



Norfolk County Council

Norfolk County Council
Minerals and Waste Local Plan
2021-2038

Statement of Common Ground between
Anglian Water and Norfolk County Council

November 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 Consultation 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 the means by which 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 Anglian Water and Norfolk County Council only, as requested by Anglian Water at the Regulation 19 Pre-submission Consultation stage. The issues and matters discussed by Anglian Water have been set out in this document, with 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 policies 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 [Norfolk Strategic Planning Framework](#) (NSPF). 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 within the NSPF sets out the Norfolk strategic statement of common ground between all signatories to the agreement, set out on page 2, in relation to minerals and waste.

Anglian Water are a signatory of the NSPF. **Agreement 23** states ‘**The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.**’

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.

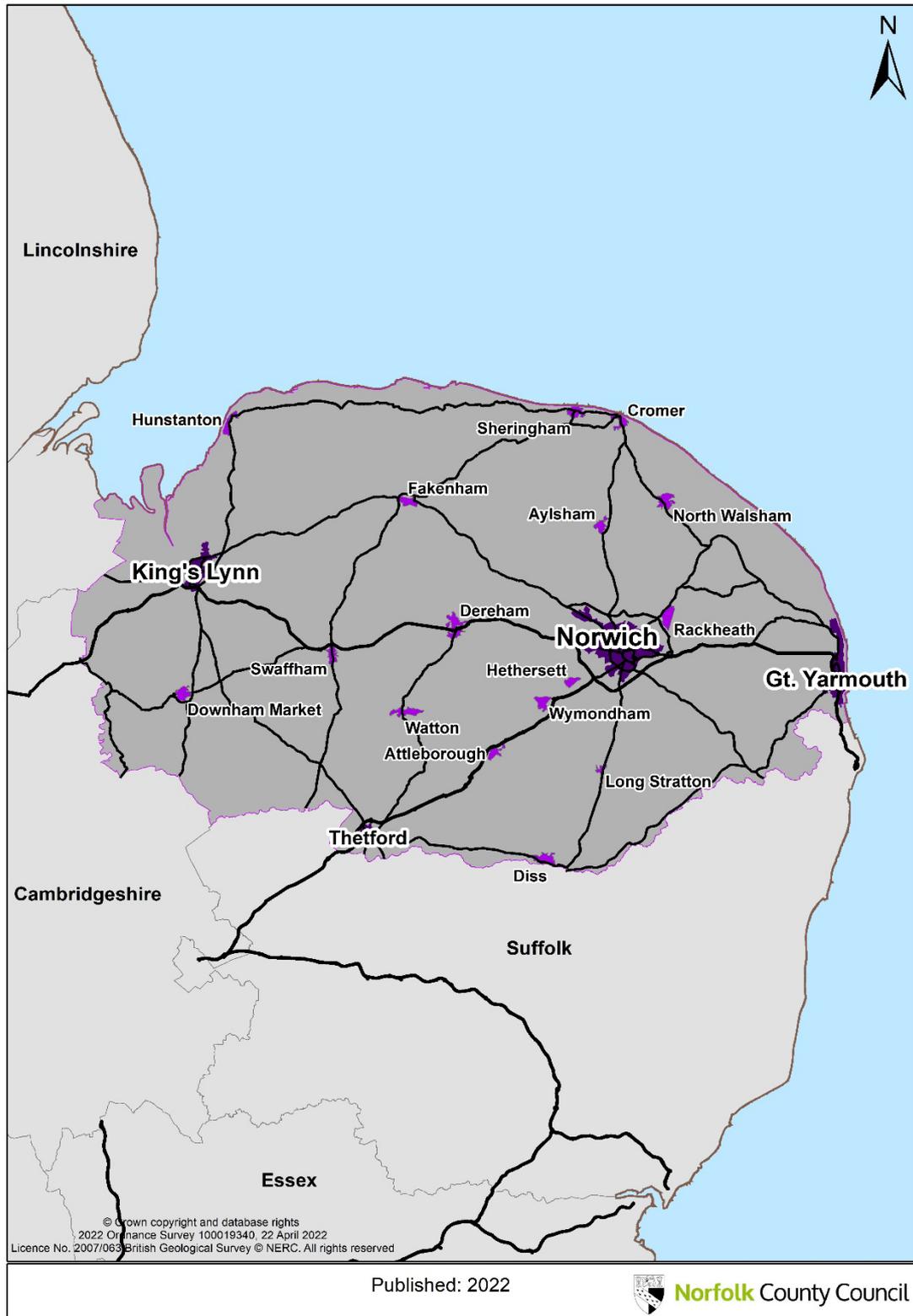


Figure 1: Strategic Geography covered by this statement

3. List of Parties Involved

For the purposes of this document only, this statement of common ground is between Norfolk County Council, the council directly responsible for preparing the Norfolk Minerals and Waste Local Plan, and Anglian Water, a specific consultation body, 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 Anglian Water. 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 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 table below sets out the main issues raised at the Regulation 19 stage of the Minerals and Waste Local Plan in Anglian Water's comments, the changes proposed to the NM&WLP by Anglian Water, the NCC planning officer response, and any remaining unresolved issues.

1) Comments on whole document

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99270]: (Comment)

Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.

Anglian Water is a statutory consultee under the Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water wants to proactively engage with the local plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protects the environment and natural resources. In the context of the Minerals and Waste Local Plan preparation, we are engaging as a waste operator through the operation and management of our water recycling network and centres. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.

