

Norfolk County Council Minerals and Waste Local Plan 2021-2038

Statement of Common Ground between Broads Authority and Norfolk County Council

July 2023



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Abbreviations

NM&WLP - Norfolk Minerals and Waste Local Plan

NPPF – National Planning Policy Framework

NPPG - National Planning Practice Guidance

NSPF – Norfolk Strategic Planning Framework

SoCG - Statement of Common Ground

WPA – Waste Planning Authority

1. Introduction

Section 110 of the Localism Act (2011) established a duty to cooperate in relation to Local Plans and sustainable development, or use of the land. The duty to cooperate requires cooperation during the preparation of development plan documents and other local development documents between relevant bodies. Paragraph 27 of the NPPF sets out the requirement to produce one or more Statement(s) of Common Ground to form part of the evidence required to demonstrate compliance with the duty to cooperate. Such a document should be a written record of the collaboration and progress made between authorities, detailing where agreement has been reached and where there are outstanding issues.

Since the launch of the Local Plan Review in 2017, Norfolk County Council, as the Minerals and Waste Planning Authority for Norfolk, engaged with statutory bodies in accordance with the requirements of the Duty to Cooperate. Strategic issues identified through this process, together with the outcomes of ongoing engagement with the relevant consultation bodies, are highlighted and summarised in the Duty to Co-operate Statement (June 2023).

At the Regulation 19 Pre-submission Local Plan representations stage, a draft Statement of Common Ground was published, which identifies the strategic cross-boundary issues associated with the Plan and shows where effective cooperation is (and if appropriate where it is not) being made on any issues. The statement is continuing to be updated as the Plan progresses to submission, providing a narrative of where and how cooperation is being sought.

A Statement of Common Ground does not necessarily seek to achieve agreement on all strategic cross-boundary issues, however it is a way of showing that the council have identified all relevant strategic cross-boundary matters, and that agreement has been sought with others and that such relevant matters have been identified. It is how authorities can demonstrate that their plans are based on effective and ongoing cooperation and that they have sought to produce strategies that as far as possible are based on agreements with other authorities.

Purpose of this Document

This document is a bespoke Statement of Common Ground between The Broads Authority and Norfolk County Council only, as requested by The Broads Authority at the Regulation 19 Presubmission representations stage. The issues and matters raised by the Broads Authority have been set out in this document, and an explanation and proposed resolution from Norfolk County Council for the outstanding objections set out for the parties to sign/ agree; and highlight those areas where agreement has not been possible. It is intended to provide clarity to the Inspector on the resolution of remaining issues between the two parties.

National Planning Policy and legislation

The National Planning Policy Framework (NPPF, July 2021) and Localism Act 2011 requires all Local Planning Authorities (including Minerals and Waste Planning Authorities) to prepare a Statement of Common Ground alongside the production of their Local Plans.

For a Local Plan to be found 'sound', it must be:

- a) Positively prepared;
- b) Justified;
- c) Effective; and
- d) Consistent with national policy

For a Plan to be effective it must be:

"...deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground..." (NPPF Paragraph 35c)

The National Planning Practice Guidance (NPPG) defines a statement of common ground as:

"...a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries..." (NPPG Paragraph: 010 Reference ID: 61-010-20190315 Revision date: 15 03 2019)

Current adopted Norfolk minerals and waste planning policy documents (2010-2026)

The Norfolk Core Strategy and Minerals and Waste Development Management Policies Development Plan Document (DPD) (the 'Core Strategy) was adopted by Norfolk County Council in 2011. It contains policies to be used in the determination of planning applications for minerals extraction and associated development and waste management facilities in Norfolk. The current adopted Norfolk minerals and waste planning policy documents also include the Minerals Site Specific Allocations DPD and the Waste Site Specific Allocations DPD.

A new Norfolk Minerals and Waste Local Plan (NM&WLP) is being produced to consolidate the three existing plans into one plan, to ensure that the polices within the plan remain up-to-date and to extend the plan period from 2026 to 2038.

Norfolk County Council Minerals and Waste Development Scheme

The Minerals and Waste Development Scheme sets out the timetable for producing and reviewing minerals and waste planning policy documents, including those forming part of the Norfolk Minerals and Waste Local Plan. The Regulation 19 publication document was open for a period of representations between 9am on 28 September until 5pm on 19 December 2022. Submission of the Local Plan to the Planning Inspectorate is planned for summer 2023.

Norfolk Strategic Planning Framework

In 2015, Norfolk's planning authorities agreed to formally cooperate on a range of strategic cross-boundary planning issues through the preparation of the <u>Norfolk Strategic Planning Framework</u> (<u>NSPF</u>). The aim of this framework is to agree shared objectives and strategic priorities, demonstrate compliance with duty to cooperate and consistency with the revised NPPF. The latest version (January 2021) was endorsed by all stakeholder authorities in 2021.

Section 9.10 of the NSPF summarises the minerals and waste resources in Norfolk. Agreement 29 withing the NSPF sets out the Norfolk strategic statement of common ground between all signatories to the agreement, set out on page 2 of the NSPF, in relation to minerals and waste.

The Broads Authority and Norfolk County Council are both signatories of the NSPF. Agreement 29 is set out below and recognises there is a need for a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that Norfolk (and the country) needs, whilst ensuring that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.

Agreement 29:

It is agreed that:

- 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self- sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand.
- 2) A steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Norfolk Minerals and Waste Local Plan to meet the forecast need for sand and gravel, carstone, and silica sand.
- 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development.
- 4) The Norfolk Minerals and Waste Local Plan policies will enable the reuse, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy.
- 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order amount of waste expected to a for Norfolk to meet the existing and forecast rise over the Plan period.
- 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns. Priority for the location of new waste management facilities will be given to the reuse of previously developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.
- 7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.

