

## **Minerals and Waste Local Plan - Regulation 19 Consultation South Norfolk and Broadland Councils**

Thank you for your recent consultation on the above document. Having reviewed the consultation documents, we are pleased to note that the previous comments made by South Norfolk Council in relation to Policies MW6, WP2, WP15 and MIN 212 (now removed) have been incorporated into the updated document.

However, we also note that the other amendments suggested in our response to the Initial Public Consultation (dated 13 August 2018) which were also reiterated at Regulation 19 (dated 29 October 2019) have not been included within the latest version of the Norfolk Minerals and Waste Local Plan. We therefore wish to reiterate these comments and where relevant provide any further note. These have been included below for completeness.

### General comments regarding the format of the policies:

Note that Policy MW2: Development Management Criteria is now referenced as MW1, however our comment in relation to several policies concerning particular development types still referring to general development management policy (now MW1) is reiterated, and whilst the reason for this is understood, the policies in the plan should be read as a whole.

### Comments on specific policies:

WP3 – note amendment to include *'redundant'* so that criteria d) reads: *land within or adjacent to redundant agricultural and forestry buildings*. Whilst this differs from the Councils suggestion, this is considered acceptable.

WP4 and WP5 - note amendment to replace the word 'may' so that it reads *'will only be acceptable'*. Whilst this differs from the Councils suggestion, this is considered acceptable.

WP7 – reiterate previous comments. The Policy could be more effective as *'will not be acceptable outside of land identified in' and 'Concerned that this may not be legally sound, in that it goes beyond the remit of the Minerals and Waste Local Plan by seeking developer contributions. It would also be difficult to 'retro-fit' new Household Waste Recycling Centres into identified growth locations, if it was not a requirement when those locations were identified. Consideration could be given to allocating sites in the Minerals and Waste Local Plan which have good access to the growth locations.'*

WP16 – This seems to overlap with Policy MW1: Development Management Criteria, and it is considered that this policy would be better placed and combined with MW1.

### Comments on Proposed Minerals Extraction Sites:

MIN25 at Haddiscoe – reiterate previous comments: *'the site is very close to the nearest dwelling and the village generally, it would seem to be quite a significant site in terms of volume of material to be extracted, number of lorry movements etc. (we note there is a balance to be struck between length of extraction time and daily vehicle movements, to address concerns raised by the previous refusal of*

*permission). Is there any scope to reduce the extent of the site, moving the boundary away from nearby dwellings and/or phasing the extraction as part of any mitigation? This, along with the impact on the Grade I Listed church and the visual impact of the proposed bunding, was a concern that South Norfolk Council raised in respect of the previous application on this site. In addition, the landscape assessment refers to mature screen planting, it would be useful if retention of this was picked up in the Initial Conclusion.'*

In addition, it should be noted that opposite the site on land south of Beccles Road, Haddiscoe, has been put forward as a preferred option for residential development (Part of SN0414) as part of the South Norfolk Village Clusters Housing Allocations Plan

MIN 96 - land at Grange Farm (between Spixworth Road and Coltishall Lane), This site is located an equal distance between Spixworth and Horsham St Faith where it should be noted that the Greater Norwich Local Plan (GNLP) has preferred sites within Horsham St Faiths for residential or employment use. Whilst not adopted the draft GNLP was submitted to the Secretary of State for independent examination in July 2021. Subsequent Hearings took place in February 2022. In addition, no reference is made to the Spixworth Neighbourhood Plan which was adopted in July 2021.

### Summary

Overall whilst the Councils have provided comments on the updated document, these are considered suggestions and in most cases are reiterating previous comments. Consideration has also been given to the Norfolk Strategic Planning Framework (NSPF), where the plan is largely consistent with the agreements of this Framework.

Therefore, the Council wishes to make has no object to the adoption of the plan and look forward to working with you further as the plan progresses.