Anglian Water has previously engaged with Norfolk County Council in making representations on earlier iterations of the Minerals and Waste Local Plan (MWLP). Through our representation on the Publication Version of the MWLP we will positively respond with reference to our previous comments and indicate areas of support and where we have outstanding matters of concern

Conclusion

Anglian Water is supportive of many of the policy areas that guide development associated with our role as a waste operator, and policies that seek to safeguard our existing assets and network. We though continue to have a number of concerns in relation to the soundness of the plan, and a number of these were previously raised in our consultation response to the Preferred Options consultation (Reg. 18) and newly introduced policies/policy tests. Given the matters raised in our response, we would want to engage with Norfolk County Council Minerals and Waste Policy Team to identify areas where we can agree proposed modifications to policy and areas where there are outstanding matters to be addressed through examination process. We would welcome the preparation of a Statement of Common Ground in this respect.

NCC Planning Officer response: Noted. The representations made by Anglian Water on specific paragraphs and policies within the NM&WLP are responded to in the relevant sections of this Feedback Report relating to each policy. Norfolk County Council will prepare a Statement of Common Ground with Anglian Water as requested.

Anglian Water comments to NCC response: Anglian Water welcomes the opportunity to engage with NCC over the matters raised in our submission to the Publication Version of the Norfolk MWLP.

Remaining unresolved issues: Yes (see Matter 10 and Matter 13)

2) Policy MW1. Development Management Criteria

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99271]: (Objection)

We note that the policy has been amended to include additional clauses regarding the conservation and enhancement of the natural, built and historic environment, and surrounding landscapes. Whilst we support the policy aims, the approach is unclear and does not provide sufficient detail for applicants. For example, the bulleted list provides a range of measures and enhancements to be provided, but these should be informed by the context of the application, given that the nature of mineral extraction and waste management proposals vary significantly. Furthermore, the supporting text for the requirement to provide biodiversity and geodiversity net gains, does not provide an interpretation of geodiversity net gain nor how applicants should demonstrate how it will be provided and managed.

Suggested change: We disagree with the use of the 'must' in the final section of this policy, as the purpose of planning is to balance the benefits versus the harm. We propose that 'should' is a term that provides a better

interpretation of this policy requirement, particularly as enhancement measures need to be justified and proportionate to development proposals. The policy seeks to address a wide range of development management criteria and it may be clearer if it is split into specific subject/topic areas that reflects the supporting text.

NCC Planning Officer response: The policy states that “proposals must also conserve and where opportunities arise enhance ...” therefore, in terms of enhancement the policy wording provides flexibility as to when specific enhancement measures will be appropriate and what the enhancement measures could be. Therefore, enhancement measures will be informed by the context of the application and assessed on a case-by-case basis at the planning application stage. Therefore, no change is required to the policy wording.

The principle of the provision of geodiversity net gains is to deliver measurable improvements for geodiversity by creating or enhancing opportunities for the study or research of geodiversity either by providing areas for this (such as open faces) or by research or study of geological exposures during the course of the development. This would again be subject to the wording above regarding opportunities, and so would be assessed on a case-by-case basis informed by the context of each application.

We will propose an amendment to paragraph 6.21 to insert a new sentence to state “Geodiversity net gains will be assessed on a case-by-case basis informed by the context of each application.”

Geodiversity is defined in the glossary of the NM&WLP.

Anglian Water comments to NCC response: Anglian Water welcomes the explanation regarding the intention of the policy.

Anglian Water suggests that the term geodiversity should be explained in the glossary, and the supporting text should indicate that ‘geodiversity net gains will be assessed on a case-by-case basis informed by the context of each application’.

Remaining unresolved issues: No

3) Policy MW3. Climate change mitigation and adaption

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99272]: (Comment)

We support the aims of the policy which aligns with our Strategic Direction Statement and strategic ambitions. Anglian Water recognises that climate change is one of the key challenges for us as a water company, and we have a clear ambition to become a net zero business by 2030 and reduce capital (embedded) carbon by 70% from a 2010 baseline. Our Net Zero Strategy to 2030 includes measures for decarbonising our electricity supply and vehicle fleet, as well as focusing on procuring green electricity. Currently we generate around 30% of our energy from renewable sources including bio-resources, wind, and solar power – our existing renewable energy installations not only contribute towards our renewable energy target, but also help to provide energy security for the operation of essential infrastructure such as our water supply and water recycling networks and assets. Our 2025 target is to increase our energy from renewables to 45% and 100% by 2030. Our strategy is based on decarbonisation principles and hierarchy that first reduces emissions, uses renewables and green energy, and then utilises carbon insets/offsets through natural sequestration measures. We have also maximised opportunities to extract heat from final effluent discharged from Anglian Water water recycling centres which is then transferred to greenhouses in Norfolk (Whitlingham) and Suffolk. Closed-loop heat pumps are used to transfer waste heat from our water recycling centres to the greenhouses to accelerate the growth of the plants. The heat pumps are powered by a new CHP (Combined Heat and Power) plant, the carbon emissions of which are channelled back into the greenhouses to help the plants grow.

The policy accords with the paragraph 20 of the NPPF (National Planning Policy Framework), although it could set out clearer planning measures to address climate change mitigation and adaptation. A complete policy position would set out the current baseline of emissions from the mineral and waste sectors and show the pathway to reducing emissions by 78% by 2035 and to net zero by 2050, as set out in the Climate Change Act.

The recent announcement that the government has proposed changing national planning policy to relax restrictions on building new onshore wind farms in England by removing the rigid requirement for onshore wind sites to be designated in a local plan, is an opportunity to highlight that our operational sites such as WRCs could be potential locations for onshore wind, subject to other policy considerations. In addition, we welcome the amendments to criterion d. following our representation to the Preferred Options consultation, regarding managing surface water flows through sustainable drainage systems, and connections to the public sewerage network.

