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:

Title
Mrs

First Name
Helen

Last Name
Hall (received via post)

Address Line 1
169 Crowgreen Road

Address Line 2
Pilgrims Hatch

Address Line 3 (if this is not required, please write N/A)
Brentwood

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

Post Code
CM15 9SH

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

Email address (If you do not wish to provide this information, please write N/A)

Q3. Agent’s Details:

No Response

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

Paragraph 14 Wangford
Policy MS7
Policies Map Wangford Quarry

Q5. Do you consider the Local Plan is

<table>
<thead>
<tr>
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<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>(1) Legally compliant</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>(2) Sound</td>
<td>X</td>
<td></td>
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<td>(3) Complies with the Duty to co-operate</td>
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</table>
We object, on behalf of Mr and Mrs Hall, to policy MS7: Wangford, in respect of a proposed extension to Wangford quarry for gravel extraction. Mr and Mrs Hall are the owner-occupiers of No. 2 Cave Cottages which is one of a pair of cottages which lies immediately to the south of the A1095 Halesworth Road and so is in close proximity to the proposed quarry extension. As set out on the plan associated with policy MS7 entitled “Wangford Quarry”, the proposed extension is one for three county-related interventions in this local area taking into account the existing quarry to the east, the landfill site and the proposed extension which these representations concern. It is accepted that minerals are finite and "they are where they are" but their quarrying still needs to be compliant with current planning policy or the plan would not be sound or legally compliant. There are clear and direct planning issues in respect of a range of relevant matters which can result from an inappropriate allocation and undermine the soundness of the plan and these arise in this case. We note that any quarrying of the site would need to adhere to the policy criteria as set out in draft policy MS7 (a-h) however any allocation sets a development plan presumption and it is fair and appropriate to have some regards to these matters at representation stage. The site and general area are the subject of a number of layers of sensitivity. The first, albeit not in a particular order, is the AONB designation which covers the broad area. Paragraphs 111 and 116 of the NPPF are very clear that planning permission for major developments (and there is no doubt that any application for the quarry extension would be so defined and it would comprise EIA development) should be refused unless in exceptional circumstances. This therefore sets a very high test in respect of this allocation. 9. In addition the site is in close proximity to the wetland habitat to include the hen reed bed SWT site which is rich in wildlife and appropriately designated. The NPPF as one would expect is equally protective of the natural and local environment and this is a fundamental component of the Framework as articulated from paragraphs 109- 125 in the interest of sustainable development. There are also a number of European directives which need to be taken into account. In addition, the tourism context of Southwold is also a further layer of sensitivity. Southwold is well-known as a honeypot location and the tourism industry provides jobs for a significant number of people. It is also a year-round tourist attraction albeit with an inevitable focus during the summer months. The economic dimension to sustainable development is a matter to which a great deal of weight can be attributed when considering this allocation. It is noted that the same is said of the existing quarrying at 14.9 (i) of the Plan but clearly there is a direct conflict between the two. We briefly run through the MS7 criteria reiterating that we accept that this is not an application but a submission draft policy allocation but nonetheless this is still a useful exercise. The consideration of the relevant matters that policy MS7 presents is an appropriate forum for questioning the allocation in the plan. Criterion (a) deals with the amenity implication of HGVs. This is relevant in terms of the cited residential properties, not only Cave Cottage but those which are cited in the introductory text to the policy. We note that we are also dealing with cumulative impacts with the ongoing quarrying and landfill site. This is relevant also in terms of the tourism dimension as the Halesworth Road is an important route into Southwold and one which a number of tourists travel along. A road whose character is unduly influenced by HGV movements is not encouraging of the tourism industry. In respect of criterion (b) we would of course anticipate a mitigation of landscape and visual impact through a scheme of planting and bunding, however, the quarrying will take place over a number of years and this will have a long-term impact upon the character and appearance of the AONB. We note that the existing quarry has a great deal of impact in any event and obvious mitigation is not apparent. In respect of criterion (c) archaeological evaluation should be pre-designation noting the Development Plan status associated with the adoption of policy MS7. Criterion (d) is particularly pertinent as it sets out an extensive list of very sensitive designations. It is difficult to conceive of a more sensitive site and this is very clearly reflected in the policy which does seem to undermine the appropriateness of this designation. In respect of (e) we note that the site, as also reflected in criterion (d), is a groundwater source protection zone and consequently there are potential implications arising from this development which would not occur elsewhere. In respect of criteria (f), (g) and (h) we note that these are standard matters which we would expect attached to any application for planning permission. In short the site is a particularly sensitive one and this is reflected in the policy. Whilst acknowledging the gravel which can be extracted from the site, we are not clear that the evidence base conclusively demonstrates that this is the only site and that there are no other sites that meet policy requirements where the layer of sensitive of this magnitude does not exist. For these reasons policy MS7 is not seen as being sound. There is no clear indication as to why a less sensitive location could not be chosen and one cannot readily see how a scheme could meet all of the criteria as set out in the draft policy. Continuance of this designation could undermine the overall plan for these reasons.
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

Q11. Your details:

<table>
<thead>
<tr>
<th>Name</th>
<th>H Hall</th>
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<tbody>
<tr>
<td>Date</td>
<td>16 July 2018</td>
</tr>
</tbody>
</table>
1. Mr and Mrs Hall, object to policy MS7: Wangford, in respect of a proposed extension to Wangford quarry for gravel extraction.

