Matter 1: Duty to co-operate and legal issues

1. The Draft Plan appears to dismiss marine aggregates out of hand without giving them any serious consideration, which is contrary to the policies in the framework. We think that this is a serious error which has led to the completely unnecessary and unjustified proposal to excavate in the AONB at Wangford, for the reasons listed below.

1.1. The NPPF (2012) para. 145 first bullet point states that MPA’s should assess all supply options, including marine dredged (ref. ii)). Please see also the current version of the NPPF para. 207.a).

1.2. The Crown Estates Marine Aggregates Report 2018 indicates that approximately 250,000 tonnes of marine dredged aggregate was landed in Ipswich in 2017, and that very little of this aggregate was used in Suffolk. The entire proposed annual output from Wangford Quarry is significantly less than this total (ref. iii) page 7).

1.3. Crown Estates also indicate in their report that there is a clear excess of licensed over actual marine aggregates extraction in the Eastern Region. The permitted take is 7.93 million tonnes per year, the 3 year average actual take is 4.35 and the 10 year maximum take is 6.08. (Ref iii) page 3).

1.4. In their responses to the March 2018 consultation, Brett Aggregates say that marine aggregates are very important in Suffolk, and they look forward to enhancing their wharf operations in Ipswich as required to supply the Suffolk market (ref. iv)).

1.5. Associated British Ports, together with potential customers, is giving active consideration to using their Wharf Site W3 within the Inner Harbour area of the Port of Lowestoft for the import of aggregate, a use for which ABP consider there to be a clear demand (ref. v)).

1.6. Ipswich and Lowestoft are close to the major demand centres for aggregates from Wangford, so could conveniently replace the output from Wangford, and reduce the lorry traffic along the A12.

1.7. The cost of marine dredged aggregates is said to be now close to that of land won aggregate (ref. vi)).

1.8. SCC have no specific policies regarding marine dredged sand and gravel other than the safeguarding of wharves (5.19 to 5.22 of ref. i)). Points 1.1. to 1.7. above demonstrate the need to explicitly consider using marine dredged aggregate, as well as imported crushed rock, as an alternative to quarrying in the AONB, which SCC have failed to do.

2. As mentioned in our previous submissions to SCC, there have been a number of developments in the AONB in Reydon approved by Waveney District Council and in Wangford approved by Suffolk County Council. This proposal,
if it went ahead, would result in a near complete ribbon development from the A12 through Reydon and into Southwold (Ref. ix) Fig: 5.1 page 8).

2.1. The NPPF states that the cumulative effect of developments adding up should be avoided (para. 143 sixth bullet point, para. 144 third bullet point). It appears clear that there has been insufficient co-operation between SCC and WDC to avoid this happening.

2.2. For an example of a planning authority not following NPPF guidelines, please see Ref. viii) Section 11 and para. 4.31 on page 43 (Reydon Solar Array development).

3. The Suffolk Minerals Core Strategy 2008-2021 Policy DC1 states that “proposals that would have an adverse effect on landscape character and/or historic features of a Suffolk Landscape Type will not be permitted”. Further development at Wangford, which would have an adverse effect on the landscape character, is contrary to this Council Policy (ref. vii)).

References:


iv) Suffolk Minerals and Waste Local Plan Responses to Preferred Options Consultation March 2018 – page 47.

v) Associated British Ports - Minerals and Waste Local Plan Publication Stage Representation to these hearings.


ix) Opposition to the inclusion of Wangford Quarry Extension (Policy MS7) in the draft Suffolk minerals and Waste Local Plan 2018 by Aileen and William Irving.
Glossary:-

AONB – (Suffolk Coast and Heaths) Area of Outstanding Natural Beauty

MPA – Minerals Planning Authority

NPPF – National Planning Policy Framework

SCC – Suffolk County Council