NCC Planning Officer response: Noted. We have been unable to find any published data on the current baseline of emissions from the mineral sector in Norfolk. Data is available on emissions from the mining and quarrying sector in the UK which was 18620 kt CO₂e in 2020 ([UK mining & quarrying GHG emissions | Statista](#)) and includes production of crushed rock, construction materials, industrial minerals, coal, oil and gas. Data is available on the emissions from landfill (76.8 kt CO₂e in 2020) and 'other' waste management (71.6 kt CO₂e in 2020) in Norfolk ([Local Authority GHG Map \(beis.gov.uk\)](#)). However, emissions from transport as a whole are reported separately and therefore the proportion of emissions from transport from the minerals and waste sectors in Norfolk is not available. Some waste management facilities may also be categorised in different sectors, for example, Palm Paper Ltd is not within the waste management category and instead is a 'large industrial installation' (emitting 13 tonnes of CO₂ in 2020). Therefore, it is not possible to set out the current baseline of emissions from the mineral and waste sectors in Norfolk. Policy MW3 will apply to all future planning applications for minerals and waste development, however, it is not possible to reduce the carbon emissions from existing permitted developments through this policy unless new planning applications are submitted for those developments.

Norfolk County Council's 'Local List for the Validation of Minerals and Waste Planning Applications' (2023) requires all planning applications for major development to submit a 'climate change, energy, renewable energy and sustainability statement' to set out how details of sustainable design and construction have been addressed.

Anglian Water comments to NCC response: Anglian Water recognises the difficulty the Council faces in trying to establish a baseline for the minerals and waste sector, and such information is likely to emerge as sectors prepare to meet the national zero carbon target in 2050 (Climate Change Act 2008). We suggest that a reference in the text to refer to the establishment of a baseline and clear targets when sufficient information is available to align the minerals and waste sector -even if this needs to be caveated to exclude certain uses/emissions that cannot be quantified. This could be established part of the annual monitoring procedure for Policy MW3, rather than being addressed in a review of the MWLP.

Remaining unresolved issues: No

4) Policy WP2. Spatial strategy for waste management facilities

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99273]: (Support)

Anglian Water is supportive of the policy and welcomes the amendments following our previous representation, to ensure that it is consistent with the National Planning Policy Framework and planning practice guidance in terms of the specific locational needs for water recycling centres.

NCC Planning Officer response: Support noted.

Anglian Water comments to NCC response: N/A

Remaining unresolved issues: No

5) Policy WP3. Land suitable for waste management facilities

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99274]: (Objection)

The Local Plan is unsound because Policy WP3 is not positively prepared in terms of achieving sustainable development or justified given reasonable alternatives. We would welcome modifications to the policy and supporting text.

Reference is made to waste management facilities on water recycling centres being limited to composting and anaerobic digestion. In our representation to the Preferred Options Consultation, we indicated that Anglian Water as sewerage undertaker is concerned that this is not justified in that there may be other waste management uses which would be suitable at water recycling centres, dependent upon both scale and location. The policy as currently drafted stifles innovations coming forward in the field of bio-resources. Therefore, the policy should be flexible to ensure that future sustainable options for bio-resources are considered - particularly in the context of addressing climate change mitigation and nutrient neutrality.

We consider that the development management criteria in Policy MW1 should be appropriate to ensure that suitable waste management facilities are considered at water recycling centres, and the specific types of facilities do not need to be specified.

We would therefore welcome modifications to Policy WP3 to allow for other waste management uses at water recycling centres associated with ambitions for the long-term sustainable management and operation of our facilities. Amending the policy would support the delivery of lower carbon solutions and so assist in the pathway to net zero for the sector in Norfolk. g) water recycling centres [delete: (composting and anaerobic digestion only)];

Suggested change: g) water recycling centres [delete: (composting and anaerobic digestion only)];

NCC Planning Officer response: Noted. Water Recycling Centres (WRCs) have historically been located within the open countryside close to watercourses. Generally, waste management facilities (other than landfill or WRCs) would not be suitable in the open countryside. However, we note that the current inclusion of composting and AD facilities only at water recycling centres is potentially restrictive with regards to future innovative technologies in the field of bio-resources at WRCs. Therefore, we will propose a main modification to delete '(composting and anaerobic digestion only)' and replace with '(to principally manage wastes arising from the WRC process only)' to provide greater flexibility regarding the potential waste management treatment methods that could be used.

Anglian Water comments to NCC response: Anglian Water welcomes the proposed main modification to Policy WP3, and we are satisfied that this will address the flexibility to manage waste streams arising at our WRCs in a way that will help us deliver low carbon solutions.

Remaining unresolved issues: No

6) Policy WP9. Anaerobic digestion

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99275]: (Support)

We support the policy, which acknowledges that anaerobic digestion facilities will be acceptable where they are integrated with water recycling centres.

NCC Planning Officer response: Support noted.

Anglian Water comments to NCC response: N/A

Remaining unresolved issues: No

7) paragraph W9.1 of the supporting text to Policy WP9.

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99526]: (Comment)

Suggested change: It would be helpful if the supporting text explained that anaerobic digestion (AD) produces biogas (a mixture of around 60% methane and 40% carbon dioxide) and digestate, and that biogas can be burned directly in a gas boiler to produce heat or burnt in a combined heat and power (CHP) unit to produce heat and electricity.

Alternatively, the biogas can be cleaned to remove the carbon dioxide and other substances, to produce biomethane, which can be injected into the national gas grid to be used in the same way as natural gas or used as a vehicle fuel.

This would demonstrate the options available from AD and replace the text in paragraph W9.1 that states methane gas drives a diesel generator.

NCC Planning Officer response: A minor modification will be proposed to amend the supporting text in paragraph W9.1 as suggested.

Anglian Water comments to NCC response: Anglian Water welcomes the proposed minor modification to the supporting text to provide clarity on the AD process.

