Breckland's Response to Norfolk's Minerals and Waste Local Plan

Breckland District Council recognises the importance of having sufficient minerals and waste provisions within the county to support growth and broadly supports Norfolk's Minerals and Waste Local Plan. It has the following comments:

1. Nutrient Neutrality
   In March 2022, Norfolk LPAs were alerted to the issue of the "unfavourable condition" of the River Wensum and Broads SAC leading to a requirement to mitigate nutrient pollution from development, farming and to upgrade wastewater treatment works. Nitrogen and Phosphorus affects both water and air quality and Breckland District Council considers that the location of waste facilities particularly from agricultural waste and composting and its impact on the River Wensum and Broads SAC should be carefully considered.

Relevant Policies

Page and Section	Paragraph	Comment
Page 52	Policy WP2: Spatial Strategy for waste management facilities – STRATEGIC POLICY 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…..However, due to their characteristics, the following types of facilities will be acceptable in locations more distant from the urban areas or main towns, if they are close to the source of the waste, or the destination of the recovered waste material: • agricultural waste treatment facilities • windrow (open-air) composting facilities • community composting facilities • small scale local facilities (including "bring" sites for the collection of recyclables)	Consider the impact of increase Nitrogen and Phosphorus Pollution from organic waste (development, agriculture) on nitrogen and phosphorus sensitive zones (i.e. where the river catchment is deemed to be in "unfavourable condition" with regards the spatial strategy for waste management facilities. The location of agricultural waste treatment, windrow composting and community composting to nutrient sensitive river catchment areas.
Page 53 Map 4	Map with 3 and 5 mile zones around urban areas	Many of the urban areas highlighted are in nutrient sensitive river catchment areas

Page and Section	Paragraph	Comment
Page 54	W3. Land suitable for waste management facilities – STRATEGIC POLICY W3.4 Open windrow composting facilities are likely to be suitable in more rural locations due to their similarity to other agricultural developments (e.g. farms). They can produce odours because of the biodegrading process and therefore, rural, less populated locations are more appropriate for these facilities. Policy WP3: Land suitable for waste management facilities – STRATEGIC POLICY Waste management facilities (other than landfill sites and water recycling centres) will be acceptable only on the following types of land: d) land within or adjacent to redundant agricultural and forestry buildings; g) water recycling centres (composting and anaerobic digestion only);	Consideration of the impact of open air composting on air and water quality for habitat sites.
Page 58	W8. Composting	Consideration of air pollution on sensitive habitat sites (Natural England's Shared Nitrogen Air Pollution Schemes in Breckland)
Page 58	Policy WP9: Anaerobic digestion Anaerobic digestion facilities will only be acceptable on the types of land identified in Policy WP3 or integrated with water recycling centres	Consideration of nitrogen and phosphorus pollution on the river catchment areas of the River Wensum and Broads SAC.
Page 63	Policy WP14: Water Recycling Centres 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. Proposals must also comply with the development management criteria set out in Policy MW1	Suggest in light of the issues around nitrogen and phosphorus pollution to remove the word"or" and replace with the word "and". WRCs will only be acceptable if they treat greater quantity of water **and** improve quality of discharged water.
Page 64	W15. Whitlingham Water Recycling Centre	Consider whether the policy should refer to water quality improvements required at this site?
Page 66	Policy WP16: Design of waste management facilities	Suggest that reference should be made to natural based solutions within the design? E.g. wetlands around WRC, other nature based waste management solutions

Page and Section	Paragraph	Comment
Page 79	Policy MP5: Core River Valleys Minerals development will only be permitted in Core River Valleys (as shown on the Policies Map) where the applicant demonstrates that the development will: • enhance the form, local character and distinctiveness of the landscape and historic environment; and • enhance the biodiversity of the river valley (either immediately or on restoration); and • not impede floodplain functionality	Suggest that it should add that it does not impede on the natural water quality infrastructure e.g. natural riparian strips- reed beds or water woodlands etc
Page 80	MP7. Progressive working, restoration and after-use Where possible, restoration should be focused on providing multiple benefits of landscape, geodiversity and biodiversity enhancement through restoration with public amenity value. However, it may be decided that a site, wholly or partly, would be better suited to being restored to agriculture, to leisure and recreational development, or to water storage, which could provide benefits for flood alleviation or water supply.	Suggest to add Or where appropriate provide nature based water filtering enhancements
Page 81	MP7.7 Where restoration creates permanently filled water bodies these may be suitable as Ark sites to protect the white clawed crayfish, which would be encouraged. Where such waterbodies are isolated from existing rivers, protection is given from invasive crayfish and the crayfish plague they carry.	Suggest to add that restoration should be for the benefit of the river catchment overall.
Page 82	Policy MP7: Progressive working, restoration and after-use	Add also where appropriate, enhance water quality by provision of natural filtering interventions

Breckland's Comment on the Location of Mineral Extraction Sites

Reference	Extraction Site	Breckland's Comment
Min 12 on Page 100 & page 103	Mineral extraction sites within Breckland Beetley land north of chapel land 1,175,000 of sand and gravel	This is an extension of an existing site, Breckland DC has no objections.
Min 51 on page 100 & 103	Land west of Bilney road, Beetley 1,830,000 of sand and gravel	As stated in 2019 consultation, Breckland considers that road improvements would be required for this site due to traffic issues. However, it is noted that Highways considers access by Rawhall Lane is suitable.
Min 13, Page 100 & 103	Land west of Bilney Road Beetley Close to Min 51 included in 1,830,000 sand and gravel	As stated in the 2019 consultation, Breckland DC considers Road improvements would be required due to traffic issues. 8,51 and 13 all very close to each other therefore a very large site. However, it is noted that Highways considers access by Rawhall Lane is suitable.
Min 8 Page 100 &103	Land North of Stoney Lane Beetley	Breckland DC has stated in its previous response to the 2019 consultation that it was considered that this site was unsuitable due to excessive increase in traffic in the area and access issues and deliverability as the site is owned by a landowner and not a minerals aggregate operator. The information on this site proposal has been aggregated with the information for Min 51 and 13 so it is not clear whether these issues have been addressed in particular to this site.
Min 200 Page 100 Min & page 113 map	Carbrooke Land west of Cuckoo Lane 300,000 of sand and gravel	This is an extension of existing site and Breckland has no objections

Deadline 19th December

Email response to:LDF@norfolk.gov.uk