

Date: 16<sup>th</sup> December 2022  
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Our Ref: IP/22/00985/VC



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To Whom it may concern,

**Application Ref:** Norfolk Minerals and Waste consultation.

**Proposal:** Minerals and Waste Local plan: pre-submission publication.

Thank you for consulting Suffolk County Council (SCC) on the above planning application.

We make the following comments:

**Statement of common Ground**

Matter 1: The provision of Minerals.

- Agreement 1: WE AGREE
- Agreement 2: WE AGREE

Matter 2: The provision of Waste Management Facilities.

- Agreement 3: WE AGREE.
- Agreement 4: WE AGREE

Matter 3: safeguarding.

- Agreement 5: WE AGREE

Matter 4: Impacts on local communities and environment.

- Agreement 6: WE AGREE

## Comments made by Suffolk County Council at the Previous REG 18

Policy WP2: special strategy for waste management facilities.

- The stated distance from Norfolk urban and main towns seems restrictive and could lead to acceptable proposals being contrary to policy.

Policy WP17: Safeguarding waste management facilities.

- The lower limit of 20,000 TPA should be removed. Some small hazardous waste sites for example could not be safeguarded with this limit.

Policy MP1: provisions for minerals extraction

- The approach to calculating the shortfall within the plan period is supported.

Policy MP2: special strategy for mineral extraction

- The inclusion of stating a distance from Norfolk urban areas and main towns seems very restrictive. It is suggested that this section is removed.
- Strategy of minerals extraction being well related to one of Folks Urban areas or main towns via appropriate transport infrastructure is supported.

## Reg 19 (pre-submission publication) comments

Policy MP1:

- No comment

Policy MP2: Transport

- No comment

Policy MP3: Climate change mitigation and adaptation

- No comment.

Policy MW4: The brecks.

- N comment.

Policy MW5: agricultural soils

- No comment.

Policy WP1: waste management capacity to be provided.

- No comment.

Policy WP2: Special Strategy for waste management facilities

- No comment.

Policy WP3: land suitable for waste management facilities.

- No comment.

Policy WP4: recycling or transfer of inert construction, demolition of exaction waste.

- No comment.

Policy WP5: Waste transfer stations, materials recycling facilities, end of life vehicles facilities and waste electrical and electronic equipment recovery facilities.

- Week policy – just points you to other policies. (no comment)

Policy WP6: transfer, storage, processing and treatment of hazardous waste.

- No comment

Policy WP8: composting.

- No comment.

Policy WP9: anaerobic digestion.

- No comment

Policy WP10: residual waste treatment facilities.

- No comment

Policy WP11: disposal of inert waste by landfill.

- Point c “improvements to biodiversity” could be changed to “deliver measurable improvements to Biodiversity net gain” ... this will bring it in line with the language used in the environment act around net gain.
- This would make the policy more effective, better mirroring of working in the acts / legislation.
- Otherwise quite strong landfill policy

Policy WP12: non-hazardous and hazardous waste landfill.

- Point e “improvements to biodiversity” could be changed to “deliver measurable improvements to Biodiversity net gain” ... this will bring it in line with the language used in the environment act around net gain.

Policy WP13: landfill mining and reclamation.

- No comment.

Policy WP14: water recycling centres.

- No comment.

Policy WP15: Within water recycling centre.

- No comment

Policy WP16 Design of waste management facilities.

- No comment.

Policy WP17: safeguarding waste management facilities.

- In line with previous comments, It is suggested to re 20,000 tonnes per annum. There may be hazardous waste management facility operating below 20,000 tonnes which may be worth safeguarding.

Policy MP1:

- No comment.

Policy MP2: special strategy for minerals extraction

- No comment.

Policy MPSS1: Silica sand extraction.

- No comment

Policy MP3: borrow pits.

- Would suggest that policy includes requirement that Borrow Pits will be restored with a measurable increase in biodiversity net gain after use if possible.

Policy MP4: Agricultural or potable water reservoirs.

- No comment.

Policy MP5: core river valleys.

- “enhance the biodiversity of the river valley” could replace with... “provide a measurable increase the Biodiversity of the river valley”
- This brings the wording more in line with the Environment act and BNG requirements.

Policy MP6: Cumulative impacts and phasing of workings.

- No comment.

Policy MP7.

- Would suggest to replace “Enhanced” with “Measurable increase in Biodiversity”

Policy MP8: Aftercare.

- No comment.

Policy MP9: Ashphalt plants.

- No comment

Policy MP10: safeguarding of port and rail.

- No comment.

Policy MP11: Mineral safeguarding areas

- No comment.

Kind Regards

Ross Walker  
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Suffolk County Council