2. Strategic Geography

The geographical area covered by this statement comprises the administrative area of Norfolk County Council. This is the plan area covered by the emerging Minerals and Waste Local Plan. The plan area is bordered to the South-West by the minerals and waste planning authorities of Cambridgeshire and Peterborough to the North-West by Lincolnshire and to the south by Suffolk.

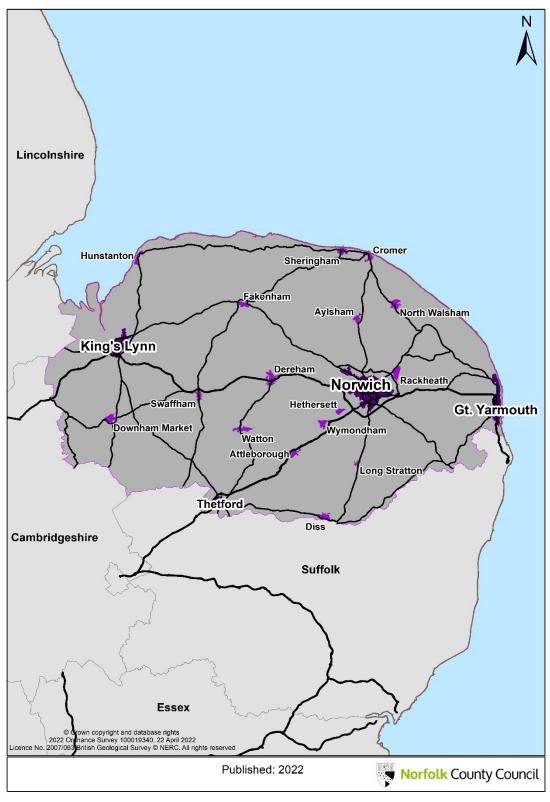


Figure 1: Strategic Geography covered by this statement

For the purposes of clarity, The Broads Authority Executive Area is shown in Figure 2 below, and encompasses the floodplains and lower reaches of the main rivers (Bure, Waveney and Yare) and their tributaries (Ant, Chet, Thurne and Wensum) in Norfolk. The Broads Authority are the local planning authority for the Broads, with their own Local Plan and they co-operate jointly with other Local Planning Authorities on matters such as housing. It is recognised in the NSPF the Broads Authority Area overlaps functional housing and travel to work areas of central Norfolk, Great Yarmouth and Lowestoft.

Figure 2: The Broads Authority Executive Area



Source: https://www.broads-authority.gov.uk/about-us/who-we-are

List of Parties Involved

For the purposes of this document only, this bespoke Statement of Common Ground is between Norfolk County Council, the council directly responsible for preparing the Norfolk Minerals and Waste Local Plan, and the Broads Authority, a 'relevant authority', as defined in the Town and Country Planning (Local Planning) (England) Regulations 2012.

4. Governance Arrangements

This statement has been prepared by Norfolk County Council and agreed with the Broads Authority. The statement will be published on the Norfolk County Council website in the Examination Library once the Publication version of the Local Plan has been submitted to the Planning Inspectorate for independent examination.

It should be noted that the signatories to this document have done so on the basis of the principles set out in this Statement, and by signing it does not prejudice the ability of any such signatory making detailed representations (in support or objection) to the content of the emerging Local Plan.

5. Timetable for Agreement, Review and Update

This bespoke Statement of Common Ground is being published prior to the submission of the Norfolk Minerals and Waste Local Plan for examination and will be reviewed and updated if required during the examination process.

6. Matters Discussed and Resolutions Presented

The information below sets out the main issues raised by the Broads Authority at the Regulation 19/20 stage of the Minerals and Waste Local Plan, the NCC planning officer response and any remaining unresolved issues then follow.

Policies

1) Paragraph 1.2 of Chapter 1: Introduction

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID 99118]: (Comment)

Factual issues - 1.2 – as written, it excludes the Broads Authority.

Suggested changes: Rather than 'lodged with district councils' say 'lodged with Norfolk Local Planning Authorities'

NCC Planning Officer response: A minor modification to paragraph 1.2 will be proposed to change this wording as suggested.

Broads Authority comments to NCC response: Support this amendment.

2) Paragraph 3.12 of Chapter 3: Norfolk Spatial Portrait

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99120]: (comment)

3.12 - could the navigable waterways of the Broads be used for the transport of such freight?

Suggested changes: none

NCC Planning Officer response: There is the potential for the navigable waterways of the Broads to be used for the transport of minerals and waste associated freight, but this would depend on where the source and the market for the minerals or waste is in relation to the Broads and locations for unloading and offloading the minerals or waste. Paragraph 3.12 does not currently refer to the use of the Broads for transport of minerals and waste as it is not currently used for that purpose.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

3) Policy MW1. Development Management Criteria

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99138]: (Objection)

It is good that light pollution is mentioned in terms of amenity, but situations could arise where a site is isolated and there would be no impacts on amenity, but light pollution could be caused. The policy needs to consider the impact of light pollution in all instances – on people, landscape, dark skies, wildlife. The current wording is narrow in scope – only impact on people (amenity). Addressing light pollution is not necessarily about not having lighting, but a good design, doing what is needed at the right intensity and for as long as needed. Particularly in or near the Broads which have intrinsically dark skies. As worded, the policy means that schemes that have external lighting that does not cause amenity issues, but could cause other light pollution issues, fall through the gap.