2. Mr and Mrs Hall are the owner-occupiers of No. 2 Cave Cottages which is one of a pair of cottage which lies immediately to the south of the A1095 Halesworth Road and so is in close proximity to the proposed quarry extension.

3. As set out on the plan associated with policy MS7 entitled "Wangford Quarry", the proposed extension is one for three county-related interventions in this local area taking into account the existing quarry to the east, the landfill site and the proposed extension which these representations concern.

4. It is accepted that minerals are finite and "they are where they are" but their quarrying still needs to be compliant with current planning policy or the plan would not be sound or legally compliant. There are clear and direct planning issues in respect of a range of relevant matters which can result from an inappropriate allocation and undermine the soundness of the plan and these arise in this case.

5. We note that any quarrying of the site would need to adhere to the policy criteria as set out in draft policy MS7 (a-h) however any allocation sets a development plan presumption and it is fair and appropriate to have some regards to these matters at representation stage.

6. The site and general area are the subject of a number of layers of sensitivity.

7. The first, albeit not in a particular order, is the AONB designation which covers the broad area.

8. Paragraphs 111 and 116 of the NPPF are very clear that planning permission for major developments (and there is no doubt that any application for the quarry extension would be so defined and it would comprise EIA development) should be refused unless in exceptional circumstances. This therefore sets a very high test in respect of this allocation.
9. In addition the site is in close proximity to the wetland habitat to include the hen reed bed SWT site which is rich in wildlife and appropriately designated. The NPPF as one would expect is equally protective of the natural and local environment and this is a fundamental component of the Framework as articulated from paragraphs 109-125 in the interest of sustainable development. There are also a number of European directives which need to be taken into account.

10. In addition, the tourism context of Southwold is also a further layer of sensitivity.

11. Southwold is well-known as a honeypot location and the tourism industry provides jobs for a significant number of people. It is also a year-round tourist attraction albeit with an inevitable focus during the summer months. The economic dimension to sustainable development is a matter to which a great deal of weight can be attributed when considering this allocation. It is noted that the same is said of the existing quarrying at 14.9 (i) of the Plan but clearly there is a direct conflict between the two.

12. We briefly run through the MS7 criteria reiterating that we accept that this is not an application but a submission draft policy allocation but nonetheless this is still a useful exercise.

13. The consideration of the relevant matters that policy MS7 presents is an appropriate forum for questioning the allocation in the plan.

14. Criterion (a) deals with the amenity implication of HGVs. This is relevant in terms of the cited residential properties, not only Cave Cottage but those which are cited in the introductory text to the policy. We note that we are also dealing with cumulative impacts with the ongoing quarrying and landfill site. This is relevant also in terms of the tourism dimension as the Halesworth Road is an important route into Southwold and one which a number of tourists travel along.

15. A road whose character is unduly influenced by HGV movements is not encouraging of the tourism industry.
16. In respect of criterion (b) we would of course anticipate a mitigation of landscape and visual impact through a scheme of planting and bunding, however, the quarrying will take place over a number of years and this will have a long-term impact upon the character and appearance of the AONB. We note that the existing quarry has a great deal of impact in any event and obvious mitigation is not apparent.

17. In respect of criterion (c) archaeological evaluation should be pre-designation noting the Development Plan status associated with the adoption of policy MS7.

18. Criterion (d) is particularly pertinent as it sets out an extensive list of very sensitive designations. It is difficult to conceive of a more sensitive site and this is very clearly reflected in the policy which does seem to undermine the appropriateness of this designation.

19. In respect of (e) we note that the site, as also reflected in criterion (d), is a groundwater source protection zone and consequently there are potential implications arising from this development which would not occur elsewhere.

20. In respect of criteria (f), (g) and (h) we note that these are standard matters which we would expect attached to any application for planning permission.

21. In short the site is a particularly sensitive one and this is reflected in the policy.

22. Whilst acknowledging the gravel which can be extracted from the site, we are not clear that the evidence base conclusively demonstrates that this is the only site and that there are no other sites that meet policy requirements where the layer of sensitive of this magnitude does not exist.

23. For these reasons policy MS7 is not seen as being sound. There is no clear indication as to why a less sensitive location could not be chosen and one cannot readily see how a scheme could meet all of the criteria as set out in the draft policy.

24. Continuance of this designation could undermine the overall plan for these reasons.