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Submission by email: [PlanningPolicy@broads-authority.gov.uk](mailto:PlanningPolicy@broads-authority.gov.uk)

Our ref: WH/19-00769  
Date: 24 September 2025

Dear Sir/Madam

**Re: The Local Plan for the Broads, Review Plan Period 2021 to 2042 Publication (Regulation 19) Consultation – Representations on behalf of British Sugar Plc**

We act on behalf of British Sugar Plc in respect of Cantley Sugar Factory and have been instructed to submit representations to the above consultation.

As the Authority is aware, we submitted representations to the Issues and Options consultation and the Preferred Options consultation in 2022 and 2024, respectively. The background information in relation to British Sugar and Cantley Sugar Factory are set out in the previous representations and set out below, for consideration during the examination process.

**British Sugar Plc**

British Sugar Plc was formed in 1936, and has been one of Associated British Foods' ('ABF') subsidiary companies since 1991. It is the sole British producer of sugar from sugar beet and processes all sugar beet grown in the UK by around 2,300 growers. From the four factories in the UK, including Cantley Sugar Factory, a total of circa 8 million tonnes of sugar beet is processed annually.

British Sugar's sugar processing creates a number of co-products including Topsoil, animal feed, LimeX and aggregates. Furthermore, their innovative approach to the operation also enables the creation of a range of co-products from power generation and bioethanol. British Sugar is continuously reviewing opportunities to grow and diversify the operations in partnership with ABF's subsidiary or third party agri-food sector businesses while reducing greenhouse gas emissions to operate more sustainably.

British Sugar supports up to 7,000 UK jobs in the wider economy, and supplying over 50% of the UK's demand for sugar.

## **Cantley Sugar Factory**

Cantley Sugar Factory was the first sugar beet processing factory in the UK and has been in operation since its opening in 1920. Cantley Sugar Factory is of national importance, producing home-grown sugar and other related produces.

The factory is integral to the local – and regional – economy, as well as the local communities. The factory employs 90 permanent staff and a further 25 seasonal employees during the Campaign period (the annual harvest and processing season for sugar beet). In addition, the factory supports 80 off-site indirect jobs within the catchment area and 350 local farmers and several haulage companies. The factory also supports local schools and colleges through offering work experiences and apprenticeship schemes every year.

In addition to the production of sugar, the sustainable production of the site ensures that the output of each process becomes the input of the next, turning raw materials into products thus avoiding unnecessary waste. The result is the production of much more than sugar, with its co-products including:

- Animal feed from residual sugar beet fibre which is supplied to the livestock industry;
- Topsoil from soil recovered from sugar beet which is used primarily by the landscaping industry;
- LimeX, a liming material supplied to agriculture;
- On-site power generation (Combined Heat and Power) and the export of electricity into the electrical grid, and
- Aggregates from stones recovered from sugar beet which is used by civil engineering, road building and construction industries.

British Sugar is fully committed to the ongoing and long-term operations at its factory in Cantley. For example, in recent years, the business made significant investment (£10m) in a new waste water treatment plant, which has been completed and operational. Furthermore, the installation of a new CHP plant has recently been completed and enabled the decommissioning of the previous coal boiler, and is now 40% hydrogen ready. British Sugar will continue to review opportunities to diversify and reduce greenhouse gas emissions further through on-site renewable energy development. British Sugar's operations at Cantley are diverse and they will continue to invest in further opportunities for diversification, efficient operations and carbon emission reductions, which will strengthen its role in the agri-food sector in the region and the sustainable, low carbon future.

Our representations to the consultation are made in the context of the above background and having regard to the tests of soundness as set out in the National Planning Policy Framework 2024 ('NPPF').

## **Representations**

### **Policy PUBCAN1: Cantley Sugar Factory**

Cantley Sugar Factory benefits from a site specific designation under Policy CAN1 in the adopted Local Plan. The policy defines the defined area of Cantley Sugar Factory as an employment site and supports development that secures and enhances the sugar factory's contribution to the economy of Broads and wider area. British Sugar is fully committed to the site in the foreseeable future and continues to invest in the improvement, enhancement and

diversification of the operations. We therefore support the continued designation of Cantley Sugar Factory under Policy PUBCAN1 in principle.