Suggested changes: Another criterion needs to be added that specifically talks about light pollution. Para 6.12 is very good, but that is not policy – adding that wording as a new criterion would address our comment. Noting our comments on para 6.16 (see other comment), lighting needs to be fully justified as well. Referring to this guide would also address our comments: "Towards A Dark Sky Standard" [https://www.southdowns.gov.uk/wp-content/uploads/2021/08/Towards-A-Dark-Sky-Standard-V1.1.pdf]. This is a general guide and overview of the key considerations needed for good lighting design and the protection of dark skies.

NCC Planning Officer response: Noted. We accept that the policy currently only contains a specific reference to light pollution in terms of amenity and it would be beneficial to include a wider reference to light pollution impacts. Therefore, we will propose a modification to bullet point h of policy MW1 to state: The appearance, quality and character of the landscape, countryside and visual environment, <u>including intrinsically dark landscapes</u>, and any local features that contribute to its distinctiveness'.

Broads Authority Comments to NCC response: Support this amendment.

4) Policy MW1. Development Management Criteria

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99144]: (Objection)

MW1 part 1 – to be consistent with the NPPF, this criterion needs to mention the impact on the setting of these assets as well as on the assets themselves.

Suggested changes: Change criterion to say: Protected landscapes [insert: 'and their setting'] including the Norfolk Coast Area of Outstanding Natural Beauty, the Heritage Coast and the Broads.

NCC Planning Officer response: The NPPF (para 176) specifically refers to the protected landscapes and only refers to development within the setting in terms of its impact on the protected landscape, as follows: "development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas". Therefore, the current policy wording is in accordance with the NPPF and does not need to make specific reference to their setting. This is because the reference to setting in the NPPF is in relation to the impact of the development on the designated area, not on the setting itself.

Broads Authority Comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

5) Paragraph 6.16 of the supporting text to Policy MW1: Development Management Criteria

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99143]: (Objection)

Paragraph 6.16 – bullet point on lighting – needs to say more – it is about justifying the need for light in the first place, designing light so it is shielded and pointing down, of the right intensity for the job and only on when needed. This paragraph is a good start but does not go far enough and as per the comments on MW1, Policy MW1 needs to be wider than the impact of light on amenity.

Suggested changes: Change criterion to say: [Insert: 'Only using lighting if fully justified'], minimising the use of external lighting, use hooded/cowled lighting to direct light downwards, [insert: 'only have the lighting on when it is needed (use timers, on/off switches or motion sensors), make sure the intensity is appropriate for the lighting task'] and contain light within the site.

NCC Planning Officer response: Noted. The measures listed in the paragraph are examples and are not intended to be exhaustive. A minor modification to paragraph 6.16 will be proposed to include additional information on lighting.

Broads Authority Comments to response: Support this amendment.

Remaining unresolved issues: No

6) Paragraph 6.19 of the supporting text to Policy MW1: Development Management Criteria

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99119]: (Comment) 6.19 – again by only mentioning district and borough local plans, you don't include the Broads Authority's Local Plan. Say Norfolk LPA Local Plans.

Suggested changes: Say 'Norfolk Local Planning Authorities' instead of 'district councils'

NCC Planning Officer response: A minor modification to paragraph 6.19 will be proposed to change this wording as suggested.

Broads Authority comments to response: Support this amendment.

7) Paragraph 6.30 of the supporting text to Policy MW1: Development Management Criteria

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99139]: (Comment)
Para after 6.30 could do with a para number
Suggested changes: Insert paragraph number.

NCC Planning Officer response: It was intended to be part of 6.30, but we appreciate it has been formatted to

look like a new paragraph.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

8) Policy MW2: Transport

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99121]: (Comment)

MW2 - should this refer to how staff travel to and from the site as a place of work? MW2 – should this refer to the potential to use clean fuel/net zero emissions fuel for the HGVs or other work vehicles?

Suggested changes: none

NCC Planning Officer response: The policy would apply to both vehicle movements associated with the transport of minerals and waste to and from a site and staff travel to and from site as a place of work.

We consider that it is not appropriate for a land use policy to refer to the type of fuel to be used in HGVs or other work vehicles associated with a minerals or waste development and it would not be possible to condition or enforce this at the planning application stage.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

9) Policy MW3. Climate change mitigation and adaption

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID 99122]: (Comment)

We have some queries and questions. These are not saying the Plan is unsound by asking these queries, but we would welcome thoughts on these and they may result in improvements to the Plan. MW3 - Where a site will be in place for a number of years, would resilience to the effects of climate change be sensible to consider?

Suggested changes: Consider adding term/concept of 'resilience' to policy.

NCC Planning Officer response: Whilst the policy wording does not include the term resilience, the purpose and consequence of adaption is for developments to increase resilience to the effects of climate change.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

10) Policy MW5. Agricultural Soils

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99128]: (Comment)

Could the situation arise whereby peat is excavated, not as a produce to sell, but to access a minerals site or to develop a waste site? Peat has many qualities. We have a policy that seeks the reduction of peat excavated as part of a scheme and its appropriate assessment/'disposal' to address these qualities and prevent it from becoming a carbon source. Should the Minerals and Waste plan have something similar? (See DM10, page 49 Local-Plan-for-the-Broads.pdf (broadsauthority.gov.uk)).

Suggested changes: Consider peat reduction in policy.

NCC Planning Officer response: This policy uses the Agricultural Land Grades as mapped by Natural England and referred to in the NPPF and PPG. Peat is not a separate agricultural land grade in itself and therefore is not specifically referred to in the Policy. If a planning application was submitted for a minerals or waste development located in the Broads Authority area, then the relevant policies in the Local Plan for the Broads would be applied when the application is determined, including DM10 where applicable.

