Matter 3 – Minerals policies and sites

Issue 1 - Whether the policies are positively prepared in terms of making adequate provision for minerals.

The Suffolk Minerals and Waste Local Plan allocates land for 31% more minerals provision than what is required. This is considered excessive in the context that it includes an allocation for minerals extraction at Wangford (Policy MS7) which is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. The removal of this allocation would still result in an over provision of 20%. An overprovision of 20% would result in a plan, when taken as a whole, could be considered positively prepared with respect to minerals provision.
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Issue 2 - Whether the policies are consistent with national policy with specific regard to protection of the environment.

As stated in the representations made at Regulation 19 by Waveney District Council, it is not considered that Policy MS7 Wangford is consistent with national planning policy, particularly with regard to the protection of the environment. Unless further evidence is submitted justifying the allocation, the allocation should ideally be removed in order for the plan to be sound. Alternatively, the policy criterion referred to in question 78 as discussed in the District Council’s Matter 3 Issue 3 statement should be added to the policy.

Area of Outstanding Natural Beauty

The Suffolk Coast and Heaths Area of Outstanding Natural Beauty is an important resource to East Suffolk. The Council understands and support the sustainable extraction of minerals to support economic growth and development. However, the Council considers that the expansion of quarrying in the Area of Outstanding Natural Beauty should be an absolute last resort.

The District Council maintains that there is insufficient evidence supporting the plan to demonstrate that the allocation is consistent with paragraphs 172 and 205 of the National Planning Policy Framework.

The response to Waveney District Council’s representations made at Regulation 19 by Suffolk County Council (March 2019) does not sufficiently address the concerns raised about the investigation of alternative sites which could yield a similar quality material. The County Council stated in their response that the site sits within the Norwich market area and deposits in Norfolk are generally quite sandy. However, there is no evidence presented to justify this argument and no evidence of discussions between Suffolk and Norfolk County Council about the provision of higher quality aggregates which would demonstrate the need for this quarry. The County Council in their response do not address the concern raised in the District Council’s representations with regard to the investigation of potential deposits on alternative sites adjacent to existing quarries or elsewhere within the extensive Minerals Consultation Area which were not submitted during the ‘call for sites’.

The District Council maintains that irrespective of the quality of material, the significant over-allocation of minerals provision of 31% in the plan undermines the need for this site, which if developed could have a significant impact on the Area of Outstanding Natural Beauty.
Heritage Impact
The District Council’s representations at the Regulation 19 stage raised concern about the lack of evidence on the impact of the site allocation on the historic environment. The site is in close proximity to two grade II listed buildings Reydon Grange, and Reydon Hall and could be considered to be in the setting of these listed buildings. The response to the District Council’s representations by Suffolk County Council (March 2019) argues that an assessment of heritage assets was carried out as part of the site selection process as document in the Site Selection Report (EB22). They add that this conclude no historic buildings would be affected.

Given the close proximity of the listed buildings and the fact that the site could be considered to be in the setting of these buildings, the detail in the Site Selection Report (EB22) is not sufficient to demonstrate that there will be no impact. The constraints plan in Appendix 4 of the Site Selection Report does not even identify listed buildings as a constraint. There is no consideration of the extent of settings of the listed buildings or the impact on the significance of the settings by a new quarry operation.

Traffic Issues
The District Council’s representations at the Regulation 19 stage questioned whether any traffic modelling had taken place to support the proposed allocation given the capacity issues identified on nearby junctions on the A12 from evidence supporting the Waveney Local Plan. The County Council’s response to these representations (March 2019) indicate that traffic modelling is not required as the highway access is long established. However, if there is an intensification of traffic associated with the expansion to the quarry there will be more traffic using the A12 which could have an impact on the functioning of junctions. Therefore, it is uncertain whether the allocation could lead to severe impacts on the road network as per paragraph 109 of the NPPF.
Matter 3 – Minerals policies and sites

Issue 3 - Whether specific policy requirements are justified and effective.

Policy MP10 – Question 49 - Should the last paragraph of the policy refer to ‘minerals consultation area’?

It is considered that Policy MP10 as submitted is not clearly worded with regard to the extent of Minerals Safeguarding areas. The suggested change would help but is not sufficient. Clarification is needed in part a) of the policy as to whether Minerals Consultation Areas and Minerals Safeguarding areas share a common (contiguous) border or whether they are designations covering separate areas. The Policies Map should also be amended to clearly show the extent of Minerals Safeguarding Areas if these are different to Minerals Consultation Areas.

Policy MS7 – Question 78 - Should the policy require demonstration of exceptional circumstances for development in the Area of Outstanding Natural Beauty (AONB), as required by national policy?

Whilst it is not normal practice to repeat national planning policy in local policy, the District Council considers in this case, should the allocation remain in the Local Plan, the policy should include a requirement to this effect.

As outlined in the District Council’s representations made during the Regulation 19 stage and in Council’s Hearing Statement for Matter 3, Issue 2, the Council considers there is insufficient evidence at this stage to demonstrate that the exceptional circumstances required by paragraph 172 of the National Planning Policy Framework have been met.

However, if the policy and supporting text made clear and reinforced that the principle of development is conditional upon the exceptional circumstances being demonstrated at the time of a planning application, this would address some of the District Council’s concerns. This would clearly result in a situation where the allocation could not be relied upon to meet minerals needs as there will still be uncertainty as to whether the site could be developed. However, this would not be a problem given the significant over-allocation of provision in the plan.

The supporting text or the policy could usefully set out what evidence and supporting documentation would be required to demonstrate this. This could include an assessment of supply and demand of minerals resources at the time of the application, alternative options as well as evidence on landscape impact and mitigation.