Policy PUBCAN1 Part 2 supports development within the defined area which secures and enhances the sugar works' contribution to the economy of the Broads and the wider area subject to 17 criteria, an increase from 8 criteria in Policy CAN1. We consider that the Policy should support the sustainable growth and expansion of the significant and established existing business based on its operational requirements and needs, while ensuring that constraints and features as identified in the supporting paragraph are addressed and considered in planning application processes. In this regard, we object to the following criteria under Part 2 of Policy PUBCAN1, so that there are no unreasonable or impractical requirements placed on future development requirements by British Sugar.

Criterion d) does not negatively impact on the neighbouring pub (The Reedcutter which is covered in policy PUBSSPUBS)

We requested the deletion of this criterion as it is too broad and unclear as to what specific impacts other than an impact on matters such as environmental considerations, visual amenity and access which are covered by other policies, the applicant is required to address.

The Authority's reasons for this criterion in response to our previous representations are as follows:

*"The reason for this additional criteria is because as stated in one of the previous comments, the additional land that is likely to be included in the boundary to which the policy applies is a car or service yard currently. The Factory have not said specifically what they wish to do to that land once it is included in the boundary. A car park use is different to, say, a building or some kind of treatment process associated with what the factory does. Therefore as an as yet unknown use could be brought closer to the pub, which as you say has been running for a long time, we feel it is reasonable to have the criterion that states that the proposals need to consider the pub."*

The land in question is the car park and service yard which have been used for the purpose of the operations of the Sugar Factory. We requested the inclusion of this area (which is reflected in the Publication version policy map) on the basis of the intrinsic nature of this area, forming a fundamental component of the operation of British Sugar. There will always be a requirement for parking and servicing areas, so unless alternative provision is made elsewhere, this area is likely to remain as car parking/servicing yard for the factory. The inclusion of the car park/servicing yard within the Cantley Sugar Factory policy area means that any development of this area would be brought forward and considered in line with the objective of the policy, which supports the ongoing operation and enhancement of the Sugar Factory's contribution to the local economy. Therefore, the use/development, if alternative to the current car park and service yard is proposed, will form part of the factory's ongoing operations.

In this context, we remain concerned that the criterion is ambiguous, and it is not clear what specific impacts the proposals need to consider in respect of the pub, and therefore consider that this criterion is unsound. It should be either deleted or specific impacts or considerations to be given to the pub should be identified in the policy.

Criterion g) Retains and does not impact the tree belt along the eastern edge of the track to the river, (See policy PUBDM19)

In our previous representations, we requested this criterion be amended to include “wherever possible” in line with the NPPF, as it is ancient woodland and veteran trees which are defined as irreplaceable habitats that have the highest level of protection by the NPPF. In response, the Authority advised that a new policy on trees (Policy PUBDM19) has been introduced which should be used for any schemes that propose the removal of trees.

Policy PUBDM19 is a more stringent policy on the protection of existing trees than the NPPF. Our representations on Policy PUBDM19 are made separately. The criterion still requires the retention and absolute protection of existing trees that are not ancient woodlands or veteran trees, contrary to the provisions under the NPPF. We therefore object to criterion d) and consider that the following amendments are made:

g) Retains and does not impact the tree belt along the eastern edge of the track to the river, **wherever possible** ~~(See policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development)~~

Criterion k) Protects and where possible enhances public access to the staithe and slipway

Our previous representations sought amendments to criterion k) in order to provide clarification that the protection of public access to the staithe and slipway is considered alongside the need to ensure health and safety. We considered to this be necessary as one of the exiting Public Rights of Way (PROW Cantley FP19) within the Cantley Sugar Factory policy runs across the heavy industrial operational area, which British Sugar has been seeking to divert for health and safety reasons.

