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Mr John Pitchford,  
Suffolk County Council  
Minerals and Waste Policy  
Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

24 July 2019

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Dear Mr Pitchford

## **Examination of Suffolk Minerals and Waste Local Plan - Policies MP2(g) and MS7**

Following the completion of the recent hearing sessions and based on all that I have now read and heard, I write to set out my interim findings on the submitted Policies MP2(g) and MS7: Wangford. However, I emphasise that these are not my final conclusions and that these findings may be subject to change dependent upon, amongst other things, the consultation on any proposed modifications.

In summary I conclude that the inclusion of Policies MP2(g) and MS7 are likely to mean that the Plan is unsound and that modifications deleting those policies are necessary to make the Plan sound. The reasons for my finding, in summary are as follows.

The site is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). The National Planning Policy Framework (the Framework) states that great weight should be given to conserving landscape and scenic beauty in AONB, which have the highest status of protection. The Framework states that permission should be refused for major developments in these areas except in exceptional circumstances. Considerations as to whether there would be exceptional circumstances are set out in paragraph 116 of the 2012 Framework.

The aggregate material at Wangford comprises a significant element of coarse gravel which is an important component in the manufacture of concrete and concrete products. The site is well located in terms of major markets in Norwich and Ipswich giving it a commercial advantage in comparison to sites that are accessible to only one of those centres. Sand and gravel occur throughout East Anglia, but most reserves have a high sand content and coarse gravel is less common. This material is produced at the existing Wangford quarry, but this has a limited lifespan. The operator also has a quarry at Bradwell in Essex which produces similar material, but this is 60 miles to the south. There are further quarries operated by other companies in East Anglia which produce similar material, although the operator is not aware that any of these could increase their production to compensate for the loss of the existing Wangford quarry.

Although there is a commercial justification for the proposed allocation on the basis of its distance from major markets and the material that would be extracted, it has not been conclusively demonstrated that there will be any regional shortfall of this material over the Plan period. For this reason, it is unlikely that allocation of the site could be justified on the basis of need as an exception to the requirement in national policy that the landscape and scenic beauty will be conserved. In coming to this view, I have taken into account the stated benefits to the local economy and the potential for enhancing public access and biodiversity as part of restoration.

The allocated sites in the submitted Plan would provide for about 31% more sand and gravel than is needed. On the basis that the allocated sites would provide for 12.18Mt to be worked within the Plan period, omission of the site would still provide for 11.18Mt, significantly more than the 9.3Mt required. Allocation of the site is thus not necessary to meet the identified need.

In addition to my finding on the need for the development, the proposal would be harmful to the landscape. Following the working, the landform would be altered, and this would not be consistent with national policy in terms of conservation of the landscape. If the site were to be allocated detailed restoration guidelines could potentially be included in the Plan. However, the harm to the protected landscape during the period of working would not be consistent with national policy.

While the details of any proposal would be matters to be considered under a planning application, I am concerned that allocation of the site is not justified in terms of need and that it is likely that any development would be inconsistent with national planning policy. For these reasons I find that Policies MP2(g) and MS7 would not be sound.

I will provide further comments in response to the schedule of modifications that has been provided but ask that this letter is considered in finalising the schedule.

Yours sincerely

*Nick Palmer*

INSPECTOR