continue in their original intention to dismiss this proposal and not to include it on the plan.**

| E/70 | Mike Jones, RSPB | Wordwell  
We note that whilst this site is outside the Breckland SPA, it lies adjacent to the European site on one side, and also lies within the wider Brecks landscape that was historically part of the stone-curlew’s range. The stone-curlew, one of our rarest breeding birds is recovering from historic declines nationally and is slowly recolonising the wider Brecks landscape. Therefore, as per our comments on the Barnham and Cavenham proposed sites, the plan will need to demonstrate at a strategic level through its HRA that this site can avoid indirect impacts on the Breckland SPA. We strongly recommend that restoration is to native Brecks grass heath to support wider work of the local community and conservation organisations in the recovery of the Brecks stone-curlew population. |

| E/72 | Rodney Chadburn, The Stour and Orwell Society | **Suffolk Minerals and Waste Preferred Options - Consultation October - December 2017**  
I write as Honorary Secretary of the Stour and Orwell Society whose response to your consultation was submitted by email on the 11th of December.  
Two points:  
1. The response was submitted by email from my Chairman, Thomas Hill QC. He tells me that it was transmitted ‘with only 3 minutes to spare’ and he has asked me to get confirmation that he met the deadline.  
2. Also, he wishes me to be the main point of contact for SOS. So, my contact details are:  
Rodney Chadburn  
Honorary Secretary, The Stour and Orwell Society |
Please find attached a representation for the Suffolk Minerals and Waste Local Plan Preferred Options Consultation 2017, relating to Land at Holton St. Mary, submitted on behalf of A P T Farming Ltd. I would be grateful if you could confirm receipt of this email and its attachments. If you need any of the documents submitted in a different format, or have any comments or queries, please do not hesitate to get in touch.

[Contents of attachment below]

1. INTRODUCTION
1.1 This representation has been prepared by Strutt & Parker on behalf of APT Farming Ltd in relation to the Suffolk Minerals & Waste Local Plan Preferred Approach Consultation (December 2017). This representation has been prepared specifically in relation to the promotion of land at Holton Hall Farm, Holton St Mary’s, as shown on the location plan in Appendix A.
1.2 The site has not previously been promoted as part of the previous Call for Sites consultation and this is a new proposed site allocation within the plan.
1.3 This representation sets out the planning policy support for the proposals in relation to the emerging Local Plan Consultation and National Planning Policy Framework. This includes an assessment of the site against questions set out within the consultation document.

At this stage the County Council will not be including this site in the plan, due to the lack of geological information provided with this proposal. Additionally, there are concerns regarding the access onto the A12 which is considered inadequate. A large section of the site is also overlooking an area of outstanding natural beauty, unscreened. This could have significant effects on the AONB setting.
1.4 In accordance with criteria set out in the Planning and Compulsory Purchase Act (2004) and the National Planning Policy Framework (NPPF), when allocating sites for development Local Authorities need to be satisfied that their plan is ‘sound’. As set out in paragraph 12 of the NPPF to be sound, a development should be positively prepared, justified, effective and consistent with national policy. Namely that it is:

- **Positively Prepared**: The plan should be prepared on a strategy, which seeks to meet objectively assessed development and infrastructure requirements and consistent with achieving sustainable development.
- **Justified**: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- **Effective**: The plan should be deliverable over its period and based on effective joint working cross-boundary strategic priorities; and
- **Consistent with National Policy**: The plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.5 This document provides an assessment of the preferred options consultation document against the key criteria in the NPPF as set out above, with reference to land at Holton Hall Farm.

To further inform this representation, further information will be provided following the close of the consultation to inform, highway and landscape considerations.

### 2. RESPONSE TO KEY QUESTIONS WITHIN THE PREFERRED OPTIONS CONSULTATION DOCUMENT

2.1 This section provides a response to the key questions set out in the consultation document as
appropriate to land at Holton Hall Farm. Each question has been answered in turn:

Proposed Vision

2.2 The proposed vision is supported and it is supported that Suffolk CC recognises the need to ensure the extraction of minerals and the allocation of waste sites is undertaken in a sustainable manner. We also support the provision that new mineral sites will only be permitted in sustainable locations.

2.3 In this regard, the land at Holton Hall Farm benefits from being ideally located in very close proximity to the A12. It benefits from being located midway in between the two large urban centres of Ipswich and Colchester and it is very well located to serve the planned growth in both centres, including the new Garden Town to the north of Colchester, which is only a short drive from the application site. It is also situated within very close proximity to Hadleigh, which is one of the principle settlements within Babergh District. Therefore, allocation of this land for mineral extraction would be a very sustainable location for the facility.

2.4 The location plan of the land put forward for mineral extraction has been planned to ensure the mineral extraction is located a long distance from the village of Holton St Mary, to ensure that existing residential amenity is protected as a result of the proposals.

2.5 The landowners, own a large proportion of land within the area and there is some flexibility regarding the quantum of land allocated for the mineral extraction.

Proposed Strategic Objectives

2.6 Broadly the Proposed Strategic Growth Objectives are supported. In particular Objective 3, which seeks to make provision for suitable site allocations to meet the
predicted need for new mineral extraction sites, is supported.

**Mineral Policies: MP1: Provision of land won for Sand and Gravel**
2.7 The approach to ensuring the delivery of a supply of 10.422Mt over the plan period to the end of 2036 is supported, along with the requirement to maintain at least a 7-year land bank.

**Mineral Policies: MP2: Proposed Sites for Sand and Gravel Extraction & Allocation of Holton Hall Farm**
2.8 In order for the plan to be sound in planning terms, policy MP2 needs to be amended in order to allocate an additional site, which could be defined as ‘Site M11 Holton St Mary.’ The rationale for this approach is set out as follows:
2.9 Paragraph 7 of the NPPF sets out that there are three dimensions to sustainable development: - namely economic, social and environmental. In economic, social and environmental terms. The allocation of land at Holton Hall Farm, is consistent with all three objectives and would provide a sound allocation as part of the emerging Local Plan.
2.10 In considering detailed planning policy considerations, there are a number of detailed criteria which render land at Holton Hall Farm as a suitable site for a quarry development, and the site scores very well against key sustainability appraisal criteria. These are listed in turn as follows:

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<td>2.11 As set out above, the application site is situated in a very sustainable location for a quarry, in close proximity to three of the key service centres in the area (Ipswich, Colchester and Hadleigh). It also benefits from the opportunity for ease of access onto the A12 to the</td>
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east of the application site, being situated only 320m away at the closest point.

2.12 It would be the intention for the application site to be accessed using the existing industrial access from Holton Park, which is also under the ownership of the applicants. This industrial access is already regularly used by HGV’s, which has fully established the principle of HGV’s accessing the area. The allocation for the site for a quarry would result in an intensification of the number of vehicle movements, which the applicants consider would equate to approximately 40 additional movements per day. It is considered that this number of additional movements could be comfortably accommodated on the highway network.

2.13 The application site also adjoins the B1068 and the applicants consider that there would also be an opportunity to have an access from this side of the site if considered beneficial. Also for consideration is the opportunity of having both accesses, which could be used to create a one-way ‘in and out’ system. This would be subject to completion of a detailed transport and access survey. The applicants are happy to commission further transport work to provide further comfort on the deliverability of the site.

**Landscape and Visual Considerations**

2.14 The site is situated above the Dedham Vale, which is located to the south, with the River Brett located to the west. Being situated on higher ground than Dedham Vale the site is not generally visible from within the Area of Outstanding Natural Beauty. The lie of the land and the break of the slope from south to west, prevents all but minimal views of the site from the south and to the west. Further screening options, including the use of strategic planting and bunds, could be explored in order to further mitigate any views from the development.
2.15 To the north is a substantial tree lined boundary of oak trees, which screens much of the development to the north.

2.16 The site itself is generally flat. As a result, any quarry development would not be overly prominent within the wider landscape.

2.17 The principle view to the site, is from the A12 to the south-east. The A12 is a significant and detrimental feature in the wider landscape and views of the site from this location are not considered to be sensitive in landscape terms.

2.18 The applicants would be happy to provide additional landscape planting as considered appropriate by Suffolk County Council at planning application stage, however the proposals are considered to be fully sound in landscape and visual terms.

Neighbouring Residential Amenity

2.19 The closest neighbouring receptors to the site are the residential dwellings in Holton St Mary, including Squirrels Hall, which is situated 120m to the east of the application site and Holton Hall House, which is situated to the 300m north-east of the proposed extraction area. The quarry site application boundary has been drawn in order to ensure that suitable distance is maintained (300 metres) between the quarry operations and the nearby residential receptors within Holton St Mary. In addition, the quarry operations would be separated from the village of Holton St Mary by an extensive existing tree belt.

2.20 The closest residential property to the site, is Squirrels Hall, which is located approximately 120 metres from the application site. However it is separated from the site, by an extensive area of Orchard. As a result the site is not visible from Squirrels
Hall and there will be no adverse impact on the residential amenity of Squirrels Hall as a result of the development.

2.21 Holton Hall House is located approximately 200 metres from the boundary of the application site. This property also benefits from being visually screened by the proposed quarry site by an existing landscape buffer. Additional landscape planting can be provided as required along this boundary.

2.22 In the event that Suffolk CC had any significant concerns regarding the proximity of the application site to Squirrels Hall or Holton Hall, the applicants would be happy to consider an amendment to the red line to ensure that suitable and adequate separation is provided.

2.23 In terms of HGV movements, as set out above, the application site benefits from the potential for two points of access. Access could either be provided from the existing industrial estate in Holton St Mary to the north-east of the application site, which is owned by the applicants. This access already provides a well maintained and wide access from the quarry onto the public highway. Wheel washing facilities would be provided within the quarry. By providing a long access via the industrial land into the site, it would avoid any concern regarding mud on the public highway. The applicants would also be happy to work with Suffolk County Council to ensure that residential amenity within Holton St Mary is protected having regard to vehicle movements. This could include seeking to restrict the hours that HGV’s can enter and leave the quarry in the morning and restricting the total number of HGV movements per day, if it was considered necessary. The applicants currently estimate that approximately 40
movements per day would be created as a result of the quarry activity. 

2.24 The alternative access is provided to the south of the site onto the B1068. This access is situated away from neighbouring residential amenity and would enable direct access onto the A12 (situated 320m to the east of the application site) without travelling past any neighbouring properties. It is the applicant’s intention to undertake a full access appraisal in order to demonstrate the best location for an access to the site. 

Extraction

2.25 Historically, borehole testing of the site has been undertaken, however the full results of this information is not available to the applicants. Further borehole testing will be undertaken to ascertain the quantum and depth of mineral reserve, within the area of search as shown on the site edged red location plan. It is estimated that the available mineral reserve is approximately 2 million tonnes, within an area of approximately 55 hectares. However, this is subject to analysis of existing borehole data. This has the ability to make a significant contribution to the Suffolk CC landbank over the plan period, within a very sustainable settlement between two key settlements. It also provides an 11th allocated site, which will give greater competition and availability of the resource.

2.26 The bedrock underneath the sand and gravel consists of London Clay. It is highly likely that the London Clay will restrict infiltration and movement of ground water in the quarry and therefore it is likely that the mineral will predominantly be worked wet.

2.27 The historical borehole tests also demonstrate that the mineral deposit above the London Clay consists almost entirely of sand and contains the major part of the ground water layer. This is overlain by upper seams of
sand and gravel, which form the most economically significant deposit within the quarry. From borehole tests undertaken, it is likely that extraction will only be necessary approximately 3 metres below the water table. In the event that any de-watering is required, the water will be re-circulated within the site, to ensure that there is no water discharge off site. Measures will be taken to ensure that there is no impact upon the water table as a result of the operations and early engagement will be held with the Environment Agency in this regard.

**Phasing & Restoration**

2.28 A requirement of the Call for Sites form, was the requirement to provide some detail in terms of processing plant location, potential direction of working, including phases and a potential concept restoration scheme.

2.29 On the basis that the principle access to the quarry would be provided to the north-east of the site, via the existing industrial site, it would be the applicant’s intention to provide the wheel washing facilities and the weighbridge to the south of the access into the site. The processing plant will be located centrally within the application site, which would ensure good screening from the village and surrounding landscape by virtue of the existing strong landscape buffer, which can be maintained and enhanced. The intention would be to extract the mineral in a clockwise direction, starting with the area to the east of Squirrels Hall. This would ensure that any minimal perceived disturbance of this area and the village is completed and restored at the outset of the operations. If required, additional screening can be implemented between the extraction site and Squirrels Hall. Extraction would then continue in a clockwise
2.30 Dependent upon market demand it is estimated that a period of approximately 15-20 years would be required for the extraction and subsequent restoration of the quarry. It is estimated that the mineral would be extracted in approximately 10 phases in total, with each phase completed within 18 months to 2 years. This will be subject to further discussion with an end operator at the appropriate time. Subject to obtaining the relevant planning consents and following adoption of the Minerals and Waste Local Plan it is considered that the quarry could be operational by 2020.

2.31 In terms of restoration, the applicants are currently flexible on the restoration options for the site and they recognise that it is critical to ensure that any restoration is undertaken sensitively having regard to the wider landscape and the Dedham Vale AONB to the south/south-west of the site. Whilst the intention would be to provide an agricultural restoration of the site, there would be some flexibility on this.

2.32 The intention would be to restore the site by ensuring that any restoration is undertaking having regard to the levels and character of the surrounding landscape. The quarry would be restored to similar levels to existing or to a slightly lower level, but in keeping with the contours of the surrounding land. To minimise the need for any fill to be imported into the site, the applicants would consider the provision of a lagoon within the site, which could also be used as a recreation feature upon completion. Also for consideration is the option to restore the site to a slightly reduced level, reducing the amount of infill required to be imported to the site.

