# 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 agent |
| Q2. Personal Details: | No Response |
| Q3. Agent's Details: | |
| **Title** | Miss |
| **First Name** | Charlie |
| **Last Name** | Christensen |
| **Job Title (where relevant - if this is not relevant, please write N/A)** | Planning Advisor |
| **Organisation (where relevant - if this is not relevant, please write N/A)** | Environment Agency |
| **Address Line 1** | Iceni House |
| **Address Line 2** | Cobham Road |
| **Address Line 3 (if this is not required, please write N/A)** | Ipswich |
| **Address Line 4 (if this is not required, please write N/A)** | Suffolk |
| **Post Code** | IP3 9JD |
| **Telephone Number (if you do not wish to provide this information, please write N/A)** | |
| **Email address (where relevant - if this is not relevant, please write N/A)** | |
| **Name and address of the person or organisation you are acting as an agent for** | Environment Agency |

| Q4. To which part of the Local Plan does this representation relate? | |
| **Paragraph** | - |
| **Policy** | MS2 |
| **Policies Map** | Barnham |
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>X</td>
</tr>
<tr>
<td>(2) Sound</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>(3) Complies with the Duty to co-operate</td>
<td></td>
<td>X</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 floods section in Policy MS2 does not address flood risk from all sources, in particular fluvial and surface water. There is a clear surface water flow path across the site as shown on the risk of flooding from surface water map. Flow paths should be protected to ensure flood risk is not increased. A very small part of the site is within Flood Zones 2 and 3. It is very close to the boundary of the site, but the impact of climate change will need to be considered. A Flood Risk Assessment (FRA) would be needed to demonstrate the risk of flooding to those working on site and to ensure that flood risk is not increased. Paragraph 9.27 states that Barnham is in a Groundwater Source Protection Zone (SPZ). However, this is under the 'Floods' heading. We are supportive of the reference to these constraints, however the issues of flooding and the location within a SPZ should be separated out. We would like to see either two separate headings, or a single heading named ‘Flooding and Groundwater’. Although we note that restoration is not proposed, as the site is located within a SPZ2, and the Bretenham and Euston Safeguard Zones, we would not consider hazardous or non-hazardous restoration appropriate. A thorough hydrogeological risk assessment would be required before restoration that collects substantial baseline data. Strict Waste Acceptance Criteria (WAC) would also be applied to ensure the protection of groundwater quality. We would like to see this included as part of the Policy.

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.

No Response

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?

No, I do not 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:

No Response
Q1. Please state if you are responding:

As an agent

Q2. Personal Details:

No Response

Q3. Agent's Details:

Title
Miss

First Name
Charlie

Last Name
Christensen

Job Title (where relevant - if this is not relevant, please write N/A)
Planning Advisor

Organisation (where relevant - if this is not relevant, please write N/A)
Environment Agency

Address Line 1
Iceni House

Address Line 2
Cobham Road

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Ipswich

Address Line 4 (if this is not required, please write N/A)
Suffolk

Post Code
IP3 9JD

Telephone Number (if you do not wish to provide this information, please write N/A)
02084745593

Email address (where relevant - if this is not relevant, please write N/A)
charlie.christensen@environment-agency.gov.uk

Name and address of the person or organisation you are acting as an agent for
Environment Agency

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

Paragraph -

Policy MS2

Policies Map

Barnham

Q5. Do you consider the Local Plan is

Yes

No

(1) Legally compliant
X

(2) Sound
X

(3) Complies with the Duty to co-operate
X

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.

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No Response

Q11. Your details:

Name Charlie Christensen

Date 23/07/2018