Remaining unresolved issues: No

8) Policy WP14. Water recycling centres

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99277]: (Objection)

The Local Plan is unsound because Policy WP14 is not positively prepared in terms of achieving sustainable development or justified given reasonable alternatives. We support the amendments to this policy that reflect our previous representations to the Minerals and Waste Local Plan. However, we note that policy MW3 Climate Change Mitigation and Adaptation provides a positive policy framework for renewable energy to support our routemap to net zero ambition - this includes renewable energy installations contributing to our energy requirements at our water recycling centres (WRCs). It would be helpful if the policy and supporting text acknowledges that improvements to existing sites and supporting infrastructure relating to climate change mitigation and adaptation and resilience of essential infrastructure will be addressed through Policy MW3.

Suggested change: PROPOSED POLICY MODIFICATION: New or extended Water Recycling Centres, or improvements to existing sites and supporting infrastructure, will only be acceptable where such proposals aim to:

- a. treat a greater quantity of wastewater; and/or
- b. improve the quality of discharged water; and/or
- c. reduce the environmental impact of operation; [insert: "and/or"]

[insert: 'd. incorporate climate change adaption and mitigation measures (as detailed in Policy MW3)'].

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

NCC Planning Officer response: Noted. We will propose a main modification to the policy wording to make the suggested change.

Anglian Water comments to NCC response: Anglian Water welcomes the Council's support for our suggested amendment for Policy WP14 and the intention to propose a main modification to this effect.

Remaining unresolved issues: No

9) paragraph W14.2 of the supporting text to Policy WP14

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99276]: (Comment)

SUPPORTING TEXT MODIFICATION: We would welcome modifications to this paragraph of the supporting text as it implies that there have been recent changes to the General Permitted Development Order (2015) regarding the permitted development rights for water and sewerage in Schedule 2.

Suggested change: It would be correct to state: "W14.2 With increasing populations and water quality standards there is continuing investment being made into wastewater treatment. [delete: Although changes to permitted development rights have sought to remove the need for planning applications for very small developments] [insert: 'Permitted development rights exist for certain types of water and sewerage development which are set out in the General Permitted Development Rights Order 2015 (as amended).] [Insert: 'However'], there are still applications that will need to be determined [insert: 'beyond the thresholds for permitted development']".

NCC Planning Officer response: Noted. A minor modification will be proposed to amend the supporting text as suggested.

Anglian Water comments to NCC response: Anglian Water welcomes the proposed minor modification to the supporting text to reflect our suggested amendment.

Remaining unresolved issues: No

10) Policy WP15. Whitlingham Water Recycling Centre

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99281]: (Objection) The Local Plan is unsound because Policy WP15 is not positively prepared in terms of achieving sustainable development or justified given reasonable alternatives.

We support the amendments to the policy because of our previous consultation submission to the Preferred Options consultation in 2019. However, there remains an outstanding area of concern that we wish to raise, as a result of our comments on the supporting text above, regarding our current and emerging plans and strategies that provide further detail regarding future investments at Whitlingham WRC.

PROPOSED POLICY MODIFICATION: Our draft DWMP consultation was undertaken with a wide range of stakeholders including local authorities and The Environment Agency. The policy does not need to reference the requirement for a longer-term masterplan as this aspect is fulfilled by the DWMP, which Councils are consulted on, and future AMP (Asset Management Plan) periods for investments in capital programmes. Therefore it is proposed that Policy WP15 of the local plan is amended.

We acknowledge that The Broads SAC (Special Area of Conservation) and the Crown Point Registered Park and Garden are designated wildlife and heritage sites in proximity to Whitlingham WRC and these are identified in the newly introduced criteria d. and e. of the policy. We would question why these criteria are specifically required when natural and historic environment criteria are already wholly addressed through Policy MW1, together with other natural and historic environment designations and assets. We consider that Policy MW1 provides a comprehensive approach to the relevant development management criteria that should underpin development proposals that require planning permission at our WRCs, including Whitlingham WRC.

Suggested change: Our draft DWMP consultation was undertaken with a wide range of stakeholders including local authorities and The Environment Agency. The policy does not need to reference the requirement for a longer-term masterplan as this aspect is fulfilled by the DWMP, which Councils are consulted on, and future AMP (Asset Management Plan) periods for investments in capital programmes. Therefore, it is proposed that Policy WP15 of the local plan is amended as follows:

"Any proposals for the improvement of the WRC must [delete: be accompanied by and] be consistent with a longer-term [delete: 'masterplan'] [insert: 'strategy'] for the WRC [insert: 'which forms part of Anglian Water's Drainage and Wastewater Management Plan, or is required to:'] [delete: produced in collaboration with the

constituent authorities of the Greater Norwich Growth Board, the Broads Authority and the Environment Agency'].

[insert: 'a) comply with new legislation; and/or

b) accommodate growth within, or connecting to, the Whitlingham water recycling catchment.']

We would question why criteria d. and e. are specifically required when natural and historic environment criteria are already wholly addressed through Policy MW1, together with other natural and historic environment designations and assets.

NCC Planning Officer response: The DWMP is a high-level document and does not contain any development specific details of future proposals for improvements to Whitlingham WRC. A masterplan is a document in which a greater level of site specific and proposal specific detail would be included. Therefore, given both the importance of Whitlingham WRC and its location proximate to the Broads SAC, it is considered that retaining the requirement for a masterplan is appropriate and justified.

Policy requirement d is justified because Policy WP15 is site specific. The location of the Crown Point Registered Park and Garden in relation to the WRC; with the potential for development of the WRC to affect it and for the special regard to be had to the conservation of such assets, should be specifically recognised within the policy.

The site-specific nature of WP15 as it relates to Whitlingham WRC also justifies the inclusion of policy requirement e so as to meet HRA plan requirements by making specific reference to the Broads SAC; for clarification we propose to add the word **integrity** to point e to read '...integrity of the Broads Special Area of Conservation...'.

We will propose a modification to Policy WP14 to include the suggested requirement "comply with new legislation" as this would be applicable to development at all Water Recycling Centres, not just Whitlingham WRC.

AW suggested change point b is covered in the first paragraph of the policy and therefore does not need to be repeated.