Policy WP3 of the NM&WLP directs waste management facilities to be located on land allocated, permitted or in existing industrial use (B2 and B8) or on previously developed land where the likelihood of peat being excavated as part of a scheme would be very low. In the west of Norfolk where there are mapped areas of peat (to the west of King's Lynn and south of Downham Market), there are no safeguarded mineral resources. Therefore, it is very unlikely that peat would be excavated as part of a mineral extraction operation for sand and gravel, Carstone or silica sand because the locations of peat do not overlap with the location of these mineral resources.

Broads Authority comments to response: NCC response noted. We do not wish to take this issue any further. **Remaining unresolved issues:** No

11) Policy WP2. Spatial strategy for waste management facilities

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99117]: (Objection)

This policy says 'New or enhanced waste management facilities should be located within five miles of one of Norfolk's urban areas or three miles of one of the main towns and be accessible via appropriate transport infrastructure, subject to the proposed development not being located within: the Broads Authority Executive Area or the Norfolk Coast Area of Outstanding Natural Beauty, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest'. Elsewhere, throughout the document, the stance is no minerals and waste sites within the Broads, yet this policy says they could be. A look at the maps suggests that there are no settlements that need a facility within the AONB or Executive Area to achieve the 3 miles/5 miles criteria; as such, why is this criterion needed?

Suggested changes: If this part of the policy is to be kept in, we request there is reference to the need for close working with the Broads Authority. We also request that any proposals would need to demonstrate no alternative sites are available. You could amend bullet point 1 as follows: the Broads Authority Executive Area or the Norfolk Coast Area of Outstanding Natural Beauty, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Any proposals in these areas would need to also demonstrate that no alternative sites outside of these areas are available. Scheme promoters will be required to work closely with the Broads Authority and AONB.

NCC Planning Officer response: The policy wording is in accordance with paragraph 177 of the NPPF. The policy criterion is required because there are some locations that are within 5 miles of an urban area or 3 miles of a main town that are also within the AONB or the Broads Authority area. There are no policies within the NM&WLP that state no minerals or waste sites within the Broads. The Broads Authority would be consulted on any minerals or waste planning applications that are submitted within the BA Executive area. We do not consider that it is appropriate to include the text about working closely with the BA and AONB within the spatial policy as this is not a spatial element. We do not consider that it is necessary to state that

proposals would also need to demonstrate that no alternative sites outside of these areas are available as the policy already states that it would not be appropriate other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest, in accordance with the NPPF.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

12) Map accompanying Policy WP2: Spatial strategy for waste management facilities

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99140]: (Comment)

Map 4 – may not matter, but the urban areas are blue, and the main towns are blue, and the shades are not very different, so it is not easy to tell which blue is which.

Suggested changes: None

NCC Planning Officer response: Noted. As each of the urban areas and main towns are labelled on Map 4 we do not consider that this is an issue.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

13) Policy WP9. Anaerobic digestion

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99123]: (Comment)

Aren't anaerobic digesters an in-scope type of development in terms of impact on nutrient enrichment and therefore nutrient neutrality?

Suggested changes: none

NCC Planning Officer response: Policy WP1 states that sufficient waste management capacity currently exists in Norfolk to meet the growth forecast. Therefore, the NM&WLP does not allocate any anaerobic digestion sites. The criteria-based policy for planning applications for anaerobic digestion facilities also requires compliance with the development management criteria in Policy MW1. At the planning application stage Policy MW1 requires proposals to demonstrate that the development would not have an unacceptable impact on the natural, geological and hydrogeological environment (including internationally, nationally or locally designated sites and irreplaceable habitats). This would include consideration of nutrient enrichment on designated sites and irreplaceable habitats if relevant to the location of the proposed facility. A Habitats Regulations Assessment (Task 1 Test of Likely Significant Effects) has been carried out on the NM&WLP. Any planning application submitted for anaerobic digestion would also need to be assessed under the Conservation of the Habitats and Species Regulations 2017 (as amended).

It should also be noted that an anaerobic digestion facility would require an Environmental Permit from the Environment Agency and paragraph 188 of the NPPF (2021) states: "The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively."

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

14) Policy WP13. Landfill mining and reclamation

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99124]: (Comment)

Some of the wording in 13.5 is not included in WP13. In particular, there is no mention in the policy of the need to mitigate the potential rapid release of leachate or emissions and odours. This is mentioned in 13.5 but not in the policy.

Suggested changes: This may be covered to some extent in MW1, but as it is raised specifically in 13.5, does it need to be a consideration for schemes captured by WP13?

NCC Planning Officer response: The Policy refers to the requirement for proposals to comply with development management criteria set out in Policy MW1. We consider that this covers the assessment of potential impacts such as the release of leachate, landfill gas emissions and odours. Policy MW1 states that waste management development will be acceptable where the proposal demonstrate that the development would not have an unacceptable impact on local amenity and health (including odour and air quality), the quality and quantity of surface waterbodies and groundwater, the natural, geological and hydrogeological environment.

It should also be noted that a landfill mining operation would require an Environmental Permit from the Environment Agency and paragraph 188 of the NPPF (2021) states: "The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively."

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

15) Paragraph W15.6 of the supporting text of Policy WP15: Whitlingham WRC

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99125]: (Comment)

WP15.6 – how does the likely requirement for all WRCs to be at best available technology by 2030 relate to what is written here?

