



Norfolk County Council

Norfolk Minerals and Waste Local Plan

Main Matter 2 – Vision and Strategic Objectives of the Plan

Norfolk County Council

Hearing Statement

May 2024

Issue: Whether the Vision and Strategic Objectives of the Plan are the most appropriate, are soundly based and provide an appropriate basis for meeting the future demand for minerals and future waste management needs sustainably.

1. Does the Minerals and Waste Local Plan Vision to 2038 (the Vision) adequately and accurately reflect the future environmental, economic and social dimensions of the County to ensure a steady and adequate supply of minerals and the management of waste?

NCC response:

1.1 Yes, the Vision does adequately and accurately reflect the future situation in Norfolk regarding environmental, economic and social dimensions within the context of the Norfolk Minerals and Waste Local Plan's (NM&WLP) remit.

1.2 The Vision has been informed by the information contained in the Norfolk Spatial Portrait (Chapter 3) of the NM&WLP and the information contained in the Sustainability Appraisal Scoping Report which was updated in February 2022 (document A3.1). The Sustainability Appraisal Scoping Report includes the baseline information, identifies the sustainability problems and includes the Sustainability Appraisal Objectives.

1.3 Paragraph one of the Vision sets out the future provision of the steady and adequate supply of mineral to support sustainable economic growth; with paragraphs four and five setting out the future for waste management to support growth by appropriately dealing with forecast waste arisings.

1.4 Paragraphs three and seven describe how the Vision reflects the way in which mineral and waste development will address future environmental and social dimensions within Norfolk while providing the steady and adequate supply of minerals and sufficient waste management capacity to meet forecast arisings.

1.5 Finally, paragraph eight of the Vision sets out how mineral and waste development will minimise and mitigate their contributions to climate change while also being designed and located to reduce the risk from and adapt to effects related to climate change. Further details on the forecast tonnages of minerals and waste to plan for are contained in policies WP1 and MP1.

2. Does the Vision adequately address biodiversity and climate change impacts?

NCC response:

2.1 Yes, the Vision adequately addresses biodiversity and climate change impacts. The Vision states in paragraph seven that mineral and waste management development in Norfolk will provide biodiversity net gains. In paragraph three, the Vision is clear that all mineral workings will provide progressive restoration schemes and the enhancement of Norfolk's biodiversity. At the NM&WLP submission stage, we proposed additional modifications (document A25) including additional text to the Vision to state "All developments will provide a minimum measurable 10% biodiversity net gain and wherever possible contribute to the delivery of the national Nature Recovery Network objectives". However, the requirement for major planning applications to deliver 10% measurable biodiversity net gain has subsequently become mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) from 12 February 2024.

2.2 The last paragraph of the Vision states that, 'Mineral development and waste management within Norfolk will be undertaken in ways that minimise and mitigate their contribution to climate change, including reducing methane emissions and reducing carbon emissions...' The emerging plan then goes forward with policies to deliver these aims and objectives, including Policy MW3 'Climate change mitigation and adaptation'.

3. Should the Vision reflect the national and local economic benefits of mineral extraction and the contribution that these may make to supporting the rural economy?

NCC response: The Vision states that 'A steady and adequate supply of minerals to support sustainable economic growth will be planned for...'. The Vision further recognises the important contribution that Norfolk makes to the national supply of silica sand, whilst also setting out that Norfolk will continue to be self-sufficient in the production of sand and gravel. The sand and gravel market in Norfolk is largely self-contained with relatively small volumes of imports or exports between neighbouring MPAs. This is set out in the Local Aggregate Assessment 2022 (document B3), paragraphs 5.3.2 & 5.3.3. Therefore, it is considered that the Vision appropriately reflects the contribution made by mineral extraction to the economy while at the same time not duplicating policy within the NPPF (September 2023), paragraph 211 (NPPF December 2023, paragraph 217) that 'when determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy'. Although employment levels at mineral extraction sites tend to be low, aggregate minerals contribute to economic growth in Norfolk by providing raw materials for the construction industry.

4. Does the Vision promote and reflect the proximity principle in relation to the management of waste?

NCC response: Yes, the Vision promotes and reflects the proximity principle in relation to the management of waste. The proximity principle relates to the disposal of waste and to the recovery of mixed municipal waste. The Vision states in paragraph six that, 'New waste management facilities will be located in proximity to Norfolk's urban areas and main towns.' It is these areas which would be the most significant generators of waste within the county and therefore, the NM&WLP will direct waste management facilities to be in proximity to those locations. This is set out in paragraphs W2.1 to W2.3 and Policy WP2 of the NM&WLP. Furthermore, the Vision states in paragraph five that Norfolk will plan for net self-sufficiency in waste management, where practicable. Given that some waste streams require specialised processing at plant which only become viable at greater than county scales there may be some waste which moves out of the county for treatment. Conversely, there are some specialised waste management facilities in Norfolk which take waste from a regional or national catchment.