Anglian Water comments to NCC response: We welcome the proposed amendment to reflect the publication of the DWMP.

However, the requirement for a long-term masterplan for the Whitlingham Trowse WRC is neither practicable nor feasible. It is not clear what this would look like as areas cannot be allocated or safeguarded for specific uses for future development. Further, a master plan would not be compatible with our AMP cycles. Any 'master plan' would require continual amendment and update to reflect the need for us to replace existing process equipment and units as this comes to the end of its operational life, to introduce new infrastructure to meet changing legislative requirements including environmental permits, to deliver technological innovation, and process equipment associated overall growth. We would end up in a scenario whereby when we do need to apply for planning permission (given a lot of our development is permitted development) that the development proposed is not in accordance with the 'master plan' and therefore treated as a departure to the Local Plan resulting in objections from stakeholders or the Council itself. Whilst we understand the Council's desire to ensure that new development at Whitlingham Trowse WRC minimises environmental and amenity impacts, the mechanisms to achieve this exists through Policy WP15 as a whole and other policies within the plan, alongside other regulatory processes which we are governed by and need to adhere to.

An example of where we need to act quickly is the final Ofwat approved [Accelerated Infrastructure Delivery Project](#) to bring forward the necessary infrastructure to ensure that Whitlingham Trowse WRC meets the Technically Achievable Limits (TAL) for phosphorus and nitrogen, as identified by the proposed requirement in the Levelling Up and Regeneration Act 2023 for WRCs with a population equivalent greater than 2,000 to meet TAL by 2030. This accelerated scheme for completion by 31st March 2027 will help to ensure that developers mitigate a lower threshold of nutrients, and enable development currently blocked by nutrient neutrality, which was imposed by Natural England in March 2022, to come forward within the Whitlingham Trowse WRC catchment much sooner and at a lower cost to developers. Similar accelerated schemes are proposed at Fakenham and Dereham by 2025, with further projects coming forward at other WRCs within the catchments affected by nutrient neutrality. It would not be feasible in this instance to be compliant with a long-term masterplan that would not have been informed by these changes, and any planning application

required to be submitted would not be consistent with the masterplan, adding delay and uncertainty to the process. <https://www.ofwat.gov.uk/wp-content/uploads/2023/04/A1-accelerated-process-all-schemes-final-decisions.pdf>

In addition to the DWMP, we have now submitted our PR24 Business Plan to our regulators, which sets out the investment required over the five years of the next AMP (AMP8 2025-2030). Our DWMP and Business Plan processes operate on 5 yearly cycles, where all relevant data (including on growth and forecasts) is reviewed, and the plans updated accordingly. Our Long Term Delivery Strategy 2025 – 2050 will contextualise our long-term focus on business planning and set out our ambition for 2050, a core pathway of enhancement activities required to deliver our ambition, and alternative pathways required under a range of different scenarios. Together, we consider that these plans help to contextualise the investments and delivery of improvements to our WRCs including Whitlingham Trowse WRC. We are open to holding annual/bi-annual meetings with the Council and stakeholders to discuss any matters relating to the WRC and our investment plans – whether informally or through the Council reconvening the local liaison group.

We have now submitted our PR24 Business Plan to our regulators, which sets out the investment required over the five years of the next AMP (AMP8 2025-2030) including those investments proposed at Whitlingham, WRC. It is considered that the level of information in our business plan and annual/biannual meetings with the proposed re-establishment of the liaison group provides a suitable way forward that ensures the adaptability and flexibility needed to address future

Our objection to the policy remains.

Remaining unresolved issues: Yes

11) Paragraphs W15.2 and W15.3 of the supporting text to Policy WP15.

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99278 and 99285]: (Objection)

Paragraphs W15.2 and 15.3: We are disappointed that these paragraphs infer that there is no information relating to planned improvements at Whitlingham WRC, even though information was provided in our submission to the Preferred Options consultation. Through our PR19 Business Plan we identified investment to extend our plant at Whitlingham to cater for growth and increased capacity to cater for the additional sludges from our water recycling centres as a result of higher environmental quality regulations. This will provide sufficient capacity to deal with the impacts of regional growth and for increased sludge loads received from other WRCs affected by the WINEP (Water Industry National Environment Programme) phosphate reduction programmes as they are delivered through AMP7. This investment strategy is based on a longer-term plan and the knowledge that further staged investment will be needed in AMP8 and AMP9 to keep ahead of the growth projections across the Anglian region and to respond to changes in environmental legislation.

Our draft Drainage and Wastewater Management Plan (DWMP) was published for consultation earlier in the summer and we are now reviewing the responses with a view to publish the final version in 2023. The DWMP will support the development of our Long- Term Delivery Strategy (LTDS) and our business plan for the 2024 Price Review (PR24).

The draft DWMP identifies Whitlingham WRC as a catchment where there is already partnership working. The medium-term strategy for the Whitlingham water recycling catchment is attenuation with a longer-term strategy to 2050 of surface water removal, a new permit, new process streams, and infiltration removal.

We strongly suggest that the text is revised to ensure that it accurately signposts the relevant plans and strategies prepared by Anglian Water that inform our investments for Whitlingham WRC, so that the Local Plan is referencing the correct information and decision makers can access the this information through the lifespan of the plan, as our own plans are updated every 5 years to take account of changes to growth projections, regulatory and legislative changes, and environmental implications. This ensures that we can plan effectively and invest where it is needed.

Suggested change: We strongly suggest that the text is revised to ensure that it accurately signposts the relevant plans and strategies prepared by Anglian Water that inform our investments for Whitlingham WRC, so that the Local Plan is referencing the correct information and decision makers can access the this information through the lifespan of the plan, as our own plans are updated every 5 years to take account of changes to growth projections, regulatory and legislative changes, and environmental implications. This ensures that we can plan effectively and invest where it is needed.

