Minerals and Waste Local Plan Publication Stage Representation Form

Page 1: Suffolk Minerals and Waste Local Plan Publication Stage Representation

Q1. Please state if you are responding:

As an individual

Q2. Personal Details:

<table>
<thead>
<tr>
<th>Title</th>
<th>Ms</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name</td>
<td>Charlotte</td>
</tr>
<tr>
<td>Last Name</td>
<td>Ducann (received via post)</td>
</tr>
<tr>
<td>Address Line 1</td>
<td>Warren Cottage</td>
</tr>
<tr>
<td>Address Line 2</td>
<td>Rissemere Lane East</td>
</tr>
<tr>
<td>Address Line 3 (if this is not required, please write N/A)</td>
<td>Reydon</td>
</tr>
<tr>
<td>Address Line 4 (if this is not required, please write N/A)</td>
<td>Southwold</td>
</tr>
<tr>
<td>Post Code</td>
<td>IP18 6SW</td>
</tr>
<tr>
<td>Telephone Number (if you do not wish to provide this information, please write N/A)</td>
<td>[redacted]</td>
</tr>
<tr>
<td>Email address (If you do not wish to provide this information, please write N/A)</td>
<td>[redacted]</td>
</tr>
</tbody>
</table>

Q3. Agent's Details:

No Response

Q4. To which part of the Local Plan does this representation relate?

Paragraph 14  
Policy MS7 
Policies Map Wangford

Q5. Do you consider the Local Plan is

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Legally compliant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(2) Sound</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>(3) Complies with the Duty to co-operate</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Q6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The plan is unsound for the following reasons: The degradation of AONB site. Designation of an iconic landscape and valuable farmland. Destruction of tranquillity, beauty & character of area & industrialisation of rural area. No environmental considerations of wildlife and plant life, especially red listed curlews or oaks or independent survey. Not in public interest whatsoever enough gravel at Henham & other sources.

Q7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

There are no modifications possible to make this local plan sound: It should not be allowed to proceed especially in a time of ecological collapse & food insecurity. Local considerations of land is more important than the financial interests of a multi national cooperation.

Q8. SCC Response

No Response

Q9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

Q10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To voice concerns regarding the environmental destruction in the present ecological crisis in the UK, as well as national farming & further pressures due to climate change

Q11. Your details:

Name  C Ducann
Date   20 July 2018
Suffolk Minerals & Waste Local Plan
Publication Stage Representation Form

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the, Title, Name and Organisation boxes below but complete the full contact details of the Agent in 2.

Title
MS

First name
CHARLOTTE

Last Name
DUCLANN

Job Title (where relevant)

Organisation (where relevant)

Address Line 1
WARREN COTTAGE

Address Line 2
RISSEMORE LANE EAST

Address Line 3
REYDON

Address Line 4
SOUTHWOLD

Post Code
IP18 6SW

Telephone Number & Email Address (where relevant)
Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?
   
   Paragraph 14 Policy MS7 Policies Map MS7

4. Do you consider the Local Plan is:

   4. (1) Legally Compliant
       
       Yes [ ] No [ ]

   4. (2) Sound
       
       Yes [ ] No [ ]

   4. (3) Complies with Duty to co-operate
       
       Yes [ ] No [ ]

Please tick as appropriate

5. Please give details of why you consider the Local Plan in not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please use this box to set out your comments.

This Plan is unsound for the following reasons:
  The degradation of AONB site
  Destruction of an iconic landscape and valuable farmland
  Destruction of tranquility, beauty and character of area
  Industrialization of rural area
  No environmental consideration of wildlife and plant life, especially red listed curlews
  Not in public interest whatsoever
  Enough greenbelt at Henham or other sources
6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised working of any policy or text. Please be as precise as possible.

There are no modifications possible to make this Local Plan sound: it should not be allowed to proceed, especially in a time of ecological collapse of food insecurity.

Local consideration of land is more important than the financial interests of a multinational corporation.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking modification, do you consider it necessary to participate at the oral part of the examination?

☐ No, I do not wish to participate at the oral examination

☑ Yes, I wish to participate at the oral examination
8. If you wish to participate as the oral part of the examination, please outline why you consider this to be necessary:

To voice concerns regarding the environmental destruction in the present ecological crisis in the UK, as well as national farming and further pressures due to climate change.

*Please note* that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature: [Blurred Signature] Date: 19/7/18

Please return to: Graham Gunby, Development Manager, Suffolk County Council, 8 Russell Road, Ipswich, Suffolk, IP1 2BX. All correspondence must be received by Monday 23rd July 2018 at 17:00, or the views expressed will not be able to be taken into account.

Notes to Accompany Representation Form

1. Introduction

1.1. The plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published plan when submitted, which will be examined by a Planning Inspector. The Planning and Compulsory Purchase Act 2004 (as amended) (PCPA) states that the purpose of the examination is to consider whether the plan complies with the legal requirement, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

2.1. The Inspector will first check that the plan meets legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

2.2. You should consider the following before making a representation on legal compliance:
• The plan in question should be included in the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the Local Development Documents (LDDs) it proposes to produce. It will set out the key stages in production of any plans which the LPA proposes to bring forward for independent examination. If the plan is not in current LDS it should not have been published for representations. The LDS should be on the PLA’s website and available at its main offices.

• The process of community involvement for the plan in question should be in general accordance with the LPA’s Statement of Community Involvement (SCI) (where one exists). The SCI sets out the LPA’s strategy for involving the community in the preparation and revision of LDDs (including plans) and the consideration of planning applications.

• The Plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (the regulations). On publication, the LPA must publish the documents prescribed in the Regulations, and make them available at its principle offices and on its website. The LPA must also notify the various persons and organisations set out in the Regulations and any persons who have requested to be notified.

• The LPA is required to provide a Sustainability Appraisal Report when it publishes a plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economical factors.

• In London, the plan should be in general conformity with the London Plan (the Spatial Development Strategy).

2.3. You should consider the following before making a representation on compliance with the duty to co-operate.

• The duty to co-operate came into force on 15 November 2001 and any plan submitted for examination on or after this date will be examined for compliance. LPAs will be expected to provide evidence of how they have complied with any requirements arising from the duty.

• The PCPA establishes that non-compliance with the duty to co-operation cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in the regard. Where duty has not been complied with, the Inspector has no choice but to recommended non-adoption of the plan.

3. Soundness

3.1. Soundness is explained in paragraph 182 of the National Planning Policy Framework (NPPF). The Inspector has to be satisfied that the plan is positively prepared, justified, effective and consistent with national policy:
• Positively prepared: This means that the plan should be prepared based on strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

• Justified: The plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.

• Effective: The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

• Consistent with national policy: The plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

3.2. If you think the content of the plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

• Is the issue with which you are concerned already covered specifically by national planning policy (or the London Plan)? If so it does not need to be included?

• Is what you are concerned with covered by any other policies in the plan on which you are seeking to make representations or in any other plan?

• If the policy is not covered elsewhere, in what way is the plan unsound without the policy?

• If the plan is unsound without the policy, what should the policy say?

4. General Advice

4.1. If you wish to make a representation seeking a modification to a plan or part of a plan you should make clear in what way the plan or part of the plan is inadequate having regard to legal compliance, the duty to cooperate and the four requirements of soundness set out above. You should try to support your representation by evidence showing why the plan should be modified. It will be helpful if you also say precisely how you think the plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

4.2. Where there are groups who share a common view on how they wish to see a plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.