In response, the Authority clarified that this criterion is not referring to PROW FP19. Rather it is referring to PROW Cantley FP20 which runs along the western boundary of the Cantley Sugar Factory policy area from Station Road to the north to the south. As this route is outside the Cantley Sugar Factory area, it is not relevant to proposals within the designated area. As such, **this criterion should be deleted or, as a minimum, refer to this specific route (PROW Cantley FP20) as confirmed by the Authority.**

Supporting Paragraphs: Delivery and implementation of the policy

The delivery and implementation section of Policy PUBCAN1 does not reflect the significant upgrades made to the site in the recent years to reduce carbon emissions from British Sugar’s operations. The existing operations are described as causing negative impacts on residential amenity and highway safety and capacity. British Sugar’s operations are regulated by Environmental Permitting regime and environmental management and health & safety management are the highest priorities for British Sugar. In this context, this section places a disproportionate emphasis on negative impacts. In addition, some of the paragraphs may be perceived as requirements, rather than providing justification for specific policy requirements. As such, we request that following amendments are made to this section.

~~The works are a major emitter of carbon dioxide within the Broads, and the heavy road freight associated with the works has negative impacts on residents' amenity, and on highway safety and capacity. It is recognised that, in recent years, significant investments have been made to the existing plant at Cantley Sugar Factory to reduce carbon emissions through the installation of a new Combined Heat and Power (CHP) plant, which has enabled the use of natural gas and the decommissioning of previous coal boiler. The policy recognises that Cantley is a significant emitter of carbon dioxide in the area and seeks betterment and The policy encourages further reductions and seeks to ensure that schemes should be are designed with minimal carbon dioxide emissions in mind.~~

~~Cantley Sugar factory receives substantial amounts of raw material from local farms, requiring substantial amounts of HGV movements during the Campaign period. Where the business is required to transition to zero-emission vehicles by law in future, depending on the type of vehicles and use of technology, the provision of appropriate on-site infrastructure may be necessary. There will be required by law to move to zero-emission vehicles, potentially Battery Electric or Hydrogen powered. As these vehicles may have shorter range than existing diesel vehicles, new refuelling equipment may be needed at the site.~~

~~There is potential to use the water for moving goods to and from the site. This would reduce the impact on road travel and as such, the Authority encourages suitable and appropriate use of the river for freight. Although there is no immediate prospect of this being achieved, it remains an aspiration should circumstance permit.~~

~~Habitats Regulations Assessment identified that any development on the site should be subject to assessment under the Habitats Regulations at the planning application stage. This is secured through the Habitats Regulations and Local Plan policy PUBDM15. The policy also seeks biodiversity enhancements on site and the Biodiversity Enhancements Guide (or successor document) should be used to inform schemes.~~

~~The BREEAM policy (PUBDM55) may be of relevance, depending on the scale of proposals.~~

~~The risk of water pollution needs to be mitigated where new development is undertaken, and on an ongoing basis to ensure the water environment is protected. The Environment Agency highlights the need to address the risks of water pollution for waterside sites in industrial use.~~

~~Parts of the site are vulnerable to flood risk (and have experienced flooding), but the precise extent of different levels of risk in the immediate area could not be ascertained by the Broads' SFRA. A site-specific flood risk assessment will be needed to demonstrate the level of the risk associated with any future proposed development.~~

~~The Authority acknowledges the work undertaken to reduce light pollution, which gained an award in 2010 for sky friendly night-time exterior lighting and restricting light above the horizontal. The requirement to address light pollution remains in the policy to reflect the good dark skies in the area, particularly when further away from the works.~~

*The Authority would like to see further reduction in light pollution to improve the dark skies of the area as a whole.*

*The policy ~~requires~~ **seeks** improvements in the water efficiency of the site. This is an area that British Sugar have made **significant** improvements, **including the installation of a new waste water treatment plant**, and seek to do more.*

*Where the policy seeks to address water usage, carbon dioxide emissions and lighting, it is important to note that this does not have to be restricted to the industrial processes; provision for staff such as staff rooms, restrooms etc could be an area that could be improved.*

*~~Part of the site covered by this policy is near to the Reedcutter Pub and any proposal must ensure it does not negatively impact that pub.~~*

*In terms of airborne pollutants, the Government's Interim Guidance on PM2.5 (or successor document) could be of relevance.*

#### **Policy PUBDM15: Natural Environment**

Part 13 of the policy requires development sited within or adjacent to the identified Local Nature Recovery Network to demonstrate how the proposal will maintain and enhance the ability of the network to restore habitat and provide eco-system services in line with the Local Nature Recovery Strategy. The supporting paragraph states that applications will be required to address the requirements of the Local Nature Recovery Strategy (LNRS).