Output Sold in Suffolk
2.33 As required by the Call for Sites form, it is estimated that approximately 65% of the material from the quarry would be sold within Suffolk, with the remaining 35% sold in Essex (in and around Colchester). Further detail on this matter will be provided at planning application stage once an operator is on board. As detailed above, the site benefits from being located in very close proximity to Ipswich, Hadleigh and Colchester and it is a very sustainable location for a new quarry, which will ensure short travel distances between the quarry and the new committed developments in the major settlements. **Hours of Working**
2.34 It is the intention for the hours of working to take place between 0730-1730 Monday to Friday and 0730-1300 on Saturday. There would be no working on Sundays. This will be subject to further discussion with the Mineral Planning Authority at planning application stage. **Archaeology**
2.35 A desk based archaeology assessment of the site, was historically undertaken. This identified that there is no known archaeology of any substances within the application site area. The south-western corner of the site does clip a recorded cropmark complex, but elements of it which impinge on the application area are demonstrably recent and of little consequence in archaeology terms. The application site is fully deliverable in this regard. **Ecology**
2.36 The application site is used for arable farming and is of low ecological potential.

### 3 CONCLUSION
3.1 This representation has been made in response to the Suffolk County Council Minerals and Waste Local Plan Preferred Options Consultation. It proposes the allocation of a new site at Holton Hall Farm, which has not previously been promoted as part of this emerging Local Plan.

3.2 The current vision and objectives of the Local Plan are supported, and it is recommended that Policy MP2 is amended to include the allocation of Holton Hall Farm within the Local Plan. The site is owned by a single landowner, who are committed to the promotion of the site for a quarry. As demonstrated within this representation, there are a number of benefits associated with the application site, and its allocation within the emerging Local Plan would be fully consistent with three dimensions of sustainable development as set out in the NPPF, and therefore fully sound in planning policy terms. The benefits of the site include the following:

- It is ideally located within short distance to the major growth centres of Ipswich, Colchester and Hadleigh. It would enable mineral to be used sustainably, with the quarry located within very short drive to the key centres it will serve.

- The site benefits from excellent transport links, with direct and easy access onto the A12, which along with the A14 is the key distribution route within the County.

- Access to the site from the existing Industrial Estate is excellent. HGV traffic already regularly travel to and from the Industrial Estate and the use of the access is merely an intensification of this use. An alternative access is also available if required from the B1068.
<table>
<thead>
<tr>
<th>The site benefits from being relatively flat and well screened to ensure that there will be no impact upon the wider landscape or the AONB to the south as a result of any quarry development.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed quarry is situated a good distance from neighbouring residential properties and is very well screened from neighbouring residential amenity.</td>
</tr>
<tr>
<td>The site is fully deliverable having regard to background matters, related to noise, ecology and archaeology considerations.</td>
</tr>
<tr>
<td>Due to the topography of the site, the processing plant and other machinery will be set below ground level so that they will not be visible within the wider landscape.</td>
</tr>
</tbody>
</table>

3.3 To further support the allocation of the site within the emerging Local Plan, the applicants would be happy to undertake further work in respect of transport and borehole testing to provide further information on the deliverability of the site.

3.4 Based on the above, it is considered that the Holton Hall Farm is an excellent minerals site and that it should form an allocation under policy MP2 of the emerging Local Plan, to support the mineral requirement over the plan period.
Viridor Waste Management own and operate a number of landfill sites and Waste Management Facilities in and around Suffolk. It’s unclear from the Proposals & Safeguarding Maps whether the landfill sites at Foxhall, Masons, Lackford and Wangford are identified or not. We believe these sites ought to be identified, given their historic and current uses.

**Hazardous Waste** - The evidence base document ‘Suffolk Waste Study, September 2017’, projects the hazardous waste to decrease from 0.044 Mt in 2012 to 0.031 in 2036. It states that since the quantities involved are relatively small compared to non-hazardous waste arisings, any increases in amounts needing management will not require new sites to be identified for the development of new facilities to manage this waste stream. Nevertheless, the emerging policy should identify how proposals for facilities to deal with this stream will be dealt with.

There are some hazardous materials which are solid non-reactive hazardous waste (i.e asbestos), which can be appropriate for landfilling. Masons Landfill benefits from planning approval to provide some hazardous landfill capacity. Other landfill sites where waste inputs have dropped, could lend themselves to infilling by hazardous material. Foxhall Landfill may be appropriate for such as scheme.

Wangford was not included because it is no longer accepting waste and is near to being covered.

Policies will be amended to account for arising hazardous waste landfill proposals.

**Proposed changes**
Amend policies to include hazardous waste landfill.

---

**Excluded Sites**

We understand that a number of other potential mineral extraction sites have been excluded from this preferred options draft of the Local Plan. As these sites have not been subject to any assessment or listed in Table 8, Non-Hazardous Landfills in appendix 3.

Foxhall is currently missing from the maps and will be added in the next draft of the plan.

Lackford is currently missing from the maps and will be added in the next draft of the plan.

Thank you for highlighting these omissions.

Wangford was not included because it is no longer accepting waste and is near to being covered.

Policies will be amended to account for arising hazardous waste landfill proposals.

**Proposed changes**
Amend policies to include hazardous waste landfill.
<table>
<thead>
<tr>
<th>E/79</th>
<th>Malcolm Robinson, Hacheston Parish Council</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Please find below the response from Hacheston Parish Council to the above consultation.</td>
</tr>
<tr>
<td></td>
<td>1. General Policies - GP3 – the use of rail or sea transport for minerals and waste transport should be maximised at every possible opportunity.</td>
</tr>
<tr>
<td></td>
<td>3. Waste Policies – comments on following polices;</td>
</tr>
<tr>
<td></td>
<td>a. WP3 - the use of land for open air composting should not be encouraged in particular in the vicinity of villages or housing.</td>
</tr>
<tr>
<td></td>
<td>b. WP5 – open air composting as a waste processing methodology should be discouraged in particular in the vicinity of villages or housing.</td>
</tr>
<tr>
<td></td>
<td>c. 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.</td>
</tr>
<tr>
<td></td>
<td>4. On map SC3, Parham Composting site (facility CF4) is shown in the wrong location. Its correct grid reference is TM318601. Please do not hesitate to contact me should there be any queries with regard to the above.</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th></th>
<th>Policy GP3</th>
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<tbody>
<tr>
<td></td>
<td>Policies MP10 will safeguard current railheads and mineral wharfs to ensure their continued use.</td>
</tr>
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</table>

**Policy WP3 and Policy WP5**

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 workplaces.

**Policy WP6**

Specific licences from the Environment Agency are required for any waste management facility. Site specific risk assessments must be part of any planning application for this type of facility and must take account of nearby dwellings and workspaces. Planning conditions will be used to ensure odours, dust and noise are controlled.
<p>| | | |</p>
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</table>
| **E/80** | John Fairlie, Engena Ltd | **Identified Location of Parham**  
Thank you for highlighting this error, it will be corrected  
**Proposed Changes**  
Correct location of Parham Composting site (facility C4) on table 12 and map SC3 in appendix 3. |
|   |   |   |
| **E/81** | Kevin and Pat Keating | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.  
We write as residents of Creeting St Peter, our house being part of the Clamp Farm complex and we wish to object to the proposal.  
For some years the locality has been blighted and bullied by the proprietors of Poundfield Products. This, with their large industrial complex with 24/7 lighting is clearly another example of their total disregard for local people and the environment.  
For our family the prime concern is the traffic problem, the local roads are not suitable for the heavy, large vehicles. Cyclists, runners and local traffic are at risk. Further, sand and gravel demand is already met by existing quarry arrangements. |

Assessment Suffolk County Council  
Page 955
<table>
<thead>
<tr>
<th>E/84</th>
<th>Peter Heath, Greater London Authority</th>
<th>Thank you for consulting the Mayor on your plan. The Mayor has no comments to make at this stage. Please keep me informed of your progress.</th>
<th>Noted</th>
</tr>
</thead>
<tbody>
<tr>
<td>E/85</td>
<td>Dominic Williams</td>
<td>I am writing further to the appeal against the Suffolk County Minerals and Waste Local Plan dated December 2017, that has been entered by Poundfield Products and Brett Aggregates. The appellants want to be included in order to develop Grove Farm for mineral extraction. (The appeal is for reconsideration of the exclusion of Poundfield/Brett’s proposed development of the entire area of Grove Farm from the Minerals and Wastes policy). This raises the possibility that their proposal which I understand is a scaled-up version of the original proposal, will be included in the Plan when it is considered in 2018. Please note my objection to the appeal entered by Poundfield/Brett. I support the plan as set out in December 2017 for the reasons noted below. <strong>There is no Requirement for this Development</strong> – Suffolk County Council Mineral Planning confirm that sand and gravel demand is met by existing quarry developments with the addition of a further single site, much smaller in scale and with much lighter impact. <strong>A previous application for development of the Grove Farm site was rejected</strong> and there is no additional or new consideration evident in the new proposal. There is no additional mitigation proposed in the new application. <strong>The effect on environmental improvement will be</strong> to reverse the improvements gained with considerable support and effort from local people and Agencies to create and protect a</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>The Grove Farm site near Needham market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.</td>
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</table>
successful haven for wildlife along the Gipping Valley, and to encourage appropriate leisure use and development. The impact on local residents by industrial development on the scale proposed would be immediate and prolonged detriment – residents of Creeting Hall would be surrounded on three sides by the proposed works. This is self-evidently a detriment and the appeal document makes no apparent effort to address this. Residents of Creeting St Peter and Creeting St Mary, Needham Market and Mill Lane towards the A14 links in both directions will be negatively impacted, by noise, dust, additional traffic of heavy lorries (up to 80 movements a day, it is conservatively estimated.) This is over 25 years of operation and then for many years whilst the scars heal to some form of restoration. As a non-driver who walks regularly along Mill Lane, I am able to state that it is already hazardous. The proposed new route to access Phase 1, which will isolate Creeting Hall from the Gipping Valley completely and force walkers onto Mill Lane, will revert after Phase 1 and is also considered only as an option to increased traffic on Mill Lane as I understand it.

**Footpaths** – In addition to access from Creeting Hall to the Gipping Way Footpath, the access rights across the back of Grove Farm are difficult to use due to the works already in place. I have been told by a worker at Grove Farm that I should be using Mill Lane. The quickest route for walking to Needham Market is already jeopardised and again, it is not evident that there is any intention to preserve the right of way in the appellant’s document. Suffolk County Council has approved commercial development at the western boundary of
| E/86 | Nigel and Jackie Bentley | We have just heard that we have until this evening to lodge any objection we have to the possible inclusion of the Poundfield Products land in the 2018 plan for mineral extraction and wish to register my objection. We understand that the proposal submitted by Poundfield Products and Brett Aggregates for mineral extraction in the Gipping Valley has been excluded from the first draft of the Suffolk County Minerals and Waste Local Plan, but am aware that the proposers may challenge the exclusion. This raises the possibility that their proposal (or a version thereof) may be included in the Plan, to be agreed in 2018. What seems to happen is that a fantastical scheme is proposed, rejected, scaled down and then approved. It seems to us that the current plan is at the fantastical stage. It seems wholly uneconomic to extract the gravel in several of the areas and we are concerned that these will be dropped as a concession to the rest of the site being approved. The most lucrative areas coincide with the areas which most impact the local population, e.g. Phase 1. | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |
We object to any development for mineral extraction in the proposed areas for the reasons noted below.

**Traffic** – It is incredulous to note that Suffolk Highways have no objections to this proposed development. It is obvious to anybody who uses Mill Lane that it is unsuited to even the current levels of heavy traffic. The road verges are being eroded by lorries passing one another causing the road edge to subside into the drainage ditches and creating dangerous depressions in the road surface. As motorists, we have been forced onto the verge numerous times in order to allow the passage of a large vehicle. As cyclists we feel exceptionally vulnerable. We understand that within the development plan a new road is proposed. However, that would not reduce our vulnerability and could not be constructed until the land adjacent to the A1120 is developed. In the meantime we would have to contend with increased levels of heavy traffic. Were such development to be allowed, traffic levels would increase beyond those identified in the report by Greenfield Associates on behalf of Poundfield Products. Greenfield has identified 80 lorry movements per day purely to remove sand and gravel. However, with the ready availability of these materials, we could expect Poundfield to expand their operations thereby requiring even more traffic movements to allow the import of more cement and the export of more finished product.

**Impact on Residents** - The gravel pits will be intrusive, noisy, dusty and ugly for at least the 25 years of operation. Thereafter, whilst the plan shows the intention to return the land to agriculture, a generation on, who will remember the original use for farming? More likely the land will be looked at for industrial use.
with only its immediate past being considered. There are residences close to the development that will bear considerable impact and the village of Creeting St Peter as a whole will suffer. With regard to the noise and air pollution estimates, we can all play with figures. Currently the land is farmed arable land, hence, the low level noise we get is occasional tractors ploughing, drilling and harvesting once or twice a year. If this development is allowed we will have low level background noise constantly. We’re sure that those proposing the plan will obtain noise level readings that will comply with guidelines, but they probably won’t live with it daily. Similarly with air pollution, instead of occasional tractors, we will have excavators, dump trucks and road lorries six days per week.

**No Requirement for this Development** - SCC Mineral Planning confirm that sand and gravel demand is met by existing quarry developments.

**Accepted Objections to a previous application remain valid.** An application for gravel extraction near the Poundfield plant was rejected 10 years ago for reasons that remain relevant and valid to this larger development.

**Undermining years of effort on Environmental improvement** - The Gipping Valley has received considerable support and effort from local people and Agencies to create and protect a successful haven for wildlife. This development will destroy many years of work to create a special place.

