

04 September 2023

Mr Andrew Sierakowski
Planning Officer
Suffolk County Council
Endeavour House
8 Russell Rd, Ipswich IP1 2BX

Dear Mr Sierakowski

**SCC/0105/22B Extraction, processing and sale of sand and gravel, processing of inert waste materials and concrete batching with associated plant and related sales, associated access works, phased restoration using inert recovered materials and aftercare plan
Brockley Wood land off A12, Belstead Suffolk IP8 3JS**

I am writing on behalf of the Suffolk Preservation Society in response to the above application to raise our significant concerns about the likelihood of severe environmental impacts. The site is within the Suffolk Coast and Heaths AONB Project Area and the Management Plan 2018-23 defines the Project Area as a Valued Landscape. In the terms of the NPPF, this means that the site has demonstrable physical attributes which would take this site beyond mere countryside. The site has been allocated for sand and gravel extraction in the SCC Minerals and Waste Local Plan 2020 under site allocation policy MS3. The site is within 300m of Bentley Old Hall, a grade II* hall house which has retained its largely unaltered, remote and rural setting defined by large blocks of ancient woodland and working arable landscape. For these reasons the applications has the potential to give rise to significant impacts on sensitive the natural and historic built environment.

We defer to others to comment on noise and ecology matters, and limit our comments to those relating to landscape and heritage. On that basis we wish to make the following comments:

1. Policy framework

It is of concern that the application goes beyond the policy provision of local plan policy MS3 and includes industrial processes of concrete batching, involving significant importation of materials onto the site. This intensification of the allocated land use is unwelcome in this very sensitive location. The increase in HGV movements, increased noise levels, dust generation and scale of plant required to deliver this process will significantly exacerbate the impacts upon the character of landscape and setting of Bentley Old Hall.

2. Impact on landscape character

The site is within the Suffolk Coast and Heaths AONB Project Area. The AONB Management Plan (2018-23) defines the Project Area as a Valued Landscape, which in the terms of the NPPF means that it has demonstrable physical attributes which would take this site beyond mere countryside.

This is a material planning consideration that must be given significant weight in the planning balance. The site is bounded to the south and east by three important blocks of ancient woodlands which make an important contribution to the landscape character of the area. The adjacent woodlands are County Wildlife Sites and contain highly sensitive and important habitats. The site is currently in agricultural use but contains evidence of the remnants of ancient woodland, which is a defining characteristic of the wider setting of the site.

The Arboricultural Assessment identifies a total of 46 trees will be lost as a consequence of this development (19 for the haul road and 27 for the quarry). The report also states that 8 of these 46 trees are classified as veteran trees. The loss of such ancient woodland is wholly unacceptable. NPPF para 180c states that *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*. In the opinion of the Society there are no exceptional reasons for the loss of these important trees, and the compensation strategy that is offered is wholly inadequate and does not outweigh the substantial loss of natural capital.

3. Landscape and visual impact

While the Landscape and Visual Impact report highlights the temporary nature of the works (15 years) it does not, in the opinion of the Society, accurately evaluate the impact (both visual and aural) that this scheme will create. The site 1b is located at the southern end of the site closest to Bentley Old Hall. Much of the associated plant is large scale, for example, the washing plant ranges from 7m – 10m in height, the batching plant 6m-15m and the washing and scrubbing plant in the region of 6m-9m in height. The proposed landscape buffer is limited to only 10m and this will take some time to create effective screening, furthermore, this will be much reduced during the winter months.

Therefore, the Society does not agree with the applicant that the existing landscape features and proposed mitigation will ameliorate the visual impacts experienced by receptors from around the site and justify the conclusions drawn by the LVIA report that *the proposed development will lead to a minor adverse landscape effect. This can be mitigated through the proposed restoration scheme, which plans to restore site topography and offset the required removal of trees and hedgerow*. This conclusion is superficial and significantly underestimates the likely impacts of locating the concrete plant at the southerly end of the site, closes to the pristine parts of the Valued Landscape and designated heritage asset. The report fails to properly identify and assess the genuinely harmful visual impacts to receptors including residents, footpath users and those who are custodians of our heritage assets, and therefore its conclusions should be given very limited weight in the decision-making process.