Suggested changes: None

NCC Planning Officer response: A requirement for all WRCs to be at best available technology by 2030 does not affect the content of paragraph W15.6. However, we will be proposing a modification to Policy WP15 to include development proposals which are required to comply with new legislation (as suggested by Anglian Water).

Broads Authority comments to NCC response: Support this amendment.

Remaining unresolved issues: No

Policy WP16. Design of waste management facilities

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99131]: (Objection)

Uses the word 'should'. This is a weak term and all other policies before use the term 'will' — why is this wording used in this policy and why is it different to other policies? Does WP16 repeat MW1? If they are both needed, then WP16 needs to refer to impact on the Broads and AONB and their setting. Should it cross refer to MW1 like lots of other policies do?

Suggested changes: Continue to use the word 'will' or equivalent, like all other policies do. Refer to the impact on the Broads and AONB and/or cross refer to MW1. Suggested amendments are as follows:

Policy WP16: Design of waste management facilities

All waste management development [delete: should] [insert: 'will'] secure high-quality design and waste management facilities [delete: should] [insert: 'are required'] to incorporate:

- a) designs of an appropriate scale, density, massing, height and materials.
- b) efficient use of land and buildings, through the design, layout and orientation of buildings on site and through prioritising use of previously developed land.
- c) safe and convenient access for all potential users.
- d) schemes for the retention of existing and provision of new landscape features.
- e) measures which will protect, conserve and, where opportunities arise, enhance the natural, built, and historic environment including the setting of heritage assets; and
- f) climate change adaption and mitigation measures (as detailed in Policy MW3)

Proposed variations shall not materially diminish the quality of the approved development between permission and completion, as a result of changes being made to the permitted scheme.

[insert: "All schemes must also comply with the development management criteria set out in Policy MW1"].

NCC Planning Officer response: We consider that 'should' is an appropriate term to be used in this policy. Policy WP16 sets out specific details about design which are not included in MW1. We consider that Policy WP16 does not need to specifically refer to the impact on the Broads and AONB and their setting as this is already included in Policy MW1. In addition, Policy WP16 states that that development should incorporate "measures which will protect, conserve and, where opportunities arise, enhance the natural, built and historic environment ..." which would apply to the Broads, the AONB and their settings. We appreciate that some other policies which apply to particular types of development include a cross reference to policy MW1 for clarity, but we consider that it is not necessary to amend Policy WP16 to include a reference to Policy MW1 because the policies in the Plan should be read as a whole.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

17) Policy MP5. Core River Valleys

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99136]: (Objection)

This policy does not mention impact on the Broads or its setting and does not cross refer to MW1 like other policies do.

Suggested changes: For consistency, this policy needs to refer to the Broads and/or cross refer to MW1. You could add the following to the end of the policy:

All schemes must also comply with the development management criteria set out in Policy MW1.

NCC Planning Officer response: The Core River Valleys are a local landscape designation in the NM&WLP. Paragraph MP5.1 explains that Core River Valleys have not been defined in areas located within the Broads because the Broads landscape is already nationally protected. Therefore, we do not consider it necessary to amend the policy as suggested.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

18) Policy MP6. Cumulative impacts and phasing of workings

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99141]: (Comment)

MP6, as worded, is quite complicated... in the same sentence, the policy talks about making something unacceptable, acceptable... I understand what is trying to be said here, but I wonder if the wording is clear.

Suggested changes: none

NCC Planning Officer response: Noted, however, we do not propose to make any changes to the policy wording, which is similar to the existing adopted cumulative impacts policy (DM15) in the adopted Norfolk Minerals and Waste Core Strategy (2011) and the adopted cumulative impacts policy (MP5) in Suffolk County Council's Minerals and Waste Local Plan (2020).

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

19) Policy MP7. Progressive working, restoration and after-use

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99126]: (Comment) MP7 – could the restoration be a walk or cycle route itself – as in, not necessarily connected to the PROW? Could it become an attraction itself? MP7 – what about access to water, if a body of water becomes part of the scheme?

Suggested changes: none

NCC Planning Officer response: The policy states that "the restoration proposal must demonstrate that opportunities have been taken to improve public access where appropriate, particularly to implement the Norfolk Access Improvement Plan". There is the potential for a restored site to be a walk or cycle route itself, as has taken place at Whitlingham, but the aspiration of the policy is connectivity with the existing Public Rights of Way network. The practicality of stand-alone walk or cycle routes on a restored site would be dependent on the site being a suitable scale. Public Accessibility in perpetuity is dependent on the agreement of the landowner of the site and would be subject to a legal agreement. Public access to restored sites that include water bodies as part of the restoration also requires long term management of the site.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

20) Paragraph MP7.5 of the supporting text to Policy MP7

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99142]: (Comment) MP7.5 – grammar - strategy for maintaining biodiversity

Suggested changes: Correct grammar.

NCC Planning Officer response: Noted. This drafting error will be corrected with a minor modification.

Broads Authority comments to NCC response: Amendment supported.

21) Policy MP10. Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials.

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99137]: (Objection)

This policy uses the term 'should' in relation to the submission of a Minerals Infrastructure Impact Assessment. The rest of the policy uses 'will' for example. It seems that this assessment is essential, but the policy using the term 'should' implies it is not. Why is there difference in wording in this policy when compared to others?

Suggested changes: The criterion could be amended as follows:

Development proposals within 250 metres of the above minerals related facilities [delete: should] [insert: 'are required to'] demonstrate that they would not prevent or prejudice the use of those facilities, through the submission of a Minerals Infrastructure Impact Assessment, as set out in Appendix 9. The 'agent of change' principle will be applied to all such development.