**Footpaths** – Many rights of way and footpaths will be obliterated and the proposals to maintain them are ineffective. The entire proposal based on the report by Greenfield is riddled with non-committal phrases such as:
| Conceptual Restoration – The area of the site ‘could be restored as an open mosaic habitat’ (4.6.3) and it is proposed that 102 hectares of the site ‘could be returned to Grade 2 agricultural land’ (4.6.2) |
| Emissions – ‘where possible measures will be taken to reduce emissions’ (4.5.2) |
| Flood Alleviation – ‘There may be the potential to provide flood alleviation ponds’ (4.6.4) |
| Environmental Mitigation Measures - ‘Where necessary advance planting and/or screening of noise attenuation bunds will be constructed using soil and overburden from within the site’ (4.7.3) |
| Public Rights of Way – ‘These will require temporary diversion during the operational period but could be re-instated in their existing location’ |
| Should the proposer re-submit, we worry that, although the proposer seems to have considered all avenues that concern those of us living in the area, these are just platitudes. Twenty five years is a long time to wait and there are no guarantees and plenty of ‘wriggle room’. We know that some of these objections are not relevant to planning criteria but they are relevant to those people who live in this area. We have been puzzled by past planning support for the development of a farm to become a substantial concrete products factory and for the commercial development at the western boundary of the Parish, despite our objections to both. At previous presentations we have attended by Mid Suffolk council we have been assured that our village would remain a village and not be swamped by Stowmarket expansion. If this proposal goes ahead we will feel like an island. We hope that you are able to ensure this proposal is not included in the Plan. |
| E/92 | Matthew and Gayle Cook | Ref: Poundfield Products proposal for mineral extraction at Grove Farm  
We are writing to state our objection to Poundfield Products’ application for inclusion in the Suffolk Minerals and Waste Local Plan. Whilst their initial proposal was rejected by Suffolk County Council, we understand the proposers are challenging that decision. As local residents, we already have daily problems with the articulated vehicles that travel from Grove Farm, along Mill Lane to the A14. The road is a narrow country lane and as such is not designed for large, heavy vehicles. Passing is a regular problem and the introduction of additional aggregate transportation vehicles will add to this issue. Inevitably, it will also accelerate a deterioration in the road condition – one of only two roads that provide access to the village. In addition, the very nature of a mineral extraction site will have a negative impact on the local area in terms of dirt, dust and noise. Residents have worked hard over recent years to preserve and protect the Gipping Valley and a mineral extraction facility can only have a negative effect on the environment. Footpaths and rights of way will be lost and a large part of the beautiful countryside will effectively become a No Go Zone. Suffolk County Council Mineral Planning confirm that sand and gravel demand can be met by existing quarry developments, with the addition of an extra site. Grove Farm is unsuitable in terms of location or accessibility and will have a negative impact on the environment. | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |
<table>
<thead>
<tr>
<th>E/93</th>
<th>Gordon Crosby</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Draft Suffolk Minerals and Waste Local Plan - December 2017</strong></td>
<td>We ask that you again deny Poundfield Products, as they challenge your previous decision.</td>
</tr>
<tr>
<td>I am writing in response to the public consultation to express my full support for one specific part of the Draft Suffolk Minerals and Waste Local Plan (DSMWLP). <strong>I fully support the recommendation to exclude the “Stowmarket” Grove Farm site from further consideration as a site for mineral extraction.</strong> To be clear, I am supporting the exclusion of the Stowmarket site from the plan. <strong>Background</strong> The “Stowmarket” site at Grove Farm which lies in Creeting St Peter was proposed for inclusion on the DSMWLP and involves extraction of sand and gravel from under mainly agricultural land. The site is made up of several distinct parcels of land, spread over a large area all within the Gipping Valley, and with much of extraction area immediately bounding the River. The site selection assessment that forms part of the evidence included in the DSMWLP sets out several aspects where the proposed site is likely to have detrimental effects, and argues that the combined impact of necessary measures to contain the detrimental effects will reduce the land that is available for extraction to such an extent that the remaining, workable, land will not be economically viable. <strong>Archaeology</strong> The site assessment addresses the extensive archaeology that is thought to lie under the land, reflecting human occupation of the valley since its</td>
<td>Your support is noted.</td>
</tr>
<tr>
<td>The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.</td>
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</tbody>
</table>
formation at the end of the ice age. Most of that archaeology will currently be protected by the soils it lies under. While it is clearly possible to search an area and record and/or remove individual finds, such an approach fails to protect “in situ” the whole archaeological landscape. Clearly grave extraction destroys any remaining artefacts and totally eradicates any trace of how the features lie relative to each other, losing for good the ability to investigate the history “in situ” using as yet undeveloped techniques.

**Landscape and the amenity value to its users**

The Gipping Valley has been exploited by man for millennia, changing the nature of the landscape with developing agricultural practices and in the past two centuries with the effects of industrialisation. As a major transport corridor the Valley has a significant Roman encampment with roads, canalisation of the river dating from the late 1790s, a railway from the 1840s, and more recently the A14 built in the mid 1970s. It has many gravel pits, many flooded after extraction had ended, water mills, industrial estates, waste handling sites and chemical plants as well as agricultural areas and abundant wildlife. All have left their mark on the river corridor. The Gipping Valley Path follows for the most part the towpath of the Stowmarket Navigation and provides an enjoyable walk from Ipswich to Stowmarket from which the geology, topography, ecology and industrial history of the Valley can be appreciated. Work is underway to extend the path onwards through Stowmarket and there are significant tourism sites in Needham and Baylham. Work is also underway to preserve the history of the Navigation, with a vision to make the history more accessible to visitors.
Travelling from Ipswich towards Stowmarket on the Gipping Valley Path the landscape along the river shows the extensive impact of the industrial age as well as housing developments until Needham Market is reached. Up to that point there is very little of the route that is not beside a man made or man altered landscape. Between Needham Market and the “Muntons” site on the outskirts of Stowmarket there is little sign of industrialisation other than Badley lock on the river and glimpses of the railway and roads. These few miles are precious. They give walkers a chance to see the valley as it has been since the retreat of the ice sheets. This appreciation of the Valley can also be enjoyed from Mill Lane and to a lesser extent from the B1113. The proposed pits will destroy, permanently, this last section of unspoiled Gipping Valley. No amount of “restoration” would be able to put back the complex ecology, archaeology and simple beauty of the Valley. It is the job of the planning system to recognise the importance today and in the future of this piece of special landscape and to protect it from permanent damage. Part of the area proposed for extraction falls within the MSDC designated “Special Landscape Area”.

**Listed buildings**

The setting of Creeting Hall will be greatly affected by the proposed works as has already been identified, but the works will also impact the setting of other listed buildings, such as St Peter’s Church and Rectory, Clamp Cottages and Badley Mill House. The views of these buildings from the footpaths along the Valley will be damaged, harming an appreciation of their historic setting.

**Ecology**

Much of the proposed site abuts the River Gipping. This river corridor is teaming with wildlife, with otters, bats,
skylarks, and water voles frequently seen, and with kingfishers nesting along the river. In addition to these iconic species there are many others living in, on and beside the river. Extraction of gravel will inevitably destroy some habitats and damage many more, with noise, movement and light pollution extending the area subject to harm considerably. The extraction sites will be immediately beside about 2Km of the Gipping Valley Path, a promoted route, reducing the amenity value to users of this path through reducing the opportunity to enjoy the tranquillity, ecology and natural landscape.

**Site layout – access and vehicle movements**

The maps included with the proposal are “interesting”. They show a site for the processing centre at the north west end of the landholding, connected to roadways within the proposed “Gateway 14 logistics and business” park. Extensive proposals for the “Gateway 14” site were the subject of a public consultation in 2013 which resulted in its inclusion as an extension to the development plan for Stowmarket. As of today there has been only one relevant planning application (MSDC reference 0371/15) for the site. This is for the road layout together with site landscaping, and was made in 2015 but has yet to be determined. A more recent application (MSDC ref 1582/17) is for “Stowmarket East”, which was supposed to be the penultimate phase of the Mill Lane/Gateway 14 scheme. The new application is currently undergoing consideration by MSDC, but this new development proposal does not rely on, or include, the road system within “Gateway 14” that the proposed gravel processing plant would need. The submission of the “Stowmarket East” proposal implies that Gateway 14 is not “imminent” as it includes its own access to the A1120, while MSDC required in the
development brief access to the "Stowmarket East" area to be via the "Gateway 14" area road system from the existing roundabout.

The area in the south east corner of the "Mill Lane/Gateway 14" site is clearly identified in the overall scheme for the area and in application MSDC Ref 0371/15 as a public access, wildlife area formed around the holding lagoon necessary for drainage of the whole site. This is set out in the "proposals plan" where public paths are laid out in this area with a variety of habitats shown together with paths linking the area to other rights of way. The road layout shown for access to the processing area in the Grove Farm proposal appears to run a road through this area, and seemingly through the holding lagoon, which is omitted from the plans. This would not appear to be a viable means of vehicle access for any gravel workings, leaving the issue of vehicle access and egress unresolved. Even if it were a viable access point there remains the issue of how grave would be moved to the processing plant site from the many extraction areas, including one the wrong side of the A14. The need for vehicles to continue to move within the site over land from earlier phases will delay restoration and will extend the area of wildlife subjected to disturbance, noise, dust etc. beyond the particular phase being worked. This will enlarge and prolong the extent of the impact of site vehicles on users of the Gipping Valley Path, on the landscape in general, and on wildlife and residents in the surrounding area. Inevitably any extraction from this area is going to put more heavy goods vehicles on Mill Lane, which is wholly unsuited for anything other than light vehicle traffic due to the lack of any pavements or lighting, with tight, blind bends and it simply not being wide enough.
<table>
<thead>
<tr>
<th>E/94</th>
<th>Jennie Blackburn, Creeting St Mary Parish Council</th>
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<tbody>
<tr>
<td></td>
<td>I write to confirm that Creeting St Mary Parish Council strongly <strong>OBJECTS</strong> to the inclusion of any part of the site around Grove Farm, Stowmarket, within the Suffolk Minerals and Waste Local Plan.</td>
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</table>

**Observations**

1. **Environmental Impact:** We believe that the proposal would be detrimental to the visual amenity of this “Special Landscape Area” and the extraction plant would be a source of noise and light pollution within a rural area. The County Ecologist has identified important ecological constraints both within, and in close to proximity to, the proposed development. The site is susceptible to flooding and there would be a significant risk to the watercourse.

It is understood that the Gipping Valley is grade 2 agricultural land and of value for farming purposes and the land is home to a diverse habitat with many species of birds in the area.

2. **Traffic Impact:** The site access is very narrow, and the road leading to the site from the A14, does not have many passing places. In addition, there are a series of “blind” 90 degree bends before it reaches the A14 at

The extent of this is downplayed in the submission but the argument offered does not stand scrutiny. For these reasons the “Stowmarket” site should **remain excluded** from the Draft Suffolk Minerals and Waste Local Plan.

The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
Stowmarket – the preferred route for accessing the site - creating a hazardous route for distribution vehicles.

3. **Heritage Impact:** We understand that the Gipping Valley has been a significant focus of human activity since prehistory and it is noted that the Site Selection Report records the archaeological potential of the site.

4. **Residential Impact:** We note that the Site Selections Report states clearly that all of Phases One to Five of the proposals should not be worked because of the proximity of residential properties and we endorse this view.

5. **Public Rights of Way Impact:** There are footpaths that would be adversely affected by the proposals including Creeting St Mary FPs 2, 3 and 59.

6. **Summary**

   We support, fully, the recommendation contained within the Site Selection Report about this site, which recognises that this is not a viable site. Therefore, we conclude that the Grove Farm site is unsuitable for inclusion within the Waste and Minerals Local Plan.

   We would be grateful if you would you consider our representations on this matter.

<table>
<thead>
<tr>
<th>E/95</th>
<th>Joanne Moss</th>
</tr>
</thead>
<tbody>
<tr>
<td>I am aware that Poundfield Products and Brett Aggregates made a proposal for mineral extraction in the Gipping Valley, I also understand that this has been excluded from the first draft of the Suffolk County Minerals and Waste Local Plan. However, if this</td>
<td></td>
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</table>

The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of
exclusion is challenged, it is possible that any new proposal will be included in the plan in 2018.

I strongly object to any development for mineral extraction in the proposed area for the reasons noted below.

1) There is no requirement for this development - SCC Mineral Planning confirm that sand and gravel demand is met by existing quarry developments with the addition of a further single more suitable site elsewhere.

2) Previous Objections remain valid - An application for gravel extraction near the Poundfield plant was rejected previously for reasons that remain relevant and valid to this larger development and with no mitigation in the proposed plan.

3) Undermining years of effort on environmental improvement - The Gipping Valley has received considerable support and effort from local people and Agencies to create and protect a successful haven for wildlife. This development will destroy many years of work to create a special place. I understand that this is one of the only stretches along the A14 that remains untouched.

4) Impact on Residents - The gravel pits will be intrusive, noisy, dusty and ugly for 25 years of operation and then for many years whilst the scars heal to some form of restoration. There are several residences close to the development that will bear considerable impact constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
and the village as a whole will suffer. I wonder if the report/estimates take into account the combination with current and projected pollution from the A14 during different wind directions! Currently this has a huge impact on the levels of noise from traffic.

5) Increased traffic – Although a new route is proposed for this development the plans in the Appendices state the current access still remains an option and after stage 1 it appears site traffic may need to revert to the current road. Also, the proposal states the number of truck runs to Poundfield will reduce because the pit will supply the plant. Those journeys will still need to take place on the current road in order to take the processed sand and gravel to Poundfield plant so there will be no reduction.

6) Footpaths – Many rights of way and footpaths will be obliterated and the proposals to maintain them are ineffective. It is imperative that sufficient, effective footpaths remain in order to provide a safe path for walkers. I know that some of these objections are not relevant to planning criteria but they are relevant to those people who live in this area and whom our elected leaders and their officials need to be supportive, active and industrious members of society.

I hope that you are able to ensure this proposal is not included in future plans.

| E/96       | David and Valerie Yorath | My wife and I are writing in support of your recommendation **not to include** the proposed | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan |
development submitted by Poundfield Products and Brett Aggregates for mineral extraction in the Gipping Valley in Minerals and Waste Local Plan.

In addition to the numerous points you make we note that this is the only section of the Gipping River Valley so far untouched by development. As such it must be maintained for the recreational needs of local residents and to protect the many species of flora and fauna that proliferate here - otters, kingfishers, barn owls and varieties of orchids - the list is long.