NCC Planning Officer response: Noted. The Preferred Options response from Anglian Water stated “We have submitted our business plan for AMP 7 (2020 to 2025) to Ofwat and expect to receive final determination in December 2019. However Anglian Water has committed investment at Whitlingham Water Recycling Centre of £17million to accommodate further growth to 2031.” It does not provide any proposal specific details such as would normally be provided within a masterplan. We consider that a masterplan is an appropriate means of identifying the specifics of future proposals, their potential overall significance and the likely cumulative effects of future developments.

Paragraph W15.3 already includes information on the 5-yearly AMP process. We will propose amendments to paragraph W15.3 as requested to delete the current last sentence (There is no public information as to how much money will be spent at Whitlingham) and to replace it with: “However, Anglian Water has committed investment at Whitlingham WRC to accommodate further growth including an accelerated infrastructure project to reduce nutrients to technically achievable limits.”

Currently there are no detailed site-specific proposals that have been documented in the AW plans for future development at Whitlingham WRC, such that any assessment however tentative could be made in the Local Plan Policy. We will propose an amendment to paragraph W15.5 to include updated information on the DWMP (see our response to representation 99280).

Anglian Water comments to NCC response: Anglian Water welcomes the proposed minor modification to delete the last sentence. We suggest that the wording should be revised to state:

“However, Anglian Water has committed investment at Whitlingham WRC to accommodate further growth including an accelerated infrastructure project to reduce nutrients to technically achievable limits.”

Remaining unresolved issues: No

12) paragraph W15.4 of the supporting text to Policy WP15:

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99279]: (Objection)

As we previously stated in our representation to the Preferred Options Plan, the focus of the Local Liaison group was on operational issues only and was not intended to consider wider issues. The Local Liaison Group was active a few years ago for Whitlingham WRC to discuss matters including odour. However, the group has not been active for some time, and we consider that this text is out of date and should be removed from the Local Plan. Should there prove to be a need for a liaison group to be re-established in the future then we will work proactively with Norfolk County Council, relevant stakeholders, and the local community to discuss any concerns regarding our site. We work to engage stakeholders through the development of our plans and strategies, including our emerging Drainage and Wastewater Management Plan (DWMP). Furthermore, development that requires planning permission, has a statutory consultation process whereby the local communities are informed of planned works. As we have indicated through our proposed modification to paragraph W3.2, the Plan should indicate that the General Permitted Development Order (2015) provides a wide range of permitted development rights on our operational land.

Suggested change: We consider the text regarding the Local Liaison Group is out of date and should be removed from the Local Plan.

NCC Planning Officer response: We recognise that there is not currently an operational need for a liaison group to meet on a frequent basis. However, we consider that a liaison group should still exist for Whitlingham that could meet as and when required, depending on operational issues, complaints or significant planning applications arising. We will propose an amendment to paragraph W15.4, as suggested

by Anglian Water to revise the wording as follows: “[DELETE: It is proposed] [INSERT: **The Council proposes**] that the Whitlingham Local Liaison Group is [INSERT: **re-established**], with the purpose of discussing both operational matters and Anglian Water’s future plans for the site [DELETE: , should hold meetings on a regular basis (perhaps quarterly or six-monthly)]. The following parties should form part of the Local Liaison Group: Kirby Bedon Parish Council, Trowse Parish Council, Postwick Parish Council, Thorpe St Andrew Council, local residents, Anglian Water, the Environment Agency, Norfolk County Council, South Norfolk Council, the Broads Authority, [DELETE: and] Crown Point Estate [INSERT: **and any other relevant organisation**]. [DELETE: The Liaison Group should consider requests from other organisations to join the group.]”

Anglian Water comments to NCC response: Anglian Water notes that a liaison group may reconvene at some point, but there is no certainty that this is required. We know that a previous liaison group was set up in 2010 to address odour concerns, where we engaged in meetings and issued newsletters to local residents. As we stated in our response, we will of course work proactively with the Council and other stakeholders to understand any concerns arising from existing operations or planned investments at the WRC. However, as there is currently no active local liaison group, we consider it would be misleading to infer this in the MWLP by reference to it. However, we wish to be clear that we are not opposed to the re-establishment of such a group, and we would work with the Council to support any such requirement. It is our understanding that the re-establishment of the group would be instigated and led by the Council and therefore this should be clearly implied.

We would suggest that if the Council is averse to removing the text in paragraph 15.4 completely, that it should be rephrased to state:

“W15.4 ~~It is proposed~~ **The Council proposes** that the Whitlingham Local Liaison Group is **re-established**, with the purpose of discussing both operational matters and Anglian Water’s future plans for the site, ~~should hold meetings on a regular basis (perhaps quarterly or six-monthly)~~. The following parties should form part of the Local Liaison Group: Kirby Bedon Parish Council, Trowse Parish Council, Postwick Parish Council, Thorpe St Andrew Council, local residents, Anglian Water, the Environment Agency, Norfolk County Council, South Norfolk Council, the Broads Authority, ~~and~~ Crown Point Estate and any other relevant organisation. ~~The Liaison Group should consider requests from other organisations to join the group.~~”

Remaining unresolved issues: No

13) paragraph W15.5 of the supporting text to Policy WP15

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99280]: (Objection)

As stated above [regarding paragraphs W15.2 - W15.3] and in previous consultation responses, we have clearly recognised the need for a long-term strategy for our water recycling centres and the foul sewerage network to accommodate further growth as set out in our Water Recycling Long Term Plan. The emerging Drainage and Wastewater Management Plan (DWMP) will consider the need for further investment at our existing water recycling centres which has been developed in consultation with the Norfolk authorities, The Broads Authority, and the Environment Agency. We would therefore suggest that the supporting text in this paragraph is amended to make this clear and ensure that reference to a masterplan is removed. It is not possible to produce a masterplan for the site as there are so many factors that can change overtime, which impact on our investments and capital programmes - including innovative technology, changes to emerging growth patterns, and changing legislative requirements. These changes include the proposed measures in the Levelling Up and Regeneration Bill to address nutrient issues. As an environmentally regulated utility, all works Anglian Water undertakes are necessary and have a clear purpose and wider environmental benefit. We regularly update our plans, engaging with our regulators, stakeholders and working in partnership with other stakeholders to provide positive environmental outcomes. The recent nutrient neutrality issue in Norfolk is one such issue that will have implications for future investments at certain WRCs within the River Wensum and The Broads catchments. Therefore, the requirement for a masterplan would put the delivery of strategic investment at Whitlingham WRC at risk.

