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>Natalie</td>
</tr>
<tr>
<td>Last Name</td>
<td>Beal (received via email)</td>
</tr>
<tr>
<td>Job Title (where relevant - if this is not relevant, please write N/A)</td>
<td>Planning Policy Officer</td>
</tr>
<tr>
<td>Organisation (where relevant - if this is not relevant, please write N/A)</td>
<td>The Broads Authority</td>
</tr>
<tr>
<td>Address Line 1</td>
<td>Yare House</td>
</tr>
<tr>
<td>Address Line 2</td>
<td>62-64 Thorpe Road</td>
</tr>
<tr>
<td>Address Line 3 (if this is not required, please write N/A)</td>
<td>Norwich</td>
</tr>
<tr>
<td>Address Line 4 (if this is not required, please write N/A)</td>
<td>N/A</td>
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<tr>
<td>Post Code</td>
<td>NR1 1RY</td>
</tr>
<tr>
<td>Telephone Number (if you do not wish to provide this information, please write N/A)</td>
<td>[REDACTED]</td>
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<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>The Broads Authority</td>
</tr>
</tbody>
</table>

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

No Response

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.

| General • Perhaps something about how it fits with our Local Plans? Something about how Authorities consulted if application in or near to area? We would like to understand how our special qualities and our policies that could be of relevance would be considered in decision making. • The maps don’t say where they are; they simply have reference numbers on. Strongly recommend they have a title with the location/settlement included. • There is not much detail in there regarding the Broads and how it has a status equivalent to a National Park. There does not seem to be much commentary about other landscape designations either. This might enable better interpretation of the policies in the Local Plan. |

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 | N Beal |
| Date | 20 July 2018 |
Dear Sir

Today Planning Committee endorsed the response below to the Norfolk Minerals and Waste Local Plan Issues and Options consultation.

I hope this is helpful and I am happy to clarify any points if needed.

Yours faithfully

Natalie Beal

General

- Perhaps something about how it fits with our Local Plans? Something about how Authorities consulted if application in or near to area? We would like to understand how our special qualities and our policies that could be of relevance would be considered in decision making.
- The maps don’t say where they are; they simply have reference numbers on. Strongly recommend they have a title with the location/settlement included.
- There is not much detail in there regarding the Broads and how it has a status equivalent to a National Park. There does not seem to be much commentary about other landscape designations either. This might enable better interpretation of the policies in the Local Plan.

Policies

- There seems to be no guiding restoration policy. MP6 refers to restoration but only emphasises biodiversity net gain rather than giving guiding principles of restoration. Why is there no such guiding policy?
- GP4 – The policy should also refer to the setting of protected landscapes. Query the use of ‘significant’ when referring to adverse impacts; even small negative impacts could cause considerable issues but this policy seems to allow impacts that are less than significant but are still negative impacts. How will a threshold be defined and upheld? Request this is changed to ‘adverse impacts’. We raised this at the last consultation. We would also suggest that the term ‘impacts’ be amended to ‘effects’. The impact is the development itself, the effect the result / consequence of the impact. Suggest amenity value be incorporated into the list. The policy refers to ‘appropriate national or local guidelines for each criterion, including reference to any hierarchy of importance’ – what are these and where can they be found? How will this policy be used and in particular this part of the policy? How will the special qualities of the Broads be taken into consideration and protected? The Broads has been identified by Historic England as an area with exceptional potential for waterlogged archaeology. Any excavation within or close to the executive area will require particularly robust archaeological evaluation prior to consenting and not rely on a brief desk based evaluation and conditions. Archaeology does not appear to be mentioned here.
- Policy MP6: query the wording ‘preference will be given’ in relation to proposals that
incorporate a net biodiversity gain. Would ‘proposals will be supported’ or ‘proposals need to...’ be a better and stronger phrase?

- MP9, MP10, WP18 – will Suffolk County Council send us these consultation zones in GIS file format? Presume this should apply to the Broads Authority as well as we are the Local Planning Authority? Would it be better to use the term ‘local planning authority’ because as written the Broads Authority don’t need to comply with this policy as we are not mentioned?

- Policy MP9. Not sure what is meant by “any mitigation required falls on the development that receives planning permission last”. Should the mitigation be instated by whoever implements their permission, whether their permission was given most recently or a year ago? If a development is proposed over an area which is likely to be parcelled up / split into phases / uses then an outline scheme of mitigation and implementation programme which identifies the measures for each phase/area should be provided by the first applicant and implemented / amended accordingly by them or following phases. Wording is not clear.

- WP4 – should these be located near to areas that generate waste i.e. towns? What does ‘accessible to the public’ mean? These sites are designed for household waste so need to be accessed by the public anyway. We raised this as part of the last consultation.

- WP17 – where does landscape impact come into consideration? It is not clear if criterion d relates to landscape? As written, criterion d does not seem comprehensive or clear. Suggest point c to incorporated landscape more explicitly and additional point added for amenity. Could a reference be made to GP4 as in other policies?

- WP18 comments as per MP9 regarding ‘Any mitigation required falls on the development that receives planning permission last’.

Typographical/grammatical errors

- Page 9, ‘Aim 3: To safeguard minerals and waste development from other development other forms of development by’:
- Page 14, 4.13, ‘but to provide a general list of issues that would were appropriate be taken into account when reaching a decision upon a particular planning application’.
- Page 16, ‘Minerals and waste development will be acceptable so long as the proposals, adequately access and address the potentially significant adverse impacts upon’
- Page 19, ‘a proposal for such a facility is included in the Plan at Cavenham Quarry’.
- Page 20, ‘There are licences for the dredging of up to 9 Mt of sand & gravel off the coast of the East Anglia on an annual basis’
- Policy MP8,: ‘planning permission will be limited to the end date of the quarry planning permission or the when the indigenous material is no longer being used’
- Page 29, ‘The Plan also has to take into account of the potential to receive London Waste’.
- Page 35, 6.16, ‘The recycling of construction, demolition of excavation waste’
- Page 36, 6.24, ‘This composting has the effected of reducing’ and ‘The residue is either than landfilled at a reduced taxation rate of processed further to make a fuel’.
- WP18 ‘or prejudice the use such sites for those purposes unless suitable alternative provision is made’.
- 5.42: ‘As important as proposing new minerals development is safeguarding existing, planned or potential facilities from other forms of competing development’. Does not make sense. Should this end with something like ‘is equally important’?
The SA does not mention any of the Broads Authority documents. This was raised as part of the last consultation but has not been rectified. It is disappointing that these documents have not been reviewed. Why is this?

**Natalie Beal**
Planning Policy Officer

Broads Authority, Yare House, 62-64 Thorpe Road. Norwich NR1 1RY

www.broads-authority.gov.uk

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