Not being familiar with Council procedures we are concerned that this massive proposal could prove to be the first step to acquiring permission for a smaller development which has been rejected in the past and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.

Robin Newman

I am a resident of Creeting St. Peter. It has been brought to my attention the possibility of a quarry site being developed in our village. If this development is allowed to proceed I firmly believe it will have a detrimental impact on the village itself, its surroundings, the general environment and its residents lifestyle.

- As a dog walker, I can see that a number of public footpaths will likely disappear or will not be useable.
- The overall impact of the proposed quarry operations will be felt throughout the village / parish due to our normal windy climate.
- A major concern is the impact on Pound Road, Mill Lane & Flordon Road traffic. These country roads have a number areas where the supposed 2 lanes are dangerously close to 1

The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
They are also totally unsuitable for HGV traffic especially as there are no pavements for pedestrians.

- My neighbour has told me the Gipping river running through the parish is home to Otters (he has seen them during his walks along the river) You may be aware these animals are protected by law.

- I believe there is no question this proposal will be a blight on the countryside.

- At the time of purchasing our home in Creeting St. Peter (some 10 years ago) there was then an application (as I understand it by the same proposers) for building a quarry which was denied. Does that not set a precedent?

- I am aware that other residents are submitting their own objections which with mine I trust you will take into consideration when reaching your decision. However should your decision be in favour of the applicant (which I sincerely hope is not the case) would nevertheless bring adverse environmental effect to the doorstep of all residents, can you please confirm the council will insist on the appropriate secured financial guarantees in respect to operating and restoration conditions.

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<th>E/99</th>
<th>Jennie Blackburn, Creeting St Peter Parish Council</th>
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<td></td>
<td><strong>SUFFOLK MINERALS AND WASTE LOCAL PLAN SITE SELECTION REPORT - GROVE FARM, STOWMARKET</strong></td>
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</table>
|      | Further to our telephone conversation, I wish to confirm that Creeting St Peter Parish Council formally **OBJECTS** to the inclusion of any part of the site around Grove Farm, Stowmarket, within the Suffolk Minerals and Waste Local Plan. **Considerations**  
1. Environmental Impact: |
|      | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |
The proposal would be detrimental to the visual amenity of the area being highly visible and incongruous within this “Special Landscape Area”. The extraction plant would be obtrusive and would be a source of noise and light pollution within a rural area. The County Ecologist has identified important ecological constraints both within, and in proximity to, the proposed development. The site is susceptible to flooding and there would be a significant risk to the watercourse. It is understood that the Gipping Valley is grade 2 agricultural land and of value for farming purposes. The land is home to a diverse habitat with many species of birds in the area. Phase 6 would impact on the environmental bund that’s meant to be in place for Phase 1. Also, the proposed access road would also go through this.

2. **Traffic Impact:**
The site would be accessed by a narrow country road with some significant “pinch points” where the road narrows considerably. The road also has a series of “blind” 90 degree bends before it reaches the A14 at Stowmarket creating a hazardous route for distribution vehicles.

3. **Heritage Impact:**
Creeting Hall is a grade 2* listed property, dating back to the 16th century and the proposals would be detrimental to this architecturally and historically important building. The Gipping Valley has been a significant focus of human activity since prehistory and it is noted that the Site Selection Report records the archaeological potential of the site (as identified through the British Geological Survey).

4. **Residential Impact:**
The proposal would not be in the best interests of the local community having an adverse effect upon the quality of life of local residents. The Site Selections
**Assessment Suffolk County Council**

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<th>E/100</th>
<th>Jennie Blackburn, Creeting St Mary Parish Council</th>
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<td><strong>SUFFOLK MINERALS AND WASTE LOCAL PLAN</strong></td>
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<td><strong>GROVE FARM, STOWMARKET</strong></td>
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<td></td>
<td>I write to confirm that Creeting St Mary Parish Council strongly <strong>OBJECTS</strong> to the inclusion of any part of the site around Grove Farm, Stowmarket, within the Suffolk Minerals and Waste Local Plan.</td>
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<td><strong>Observations</strong></td>
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<td><strong>1. Environmental Impact:</strong> We believe that the proposal would be detrimental to the visual amenity of this “Special Landscape Area” and the extraction plant would be a source of noise and light pollution within a rural area. The County Ecologist has identified important ecological constraints both within, and in The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.</td>
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Report states clearly (para. 6.10 refers), that all of Phases One to Five of the proposals should not be worked because of the proximity of residential properties and we endorse this view.

**5. Public Rights of Way Impact**
There is a wide network of footpaths that would be affected by the proposals including Creeting St Peter FPs 15, 16, 17, 27 & 28.

**6. Summary**
We suggest that there are a compelling range of factors that combine to make the Grove Farm site **totally unsuitable** for development.
We support, fully, the recommendation contained within the Site Selection Report that has been prepared in respect of this site, which recognises that this is not a viable site and should not be included within the emerging Plan.
We would be grateful if you would consider our strong views on this matter and we would be happy to liaise with you further if you require any further information.
close to proximity to, the proposed development. The site is susceptible to flooding and there would be a significant risk to the watercourse. It is understood that the Gipping Valley is grade 2 agricultural land and of value for farming purposes and the land is home to a diverse habitat with many species of birds in the area.

2. **Traffic Impact:** The site access is very narrow, and the road leading to the site from the A14, does not have many passing places. In addition, there are a series of “blind” 90 degree bends before it reaches the A14 at Stowmarket – the preferred route for accessing the site - creating a hazardous route for distribution vehicles.

3. **Heritage Impact:** We understand that the Gipping Valley has been a significant focus of human activity since prehistory and it is noted that the Site Selection Report records the archaeological potential of the site.

4. **Residential Impact:** We note that the Site Selections Report states clearly that all of Phases One to Five of the proposals should not be worked because of the proximity of residential properties and we endorse this view.

5. **Public Rights of Way Impact:** There are footpaths that would be adversely affected by the proposals including Creeting St Mary FPs 2, 3 and 59.

6. **Summary**

   We support, fully, the recommendation contained within the Site Selection Report about this site, which recognises that this is not a viable site. Therefore, we
<table>
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<th>E/101</th>
<th>Stewart and Beryl Booth</th>
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<td>Over the weekend, I was astounded to hear about a proposed massive mineral extraction development, which will virtually surround our property, as part of the Clamp Farm settlement. Heard from a neighbour, would you believe because, to date, we have received no communication from our local authorities about this. To add to the farcical nature of the situation, I understand, I have only until 5.00pm today to object – speechless! I have to say that, since moving to what we thought was an idyllic corner of Suffolk, in 2012, our experience of the planning processes for the area, and the impact it is having on the local community, has been something of a shock. The various local/district councils seem hell-bent on destroying a beautiful habitat, wreaking havoc on the local residential community. Our first shock, when we arrived, was the volume and size of the lorry traffic rumbling round Mill Lane, which we subsequently found came from Poundfield. It is, not to put it too lightly, a total disgrace that this was ever permitted and, let's be honest, it is a matter of time until someone loses their life along this lane. I, personally, have rescued frightened ageing drivers who have been pushed off the road, or wedged into the grass verge, to avoid a collision. A camera mounted over the sharp corner outside Clamp Farm, for a month, would tell you all you need to know. We were aware of the proposed development of the Business Park when we bought the property. However, as the plans emerged, we saw the service road into the estate (which it appears would also serve the mineral extraction) from Tescos would conclude that the Grove Farm site is unsuitable for inclusion within the Waste and Minerals Local Plan. We would be grateful if you would consider our representations on this matter.</td>
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<tr>
<td>The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. This is the reason you were not consulted, as the council was not proposing the site be included in the Minerals and Waste Local Plan. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.</td>
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eventually feed into Mill Lane, creating a classic ‘rat run’ through to Needham Market etc. We, and many of our neighbours, have made numerous objections to this – all of which appear to have been ignored. We asked them to, at the very least, ‘cut off’ the corner at Clamp Farm, but apparently, Suffolk Highways think this will have no impact on the traffic!
So, surrounded on one side by a massive industrial estate, on a highly dangerous road, we are now being presented with a possible sand and gravel pit to the other side of our property, on an gigantic scale.
Unsurprisingly, my wife and I wish to register our objection in the strongest terms, noting the above, but specifically on the grounds below:
1. Traffic and the Roads – Suffolk Highways need to reconsider their position on this. The proposed ‘new’ road running up to the A1120 will not only be ‘rumbling’ along the back of our properties but, when they reach the ‘business park’ they will have the option of going down Mill Lane through the proposed new access.
Whatever signs you put there banning HGVs entering Mill Lane, they will use it, and it will be impossible to distinguish them from traffic going to the concrete works. Also impossible to police. In addition to this, I note on the plans that there is still the option to use the current access road to Grove Farm – the impact of this hardly needs expanding on.
2. Environmental – The valley area where the proposed development would be is an area of outstanding natural beauty, which local people and organisations have worked to make into a spectacular wildlife habitat – this would be decimated.
3. The Residents – the impact of this development would be catastrophic to our lives, and to our fellow
local residents, with so many of us being so close to the development. 25 years of noise, dust, and an unsightly vista, to say nothing of the time it will take to restore the area afterwards is too big a price to pay, and an unfair burden we shouldn't have to face. As a closing point, it is my understanding that this is not the first time this proposal, or a similar one, has been submitted. From what I can see, the original reasons which caused this to be rejected last time remain valid. Furthermore, I would contend that, given the impending development of the Business Park, there is, even more, reason why this must not go ahead. If both projects went ahead, the whole area between Stowmarket and Creeting St Peter would become a mix of industrial units and waste ground. I await your consideration with great interest and trust that, in future, residents so close to this kind of development will be informed directly, allowing them to give the matter due consideration, and make a timely response.

E/103 Lynne Edwards

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<tr>
<th>Project Ref: PP GF MP_2017 Project No: PPL/GF/111</th>
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<td>I refer to the above which has just been brought to my attention by a neighbour. I would like to strongly object to the proposal of the above project on the grounds that I live opposite the proposed site and the quarrying works not only will be tearing up the countryside in an identified area of Suffolk rolling countryside (which I understood to be protected) but the works will no doubt have a negative impact on the property prices, not to mention the current uninterrupted views of this beautiful countryside ruined by this massive project. One of the main attractions of these properties along Stowmarket Road is the Suffolk rolling countryside behind them which many people comment on when visiting – what a beautiful view, this will be ruined.</td>
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The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
| E/105 | Stewart and Beryl Booth | Over the weekend, I was astounded to hear about a proposed massive mineral extraction development, which will virtually surround our property, as part of the Clamp Farm settlement. Heard from a neighbour, would you believe because, to date, we have received no communication from our local authorities about this. To add to the farcical nature of the situation, I understand, I have only until 5.00pm today to object – speechless! I have to say that, since moving to what we thought was an idyllic corner of Suffolk, in 2012, our experience of the planning processes for the area, and the impact it is having on the local community, has been something of a shock. The various local/district councils seem hell-bent on destroying a beautiful habitat, wreaking havoc on the local residential community. Our first shock, when we arrived, was the volume and size of the lorry traffic rumbling round Mill Lane, which we subsequently found came from Poundfield. It is, not to put it too lightly, a total disgrace that this was ever permitted and, let’s be honest, it is a matter of time until someone loses their life along this lane. I, personally, have rescued frightened ageing drivers who have been pushed off the road, or wedged into the grass verge, to avoid a collision. A camera mounted over the sharp | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. This is the reason you were not consulted, as the council was not including the site in the Minerals and Waste Local Plan. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |
| E/105 | Stewart and Beryl Booth | I fail to understand how the Council can give permission to build a load of houses on a perfectly good pit and then consider an open quarry in the same local area! I hope that my objection can be registered as I understand today (11/12/2017) is the cut off day for comments. I look forward to your response, I have attached an image of the current view from our property looking over towards Creeting Hall. (see attachment) |  |
corner outside Clamp Farm, for a month, would tell you all you need to know. We were aware of the proposed development of the Business Park when we bought the property. However, as the plans emerged, we saw the service road into the estate (which it appears would also serve the mineral extraction) from Tescos would eventually feed into Mill Lane, creating a classic ‘rat run’ through to Needham Market etc. We, and many of our neighbours, have made numerous objections to this – all of which appear to have been ignored. We asked them to, at the very least, ‘cut off’ the corner at Clamp Farm, but apparently, Suffolk Highways think this will have no impact on the traffic!

So, surrounded on one side by a massive industrial estate, on a highly dangerous road, we are now being presented with a possible sand and gravel pit to the other side of our property, on an gigantic scale. Unsurprisingly, my wife and I wish to register our objection in the strongest terms, noting the above, but specifically on the grounds below:

1. Traffic and the Roads – Suffolk Highways need to reconsider their position on this. The proposed ‘new’ road running up to the A1120 will not only be ‘rumbling’ along the back of our properties but, when they reach the ‘business park’ they will have the option of going down Mill Lane through the proposed new access. Whatever signs you put there banning HGVs entering Mill Lane, they will use it, and it will be impossible to distinguish them from traffic going to the concrete works. Also impossible to police. In addition to this, I note on the plans that there is still the option to use the current access road to Grove Farm – the impact of this hardly needs expanding on.

2. Environmental – The valley area where the proposed development would be is an area of outstanding
natural beauty, which local people and organisations have worked to make into a spectacular wildlife habitat – this would be decimated.

3. The Residents – the impact of this development would be catastrophic to our lives, and to our fellow local residents, with so many of us being so close to the development. 25 years of noise, dust, and an unsightly vista, to say nothing of the time it will take to restore the area afterwards is too big a price to pay, and an unfair burden we shouldn’t have to face. As a closing point, it is my understanding that this is not the first time this proposal, or a similar one, has been submitted. From what I can see, the original reasons which caused this to be rejected last time remain valid. Furthermore, I would contend that, given the impending development of the Business Park, there is, even more, reason why this must not go ahead. If both projects went ahead, the whole area between Stowmarket and Creeting St Peter would become a mix of industrial units and waste ground. I await your consideration with great interest and trust that, in future, residents so close to this kind of development will be informed directly, allowing them to give the matter due consideration, and make a timely response.

