Suffolk Minerals & Waste Local Plan
Statement of common ground
Broads Authority

May 2019
Contact

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For more information about our minerals and waste planning policy go to: https://www.suffolk.gov.uk/planning-waste-and-environment/planning-applications/minerals-and-waste-policy/

Cover photograph acknowledgements:

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2. Cavenham Quarry, with permission from Allen Newport Ltd.
CONTENTS
1. Format ......................................................................................................................... 3
2. General Policies ............................................................................................................. 4
3. Minerals Policies .......................................................................................................... 6
4. Waste Policies ............................................................................................................. 7
5. Other ............................................................................................................................ 9
1. Format

1.1 This document sets out the representations made by the Broads Authority to the Submission Draft Suffolk Minerals & Waste Local Plan. A response is made to each representation by Suffolk County Council. Proposed changes are made in bold type. The final column sets out the Broads Authority current position including any common ground.

G Graham
Graham Gunby
Development Manager
Suffolk County Council

Natalie Beal
Natalie Beal
Planning Policy Officer
Broads Authority
## 2. General Policies

### Policy GP4: General Environmental Criteria

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<tbody>
<tr>
<td>90627302</td>
<td>Natalie Beal (received via email), Planning Policy Officer, The Broads Authority</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>• GP4 –</td>
<td>1: Add reference to “setting” being added to part “C”.</td>
<td>1: Welcome this change</td>
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<td>1: The policy should also refer to the setting of protected landscapes.</td>
<td>2: The existing wording of “significant adverse impacts” is preferred to just “adverse impacts”. Prefer to quantify/qualify adverse effects this way.</td>
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<td>2: 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?</td>
<td>3: SCC disagrees with the definition of “impact” suggested in this response. The way the word is used in the NPPF is that impacts are a potential result of development, not the development itself.</td>
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<td>3: 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.</td>
<td>4: The intent of the policy is to deal with a number of amenity issues specifically related to minerals and waste activity, such as air quality, odours, noise, etc...</td>
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<td>4: Suggest amenity value be incorporated into the list.</td>
<td>5: Don’t aim to restate things. Existing similar policy has worked well in the past.</td>
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<td>5: 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</td>
<td>6: Welcome this change</td>
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<td>6: Add additional wording to clause C) “including Areas of Outstanding Natural Beauty and the Broads.”</td>
<td>7: Noted. If SCC wish to continue with this wording, BA has no further comment.</td>
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<td>7: Archaeology is considered part of the historic environment part “f” of the policy.</td>
<td>8: Noted. If SCC wish to continue with this wording, BA has no further comment.</td>
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</table>
they be found? How will this policy be used and in particular this part of the policy?

6: How will the special qualities of the Broads be taken into consideration and protected?

7: 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.
### 3. Minerals Policies

#### Policy MP6: Progressive Working and Restoration

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<td>1: 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? 2: 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?</td>
<td>1: SCC consider that it is more appropriate to consider the details of restoration at the planning application stage, however the policy does state what post extraction uses are acceptable, but has a preference for net-biodiversity gain. An earlier Minerals Local Plan did have details in but were asked to remove this. 2: SCC consider that “preference” is the appropriate term. Other proposals may be preferred by the landowner. Experience shows that restoration schemes tend to have an element of biodiversity enhancements anyway.</td>
<td>1: Noted. If SCC wish to continue with this wording, BA has no further comment. 2: Noted. If SCC wish to continue with this wording, BA has no further comment.</td>
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#### Policy MP9: Safeguarding of Port and Rail Facilities, and Facilities for the Manufacture of Asphalt

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<td>• 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</td>
<td>The intention of this policy is to ensure that the operation of existing or permitted minerals developments are not then prejudiced by other development that comes forward in the vicinity of the minerals operation. In the scenario where planning permission for</td>
<td>Noted and SCC response is accepted.</td>
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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. housing was granted after a minerals facility was permitted, but not implemented, the housing would be required to provide the mitigation to address issues arising from a minerals facility and housing being in close proximity to one another. It would not be practical for the site which is implemented last, as this could require changing planning permissions that are already granted.