Suggested change: We have clearly recognised the need for a long-term strategy for our water recycling centres and the foul sewerage network to accommodate further growth as set out in our Water Recycling Long Term Plan. The emerging Drainage and Wastewater Management Plan (DWMP) will consider the need for further investment at our existing water recycling centres which has been developed in consultation with the Norfolk authorities, The Broads Authority, and the Environment Agency. We would therefore suggest that the supporting text in this paragraph is amended to make clear and ensure that reference to a masterplan is removed.

NCC Planning Officer response: We note that the Drainage and Wastewater Management Plan (DWMP) was published in May 2023. We will therefore propose an amendment to paragraph W15.5 to update the information about the DWMP status and content. However, we still consider that a masterplan is necessary for Whitlingham WRC because the specific detail on development proposals normally found in a masterplan are missing from any of the published Anglian Water plans. The masterplan can be a living document that can be amended, but it would provide greater detail than is currently publicly available in the DWMP. The proposed amendment to the sentence about the DWMP will state: “Anglian Water published a Drainage and Wastewater Management Plan (DWMP) in May 2023 which outlines how their water recycling service will cope with growth and climate change over the period from 2025-2050 and supports Anglian Water’s Long Term Delivery Strategy. The DWMP sets out that the medium-term plans (to 2035) for Whitlingham are to increase the network capacity and the long-term plans (2050) are for a new Water Recycling Centre or infiltration removal, or a new permit and increase capacity along with 25% surface water removal”.

We will also propose an amendment to the last sentence of paragraph W15.5 to provide clarification that the masterplan should cover a period of at least 5 years, which would fit in with the timescales of the AMP cycles.

The only reference to Whitlingham WRC in the Anglian Water 2023 strategic report refers to a nutrient removal scheme by 2025 (AMP 7), but no further details are available. Anglian Water’s PR19 Business Plan contains no references to Whitlingham WRC, and the draft Water Resources Management Plan 2024 does not contain any references to Whitlingham WRC.

Anglian Water comments to NCC response: Anglian Water welcomes the proposed minor modification to the supporting text to reference the DWMP strategies for Whitlingham Trowse WRC.

As explained in our response to the matter (Policy WP15) above, the masterplan approach is neither a practicable nor feasible way to manage future investment and expansion of facilities at Whitlingham Trowse WRC owing to the need to replace existing process equipment and units as they reach the end of their operational life, to meeting legislative and regulatory requirements, and to deliver technological innovations alongside meeting the requirements of growth in the area. At Anglian Water we have an Innovations Team that is constantly reviewing and testing new technologies and ways of working to provide the best solutions to meet our environmental obligations, which can mean that designs and associated infrastructure can evolve and change. Our ability to be adaptive and reactive would be severely compromised by any requirement for a masterplan and as set out above we would end up in a scenario whereby the development for which we are seeking permission for (where planning permission is required) is not in accordance with it which would undoubtedly lead to objections from local stakeholders including the local community. Further we are not clear what a master plan for the site would look like as we cannot safeguard areas for certain types or uses. The requirement for a masterplan could also stifle innovation if it is too prescriptive. A very high-level masterplan is in danger of not having sufficient detail to satisfy the expectations of the Council and other stakeholders. We therefore suggest that regular dialogue with the Council and stakeholders would help parties understand the needs of the site and the measures required to undertake these – whether informally or through the re-establishment of the local liaison group.

Our Annual Integrated Report 2023 provides an update on our performance throughout the financial year (2022/23) and therefore only a high-level summary for Whitlingham Trowse WRC. Further detail of the accelerated infrastructure project can be found on the Ofwat website. This allows us to deliver the nutrient removal process needed at Whitlingham Trowse earlier than required, to reflect the urgency of delivering homes within and surrounding Norwich, and peripheral communities served by the WRC. As the final decision was not made by Ofwat until June 2023, it could not be factored into the DWMP which was finalised and published at the end of May 2023. The draft Water Resources Management Plan only outlines our long-term

plans for addressing future water supply and therefore does not apply to our WRCs (unless it involves the reuse of water from WRCs as proposed at Colchester) - therefore the DWMP is the relevant plan.

<https://www.ofwat.gov.uk/consultation/accelerated-infrastructure-delivery-project-draft-decisions/#Outcome>

We have now submitted our PR24 Business Plan to our regulators, which sets out the investment required over the five years of the next AMP (AMP8 2025-2030) including those investments proposed at Whitlingham, WRC. It is considered that the level of information in our business plan and annual/biannual meetings with the proposed re-establishment of the liaison group provides a suitable way forward that ensures the adaptability and flexibility needed to address future

Our objection to the masterplan reference remains.

Remaining unresolved issues: Yes

14) Policy WP17. Safeguarding waste management facilities

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99282]: (Support)

We welcome the amendments to this policy following our representation on the Preferred Options consultation, which recognise the consultation areas extending from our WRCs and pumping stations.

NCC Planning Officer response: Support noted.

Anglian Water comments to NCC response: N/A

Remaining unresolved issues: No

15) Policy MPSS1. Silica sand extraction sites

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99283]: (Objection)

The Local Plan is unsound because it is not justified given reasonable alternatives.