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<tr>
<th>E/106</th>
<th>Phil Moss</th>
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<tr>
<td><strong>Re: Proposal submitted by Poundfield Products and Brett Aggregates for Gipping Valley mineral extraction.</strong> Whilst I understand it is not included in the first draft of the SC Minerals &amp; Waste Local Plan, this could be challenged and then this proposal or a revised version could be included in the Plan to be agreed for next year. I wish to lodge that I am in <strong>full support</strong> of the Draft County Minerals and Waste Local Plan and <strong>The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not</strong></td>
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against any inclusion of the Poundfield Products proposal. My objection to any development for mineral extraction in the proposed area is for the following reasons:
- There is no requirement for this development as I understand SCC Mineral Planning confirm that demand for sand and gravel is covered by current quarry developments with an addition of another single more suitable site elsewhere.
- Previous application’s accepted objections are still valid and there is no mitigation in the proposed plan. The application for gravel extraction near the Poundfield plant ten years ago was rejected for valid and relevant reasons to this larger proposed development.
- Impact on residents would be affected as the gravel pits would be invasive, dusty, noisy and unpleasant for twentyfive years of operation and then for many years whilst the scars heal to some form of restoration. Several resident’s properties would be close to the development that would suffer substantial impact. In fact the whole village would suffer.
- Efforts for environmental improvement over many years totally undermined as local people and agencies have supported substantial efforts in Gipping Valley to create, encourage and keep a successful haven for wildlife. This development would destroy years of hard work to create such a place enjoyed by many.
- I would add that with regard to the noise and air pollution estimates, do these take account of the effect in combination with current and projected noise and air pollution from the main A14 and during different wind conditions?
- Has traffic been considered as it is disappointing to hear that Suffolk Highways have made no objections to included as the resource is not considered viable.
this proposed development as they took the same position on the Poundfield developments. Anyone who travels this route would recognise this as a hazard and has left us to face daily travel hazards with the vehicles running to and from the factory. Although to avoid an escalation of this problem a new route is proposed for this development, the Appendices plans note the current access still remains an option and after stage 1 it suggests site traffic may need to revert to the current road. The proposal also states the number of lorry runs to Poundfield will reduce because the pit would supply the plant. However, these journeys would still need to take place on the current road in order to take the processed sand and gravel to Poundfield plant so how would there be a reduction?

- In terms of footpaths, many rights of way and footpaths will be destroyed and the proposals appear ineffective in order to maintain them. I appreciate that some of my objections may not relevant to planning standards however they are wholly relevant to those of us that live in this area and whom our elected leaders and their officials need to be loyal, active and hardworking members of society. As a local resident we feel that we have been let down by our Council through some baffling support for the development of a farm to become a substantial concrete products factory with offices and for the commercial development at the western boundary of the Parish. This in despite local residents objections to both. It is, therefore, belligerent and condescending to see both of these noted developments presented by the proposers as good reasons for this further development especially as we still see no progress to improve our internet access. I hope that you are able to ensure this proposal is not
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<th>E/108</th>
<th>Charlie Christensen, The Environment Agency</th>
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<td>We have provided some general comments which may be applicable to all sites below. We have also included some site-specific comments under the relevant site headings. We note that there are proposals for infilling of sand and gravel extractions with inert materials. This activity will require an environmental permit from us (the Environment Agency) and we would like to see reference to this in the Local Plan. Some historic sites, from pre 2001, may already hold an environmental permit, however they would need to apply for a new permit from us which implements the requirements of the Landfill Directive. Therefore, historic sites cannot rely on the existing permit to recommence operations.</td>
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**Flood risk – general principles**

All development proposals within the flood zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown in the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment (FRA). The proposed mineral sites at Barnham and Cavenham include areas in flood zone 2 and flood zone 3. We note that the flood sections do not address flood risk from all sources, in particular fluvial and surface water. Additionally objective 8 of the Sustainability Appraisal to minimise flood risk only includes a key indicator relating to fluvial flooding. We would also like to see this incorporate surface water, coastal and groundwater flood risk. |

|       | Reference to the need for permits to infill sand and gravel extraction sites with inert material will be included in the plan. The flood section can be amended to include flood risk from all sources. |
|       | **Flood Risk – General Principles**

Proposed changes to Policy GP 4 should address the need for sites in flood zones 2 and 3 to require a Flood Risk Assessment. The plan can demonstrate that the sequential test has been carried out with regard to the location of development. |

|       | **Flood Risk – Climate Change**

Reference to the ‘Flood risk assessments: climate change allowances’ can be added to the plan. |

|       | **Flood Risk - environmental permit for flood risk activities**

Reference to the need for Environment Agency permits in close proximity to a main river or a structure/culvert from a tidal main river can be added to the plan.
The Local Plan should apply the sequential test and use a risk based approach to the location of development; it should be demonstrated that this has been carried out. The plan should be supported by a Strategic Flood Risk Assessment (SFRA) and should use the NPPF Planning Practice Guidance (PPG). We note that an SFRA has been prepared to support the Local Plan.

**Flood risk – climate change**

Our 'Flood risk assessments: climate change allowances' guidance provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk. For some development types and locations, it is important to assess a range of risk using more than one allowance. Please refer to this guidance. [https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances).

**Flood risk – environmental permit for flood risk activities**

An environmental permit for flood risk activities may be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert.

**Biodiversity**

Biodiversity gains are a key part of minerals policy MP7 which gives preference to site restoration proposals that incorporate a net gain for biodiversity.

**Groundwater**

An amendment will be made to GP4 m (the local water environment) to highlight that this includes both surface water and groundwater.

**Proposed Changes**

Include reference to the need for environmental permits when infilling extraction sites with inert material.

Show that the sequential test has been applied to the plan.

Add reference to 'Flood risk assessments: climate change allowances' to the plan.

Add reference to the need for Environment Agency permits in close proximity to a main river or a structure/culvert from a tidal main river to the plan.
Application forms and further information can be found at: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits. Anyone carrying out these activities without a permit where one is required, is breaking the law. The Local Plan should consider this when allocating development sites adjacent to a ‘main river’. A permit may be required and restrictions imposed upon the work as a result in order to ensure the development does not have a detrimental impact upon the environment and flood risk.

**Biodiversity**

We would like to see an aim to enhance the County Wildlife Sites network through aiming aftercare at biodiversity gains (as is suggested in table 2 of the Sustainability Appraisal). There is the opportunity at these sites to make positive statements about the environment, and there are a number of resources available which provide guidance on potential uses of extraction sites (for example, Quarrylife Awards).

**Groundwater**

We would not have any issues with extraction in terms of groundwater provided that the extraction is constrained in such a way as not to significantly alter the rate or direction of groundwater flow i.e. so that flow to surrounding water features or other abstractors is maintained. This should be considered in response to policy GP4.
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<th>E/111</th>
<th>Phil Moss</th>
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| APPEARS TO BE A DUPLICATE OF E/106 | Re: Proposal submitted by Poundfield Products and Brett Aggregates for Gipping Valley mineral extraction. Whilst I understand it is not included in the first draft of the SC Minerals & Waste Local Plan, this could be challenged and then this proposal or a revised version could be included in the Plan to be agreed for next year. I wish to lodge that I am in full support of the Draft County Minerals and Waste Local Plan and against any inclusion of the Poundfield Products proposal. My objection to any development for mineral extraction in the proposed area is for the following reasons:  
- There is no requirement for this development as I understand SCC Mineral Planning confirm that demand for sand and gravel is covered by current quarry developments with an addition of another single more suitable site elsewhere.  
- Previous application’s accepted objections are still valid and there is no mitigation in the proposed plan. The application for gravel extraction near the Poundfield plant ten years ago was rejected for valid and relevant reasons to this larger proposed development.  
- Impact on residents would be affected as the gravel pits would be invasive, dusty, noisy and unpleasant for twentyfive years of operation and then for many years whilst the scars heal to some form of restoration. Several resident’s properties would be close to the development that would suffer substantial impact. In fact the whole village would suffer.  
- Efforts for environmental improvement over many years totally undermined as local people and agencies have supported substantial efforts in Gipping Valley to create, encourage and keep a successful haven for | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |
wildlife. This development would destroy years of hard work to create such a place enjoyed by many.
- I would add that with regard to the noise and air pollution estimates, do these take account of the effect in combination with current and projected noise and air pollution from the main A14 and during different wind conditions?
- Has traffic been considered as it is disappointing to hear that Suffolk Highways have made no objections to this proposed development as they took the same position on the Poundfield developments. Anyone who travels this route would recognise this as a hazard and has left us to face daily travel hazards with the vehicles running to and from the factory. Although to avoid an escalation of this problem a new route is proposed for this development, the Appendices plans note the current access still remains an option and after stage 1 it suggests site traffic may need to revert to the current road. The proposal also states the number of lorry runs to Poundfield will reduce because the pit would supply the plant. However, these journeys would still need to take place on the current road in order to take the processed sand and gravel to Poundfield plant so how would there be a reduction?
- In terms of footpaths, many rights of way and footpaths will be destroyed and the proposals appear ineffective in order to maintain them. I appreciate that some of my objections may not relevant to planning standards however they are wholly relevant to those of us that live in this area and whom our elected leaders and their officials need to be loyal, active and hardworking members of society. As a local resident we feel that we have been let down by our Council through some baffling support for the development of a farm to become a
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<th>E/112</th>
<th>Barry and Donna Risby</th>
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<td>I am writing to register my concern over the proposal submitted by Poundfield Products and Brett Aggregates for mineral extraction in the Gipping Valley which I understand has been excluded from the first draft of the Suffolk County Minerals and Waste Local Plan, but may be challenged. I strongly object to any development for mineral extraction in the proposed area for the following reasons. <strong>No Requirement for this Development</strong> - SCC Mineral Planning confirm that sand and gravel demand is met by existing quarry developments with the addition of a further single more suitable site elsewhere. <strong>Previous Objections remain valid.</strong> An application for gravel extraction near the Poundfield plant was rejected 10 years ago for reasons that remain relevant and valid to this larger development and with no mitigation in the proposed plan. <strong>Environment</strong> - The Gipping Valley has received considerable support and effort from local people and Agencies to create and protect a successful haven for wildlife. This development will destroy many years of work to create a special place.</td>
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<p>|       | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |</p>
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<th>Residents - The gravel pits will be intrusive, noisy, dusty and ugly for 25 years of operation and then for many years whilst the scars heal to some form of restoration. There are several residences close to the development that will bear considerable impact and the village as a whole will suffer. Traffic – The roads in the area are already very busy with industrial large vehicles where the road system is simply not capable of coping with this type of traffic. It is a concern that Suffolk Highways have no objections to this proposed development. Although a new route is proposed for this development to avoid escalation of this problem, the plans in the Appendices state the current access still remains an option and after stage 1 and it is obvious that many journeys will still need to take place on the current road in order to take the sand and gravel to Poundfield plant. Footpaths – Many rights of way and footpaths will be obliterated and the proposals to maintain them are ineffective. I strongly urge you to reject the proposals to ensure that the surrounding area does not suffer from the above issues, I know that some of these objections are not relevant to planning criteria but they are relevant to those people who live in this area. There are many other more deserving issues to tackle and address, including the appalling lack of progress to improve our internet access which is unusable. Thank you for your consideration.</th>
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<tr>
<td>E/114</td>
<td>Michelle Marshall, Stowmarket Town Council We are grateful for the opportunity to comment on the preparation of the Suffolk Minerals and Waste Local Plan. We are aware that you are likely to receive representations from neighbouring parish councils objecting to the inclusion of the site around Grove Farm, The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a</td>
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Stowmarket within the Suffolk Minerals and Waste Local Plan, and expressing their concerns about the environmental, traffic, heritage, residential and rights of way impacts on the proposal. The Town Council also wishes to add its own objection to the proposal, and we wish to endorse the comments that have been made in the Site Selection Report prepared by Suffolk County Council, that concludes that this is not a viable site for the extraction of minerals. Our specific concerns relate to the movement of lorries along Mill Lane, the dangers posed by such vehicles to motorists and pedestrians, and their impact upon those living in properties within the residential area at Cedars Park, as Mill Lane enters Stowmarket from Creeting St Peter.
We would be grateful if you would consider our views on this matter.

small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.

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<tr>
<th>E/115</th>
<th>Lynne Jardine</th>
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|       | I am writing in support of Suffolk County Council that the above site should NOT be included within the Suffolk Minerals and Waste Local Plan. The site is not suitable for the following reasons:  
· Destruction of unspoilt area of the River Gipping Valley – The special landscape area comes up to the Creeting Hall Settlement and this forms a really beautiful area of the Gipping River Valley and is the only unspoilt area for some miles.  
· Noise/Dust – this is an open landscape and any works would create an unacceptable level of noise and dust. Particular impact for us personally is in Phase 1 – this land surrounds the Creeting Hall Farm Settlement (8 dwellings). Living here we know the strong winds across the valley bring with them loose soil from The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |
farmland so the impact of sand/gravel excavation would be dreadful. Whilst this could be mitigated to some degree by bunding this would not prevent this occurring and the bunding would provide an ugly mess of weed ridden mounds spoiling what is currently a lovely view.

- Long term destruction – the proposal is for 25 years from 2020 which is probably about the rest of my life – to put up with noise, dust and the ruination of our family home. The view will never be the same even after reinstatement. We are already blighted to the East with a large industrial concrete factory complex but have views to the West with beautiful sunsets going down behind woodland – we would lose this forever.

- Historic Buildings as well as Creeting Hall which is Grade 2* there are other Listed buildings which would be impacted including Hill Farm (Grade 2) and Creeting St Peter Church (Grade 2). We live next door to Creeting Hall and needed special roof lights being within the cartilage yet the Historic Building consultee response is “no objection”. A gravel pit surrounding the Hall will have greater impact than a couple of roof lights.