NCC Planning Officer response: We considered that 'should' is sufficiently strong wording that the developer is expected to carry out this assessment. The policy states that Norfolk County Council would oppose development proposals which would prevent or prejudice the use of safeguarded sites for those purposes unless suitable alternative provision is made, or the applicant demonstrates that those sites no longer meet the needs of the aggregates industry. Therefore, it is in the developer's interest to submit an assessment to demonstrate that the development would not prevent or prejudice the use of the safeguarded facility.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

22) Appendix 2. Existing Mineral Site Specific Allocations Policies

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99127]: (Comment)

Appendix 2 – I am not sure what these are. Are you saying that these policies in another document will still be in place? They have not been reviewed, but left as is? So this Local Plan is additional to these policies? Where are these saved policies? This is not clear and might need explaining better. For example, I searched the document for 'Appendix 2' and the only two occurrences are the title of Appendix 2 and the contents page.

Suggested changes: None

NCC Planning Officer response: These appendices list the existing policies in the three adopted Norfolk Minerals and Waste Development Plan Documents and whether they will be deleted or replaced when the new NM&WLP is adopted. They are not saved policies and they will not still be in place when the new NM&WLP is adopted. The new NM&WLP is not in addition to these policies. A new sentence will be included in Appendix 1, Appendix 2 and Appendix 3 to explain this as a minor modification.

Broads Authority comments to response: Amendment supported.

Specific Site Allocations

23) Policy MIN 65 Stanninghall

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99135]: (Objection)

It is noted that this site has planning permission and the plan may not include this policy if the scheme has started. On Google Maps there is a photograph apparently showing some plant of significant size at the existing Tarmac Stanninghall Quarry. The Plan text does not indicate anything of this scale/height although Policy MIN 65 (j) refers to use of existing processing plant at the proposed site. This is somewhat concerning. The site could potentially have adverse effects on the Broads and setting of the Broads in terms of scale, and proximity in relation to the numbers of visitors to attractions and facilities in Horstead/Coltishall area – this needs to be addressed by the LVIA.

Suggested changes: The Specific Site Allocation Policy MIN 65 includes a requirement for submission of an LVIA with any planning application. If larger scale plant is moved to the proposed site, that any LVIA would need to assess the effects of this on the Broads area. The LVIA needs to also assess impact in terms of scale, and proximity in relation to the numbers of visitors to attractions and facilities. These requirements need to be made clearer in this section.

NCC Planning Officer response: Planning permission (reference FUL/2020/0085) was granted for mineral extraction at this site in August 2021 and the permission has been implemented. The existing permitted Stanninghall Quarry, which has been operational since 2015, contains sand and gravel washing and screening plant within a defined plant site area. Site MIN 65 is an extension to the existing Stanninghall Quarry. No changes to the plant site are proposed and therefore mineral extracted within the allocation site MIN 65 would be processed at the existing plant site. Therefore, the policy amendments proposed in this representation are not required as mineral extraction operations at this permitted site are controlled by planning conditions and the plant site will remain in its current location.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

24) Site Characteristics paragraph of the supporting text to Policy MIN 65: Stanninghall

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99133]: (Objection)

It is noted that this site has planning permission and the plan may not include this policy if the scheme has started. The Site Characteristics para states could be extracted within 13 years. It is not entirely clear whether this refers to the proposed site only or the proposed plus existing sites.

Suggested changes: Clarification is required as the timescale clearly influences the duration of effects. The Local Plan needs to clarify the timeline included.

NCC Planning Officer response: The site characteristics paragraph refers to the estimated sand and gravel resource within site MIN 65 which is the northern extension area as shown on the red line plan in the Policies Map. It is therefore clear that the tonnage and timescale referred to relates to site MIN 65 (the northern extension to Stanninghall) and not the existing southern part of the Stanninghall quarry site which has been operational since 2015. The planning permission (reference FUL/2020/0085) which was granted in August 2021 incorporated both the existing southern site and the northern extension area allocated in Policy MIN 65. The planning permission requires the extraction of sand and gravel at the whole site to cease by 31 December 2037 and for the site to be restored by 31 December 2038. The planning permission also requires the site to be worked and restored in phases. Planning permission for mineral extraction at the site (FUL/2020/0085) has been implemented.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

25) Paragraph M65.6 of the supporting text to Policy MIN 65: Stanninghall

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99132]: (Objection)

It is noted that this site has planning permission and the plan may not include this policy if the scheme has started. M65.6 Landscape states: it should be possible to design a scheme of working, incorporating screening. However, the plan does not show any screening (only areas of Buffer). Some of the northern and eastern boundaries may require screening as mitigation for adverse visual effects if identified by LVIA.

Suggested changes: The plan may need to include screening, or the wording of the text improved to refer to the potential need for screening as well as saying that the LVIA needs to address the issue of adverse visual effects (screening).

NCC Planning Officer response: Planning permission (reference FUL/2020/0085) was granted for this site in August 2021 and the permission has been implemented. The planning permission includes condition 5 which requires a scheme of landscaping to be submitted to and agreed in writing by the County Planning Authority, including advanced planting proposed. This condition was discharged in December 2022. The advanced planting includes new hedgerow along the eastern boundary and hedgerow and woodland planting along the northern boundary. It also includes a temporary soil screening bund located to the south of the advanced planting along the northern boundary. Therefore, the policy amendments proposed in this representation are not required as mineral extraction operations at this permitted site are controlled by planning conditions.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

26) Policy MIN 25 Haddiscoe

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99134]: (Objection)

This is immediately adjacent to the Broads Authority boundary

Landscape impact concerns are as follows:

Proximity and landscape sensitivity mean that there would be potential for adverse effects on the Broads and setting.

