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 | n/a |
| | First Name | Eleanor |
| | Last Name | Johnston (received via email) |
| | Job Title (where relevant - if this is not relevant, please write N/A) | Marine Officer (Planning) East |
| | Organisation (where relevant - if this is not relevant, please write N/A) | Marine Management Organisation |
| | Address Line 1 | Town Hall |
| | Address Line 2 | Bridge Street |
| | Address Line 3 (if this is not required, please write N/A) | Peterborough |
| | Address Line 4 (if this is not required, please write N/A) | n/a |
| | Post Code | PE1 1HF |
| | Telephone Number (if you do not wish to provide this information, please write N/A) | **Redacted** |
| | Email address (where relevant - if this is not relevant, please write N/A) | **Redacted** |
| | Name and address of the person or organisation you are acting as an agent for | Marine Management Organisation |

| Q4. To which part of the Local Plan does this representation relate? | No Response |
| Q5. Do you consider the Local Plan is | No Response |
MMO Marine Planning response to Suffolk Minerals & Waste Local Plan - Submission Draft Consultation

Thank you for giving us the opportunity to comment on the Suffolk Minerals and Waste Local Plan Submission Draft Consultation. The comments provided within this letter refer to the document entitled Suffolk Minerals & Waste Local Plan, Submission Draft, June 2018. As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the East Inshore and East Offshore Marine Plans are of relevance. The East Marine Plans cover the area from Flamborough Head to Felixstowe, including the tidal extent of any rivers within this area. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, the Marine Information System and the Planning Advisory Service soundness self-assessment checklist.
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.

Recommendations 1. The South East Marine Plan Part of the area covered by the Suffolk Minerals & Waste Local Plan lies within the South East Marine Plan Area. This is from Landguard Point to the northern bank of the tidal River Stour and includes all of the tidal River Orwell. In the document “Index and Chapters 1 to 6” the South East Marine Plan is not referenced. It is recommended to ensure your plan is ‘sound’ that it includes a reference to marine planning for the south east marine plan area. The South East Marine Plan is currently under development and aims to be adopted in 2020. With no marine plan for this marine plan area we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. In particular The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK) construction industry. References to the South East Marine Plan and Marine policy statement may be most appropriate in policy MP9 of the Suffolk Minerals & Waste Local Plan, for example. My colleague, Tom Pavitt, who is the Marine Planning Officer for the South East, met with Cameron Clow from Suffolk County Council in March 2018. He presented about marine planning, the South East Marine Plan and ways to reference marine planning in planning documents. Please let me know if you would like these slides to be re-sent. The MMO looks forward to continued cooperation with Suffolk County Council in the development of the South East Marine Plan, including potential policies on infrastructure landing facilities. 2. The East Inshore Marine Plan The area covered by the Suffolk Minerals & Waste Local Plan also lies within the Inshore East Marine Plan Area. Therefore, we would recommend that the east marine plans are considered. In the document “Index and Chapters 1 to 6”, the East Inshore and East Offshore Marine Plans, specifically the policy PS3, is referenced under Policy MP8. This is a good example of referencing to the east marine plans. There are other policies within the Suffolk Minerals & Waste Local Plan which have marine relevance and so it is also recommended that the east marine plans and specific policies are referred to in these sections. For example, references would be appropriate in policy MP9. Examples of east marine plan policies that you may wish to consider are listed below. Hyperlinks are provided for further information. These policies are provided only as a recommendation and we suggest that your own interpretation of the east marine plans is completed. • CC1: Proposals should demonstrate that they have taken account of how they may: • be impacted upon by, and respond to, climate change over their lifetime • impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts, • BIO1: Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including habitats and species that are protected or conservation concern in the East Marine Plan and adjacent areas (marine, terrestrial). • ECO1: Cumulative impacts affecting the ecosystem of the East Marine Plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation. • GOV1: Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa. • SOC3: Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference: a. that they will not adversely impact the terrestrial and marine character of an area b. how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them c. how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against d. the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts. As previously stated, we would also recommend you consult the following references for further information: East Inshore and East Offshore Marine Plans and Marine Information System Thank you for your support for marine planning.