4. Inadequate detail on proposed lighting

The site will be lit for security and operational reasons. It is therefore of genuine concern that the lighting report is so limited in terms of detail and does not give information on the height of the columns, or an assessment of light pollution. The site is within the AONB Project Area and one of its important characteristics is dark skies. The introduction of security lighting as part of an intensive industrial processing plant will detract from the dark skies, especially close to the south and eastern ends of the site.

5. Inadequate landscape buffer

We note from the Arboricultural report that the proposed buffer between the quarry and the adjacent woodlands is only 10m. A number of consultees have raised concerns about impacts to biodiversity by this development as well as the negative impacts of noise on residential amenity. Therefore, it is essential that if this application is to be supported it must significantly increase buffer zones to mitigate impacts including visual, noise as well as ecological impacts. The [NPPG](#) recommends that buffer zones around ancient woodlands should be *at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.... For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. ...Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.* Therefore, in accordance with national guidance the proposed buffer zones should be significantly increased to protect amenity, heritage and biodiversity.

6. Setting of Bentley Old Hall, Hall – Views of silos impacting setting when approaching from the south – CHECK

Policy MS3 of the Local Plan recognises the setting of Bentley Old Hall as a constraint in the allocation of this site, namely: *Proposals should adequately assess if there would be potential impacts upon Bentley Old Hall which is a Grade II* listed building and propose suitable mitigation if required.*

The A12 runs to the west of the site and has in large part redefined the rural landscape of Belstead. However, the application site provides a buffer between the A12 and Bentley Old Hall, ensuring that its agricultural setting is maintained. The deeply rural, tranquil landscape setting of open fields and a woodland backdrop make a strong contribution to the significance of the 14th century farmhouse. The presence of the Brockley and Old Hall Woods to the south and east of the site has also added to the remarkably unspoilt and tranquil setting of the grade II* building.

The proposal would mean that when approaching the heritage asset from the south along the PROW, Bentley Old Hall will be viewed in context with the site which is only 300m to the north. The proposed siting of phase 1b with its concrete plant and wash plant on the most southern boundary will exacerbate these harmful impacts and further erode this tranquil setting of the farmhouse, and represent an industrial intrusion into this unspoilt ancient landscape.

The topography of the site means that Bentley Old Hall is set lower than the proposed quarry and concrete batching site, and consequently will have a greater likelihood of visual and noise intrusion. This impact upon the tranquility would harm the setting of the building, and thereby its significance, contrary to local and national policy. As a grade II* building is an irreplaceable resource and should be conserved in a manner appropriate to its significance. Accordingly, the planning authority has a statutory duty to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

The heritage assessment concludes that *Due to the temporary nature of the development, set operational hours, and lack of visual impact between these assets and the Site, it is considered that the proposed development will result in less than substantial harm (lower end) to the significance of Bentley Old Hall. Nevertheless, the assessment does recognise that this noise may damage the idyllic setting of these assets during operational hours.* The Heritage Impact Assessment does not follow best practice as set out in The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), which states that the applicant should explore ways to maximise enhancement and avoid or minimise harm. In this case the magnitude of harm to the setting of Bentley Old Hall could be mitigated by the re-siting of the wash and concrete plant closer to the A12 altogether with a significantly increased landscape buffer on the southern boundary to ameliorate visual impacts, especially during the winter months when levels of natural screening will be reduced.

In conclusion, if this application is to go forward with a positive recommendation it is essential that the layout of the site is reviewed to move industrial process, should they be acceptable, closer to the A12. Mitigation in the form of additional woodland planting to join up Blockley and Old Hall wood could be explored to provide a landscape legacy for the AONB Project Area.

We trust that you will find these comments helpful and would ask to be consulted on any amendments to the application.

Yours sincerely

Fiona Cairns MRTPI IHBC
Director

Cc: Cllr Richard Rout, SCC Cabinet Member for Finance and the Environment
Cllr Richard Smith MVO, SCC Cabinet Member for Economic Development, Transport Strategy and Waste
Bentley Parish Council
Belstead Parish Council
Beverley McClean, AONB Partnership
Mark Barnard, Suffolk County Council