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:

<table>
<thead>
<tr>
<th>Title</th>
<th>n/a</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name</td>
<td>Amy</td>
</tr>
<tr>
<td>Last Name</td>
<td>Wright (received via email)</td>
</tr>
<tr>
<td>Job Title (where relevant - if this is not relevant, please write N/A)</td>
<td>Senior Planning Policy Officer</td>
</tr>
<tr>
<td>Organisation (where relevant - if this is not relevant, please write N/A)</td>
<td>West Suffolk District Councils</td>
</tr>
<tr>
<td>Address Line 1</td>
<td>n/a</td>
</tr>
<tr>
<td>Address Line 2</td>
<td>n/a</td>
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<tr>
<td>Address Line 3 (if this is not required, please write N/A)</td>
<td>n/a</td>
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<tr>
<td>Address Line 4 (if this is not required, please write N/A)</td>
<td>n/a</td>
</tr>
<tr>
<td>Post Code</td>
<td>n/a</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 (where relevant - if this is not relevant, please write N/A)</td>
<td>[REDACTED]</td>
</tr>
<tr>
<td>Name and address of the person or organisation you are acting as an agent for</td>
<td>West Suffolk District Councils</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy</td>
<td>-</td>
</tr>
<tr>
<td>Policies Map</td>
<td>-</td>
</tr>
</tbody>
</table>

Q5. Do you consider the Local Plan is

No Response
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.

Page 115 refers to Safeguarding policy WP17, but we believe that it should read policy WP18? At the time of commenting, it should be noted that the new NPPF is awaited, with possible revisions to national minerals policy and the NPPG, and implications for the Local Plan. Within the Pre-submission consultation, West Suffolk Councils note: In terms of waste, only Sizewell "A" Nuclear Power Station has been allocated. In terms of minerals, we have comments on three of the proposed site allocations. In December 2017 West Suffolk Councils raised concerns (but did not object) to the following sites in the SCC Issues and Options W&M LP: a. Barnham (sand and gravel site) – current map ref SB1, site ref M2 b. Cavenham (sand and gravel site) – current map ref FH3, site ref M4 c. Worlington (sand and gravel site) – current map ref FH4, site ref M9

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 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:

Name   A Wright
Date   23 July 2018
Based on the updated evidence and documents on: https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/minerals-and-waste-local-plan-consultation/ we have the following comments to make:

Page 115 refers to Safeguarding policy WP17, but we believe that it should read policy WP18?

At the time of commenting, it should be noted that the new NPPF is awaited, with possible revisions to national minerals policy and the NPPG, and implications for the Local Plan.

Within the Pre-submission consultation, West Suffolk Councils note:

In terms of waste, only Sizewell “A” Nuclear Power Station has been allocated.

In terms of minerals, we have comments on three of the proposed site allocations.

In December 2017 West Suffolk Councils raised concerns (but did not object) to the following sites in the SCC Issues and Options W&M LP:

a. Barnham (sand and gravel site) – current map ref SB1, site ref M2
b. Cavenham (sand and gravel site) – current map ref FH3, site ref M4
c. Worlington (sand and gravel site) – current map ref FH4, site ref M9

These sites remain in the Pre-submission Local Plan and comments on each proposed allocation are set out below:

It is understood that SCC is the minerals and waste planning authority for Suffolk. SCC will liaise with its own internal departments on the Pre-submission Local Plan as the Highways Authority and the Local Lead Flood Authority.

Barnham (sand and gravel site - proposed extension to an existing quarry) – current map ref SB1, site ref M2.

This is a sensitive location within the Brecks.

This site is located within Breckland SPA and adjacent to Breckland SAC. It is noted that a Habitats Regulations Assessment has been undertaken. SEBC and FHDC are concerned the likely significant effects appear to have been screened out for this site without justification and reliance has been placed entirely on a project specific HRA.

The potential for in-combination effects should also be considered and you may wish to consider proposed development allocated in the adopted SEBC Vision 2031 documents and in the FHDC Proposed submission SALP (as modified).

The potential for other ecological and landscape effects does not appear to have been considered in any detail at this stage.
West Suffolk Councils response to the Pre-submission SCC W&MLP Consultation, (July 2018).

It should be noted that there have been concerns from the Parish historically in relation to HGV traffic routing in proximity to the primary school, and B1106 crossings, and that this is referenced in para 9.8 and specific Policy MS2 (within Chapters 7 to 17).

Air quality is to be considered within an Air Quality Assessment within a future planning application, (para 9.24, supported by Policy MS2 (k)). Noise too will be considered at planning application stage (para 9.25) although for consistency this should also be reflected in a policy requirement.

Cavenham (sand and gravel site – proposed extension to existing quarry) – current map ref FH3, site ref M4, SAR12, AP2, secondary aggregates inert waste recycling and inert waste tipping; asphalt plant

This is also a sensitive site in the Brecks. The site is adjacent to Cavenham Heath NNR, Cavenham-Icklingham Heath SSSI, Cavenham Heath RIGS.

This site is located within Breckland SPA and adjacent to Breckland SAC. It is noted that a Habitats Regulations Assessment has been undertaken. FHDC is concerned the likely significant effects appear to have been screened out for this site without justification and reliance has been placed entirely on a project specific HRA.

The potential for in-combination effects should also be considered and you may wish to consider proposed development at RAF Lakenheath DC/18/0456/EIASCR, development allocated in the adopted SEBC Vision 2031 documents and in the FHDC Proposed submission SALP (as modified).

The potential for other ecological and landscape effects does not appear to have been considered in any detail at this stage.

Paras 11.21-11.24 detail that the traffic associated with the proposed extension is not yet known, (without further geological investigations on site). An air quality assessment, (which the supporting text states will be submitted with a future planning application should over 100 HGVs be generated each day from the site), should consider cumulative impacts. Noise measures are considered in para 11.25. This is reinforced in Policy MS4 requirements (f) and (g).

Worlington proposed extension - (sand and gravel site –extensions to existing quarry – current map ref FH4, site ref M9

Badlingham Lane County Wildlife Site forms the northern boundary of this proposed extension. The potential for ecological affects does not appear to have been considered at this stage.

Noise is considered in para 17.15, and policy MS10 (d).
West Suffolk Council's response to the Pre-submission SCC W&MLP Consultation, *July 2018*.

We would welcome the opportunity to discuss any of the issues raised as part of our ongoing duty to co-operate.

Ends