5. Should the Vision provide a commitment to the principles of sustainable development to be reflective of Section 5 of the Plan?

NCC response:

5.1 The Vision does commit to the principles of sustainable development through the Plan. The three objectives of sustainable development within Section 5 are economic, social and environmental. The NPPF (December 2023) at paragraph 11 (a) and (b), provides detail of how plans should promote these sustainable development objectives through promoting a sustainable pattern of development that seeks to: meet the development needs of their area, align growth and infrastructure, improve the environment, and mitigate climate change and adapt to its effects.

5.2 Paragraph one of the Vision sets out that Norfolk will continue to be self-sufficient in sand and gravel and provide a steady and adequate supply of minerals to support sustainable economic growth through mineral site allocation and additionally for nationally important industrial minerals through criteria-based locational policies. For minerals this meets the development needs of the area and aligns growth and infrastructure. Paragraph five of the Vision provides for the development needs of the area and growth and infrastructure in relation to waste management facilities to meet the existing and forecast growth in waste arisings, whilst paragraph six links the location of new waste management facilities to proximity to Norfolk's urban areas and main towns. Paragraph four highlights that there is a continued drive to prevent the generation of waste, as well as increase the re-use, recycling and recovery of waste, thereby reducing the quantity and proportion of waste requiring disposal.

5.3 Paragraph seven of the Vision states that "mineral 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; opportunities to enhance such features will be supported and all developments will provide biodiversity net gains". In addition, paragraph three of the vision states that all mineral workings will be covered by progressive restoration schemes and the enhancement of Norfolk's biodiversity, and the creation of high-quality landscapes will be strongly supported. These aspects of the Vision are aligned with the sustainable development principle for local plans to improve the environment.

5.4 Paragraph seven of the Vision states that mineral development and waste management in Norfolk will be undertaken in ways that minimise and mitigate their contributions to climate change including methane and carbon emissions and are designed and located to reduce the risk from and adapt to climatic effects. This meets the last point made in NPPF (September 2023 and December 2023), paragraph 11(a) regarding plan-making and sustainable development. Therefore, it is considered that the Vision provides commitment to the overarching objectives of sustainable development.

6. Should the Minerals Strategic Objectives refer to the need to maintain landbank durations for aggregate and industrial minerals?

NCC response:

6.1 No, the Minerals Strategic Objectives should not refer to the need to maintain landbank durations for aggregate and industrial minerals. The Mineral Strategic Objectives refer to the need to provide a steady and adequate supply of aggregate and industrial minerals and this is in accordance with national policy as set out in the NPPF (September 2023) paragraph 210(a) (& NPPF, December 2023, paragraph 216(a)).

6.2 NPPF (September 2023) Paragraph 213(e) (NPPF December 2023, paragraph 219 (e)), states that landbanks of aggregate mineral reserves are principally an indicator of the security of aggregate mineral supply, and to indicate the additional provision that needs to be made for new aggregate extraction and alternative supplies in minerals plans. Further guidance is provided in the NPPG, paragraph 80 (Ref ID: 27-080-20140306) that landbanks of aggregate mineral reserves are principally a monitoring tool to provide a mineral planning authority with early warning of possible disruption to the provision of an adequate and steady supply of land-won aggregates in their area.

6.3 It is also important to note that landbanks refer specifically to mineral reserves, so those resources that benefit from a grant of permission for extraction, not the allocation of mineral extraction sites within a Minerals Plan. The submission of suitable applications for mineral extraction is within the hands of the mineral operators and not the Mineral Planning Authority (MPA). Landbanks are principally shown within the annual Local Aggregate Assessment; NPPG paragraph 82 (Ref ID: 27-082-20140306) states that they are used to define the level of provision when preparing minerals plans, and as a means of assessing when an MPA should review the current provision, potentially triggering a review of site allocations with the minerals plan.

6.4 For the provision of industrial minerals, a steady and adequate supply of industrial minerals is through the maintenance of a stock of permitted reserves to support new or existing plant and the maintenance and improvement of existing plant and equipment (NPPF paragraph 220(c) December 2023, & NPPF paragraph 214(c), September 2023). As has been stated above, the decision on the timing of the submission of planning applications for mineral extraction is within the hands of the mineral operator.

6.5 Therefore, taking into account the nature and use of landbanks; it is considered that the Mineral Strategic Objectives correctly include the provision of a steady and adequate supply of minerals - which can be identified through the allocation of suitable sites, as well as a 'criteria-based' policy for silica sand extraction on unallocated sites - instead of referring to the need to maintain specific landbank durations.