- Public Rights of Way – many footpaths cross the site with local and visiting walkers taking different routes to the River Gipping Walk – I cannot see how these could be adequately safeguarded.

- Mill Lane Development – the proposal seeks to take Lorries out through what is designated a wildlife habitat area – hardly conducive. I am appalled the applicants think this is a suitable site which I can only assume is driven by greed yet the wider community would have to suffer the consequences.

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<tr>
<th>E/116</th>
<th>Fiona Cairns, Suffolk Preservation Society</th>
<th><strong>Designated Landscapes – AONBs</strong></th>
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<td>The extraction of minerals in an AONB landscape is a major development and statutory weight must be given</td>
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to the landscape designation when weighing the public benefits that might accrue. The CROW Act, S.85 places a statutory duty on the decision maker to “conserve or enhance the natural beauty of their area” and the NPPF states at para. 115 that “Great weight should be given to conserving landscape beauty and scenic beauty in National Parks the Broad’s and Areas of Outstanding Natural Beauty, which have the highest statues of protection in relation to landscape and scenic beauty”. It continues at paragraph 116 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.” (my emphasis). Furthermore, footnote 9 of para. 14 makes clear that the presumption in favour of sustainable development is outweighed by the statutory duty to conserve and enhance the natural beauty of the AONB.

NPPF guidance specific to the sustainable use of materials 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.

The Society is therefore concerned that the sites proposed for allocation include some affecting the Suffolk Coast and Heaths and Dedham Vale AONBs. In particular the proposed site at Wangford is wholly within the Suffolk Coast and Heaths AONB and the Society does not consider that exceptional circumstances required by the NPPF to justify their development have been demonstrated.

Furthermore the Waveney DC Local Plan states in policy DM27 Protection of Landscape Character that development affecting the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and their settings will not be permitted unless it can be demonstrated there is an overriding national need for development and no alternative site can be found. Moreover the Suffolk Coast & Heaths AONB Management Plan (2013-18) which is a statutory document as required under Sec. 89 CROW Act 2000 calls for a consistently high standard of development control decision-making to prevent adverse impact on the landscape and natural beauty of the AONB (Objective 2.7) and for the special qualities of the AONB
to be consistently taken into account and enhanced by the planning process (Objective 2.8).

**Archaeology**

The Society has serious concerns regarding the adequacy of the document in safeguarding Suffolk’s archaeology. The approach to archaeology is inconsistent, pre-determination evaluation being requested in some but not all of the proposed allocations without adequate reasons given. Best practice dictates that archaeological evaluation should be undertaken at the pre-determination stage in all cases and not at the post consent stage, unless it relates to a small extension to an existing quarry. We have the following points to make on specific sites:

(Site comments have been copied into site specific sections of this document)

In all of the above cases the Society considers the approach of relying on conditions post decision is flawed. In order to establish the full archaeological implications of these large allocation areas - which have not been the subject of any previous systematic archaeological investigation – archaeological field evaluation to accurately quantify the archaeological resource (both in quality and extent) should be carried out prior to determination of any application. This is in accordance with the NPPF (paragraphs 128, 129 and 132), in order for the Minerals Authority to be able to take into account the particular nature and the significance of any below-
ground heritage assets. Therefore the Society considers that the current approach is inconsistent and fails to safeguard the historic environment due to its failure to accord with national guidance.

**Listed Buildings**

The NPPF at para. 132 is clear that Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As previously stated we do not feel that GP4 does adequately protects the setting of heritage assets and this is particularly relevant at the following allocations:

(Site comments have been copied into site specific sections of this document)

**Stowmarket: Grove Farm**, the Society strongly concurs with the view of the SCC Senior Policy Officer that this site should not be taken forward for development due to the landscape restrictions and the potential harm to the settings of the grade II* listed Creeting Hall and grade II listed Grove Farmhouse, Hill Farmhouse, Clamp Cottages and The Clamp.

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<tr>
<th>E/121</th>
<th>Theresa Mannell</th>
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<td>I was only informed yesterday that Brett aggregates are trying to push for Poundfield Products site at Grove farm to be included in the minerals and waste plan. I am writing to let you know that I object to a site within the parish of Creeting St Peter. There are many concerns for residents mainly the noise and dust issues that will come with this quarry, the constant damage that the HGV's will do to our small road network, the</td>
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The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site
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<th>E/122</th>
<th>George Mannell</th>
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<td>I am contacting you regarding a recent planning consideration from Brett's aggregates for a proposed mineral extraction site at Grove Farm. I would like to voice my objection to the application. There are many grounds for which my objection is based, they are mainly involving my concern for the proposed site and the surrounding areas. There would be a detrimental visual impact from the development on the character of the local area. The open land around Creeting St Peter is very much an amenity enjoyed by its residents, in particular the right to a safe and quiet area to live. I feel this could be greatly compromised by the proposed plan. The size of the plan at 121 hectares is unlike any development in the area, it would therefore not be easily screened as stated under 4.7.3 of the plan. This is the same for the potential noise implication in which the noise attenuation bunds would be rendered ineffective due to the scale of the site. One of the major issues with the plan is the increase in large vehicles that will be used for the transportation of 220,000 tonnes of material from the site. An estimated output of 40 lorries from the site per day would significantly increase the stress on...</td>
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the local road network that is definitely not designed for such vehicles in excess of 20 tonnes. There is thus a large concern of the highway safety for the local area. During the summer the road network is used heavily by cyclists and pedestrians, large vehicles on such narrow roads would create an unsafe environment. The proposed access routes are both impractical, the existing grove farm industrial entrance is not fit for this purpose, it joins Mill Lane before heading west to join the A14. This route is already used by lorries causing extensive damage to the network and roadside verges. The alternative access route is via the 'Tesco roundabout' is also impractical. The route is highly congested at peak times, an increase in traffic of such proportions would only add to the problems. The local area has over the recent years been subject to frequent flooding especially along the river terrence and the low lying areas in the valley. The groundwater levels tested and monitored in section 2.6 shows a strong water table is present within the River Terrence deposits at a height equal to and slightly higher than that of the river itself. Thus the deposits lie below the water table. In order for them to be removed in the proposed dry state required, the excess water will need pumping into an already full river system. This will increase the incidence of flooding for the area which could in turn affect the access to residential properties. The initial plan proposed has already been rejected by SCC in their report into the sites suitability. For this reason I stress my objection to the plan.

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<th>E/123</th>
<th>Kevin and Michaela McCarthy</th>
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<td>I have learnt of a possible Quarry site in our Village of Creeting St. Peter and I write to Object to this proposal. If the proposal were to go ahead it would Adverse affects on our Village. After many years of working hard, my Family and I found our Dream house. In the The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of</td>
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small Clamp Farm Hamlet. We were aware of the Proposed Mill Lane Development and realised that although we were against it such developments encroaching on the Beautiful Countryside. That progress and developments are a hard force to stop, but we do Strongly object to the Proposed Gravel Pit development. As we have already one Road which is over used and Not suitable for Heavy Lorries, which constantly cause other road Users concern, because the road is to Narrow. The Road is also becoming unsafe for Horse Riders to ride there Horses due to the volume of Heavy vehicles. I and my Family live in one of the Two Listed Buildings in the Clamp Farm Hamlet, we have tried to bring our Home back to its Former Glory using correct materials and Skills. The curtledege of our property is also listed which means if we wanted to do anything within our curtledge we would be unable to. So we find it Annoying that step two strides from Our boundary and anything seems to go. To have Mill Lane Development one side and then a road which would eve lope Our property seems to Us a Step to Far. The Pits & Road traffic would ruin Our lives and Lots of Others - So that a few GREEDY people could benefit from having Gravel on there Doorstep. I would suggest further Investigation take place on and around Properties owned by Poundfield Ltd Directors to see if any Gravel was available THERE. One of the main reasons for Us moving to Clamp Farmhouse was that Planning had already Been Refused to Basically the Same People on such a development. To Grant such a Development Permission would be an Unwelcome U turn for many People and Wildlife.

constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
| E/125 | Jennie Blackburn, Creeting St Peter Parish Council | **SUFFOLK MINERALS AND WASTE LOCAL PLAN SITE SELECTION REPORT - GROVE FARM, STOWMARKET**  
Further to our telephone conversation, I wish to confirm that Creeting St Peter Parish Council formally **OBJECTS** to the inclusion of any part of the site around Grove Farm, Stowmarket, within the Suffolk Minerals and Waste Local Plan.  
**Considerations**  
1. **Environmental Impact:**  
The proposal would be detrimental to the visual amenity of the area being highly visible and incongruous within this “Special Landscape Area”. The extraction plant would be obtrusive and would be a source of noise and light pollution within a rural area. The County Ecologist has identified important ecological constraints both within, and in proximity to, the proposed development. The site is susceptible to flooding and there would be a significant risk to the watercourse. It is understood that the Gipping Valley is grade 2 agricultural land and of value for farming purposes. The land is home to a diverse habitat with many species of birds in the area. Phase 6 would impact on the environmental bund that’s meant to be in place for Phase 1. Also, the proposed access road would also go through this.  
2. **Traffic Impact:**  
The site would be accessed by a narrow country road with some significant “pinch points” where the road narrows considerably. The road also has a series of “blind” 90 degree bends before it reaches the A14 at Stowmarket creating a hazardous route for distribution vehicles.  
3. **Heritage Impact:**  
Creeting Hall is a grade 2* listed property, dating back to the 16th century and the proposals would be  

|   |   | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |
detrimental to this architecturally and historically important building. The Gipping Valley has been a significant focus of human activity since prehistory and it is noted that the Site Selection Report records the archaeological potential of the site (as identified through the British Geological Survey).

4. Residential Impact:
The proposal would not be in the best interests of the local community having an adverse effect upon the quality of life of local residents. The Site Selections Report states clearly (para. 6.10 refers), that all of Phases One to Five of the proposals should not be worked because of the proximity of residential properties and we endorse this view.

5. Public Rights of Way Impact
There is a wide network of footpaths that would be affected by the proposals including Creeting St Peter FPs 15, 16, 17, 27 & 28.

6. Summary
We suggest that there are a compelling range of factors that combine to make the Grove Farm site **totally unsuitable** for development.

We support, fully, the recommendation contained within the Site Selection Report that has been prepared in respect of this site, which recognises that this is not a viable site and should not be included within the emerging Plan.

We would be grateful if you would consider our strong views on this matter and we would be happy to liaise with you further if you require any further information.

| E/126 | Jennie Blackburn, Creeting St Peter Parish Council |
| SUFFOLK MINERALS AND WASTE LOCAL PLAN SITE SELECTION REPORT - GROVE FARM, STOWMARKET |

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**Considerations**

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2. **Traffic Impact:**
   The site would be accessed by a narrow country road with some significant “pinch points” where the road narrows considerably. The road also has a series of “blind” 90 degree bends before it reaches the A14 at Stowmarket creating a hazardous route for distribution vehicles.

3. **Heritage Impact:**
   Creeting Hall is a grade 2* listed property, dating back to the 16th century and the proposals would be detrimental to this architecturally and historically important building. The Gipping Valley has been a significant focus of human activity since prehistory.

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We suggest that there are a compelling range of factors that combine to make the Grove Farm site **totally unsuitable** for development.

We support, fully, the recommendation contained within the Site Selection Report that has been prepared in respect of this site, which recognises that this is not a viable site and should not be included within the emerging Plan.

We would be grateful if you would consider our strong views on this matter and we would be happy to liaise with you further if you require any further information.

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E/129  Clare Williams

I am writing to express my support for the draft Suffolk Minerals and Waste Local Plan, in particular the fact that Grove Farm Quarry is not included. I live at Hall Barn, Creeting Hall and if Grove Farm were to be given permission to extract sand and gravel it would destroy the quiet enjoyment of my home for me and all the residents of Creeting Hall. The noise, dust and vibration

The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a
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<th>E/132</th>
<th>Chris and Dianna Patten</th>
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<td>I am aware that the proposal submitted by Poundfield Products and Brett Aggregates for mineral extraction in the Gipping Valley has been excluded from the first draft of the Suffolk County Minerals and Waste Local Plan, I am contacting you can I am concerned that the proposers may challenge the small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.</td>
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| | from extraction machinery and traffic to transport the sand and gravel away would be very intrusive and destructive. I strongly feel that industrial activity is not suited to this part of the Gipping Valley because as you travel along the river on the train you can see that there is so little left that hasn't already been developed. River valleys should be amenities for all locals, and there is a well known and loved walk along between Stowmarket and Needham Market. Walking is an excellent way to protect and heal physical and mental health. People need to be able to escape from the built environment to quiet places in nature so that they can contemplate, calm down and consider whatever is happening in their lives. Although I appreciate that there is actually very little of our countryside that is developed, there are still not too many places where you can walk and we need to protect them. The therapeutic benefits of walking are well proven and very importantly, this activity needs very little in the way of equipment so can be taken up by pretty much anyone, regardless of income. I sincerely hope that Grove Farm will not be included in the Minerals and Waste Local Plan, either now or in the future so that the green corridor between the two towns can remain in place to preserve the distinct characters of both and provide recreational amenity for the local population. Please do contact me if there is a need. | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a |
exclusion, therefore meaning there is a possibility that their proposal (or an amended version may be included in the Plan, to be agreed in 2018. I object to any development for mineral extraction in the proposed area for the reasons noted below. SCC Mineral Planning confirm that sand and gravel demand is met by existing quarry developments with the addition of a further single more suitable site elsewhere, therefore meaning there is no requirement for this development. An application for gravel extraction near the Poundfield plant was rejected 10 years ago for reasons that remain relevant and valid to this larger development. The Gipping Valley has received considerable support and effort from local people and Agencies to create and protect a successful haven for wildlife. This development will destroy many years of work to create a special place. The gravel pits will be intrusive, noisy, dusty and ugly for 25 years of operation and then for many years whilst the scars heal to some form of restoration. There are several residences close to the development that will bear considerable impact and the village as a whole will suffer. With regard to the noise and air pollution estimates, do they take in to account the combination with current and projected pollution from the A14 during different wind conditions? The increase in traffic on the Mill Lane due to these proposal will mean that driving these roads will be even more hazardous than they are currently with the already high number of vehicles using the road for the factory. I know that the plan states that traffic will be reduced due to the small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
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<th>E/138</th>
<th>Mr and Mrs J.P. Thorpe</th>
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use of sand and gravel from the pit but how with the sand and gravel get from pit to factory - surely along the road? Many rights of way and footpaths which are used by many on a regular basis will be obliterated and the proposals to maintain them are ineffective. I hope that the views of the local community are listened to in regards the proposed developments addressed above and that you are able to ensure this proposal is not included in the Plan.