4. WASTE POLICIES

POLICY WP4: HOUSEHOLD WASTE RECYCLING CENTRES

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<td>• 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.</td>
<td>These sites should be located near areas which generate waste and SCC consider this is covered by the policy GP3 and the key diagram, which shows urban areas.</td>
<td>Noted and SCC response is accepted.</td>
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POLICY WP17: DESIGN OF WASTE MANAGEMENT SITES
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<td>• WP17 1: 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 incorporate landscape more explicitly and additional point added for amenity. 2: Could a reference be made to GP4 as in other policies?</td>
<td>1: Landscape would be considered under Point d) however this amended to make reference to “landscape.” 2: This is about design rather than anything else. Will consider this.</td>
<td>1: Welcome this change. 2: Noted and would support this cross reference if deemed appropriate.</td>
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**Policy WP18: Safeguarding of Waste Management Sites**

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<td>-</td>
<td>• WP18 comments as per MP9 regarding ‘Any mitigation required falls on the development that receives planning permission last’</td>
<td>The intention of this policy is to ensure that the operation of existing or permitted minerals developments are not then prejudiced by other development that comes forward in the</td>
<td>Noted and SCC response is accepted.</td>
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vacinity of the minerals operation. In the scenario where planning permission for housing was granted after a minerals facility was permitted, but not implemented, the housing would be required to provide the mitigation to address issues arising from a minerals facility and housing being in close proximity to one another. It would not be practical for the site which is implemented last, as this could require changing planning permissions that are already granted.

5. Other

Other Comments

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<td>General 1: Perhaps something about how it fits with our Local Plans? 2: Something about how Authorities consulted if application in or near to area? 3: We would like to understand how our special qualities and our policies that could be of relevance would be considered in decision making. 4: The maps don’t say where they are; they simply have</td>
<td>1: Add additional paragraph 2.7 which states “Besides the planning policies contained within the SMWLP the Development Plan is made up of the planning policies contained within Local Plans adopted by the District and Borough Councils within Suffolk and the Broads Authority (see links). 2: Part of process, do consult relevant LPA. 3: See response to 1. above</td>
<td>1 Welcome this change. 2 Noted. 3 Welcome this change 4 The Broads Authority would welcome improvements to help understand the context and actual location if deemed appropriate. 5 Welcome this change. 6 Noted.</td>
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</table>
| 90627302 | Natalie Beal (received via email) , Planning Policy Officer, The Broads Authority | - | - | - | 1: MP9, MP10, WP18 – will Suffolk County Council send us these consultation zones in GIS file format?  
2: 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? | 1: SCC would be happy to provide GIS files upon adoption of the plan.  
2: SCC would also be open to modification which changed “District and Borough” to “Local Planning Authority” in order to be inclusive of the Broads Authority. | 1: Noted  
2: Support this change. |
| 90627302 | Natalie Beal (received via email) , Planning Policy Officer, The Broads Authority | - | - | - | • Page 9, ‘Aim 3: To safeguard minerals and waste development from other development other forms of development by’:  
• Page 9 Aim 3 delete additional first “other development” in Aim 3. |

1: Inset Maps do have the name of the site on them. Safeguarding Maps are numbers only which correspond with the Proposals Map. Both on based on Ordnance Survey base maps.  

5: A link to the Broads Local Plan will be provided.  

6: Reference is made in Policy GP3 and the Key Diagram.
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| • 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 at 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’. |
| • Page 14 paragraph 4.13 .substitute “where” for “were”.  
  • Page 16 Policy GP4 delete “access and”.  
  • Page 19 paragraph 5.11 remove “at”.  
  • Page 20 paragraph 5.19 remove “the”.  
  • Policy MP8 remove additional “the”.  
  • Page 29 paragraph 6.4 remove “of”.  
  • Page 35 paragraph 6.16 replace “of” with “and”.  
  • Page 36, paragraph 6.24 replace ”effected” with “effect” and replace “than” with “then” and “of” with “or”.  
  • WP18 first paragraph reword to say “use of such”.  
  • 5.42 No change proposed.  
  • Include list of Broads Authority documents in SA. |
- 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'?
- Sustainability Appraisal 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?