The government's guidance on Local Nature Recovery Strategies is clear that the Local Plans must be consistent with national policy, as set out in the NPPF and that LNRSs should be used by plan-makers to inform the way they address the NPPF requirement for plans to protect and enhance biodiversity. In this context, it is considered that the wording of the policy together with the supporting paragraph goes beyond the purpose and intention of LNRSs in the plan making process, particularly with reference to "the requirements" of the LNRS. We request that the wording of the policy and the supporting paragraph should be amended so that development proposals **have regard to** the Local Nature Recovery Strategy.

#### **Policy PUBDM16: Biodiversity Net Gain**

Part 1 of this policy requires a locally set mandatory requirement of a minimum of 20% Biodiversity Net Gain. Going above the mandatory 10% BNG requirement set by the legislation could have a disproportionate impact on the deliverability and viability of development proposals. We therefore object to the mandatory requirement of a minimum of 20% BNG, and request that this is amended to 10%. The Authority's topic paper on this matter has been reviewed but viability testing does not seem to have been undertaken on industrial/commercial developments.

#### **Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development**

The policy proposes a stringent requirement with regard to loss or replacement of existing trees, woodlands, hedges, scrub and shrubs. Trees, woodlands, hedges, scrub and shrubs which require particular protection should be identified based on a site specific survey and development's impact and necessary mitigations (including a number of replacement trees required) should be identified through arboricultural, biodiversity and landscape character

considerations. We therefore object to this policy and the first three parts of the policy should be removed.

**Policy PUBDM21: Renewable and low carbon energy**

In July 2024, the government removed de facto ban on onshore wind development, and onshore wind applications are now treated in the same way as the other energy development proposals. The NPPF Paragraph 168 states that local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and give significant weight to the benefits associated with renewable and low carbon energy. However, criterion a) under Part 12 of Policy PUBDM21 requires justification for the turbine(s) being within the Broads. We consider this to be contrary to the NPPF Paragraph 168.

**Policy PUBDM27: Amenity**

Part 1 of the policy states that “development will not be permitted if it would have an unacceptable impact on the amenity of existing or potential neighbouring properties or uses”. The requirement to address the impacts on “**potential** neighbouring properties or uses” is not aligned with the NPPF’s ‘agent of principle’ policy under the NPPF paragraph 200. “Potential” properties and uses are not “existing”. Therefore, it would be unreasonable for new developments to address the impacts of neighbouring properties or uses which do not exist. We therefore object to Part 1 of the policy and request that the reference to “potential” neighbouring properties and uses is removed.

**Policy PUBDM29: Transport, highways and access**

Part 8 of the policy safeguards public rights of way and prevents development where it would result in the severance of loss of an existing public route. However, the relevant legislation allows for diversion if it is necessary to allow development, and the relevant guidance advises that the diversion should be substantially as convenient to the public. As such, we consider that Part 8 should be amended as follows:

*When determining development proposals, the Authority will safeguard public rights of way and ensure that future routes are not compromised. Development will not be acceptable where it would result in the severance or loss of an existing public route, **without an alternative route or a diversion which is substantially as convenient as the existing.** ~~The Authority, in liaison with relevant partners, will consider proposals for suitable, safe and convenient diversions.~~*

**Conclusion**

British Sugar continues to support the Local Plan Review’s continued designation of Cantley Sugar Factory (including the amendments to the boundary incorporated in the Publication version Policies Map. Our representations seek amendments to some of the criteria under Policy PUBCAN1 (Cantley Sugar Factory) and other policies in order to ensure that there are no ambiguous and unreasonable policy requirements which do not align with the NPPF, as British Sugar continues to invest in the improvement and enhancement of the operations.

We request that our representations are taken into consideration in the Local Plan review process. Should further information be required, please contact Wakako Hirose on the details below.

Yours faithfully,

**Wakako Hirose**  
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