Visual: processing plant – topography could enable this to be more visible. Possible lighting associated with plant and operation would exacerbate visual effects. Bunding during the extraction phases could also cause visual intrusion.

Footpath to NE across marshes - users are sensitive receptors. There may also be views from northern valley side above Blunderston/Flixton to Herringfleet Marshes.

Noise from plant and lorry movements.

Dust from extraction operations.

Additional lorry traffic on local roads in BA area.

Heritage concerns are as follows:

The proposed site here is immediately adjacent to the BA Executive Area boundary and I would suggest that there is the potential for harm to the setting of listed buildings, in particular, the White House, which is positioned to the north-east of the site.

In its assessment the document appears to assess the impact on heritage assets largely in terms of potential views of the mineral extraction site.

However, I would suggest that the definition of 'setting' is somewhat wider than that, with the NPPF glossary definition stating it is 'the surroundings in which a heritage asset is experienced'. The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 guidance by Historic England goes on to state (p2): 'The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its

setting is also influenced by other environmental factors, such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places'.

Amenity concerns are as follows:

This scheme is going to bring new mineral extraction to the area. There are properties and businesses nearby, that are already in existence. The amenity impacts of the scheme on existing properties needs to be considered. Any scheme will need to consider and address amenity policy requirements and this could relate to the issue or noise, dust, over bearing, hours of operation for example. Has an assessment on the impact on amenity been completed as part of the consideration of this site?

Suggested changes: Policy MIN 25 (b) refers to the submission of an acceptable Landscape and Visual Impact Assessment. However, it doesn't include the Broads. The assessment of impacts on the Broads needs to be included as an aim of the study.

The potential for detrimental impact on designated heritage assets is greater than implied in the policy. This section needs to improve reference to the potential for harm to the setting of listed buildings, in particular, the White House. I would suggest that there is some acknowledgement in M25.4 to the impact on the setting of the listed buildings being more than visual and in the last sentence it should say that it may be necessary to require measures to reduce the potential impacts on the setting of issues such as noise, dust and vibration, as well as providing the screening etc referred to, to reduce visual impacts.

Amenity impacts and concerns and the impact on any existing buildings and occupiers needs to be emphasised and addressed in this policy.

NCC Planning Officer response: If external lighting is proposed at a development, then lighting details and lighting assessments are required as part of the planning application process, together with mitigation measures to ensure that unacceptable adverse impacts do not occur, which would be conditioned as part of any planning permission. An example planning condition would be to require any external lighting to not cause glare beyond the site boundary and to require that lighting is not used at night when the site is not operational. A planning application has been submitted by Breedon Trading Limited for mineral extraction at this site (reference FUL/2022/0056). The planning application states that there will be no lighting when the site is not operational. If permitted, then the operational hours of the site will be limited by planning condition. The operational hours proposed in the planning application are 08:00 to 17:00 Monday to Friday and 08:00 to 13:00 on Saturdays. Regular monitoring and enforcement of compliance with planning conditions is carried out by Norfolk County Council as the Mineral Planning Authority.

The proposed allocation is screened by mature planting and the valley side to the north is wooded, as MIN 25 is only at a slight incline of a few metres across the site views from within the Broads Authority Executive Area would be screened at both short and long distance. The established screening surrounding the site is a mixture of deciduous and evergreen species, and bunding would be set behind the screening and grassed which would reduce the potential impacts from any bunding itself. The site proposer intends that processing of the mineral would take place at the already permitted plant site at Norton Subcourse quarry. Any screening plant at the Haddiscoe site could be low level and would be subject to assessment in any future planning application through a Landscape and Visual Impact Assessment (LVIA) as set out in requirement (b) of Specific Site Allocation Policy MIN 25. Paragraph 6.23-6.26 of the Publication version of the NM&WLP states that an LVIA will be required for mineral extraction and includes a number of features to be considered regarding the character of Norfolk landscapes including the Broads Authority Executive Area generally, therefore it is not necessary for the requirement to refer to The Broads specifically as it states "...any potential impacts to the wider landscape...".

Specific Site Allocation Policy MIN 25 (f) requires "the submission of an acceptable Transport Assessment or Statement (as appropriate) to assess the impacts of HGV traffic along the access route, and appropriate mitigation for any potential impacts to the highway" at the planning application stage; this assessment would be considered by the Highway Authority. A planning application would need to demonstrate that there would not be an unacceptable impact (including cumulative impact in combination with other existing and permitted development) on the safety and capacity of the highway network. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. If required, a maximum annual extraction rate can be controlled by planning condition.

Specific Site Allocation Policy MIN 25 (a) requires "the submission of acceptable noise and dust assessments and a programme of mitigation measures to deal appropriately with any amenity impacts" at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including air quality and dust). These assessments would be prepared in accordance with national guidance and considered by an Environmental Health Officer as part of the process to decide the suitability of the proposed extraction. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. As such the potential for these impacts and appropriate mitigation would be identified for all relevant receptors. Vibration from sand and gravel workings is not a significant issue due to the depth of working and the nature of the working methods, this only tends to be an issue for hard rock quarries where blasting is used to obtain material.