Although I know that the proposal submitted by Poundfield Products and Brett Aggregates for mineral extraction in the Gipping Valley has been excluded from the first draft of the Suffolk County Minerals and Waste Local Plan, the proposers may challenge the exclusion. This raises the possibility that their proposal (or a version thereof) will be included in the Plan, to be agreed in 2018.

I object to any development for mineral extraction in the proposed area for the reasons noted below.

**No Requirement for this Development** - SCC Mineral Planning confirm that sand and gravel demand is met by existing quarry developments with the addition of a further single more suitable site elsewhere.

**Accepted Objections to a previous application remain valid.** An application for gravel extraction near the Poundfield plant was rejected 10 years ago for reasons that remain relevant and valid to this larger development and with no mitigation in the proposed plan.

**Undermining years of effort on Environmental improvement** - The Gipping Valley has received The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
considerable support and effort from local people and Agencies to create and protect a successful haven for wildlife. This development will destroy many years of work to create a special place.

**Impact on Residents** - The gravel pits will be intrusive, noisy, dusty and ugly for 25 years of operation and then for many years whilst the scars heal to some form of restoration. There are several residences close to the development that will bear considerable impact and the village as a whole will suffer. With regard to the noise and air pollution estimates, do they take in to account the combination with current and projected pollution from the A14 during different wind conditions?

**Traffic** – It is disheartening to note that Suffolk Highways have no objections to this proposed development. They took the same position on the Poundfield developments and they have left us to run a daily gamble with the vehicles running to and from the factory. It is obvious to anybody who uses the road that it is hazardous. Although a new route is proposed for this development to avoid escalation of this problem, the plans in the Appendices state the current access still remains an option and after stage 1 it appears site traffic may need to revert to the current road. Also the proposal states the number of truck runs to Poundfield will reduce because the pit will supply the plant. Those journeys will still need to take place on the current road in order to take the processed sand and gravel to Poundfield plant so there will be no reduction.

**Footpaths** – Many rights of way and footpaths will be obliterated and the proposals to maintain them are ineffective.

I know that some of these objections are not relevant to planning criteria but they are relevant to
| E/142 | Kevin and Michaela McCarthy
DUPLICATE OF E/123 |
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<tr>
<td>Those people who live in this area and whom our elected leaders and their officials need to be supportive, active and industrious members of society. We have been badly let down by our Council through their mystifying support for the development of a farm to become a substantial concrete products factory with offices and for the commercial development at the western boundary of the Parish, despite our objections to both. It is, therefore, offensive and patronising to see both of these developments presented by the proposers as good reasons for this further development. And all of this whilst we see no progress to improve our internet access. I hope that you are able to ensure this proposal is not included in the Plan and will follow progress with great interest.</td>
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DUPLICATE OF E/123 |
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<tr>
<td>I have learnt of a possible Quarry site in our Village of Creeting St. Peter and I write to Object to this proposal. If the proposal were to go ahead it would Adverse affects on our Village. After many years of working hard, my Family and I found our Dream house. In the small Clamp Farm Hamlet. We were aware of the Proposed Mill Lane Development and realised that although we were against it such developments encroaching on the Beautiful Countryside. That progress and developments are a hard force to stop, but we do Strongly object to the Proposed Gravel Pit development. As we have already one Road which is over used and Not suitable for Heavy Lorries, which constantly cause other road Users concern, because the road is to Narrow. The Road is also becoming unsafe for Horse Riders to ride there Horses due to the volume of Heavy vehicles. I and my Family live in one of the Two Listed Buildings in the Clamp Farm Hamlet, we have tried to bring our Home back</td>
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</table>

The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not considered viable.
toits Former Glory using correct materials and Skills. The curtledge of our property is also listed which means if we wanted to do anything within our curtledge we would be unable to. So we find it Annoying that step two strides from Our boundary and anything seems to go. To have Mill Lane Development one side and then a road which would eve lope Our property seems to Us a Step to Far. The Pits & Road traffic would ruin Our lives and Lots of Others - So that a few GREEDY people could benefit from having Gravel on there Doorstep. I would suggest further Investigation take place on and around Properties owned by Poundfield Ltd Directors to see if any Gravel was available THERE. One of the main reasons for Us moving to Clamp Farmhouse was that Planning had already Been Refused to Basically the Same People on such a development. To Grant such a Development Permission would be an Unwelcome U turn for many People and Wildlife.

E/144 Nigel MacBeth

I would like to give my support to SCC’s decision not to include the proposed gravel extraction in the Gipping Valley around Creeting St Peter and surrounding areas in the counties draft mineral plan. My reasons are many but my main reason is the devastating effect any further gravel extraction would have on the archaeological sites in the area. This part of the valley is probably the last remaining example of continuous human activity spanning Prehistory through to Roman, Anglo Saxon and Medieval in the valley. If it were to go ahead then we would be removing a significant chunk of our heritage. Future generations would look upon our inability to protect
these valuable and extremely vulnerable British historical sites as no better than heritage rape. Your reasons cited in your rejection say volumes. I can only repeat them again.

5.4 The Gipping Valley has been shown the be a significant focus of human activity since prehistory. The high density of known sites supports this of all periods, recorded on the County Historic Environment Record (HER).

5.5 Phase 1 (Creeting Hall) has cropmarks of pre-modern field boundaries (CRP 017, CRP 012), a trackway (CRP 016), a medieval moated site (CRP 001) and ring ditches (CRP 002, CRP 008) are visible on aerial photography. The impact on setting of several listed buildings also needs to be considered, including grade II*, Creeting Hall. The British Geological Survey records the presence of deposits, which have the potential for Palaeolithic and Mesolithic faunal, environmental, and possible artefactual remains. Deposit modelling is needed to determine the level of this potential across the site. The water-logged nature of the deposits in this position further enhances the paleo-environmental potential of these deposits, and increases the likelihood for well-preserved organic artefacts of all periods.

5.6 Archaeological field evaluation, and deposit modelling for Palaeolithic potential, will be required at an appropriate stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. Potentially significant cost implications, and high potential for the presence of
heritage assets with archaeological interest of sufficient significance to require preservation in situ.

5.7 Phase 2 (Land S & W of Grove Farm) has cropmarks of premodern field boundaries and ring-ditches are visible on aerial-photography. The impact on setting of several listed buildings also needs to be considered. The British Geological Survey records the presence of deposits, which have the potential for Palaeolithic and Mesolithic Faunal, environmental, and possible artefactual remains. Deposit modelling is needed to determine the level of this potential across the site. The water-logged nature of the deposits in this position further Suffolk Minerals & Waste Local Plan, Grove Farm, Stowmarket, September 2017 Suffolk County Council Page 7 enhances the palaeo-environmental potential of these deposits, and increases the likelihood for well-preserved organic artefacts of all periods.

5.8 Archaeological field evaluation, and deposit modelling for Palaeolithic potential, will be required at an appropriate stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. Potentially significant cost implications, and high potential for the presence of heritage assets with archaeological interest of sufficient significance to require preservation in situ.

5.9 Phase 3 (SW of Watering Farm) has a group of two large ring ditches (CRM 014, CRM 065) the ploughed down remains of Bronze-Age burial mounds, is recorded from within the site boundary, along with evidence of both Roman and Medieval occupation (CRM 028, CRM 072). Crop marks of pre-modern field
boundaries, a possible Causewayed Enclosure, and Parallel ditches, are viable on aerial photography. The impact on setting of several listed buildings also needs to be considered. The British Geological Survey records the presence of deposits, which have potential for Palaeolithic and Mesolithic faunal, environmental, and possible artefactual remains. Deposit modelling is needed to determine the level of this potential across the site. The waterlogged nature of the deposits in this position further enhances the palaeoenvironmental potential of these deposits, and increases the likelihood for well-preserved organic artefacts of all periods. A Mesolithic bone harpoon pint (CRM 003) was found in very similar conditions 2.3km downstream. Such objects are extremely rare, both regionally and nationally.

5.10 Archaeological field evaluation, and deposit modelling for Palaeolithic potential, will be required at an appropriate stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. The features identified on aerial photography represent a rare and significant group of prehistoric monuments. These should be considered of sufficient importance to probably trigger NPPF 139, therefore requiring the preservation in situ of these important archaeological remains.

5.11 Phase 4 (Land S of Hill Farm) has crop marks of two ring ditches (CRP 003, CRM 017) and a sub-rectangular enclosure (CRP 005). The impact on setting of several listed buildings also needs to be considered. The British Geological Survey records the presence of
<table>
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<tr>
<th>E/145</th>
<th>Ian and Megan Currie</th>
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<td></td>
<td>I have just been made aware of another proposal by Poundfield Products of Grove Farm, near Creeting St Peter and Creeting St Mary to establish an aggregates quarry on the land nearby. Looking at the proposal described in the Suffolk Minerals &amp; Waste Local Plan, Grove Farm, September 2017, it talks of extraction taking place adjacent to my house on Jacks Green Road. I am extremely concerned for a number of reasons:</td>
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</table>

|       | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. As the County Council chose not to include the proposal in the draft plan consulting the local community about this specific site was considered unnecessary. Had we |
1. We received no notification of the proposal despite its direct impact to us as it is to involve quarrying the land adjacent.
2. A similar proposal was rejected owing to massive local opposition 10 year ago, and also subsequently, and nothing material has changed since then to warrant overturning the grounds for that objection. The key points being:
   - Large scale pollution to the river and local area.
   - Destruction of an area of outstanding natural beauty, (the Gipping Way) and also detrimental impact to protected flora and fauna
   - A large and detrimental, noise, dust, visual amenity and traffic impact to the local residents, in particular the unsuitability of the local infrastructure to cope with the traffic. Furthermore, the local water supply is derived from boreholes and this quarry would impact the water supply.
   - There is no economic benefit to local area to offset the massive destructive impact, few if any additional jobs will be created over an above those already established at Poundfield. The quarry will have a destructive economic impact driving tourists, walkers, and local people away from the area and damaging the local economy.
   - I note the report recommends rejection of Grove farm as a candidate site, though that rejection is qualified for some parts of the proposed sites.

I am writing to lodge my complete objection to any plans to establish any quarrying activity in the area surrounding Poundfield Products at Grove Farm, and trust you will respect and reference all previous objections by the local community, which requests that under no circumstances should any quarrying be permitted in the area, despite continued efforts by Poundfield Products to resubmit proposals. I look included this site there would have been a consultation event held in the local area. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
| E/148 | Fraser Butters | I am writing with regards to the proposal submitted by Poundfield Products and Brett Aggregates for mineral extraction in the Gipping Valley. Whilst I understand that this has been excluded from the first draft of the Suffolk County Minerals and Waste Local Plan, I wished to register my concerns as a resident - whose boundary lies next to one of the areas of potential mineral extraction – in case the decision is challenged by the proposers. For years we have had to put up with Poundfield Products gradually increasing the size and scope of their business as a concrete factory in the Gipping Valley with the resultant increase in noise, light, dust and traffic pollution as well as the visual blight it has created on the landscape. It beggars belief that they now want to create a 150+ acre site for mineral extraction with all of the additional issues that will cause for the local area. For the many good reasons why the proposal has been refused already by SCC – and for many more that, although they might not be recognised as traditional planning criteria, are hugely valid for local residents - I just wanted to register my support for that decision and a wish that any objection or resubmission by Poundfield is rejected. If necessary, and if it helps, I am more than happy to discuss this with you further at your convenience. |
| E/150 | Rebecca McPhie | I am writing to register my support for Suffolk County Council to uphold their understandable and justifiable exclusion of Grove Farm in the Minerals and Waste local plan, in light of the recent proposal submitted by Poundfield Products and Brett Aggregates. I object to the proposal on the following grounds: The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable. |
Environmental: The section of the Gipping Valley included in the application is the only section of the valley which is untouched. There are otters, water voles, roe deer and many other species which are regularly seen walking through the area, and the area should be protected. To include the proposal in the local plan would lead to further erosion and destruction, not just of the landscape but the habitat of the wildlife within it. Urban sprawl. The land in the proposal acts as a natural and physical barrier between Stowmarket and Needham Market. To include the proposal within the local plan would be to link Stowmarket East Mill Lane Development with Needham Market. The area between them should be preserved. Pollution: Air and Noise: The very nature of sand and gravel extraction would lead to a significant decrease in air quality. I cannot see how, even with mitigating steps to minimise pollution, how dust can be contained - not just polluting the landscape for householders and voters, but also, dust which will drift onto the A14. There is already a significant amount of noise pollution, even within the boundaries of the current site. Any extension of the site boundaries would make noise pollution intolerable for local residents. Poundfield Products continually ignore planning restrictions, despite community objections and there are regular 'near misses' on Creeting Road due to existing HGV traffic, wholly unsuitable for the road. Poundfield Products have no respect of the local population as things stand, for their environment or safety. There is no need for this site: SCC Mineral Planning have confirmed Sand and Gravel demand is already met by existing quarry developments, and I urge officers to uphold their decision and continue to exclude Grove Farm as a suitable site. IT IS NOT. Does a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
<table>
<thead>
<tr>
<th>E/152</th>
<th>Mark Mathewson</th>
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<td><strong>I wish to put on record my concerns and reservations regarding the contesting of the application by Grove Farm to extract gravel and sand. This application, previously refused, has grown in ambition and scale but my concerns remain and I would advocate it is again rebutted by the planning officers.</strong></td>
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<td>My issues are:-</td>
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<td>The removal of considerable quantities of soil, sand, gravel and other fundamental compounds and elements will draw water from our wet woodland into the void thereby created. Wet woodland is an important and diminished habitat and there is no consideration in the plan for its protection. I accept that there is suggestion that prophylactic measures will be expected but they are neither mandated nor outlined. The Fen Lane work to the East of the A14 would place an unacceptable burden on a one track lane unsuited to large pantechnicons. It would also significantly alter the landscape of the area and the ingress and egress routes of the red deer population frequenting the wet woodland.</td>
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<td>The extent of the application is a mere amplification of desire to extract minerals already amply supplied within the Suffolk minerals plans. The plan expects an additional 80 HGVs on the roads daily and the current levels are already nearing critical levels where an accident is just waiting to happen. More large vehicles will exacerbate this and in many places having one coming from each direction might result in the road</td>
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becoming blocked. I accept there is a small potential for some employment but there is no contingency on it being to local residents. I am aware that development is important but the benefits to the local community are minimal if even realisable. I would therefore like to add my objection to this development.

