

SUFFOLK MINERALS & WASTE PREFERRED OPTIONS

CONSULTATION: JUNE-JULY 2018

RESPONSE OF THE STOUR & ORWELL SOCIETY

THE STOUR & ORWELL SOCIETY WAS FOUNDED IN 2006 AND HAS OVER 250 MEMBERS WHO CARE FOR THE ENVIRONMENT OF THE STOUR & ORWELL AONB AND THE ADJOINING SPECIAL PROJECT AREA.

1. The Stour & Orwell Society (“SOS”) has considered its representations in Committee and these are now set out below. Representations are confined to 4 topics: (1) overall provision as described in paragraphs 5.31-5.34 of the Draft Plan and (2) to (4) proposed minerals sites at Belstead (MS3), Tattingstone (MS6) and Wherstead (MS9).
2. In respect of the General Minerals Policies set out in Chapter 5 and in particular at paragraphs 5.31-5.34, SOS disputes that it is necessary or sensible to plan for such a large over-provision. There is a shortfall of 9.3 Mt over the very lengthy 20 year plan period. Yet it is proposed to allocate land for 14.77 Mt. This is nearly a 60% excess. Even assuming that only 12.180 Mt is worked during the plan period, that is a 31% excess. Mineral workings are **not** benign, but often result in complete displacement of land uses, noise and disruption to communities and to ecosystems and the disfigurement for lengthy periods of beautiful and historic landscapes. There is a completely inadequate justification in the consultation document for the gross overprovision in the plan, which will also act as a discouragement to sustainable investment in recycled aggregate products.
3. This gross over-provision can be addressed in part by deleting some of the poorest sites. SOS’s area of interest is inevitably spatially restricted and comments are confined to this area. Generally, we would ask where do we find consideration of the setting of the Suffolk Coasts & Heath AONB and its hinterland, the AONB Additional Project Area or the Dodnash Special Landscape Area?

4. SOS requests deletion of the Tattingstone (0.9mt) and Wherstead (0.5mt) allocations, which would reduce provision by only 1.4mt (less during the plan period), leaving a more reasonable 16% excess.

MS3 Belstead (Section 10)

5. This is a strange site to include; we assume the result of a recent sale by the longstanding farming owners. It forms part of a highly attractive and visible mosaic of farmland and ancient woodlands on the southern approach to Ipswich and its working for minerals would set a highly undesirable precedent.
6. It is unclear what level of discussion there has been with Babergh DC about its recently canvassed housing options nearby.

MS6 Tattingstone (Section 13)

7. This is again a very curious and seemingly unnecessary allocation. We are told that modest volumes are being worked annually for “general fill”. Why are we supporting the digging up of low grade sandy deposits to be transported elsewhere to be used as “fill”. This is completely unsustainable and inert wastes should be used for this purpose.

8. SOS has no issue with the existing operation which lies largely away from view on the lower contours, reasonably well set back from the road and properties at Tattingsstone Heath and well screened by bunds and hedges.
9. However, this relationship will be fundamentally disrupted if workings are allowed to climb up onto the plateau. They will be highly visible from both the road and the village in an otherwise attractive landscape, protected as a Special Landscape Area. All for 0.9Mt of low grade sand to be used for “fill”. Moreover, this intrusion is planned to last for 23 years! 23 years to extract 0.9Mt is completely unreasonable.
10. The County Council needs to face up to the reality that this allocation has been promoted in order to create a hole for backfilling and that it cannot properly be considered as a planning requirement to meet the County’s minerals needs. SOS seeks the deletion of this site.

MS9 Wherstead (section 16)

11. This proposal is deeply disappointing and objectionable.
12. 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.

13. 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.

14. 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 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. It is not possible to see in the evidence base where the Council has assessed the ecological value of the proposed extension, which is known to be extensively populated by protected species.

15. 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?

16. 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. At the very least, this reference must be dropped.

17. SOS seeks the deletion of this site.

18. If clarification upon any of the above is required, please contact Rodney Chadburn, Hon Secretary to the Stour & Orwell Society, who is copied into the covering email by which this representation is submitted.

THE STOUR & ORWELL SOCIETY

23.07.18