Whilst we welcome the introduction of the policy and its approach, we would welcome modifications to the policy and supporting text as follows:

We note that the Preferred Option M&WLP policy SIL 02 - land at Shouldham and Marham (silica sand) has been removed from the Publication M&WLP and replaced with new strategic policy MPSS1. We support the inclusion of criterion (f) to require an acceptable Hydrological Impact Assessment to identify any potential impacts to groundwater and appropriate mitigation measures.

Furthermore, we welcome inclusion of criterion (i) in the policy regarding sufficient stand-off distances around any water main that crosses the site or diversion of the water main at the developers' cost and to the satisfaction of Anglian Water. We recommend that the supporting text explains that the developer will need to confirm the stand-off distances with Anglian Water in advance of submitting their application.

Suggested change: We recommend that the supporting text explains that the developer will need to confirm the stand-off distances with Anglian Water in advance of submitting their application.

PROPOSED POLICY MODIFICATION: Anglian Water would also require the standard protected easement widths for the sewers and for any requests for alteration or removal to be conducted in accordance with the Water Industry Act 1991. We therefore recommend that criterion (i) reads as follows: (i) A sufficient stand-off distance around any water main [insert: 'or foul sewer'] that crosses the site or diversion of the water main/[insert: 'sewer'] at the developer's cost and to the satisfaction of Anglian Water;

NCC Planning Officer response: We will propose a modification to the policy wording as suggested by Anglian Water. We do not consider it necessary to amend the supporting text as suggested because requirement (i) states that the stand-off distances must be to the satisfaction of Anglian Water.

Anglian Water comments to NCC response: Anglian Water welcomes the proposed modification to the policy wording in response to our suggestion.

Remaining unresolved issues: No

16) Policy MP4. Agricultural or potable water reservoirs

Respondent: **Anglian Water** (Tessa Saunders) [Person ID: 21901]

Representation [Rep ID: 99284]: (Comment)

We welcome reference to Anglian Water's Water Resource Management Plan in the supporting text to provide context to Policy MP4.

Water Resource Management Plans play a crucial role in securing the public water supply for the region. The plan identifies the investment required to secure public water supply for the region whilst protecting and enhancing the environment. This is then projected into water company business plans. Every five years we develop our Water Resources Management Plan (WRMP) which sets out how we will manage the water supplies in our region to meet current and future needs over a minimum of 25 years. Our current Plan, published in 2019, covers the period from 2020-2045. We are now developing our next Plan (WRMP24) for the period 2025 - 2050.

The proposed strategic reservoir options in South Lincolnshire and The Fens are nationally strategic infrastructure and have been identified as strategic supply side options for addressing future water demand in the Anglian Water region due to population growth, climate change impacts and protecting the environment. As nationally strategic infrastructure projects (NSIPs), these will be submitted as Development Consent Order applications to the Planning Inspectorate. An Examining Authority appointed by the Secretary of State and supported by the Planning Inspectorate examines the application and will make a recommendation to the relevant Secretary of State, who will make the decision on whether to grant or to refuse development consent. In such cases the Local Authority will not be the decision-maker but will provide a statutory local perspective throughout the process and be responsible for discharging the requirements associated with an NSIP in their area if development consent is granted.

NCC Planning Officer response: Noted.

Anglian Water comments to NCC response: N/A

Remaining unresolved issues: No

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 14 November 2023.

Matter	Policy/ Paragraph Reference – summary of issue	Rep ID	Resolved/Unresolved	Date agreed
1	Whole Document – general/co-operation	99270	Unresolved due to the specific unresolved matters listed below	21/08/2023
2	Policy MW1. Development Management Criteria – terms/format	99271	Resolved	29/08/2023
3	Policy MW3. Climate change mitigation and adaption – baseline emissions data and targets, renewable energy potential at WRCs, supporting wording/ references	99272	Resolved	21/08/2023
4	Policy WP2. Spatial strategy for waste management facilities - support wording/references	99273	N/A – no change requested	21/08/2023
5	Policy WP3. Land suitable for waste management facilities – delete composting/AD and enable other uses/ bioresources at WRCs	99274	Resolved	21/08/2023
6	Policy WP9. Anaerobic digestion - support wording/references	99275	N/A – no change requested	21/08/2023
7	Paragraph W9.1 of the supporting text to Policy WP9. Anaerobic digestion – biogas in W9.1	99526	Resolved	21/08/2023
8	Policy WP14. Water recycling centres – add climate change and mitigation measures	99277	Resolved	21/08/2023
9	Paragraph W14.2 of the supporting text to Policy WP14 Water recycling centres – Permitted Development	99276	Resolved	21/08/2023
10	Policy WP15. Whitlingham Water Recycling Centre – Amend policy criteria	99281	Unresolved	14/11/2023
11	W15.2 and W15.3 of the supporting text to Policy WP15: Whitlingham WRC – Amend text	99278	Resolved	29/08/2023

Matter	Policy/ Paragraph Reference – summary of issue	Rep ID	Resolved/Unresolved	Date agreed
12	Para 15.4 of Policy WP15: Whitlingham WRC – Local Liaison Group	99279	Resolved	29/08/2023
13	Paragraph W15.5 of Policy WP15: Whitlingham WRC – remove masterplan ref	99280	Unresolved	14/11/2023
14	Policy WP17. Safeguarding waste management facilities – support wording/references	99282	N/A – no change requested	21/08/2023
15	Policy MPSS1. Silica sand extraction sites – amend policy and supporting text	99283	Resolved	21/08/2023
16	Policy MP4. Agricultural or potable water reservoirs – information on WRMP and strategic reservoirs	99284	N/A – no change requested	21/08/2023

Signatures

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

REDACTED SIGNATURE

Dated 17/11/2023

Phil Jones, Growth Strategy Manager, Anglian Water

REDACTED SIGNATURE

Dated 21/11/2023