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 Response
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>E Johnston</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>23 July 2018</td>
</tr>
</tbody>
</table>
Dear Sir/Madam,

**MMO Marine Planning response to Suffolk Minerals & Waste Local Plan - Submission Draft Consultation**

Thank you for giving us the opportunity to comment on the Suffolk Minerals and Waste Local Plan Submission Draft Consultation. The comments provided within this letter refer to the document entitled Suffolk Minerals & Waste Local Plan, Submission Draft, June 2018.

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the **East Inshore and East Offshore Marine Plans** are of relevance. The East Marine Plans cover the area from Flamborough Head to Felixstowe, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, or the [UK Marine Policy Statement](https://www.gov.uk/marine-policy-statement) (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our **online guidance**, the [Marine Information System](https://www.marineregions.org) and the [Planning Advisory Service soundness self-assessment checklist](https://www.planningadm.com/soundness-assessment).
Recommendations

1. The South East Marine Plan

Part of the area covered by the Suffolk Minerals & Waste Local Plan lies within the South East Marine Plan Area. This is from Landguard Point to the northern bank of the tidal River Stour and includes all of the tidal River Orwell. In the document “Index and Chapters 1 to 6” the South East Marine Plan is not referenced. It is recommended to ensure your plan is ‘sound’ that it includes a reference to marine planning for the South East marine plan area.

The South East Marine Plan is currently under development and aims to be adopted in 2020. With no marine plan for this marine plan area we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. In particular The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK) construction industry. References to the South East Marine Plan and Marine policy statement may be most appropriate in policy MP9 of the Suffolk Minerals & Waste Local Plan, for example.

My colleague, Tom Pavitt, who is the Marine Planning Officer for the South East, met with Cameron Clow from Suffolk County Council in March 2018. He presented about marine planning, the South East Marine Plan and ways to reference marine planning in planning documents. Please let me know if you would like these slides to be re-sent. The MMO looks forward to continued cooperation with Suffolk County Council in the development of the South East Marine Plan, including potential policies on infrastructure landing facilities.

2. The East Inshore Marine Plan

The area covered by the Suffolk Minerals & Waste Local Plan also lies within the Inshore East Marine Plan Area. Therefore, we would recommend that the east marine plans are considered. In the document “Index and Chapters 1 to 6”, the East Inshore and East Offshore Marine Plans, specifically the policy PS3, is referenced under Policy MP8. This is a good example of referencing to the east marine plans. There are other policies within the Suffolk Minerals & Waste Local Plan which have marine relevance and so it is also recommended that the east marine plans and specific policies are referred to in these sections. For example, references would be appropriate in policy MP9.

Examples of east marine plan policies that you may wish to consider are listed below. Hyperlinks are provided for further information. These policies are provided only as a recommendation and we suggest that your own interpretation of the east marine plans is completed.

- **CC1**: Proposals should demonstrate that they have taken account of how they may:
  - be impacted upon by, and respond to, climate change over their lifetime
  - impact upon any climate change adaptation measures elsewhere during their lifetime
Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.

- **BIO1**: Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including
habitats and species that are protected or conservation concern in the East Marine Plan and adjacent areas (marine, terrestrial).

- **ECO1:** Cumulative impacts affecting the ecosystem of the East Marine Plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation.

- **GOV1:** Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa.

- **SOC3:** Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:
  a. that they will not adversely impact the terrestrial and marine character of an area
  b. how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them
  c. how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against
  d. the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts

As previously stated, we would also recommend you consult the following references for further information:

[East inshore and East Offshore Marine Plans](#) and [Marine Information System](#)

Thank you for your support for marine planning.

Yours sincerely,

Eleanor Johnston
Marine Officer (Planning) East

**Telephone:**

**Mobile:**

**E-mail:**