Regarding designated heritage assets, Specific Site Allocation Policy MIN 25 requirement (g) states that any future planning application will need to include a Heritage Statement to identify heritage assets and their settings, including the Grade II listed White House Farm, and the potential for impacts and identify appropriate mitigation if required. A Heritage Impact Assessment of the allocation MIN 25 will accompany the submission of the Minerals and Waste Local Plan for examination.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

Remaining unresolved issues: No

Background Documents

27) Appendix A of the Sustainability Appraisal Report

Respondent: Broads Authority (Natalie Beal) [Person ID: 16282]

Representation [Rep ID: 99149]: (Comment)

Given the recent announcement from Government in relation to fracking, is that something that the minerals and waste local plan needs to address? Would applications for such sites come to the County or the Local Planning Authority? That being said, the new Prime Minister, Rishi Sunak, has indicated changing stance again to banning fracking unless scientifically proven to not cause issues Does the Minerals and Waste Local Plan need to set out a policy position on fracking, in the interests of clarity?

Suggested changes: None

NCC Planning Officer response: Planning applications for unconventional hydrocarbon extraction within Norfolk would be for the County Planning Authority to determine. Licence blocks in Norfolk have been offered for tender for UK Petroleum Exploration and Development Licences (PEDL) by the relevant government department but no PEDL have been applied for in Norfolk. PEDL are required before any exploration for hydrocarbons can take place. AS there are no Petroleum Licence Areas in Norfolk (as of April 2023) there is no requirement in the NPPF for the NM&WLP to include a policy on hydrocarbon extraction. The British Geological Survey (BGS) has carried out extensive work to identify areas of feasible shale gas deposits in the UK https://www.bgs.ac.uk/geology-projects/shale-gas/shale-gas-in-the-uk/. Norfolk does not contain any of the four areas which have been identified as potentially viable for the commercial extraction of shale gas. Therefore, it is very unlikely that 'fracking' will take place in Norfolk.

Broads Authority comments to NCC response: NCC response noted. We do not wish to take this issue any further.

7. Signatures and Summary of Resolutions to agree/disagree

Resolutions

The table below summarises the up-to-date progress on matters discussed and resolutions as of 04/08/2023.

Matter	Policy/ Paragraph Reference - summary of issue	Rep ID	Resolved/Unresolved	Date agreed
1	Paragraph 1.2 of Chapter 1: Introduction - 'Norfolk Local Planning Authorities'	99118	Resolved	24/07/2023
2	Paragraph 3.12 of Chapter 3: Norfolk Spatial Portrait – Broads for transport of freight	99120	N/A – no change requested	24/07/2023
3	Policy MW1. Development Management Criteria – light pollution	99138	Resolved	24/07/2023
4	Policy MW1. Development Management Criteria – setting	99144	Resolved	04/08/2023
5	Paragraph 6.16 of the supporting text to Policy MW1 - Lighting	99143	Resolved	24/07/2023
6	Paragraph 6.19 of the supporting text to Policy MW1- 'Norfolk Local Planning Authorities'	99119	Resolved	24/07/2023
7	Paragraph 6.30 of the supporting text to Policy MW1 – Para number	99139	Resolved	24/07/2023
8	Policy MW2: Transport – travel to work and fuel for HGV's	99121	Resolved	24/07/2023
9	Policy MW3. Climate change mitigation and adaption - resilience	99122	Resolved	24/07/2023
10	Policy MW5. Agricultural Soils - peat	99128	Resolved	24/07/2023
11	Policy WP2. Spatial strategy for waste management facilities – 3/5 miles criterion	99117	Resolved	04/08/2023
12	Map accompanying Policy WP2: Spatial strategy for waste management facilities – map colours	99140	N/A – no change requested	24/07/2023
13	Policy WP9. Anaerobic digestion – nutrient neutrality	99123	N/A – no change requested	24/07/2023
14	Policy WP13. Landfill mining and reclamation – emissions and odours not in policy.	99124	Resolved	24/07/2023
15	Paragraph W15.6 of the supporting text of Policy WP15– best available technology by 2030	99125	N/A – no change requested	24/07/2023
16	Policy WP16. Design of waste management facilities – cross referencing MW1 for consistency	99131	Resolved	24/07/2023
17	Policy MP5. Core River Valleys - cross referencing MW1 for consistency	99136	Resolved	24/07/2023

Matter	Policy/ Paragraph Reference - summary of issue	Rep ID	Resolved/Unresolved	Date agreed
18	Policy MP6. Cumulative impacts and phasing of workings - cross referencing MW1 for consistency	99141	Resolved	24/07/2023
19	Policy MP7. Progressive working, restoration and after-use – Walk/cycle route	99126	N/A – no change requested	24/07/2023
20	Paragraph MP7.5 of the supporting text to Policy MP7 - Grammar	99142	Resolved	24/07/2023
21	Policy MP10. Safeguarding of port and rail facilities etc – should/required to	99137	Resolved	24/07/2023
22	Appendix 2. Existing Mineral Site Specific Allocations Policies – clarification on Appendix 2	99127	Resolved	24/07/2023
23	Policy MIN 65 Stanninghall – LVIA requirements	99135	Resolved	24/07/2023
24	Site Characteristics paragraph of the supporting text to Policy MIN 65– clarify timeline	99133	Resolved	24/07/2023
25	Paragraph M65.6 of the supporting text to Policy MIN 65 - screening	99132	Resolved	24/07/2023
26	Policy MIN 25 Haddiscoe – LVIA, heritage and amenity impacts	99134	Resolved	04/08/2023
27	Appendix A of the Sustainability Appraisal Report - Fracking	99149	Resolved	24/07/2023

Signatures

• Caroline Jeffery, Principal Planner (Minerals and Waste Policy), Norfolk County Council

REDACTED SIGNATURE

Dated 04 August 2023

• Natalie Beal, Planning Policy Officer, Broads Authority

REDACTED SIGNATURE

Dated 23 August 2023