Although I know that the proposal submitted by Poundfield Products and Brett Aggregates for mineral extraction in the Gipping Valley has been excluded from the first draft of the Suffolk County Minerals and Waste Local Plan, the proposers may challenge the exclusion. This raises the distinct possibility that their proposal (or a version thereof) will be included in the Plan, to be agreed in 2018. I object to any development for mineral extraction in the proposed area for the reasons noted below.

**No Requirement for this Development** - SCC Mineral Planning confirm that sand and gravel demand is met by existing quarry developments with the addition of a further single more suitable site elsewhere.

**Accepted Objections to a previous application remain valid.** An application for gravel extraction near the Poundfield plant was rejected 10 years ago for reasons that remain relevant and valid to this larger development and with no mitigation in the proposed plan.

**Undermining years of effort on Environmental improvement** - The Gipping Valley has received considerable support and effort from local people and Agencies to create and protect a successful haven for wildlife. This development will destroy many years of work to create a special place.

**Otters**

I have personal evidence of Otters active in the River Gipping in the direct vicinity of the proposed

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<th>E/153</th>
<th>Matt Hurst</th>
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<td>The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.</td>
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development – as I’m sure you are aware; Otters are a European protected species (EPS) and are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981. This proposal would directly impact their habitat around the River Gipping area. **Impact on Residents** - The gravel pits will be intrusive, noisy, dusty and ugly for 25 years of operation and then for many years whilst the scars heal to some form of restoration. There are several residences close to the development that will bear considerable impact and the village as a whole will suffer. With regard to the noise and air pollution estimates, do they take into account the combination with current and projected pollution from the A14 during different wind conditions? **Traffic** – It is disheartening to note that Suffolk Highways have no objections to this proposed development. They took the same position on the Poundfield developments and they have left us to run a daily gamble with the vehicles running to and from the factory. It is obvious to anybody who uses the road that it is hazardous. Although a new route is proposed for this development to avoid escalation of this problem, the plans in the Appendices state the current access still remains an option and after stage 1 it appears site traffic may need to revert to the current road. Also the proposal states the number of truck runs to Poundfield will reduce because the pit will supply the plant. Those journeys will still need to take place on the current road in order to take the processed sand and gravel to Poundfield plant so there will be no reduction. **Footpaths** – Many rights of way and footpaths will be obliterated and the proposals to maintain them are ineffective. I know that some of these objections are not relevant to planning criteria but they are relevant to
those people who live in this area and whom our elected leaders and their officials need to be supportive, active and industrious members of society. We have been badly let down by our Council through their mystifying support for the development of a farm to become a substantial concrete products factory with offices and for the commercial development at the western boundary of the Parish, despite our objections to both. It is, therefore, offensive and patronising to see both of these developments presented by the proposers as good reasons for this further development. And all of this whilst we see no progress to improve our internet access. I hope that you are able to ensure this proposal is not included in the Plan and will follow progress with great interest.

M/34 Jonathan Worsley, PDE Consulting Ltd

Suffolk Minerals & Waste Local Plan, Preferred Options Consultation, December 2017 Barton Mills Quarry – Inert Waste Disposal and Inert Recycling With reference to the above, we are writing to you on behalf of our client Needham Chalks Limited and specifically in regard to their existing operations at Barton Mills Quarry. We are writing to object to the failure to include Barton Mills Quarry in the draft plan. Since the report’s publication planning permission reference SCC018217F was granted on 16 November 2017. With the granting of this planning permission it is clear that the development, as described in the Site Selection Report, aligns with Suffolk County Council’s planning policy on all accounts. Therefore it is clear that there should be no reason as to why this Site is not included in the draft plan.

The minerals site identified within the plan were new sites or extensions to sites to provide an appropriate landbank of sand and gravel. The application you have quoted is not a new site, but an application to continue working an existing site, so it is not appropriate to identify it as a proposal in the plan.

No new waste sites (other than Sizewell A) have been identified in the plan as the Suffolk Waste Survey has not identified a need for new waste sites.

However, the site is safeguarded as a minerals working in appendix 3 of the plan and can be seen on Map FH4.
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<tr>
<th>M/47</th>
<th>Milly Butters</th>
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<tr>
<td><strong>Grove Farm Quarry – Stowmarket – Objection</strong></td>
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| - Further erosion and destruction of the Gipping River Valley  
- Footpaths – the proposal will impact a number of public footpaths in the parish which are popular routes for local and visiting walkers leading down to the Gipping River Path from the village  
- Pollution – despite any mitigating steps there will be pollutions in terms of sand/dust particularly as this is an open landscape with prevailing westerly winds  
- Noise – again with the open landscape and prevailing wind this will bring noise pollution from the operations and vehicle movements  
- Outlook/landscape – already blighted by a huge industrial complex with 24/7 lighting at the Grove Farm Poundfield site this would further ruin our views around the village  
- Urban sprawl – it is noted the proposal seeks to tie in with the Stowmarket East Mill Lane Development – it will result in urban sprawl and further destruction of the countryside |

The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
- Traffic – the application proposed to develop a route through Stowmarket East in what is an area designated for wildlife
- Proposal is to the detriment of many for the gain of the few
- SCC Mineral Planning have confirmed Sand and Gravel demand is already met by existing quarry developments with the addition of a further single more suitable site therefore there is not requirement for this site.

I hope you will duly consider my views in reaching a decision.

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<tr>
<th>M/48</th>
<th>Virginia Taylor</th>
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<tr>
<td><strong>Grove Farm Quarry – Stowmarket – Objection</strong></td>
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this is an open landscape with prevailing westerly winds

- Noise – again with the open landscape and prevailing wind this will bring noise pollution from the operations and vehicle movements

- Outlook/landscape – already blighted by a huge industrial complex with 24/7 lighting at the Grove Farm Poundfield site this would further ruin our views around the village

- Urban sprawl – it is noted the proposal seeks to tie in with the Stowmarket East Mill Lane Development – it will result in urban sprawl and further destruction of the countryside

- Traffic – the application proposed to develop a route through Stowmarket East in what is an area designated for wildlife

- Proposal is to the detriment of many for the gain of the few

- SCC Mineral Planning have confirmed Sand and Gravel demand is already met by existing quarry developments with the addition of a further single more suitable site therefore there is not requirement for this site.

I hope you will duly consider my views in reaching a decision.
I have learnt of a possible quarry site in our village of Creeting St Peter and write to object to this proposal. If the proposal were to go ahead it would have the following adverse affects on our village:

- Further erosion and destruction of the Gipping River Valley
- Footpaths – the proposal will impact a number of public footpaths in the parish which are popular routes for local and visiting walkers leading down to the Gipping River Path from the village
- Pollution – despite any mitigating steps there will be pollutions in terms of sand/dust particularly as this is an open landscape with prevailing westerly winds
- Noise – again with the open landscape and prevailing wind this will bring noise pollution from the operations and vehicle movements
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and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
| M/50 | Mr and Mrs Bahar | Re: Poundfield Products and Brett Aggregates proposal for a pit in the new Suffolk Minerals and Waste Local Plan

We have recently heard there is another application put forward for extraction from the above site. We have lived for forty years in Flint Hall after extensive work and resources to make it liveable. We now find the extraction site will extend in close view of all windows in our house.

As we are now in our late seventies we enjoy watching the many countryside walkers, families and young people we see regularly enjoying walking footpaths through the greenfield sites around us. All this will be lost by the extraction for financial gain. This should not happen. The wildlife around us we see daily will be destroyed, not just detrimental to us but to all those that come to see this lovely part of Suffolk and for those still to come.

The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.

- Proposal is to the detriment of many for the gain of the few
- SCC Mineral Planning have confirmed Sand and Gravel demand is already met by existing quarry developments with the addition of a further single more suitable site therefore there is not requirement for this site.

I hope you will duly consider my views in reaching a decision.
Please think carefully and considerately before allowing a massacre of our wildlife and countryside. There are other sites that would not have such devastating effects on all around them as this would.

We seriously object to this project.

<table>
<thead>
<tr>
<th>M/51</th>
<th>Robert W Warnes</th>
<th>Re Proposed Sand and Gravel extraction – Grove Farm Creeting St Peter – OBJECTION</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>I understand there is a proposal to include the above site into the Suffolk County Council’s mineral extraction policy and I wish to object to this on the following points:</td>
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<td>1) The outlook and landscape of the proposed site already had an industrial operation in place and it seems the above would enlarge this many times over and in the process destroy the Gipping River Valley</td>
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<td>2) As with any quarry there would be a large degree of pollution which would be very difficult to mitigate as this is a very open landscape and dust and sand would be blown in all directions. Again, another form of pollution would be the noise from the quarry plant and vehicles</td>
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<td>3) This proposal would bring a long period of misery for many people in the area.</td>
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<td>4) I understand that the existing Suffolk County Council policy on minerals extraction already satisfies the present and future demands so there is no need for this development</td>
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</table>

The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not included as the resource is not considered viable.
<table>
<thead>
<tr>
<th>M/52</th>
<th>Lesley Warnes</th>
<th>Re my OBJECTION to the proposed Sand and Gravel extraction at Grove Farm Creeting St Peter</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>I am so saddened at the prospect of having our surrounding environment ruined. We have lived here for 40 years and this is one of many attempts to ‘do something’ with the land around us. I really cannot see the need for such massive industrialisation of what is the beautiful countryside of the Gipping Valley.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Apart from the desecration of the countryside the impact on resident’s regarding noise, dust, lorry movements, light pollution and most importantly the devaluation of our homes which have a lifetime’s input into them.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>There is surely no requirement for this site.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>I trust you will consider my comments when arriving at your decision.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>M/53</th>
<th>Trevor Butters</th>
<th>Grove Farm Quarry – Stowmarket – Objection</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>I have learnt of a possible quarry site in our village of Creeting St Peter and write to object to this proposal. If the proposal were to go ahead it would have the following adverse affects on our village:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Further erosion and destruction of the Gipping River Valley</td>
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</tbody>
</table>
|      |                | The Grove Farm site near Needham Market, Creeting St Mary and Creeting St Peter is not included in the draft plan and the County Council will not include it in the next draft. Due to a number of constraints within the area (mainly proximity to nearby residents), only a small proportion of the proposed site was extractable and so it was not considered viable.
| | Footpaths – the proposal will impact a number of public footpaths in the parish which are popular routes for local and visiting walkers leading down to the Gipping River Path from the village |
| | Pollution – despite any mitigating steps there will be pollutions in terms of sand/dust particularly as this is an open landscape with prevailing westerly winds |
| | Noise – again with the open landscape and prevailing wind this will bring noise pollution from the operations and vehicle movements |
| | Outlook/landscape – already blighted by a huge industrial complex with 24/7 lighting at the Grove Farm Poundfield site this would further ruin our views around the village |
| | Urban sprawl – it is noted the proposal seeks to tie in with the Stowmarket East Mill Lane Development – it will result in urban sprawl and further destruction of the countryside |
| | Traffic – the application proposed to develop a route through Stowmarket East in what is an area designated for wildlife |
| | Proposal is to the detriment of many for the gain of the few |
| | SCC Mineral Planning have confirmed Sand and Gravel demand is already met by existing quarry developments with the addition of a further single more suitable site therefore there is not requirement for this site. |
| | included as the resource is not considered viable. |
I hope you will duly consider my views in reaching a decision.

<table>
<thead>
<tr>
<th></th>
<th>Respondent</th>
</tr>
</thead>
<tbody>
<tr>
<td>M/59</td>
<td>Fiona Cairns, Suffolk Preservation Society</td>
</tr>
<tr>
<td>E/90</td>
<td>Heaton Planning</td>
</tr>
<tr>
<td>E/91</td>
<td>Highways England</td>
</tr>
</tbody>
</table>

21. **CONTACT DETAILS**

<table>
<thead>
<tr>
<th>Number</th>
<th>Respondent</th>
</tr>
</thead>
<tbody>
<tr>
<td>SM/1</td>
<td>Dr Michael Bamford</td>
</tr>
<tr>
<td>SM/2</td>
<td>Spencer Deakin</td>
</tr>
<tr>
<td>SM/3</td>
<td>Miles Cooke</td>
</tr>
<tr>
<td>SM/4</td>
<td>Peta Jessemey</td>
</tr>
<tr>
<td>SM/5</td>
<td>Richard</td>
</tr>
<tr>
<td>SM/6</td>
<td>Mark Blackburn</td>
</tr>
<tr>
<td>SM/7</td>
<td>E J Peake</td>
</tr>
<tr>
<td>SM/8</td>
<td>Steve Woolnough</td>
</tr>
<tr>
<td>SM/9</td>
<td>Kate Dinnes</td>
</tr>
<tr>
<td>SM/10</td>
<td>Kaye Brooks</td>
</tr>
<tr>
<td>SM/11</td>
<td>Paul Banjo</td>
</tr>
</tbody>
</table>