

Consultation Documents Update and Proposed Responses
Report by Planning Policy Officer

Summary:	This report informs the Committee of the Officers' proposed response to planning policy consultations recently received, and invites any comments or guidance the Committee may have.
Recommendation:	That the report be noted and the nature of proposed response be endorsed.

1 Introduction

- 1.1 Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2 The Committee's endorsement, comments or guidance are invited.

2 Financial Implications

- 2.1 There are no financial implications.

Background papers: None

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Appendices: APPENDIX 1 – Schedule of Planning Policy Consultations received

Planning Policy Consultations Received

ORGANISATION:	Suffolk County Council
DOCUMENT:	
LINK	https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/minerals-and-waste-local-plan-consultation/
DUE DATE:	11 December 2017
STATUS:	Preferred Options
PROPOSED LEVEL:	Planning Committee endorsed
NOTES:	<p>In July 2016, Suffolk County Council's Cabinet agreed to create a combined Minerals and Waste Local Plan.</p> <p>This new plan will detail our policies for minerals and waste, and set out locations for the potential development of minerals sites (such as sand or gravel pits) and waste sites (such as recycling plants or landfill sites) in the county.</p> <p>The Suffolk Minerals and Waste Local Plan, will replace all three of the existing plans:</p> <ul style="list-style-type: none"> • Suffolk Minerals Core Strategy (adopted 2008) • Suffolk Minerals Site Specific Allocations (adopted 2009) • Suffolk Waste Core Strategy (adopted 2011) <p>The Preferred Options consultation is the second step in the process Suffolk County Council is taking to develop the new Minerals and Waste Local Plan. It sets out the preferred locations for potential development of minerals and waste sites in the county.</p> <p>This map shows the proposed and safeguarded sites: https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Safeguard-and-Proposals-Map.pdf</p>
PROPOSED RESPONSE:	<p>In general there are no new sites allocated in or near to the Broads it seems. There are some sites safeguarded for various minerals and waste uses that are near to the Broads. Suffolk County Council is requested to ensure that they consult the Broads Authority on any changes to the sites that are near to the Broads. Some of these sites W2 W3 WFT14 are adjacent to water courses supporting substantial visitor economy in the Broads. On this note, when setting the context of the County, reference to the special qualities of the Broads would be welcomed. These can be found in our draft local plan and copied below:</p> <p>The special qualities of the Broads that the Local Plan seeks to protect or enhance (as appropriate) are well known. The following list is based on public consultation for the Broads Plan, the Broads Climate Change Adaptation Plan and the Broads Landscape Character Assessment. Together, these special qualities help create the distinctiveness of the Broads' landscape.</p> <ul style="list-style-type: none"> a) Rivers and open water bodies ('broads') b) Fens, reed beds and wet woodlands c) Grazing marshes and dyke networks d) Flood plains, estuary and coast e) Navigable, lock-free waterways

	<p>f) Special wildlife</p> <p>g) Countryside access on land and water</p> <p>h) Views, remoteness, tranquillity, wildness and ‘big skies’</p> <p>i) The people, the visitors, the activities</p> <p>j) History: Geo-heritage, heritage assets, archaeology , historic structures</p> <p>k) Cultural assets, skills and traditions.</p> <p>l) People’s interactions with the landscape</p> <p>m) The settlements</p> <p>n) Variety of patterns and textures of the landscape.</p> <p>We do have some other comments:</p> <ul style="list-style-type: none"> • GP2 – e has a ‘where appropriate’ but so does the introductory sentence to the bullet points. Suggest the one in e is not needed. • GP4 says significant adverse impacts and GP3 says adverse impacts. Support the wording of GP3. Suggest these policies need to be consistent. • MP3 might benefit from bullet points. Is 10km as the crow flies or using roads? • MP5 – is a better title ‘aggregate recycling facilities’ as the policy refers to the facility rather than the product? Reference to brownfield sites – seems an afterthought. Should this be a requirement or strongly encouraged or is it ok that these come forward on greenfield land? • MP8 – five years or more. Which is it? 5 years or more than 5 years? Does not seem to be clear. • WP3 d – regarding adjacent to agricultural and forestry buildings – is the intention to allow the use of greenfield land for this use? • WP4 – at various places in the document there is reference to having facilities near centres of population that generate waste. Should the policy therefore state that they should be located near to such centres? As written, such facilities could be in the middle of nowhere. • WP11 and WP12 – last paragraph. Should these be the same? WP12 talks about residual source separated and pre-sorted waste whereas WP11 talks of pre-sorted waste only. • Throughout there is reference to existing B2 and B8 land uses or uses allocated for such a use in a Development Plan. Does NPPF22 have any relevance? That is to say could these sites come forward as a use other than employment giving rise to conflicting land uses? • WP15 talks about a small proportion – how much is a small proportion? • 6.33 - Design does seem to be important rather than desirable as Suffolk has a National Park equivalent area that is given the highest order of protection as well as other important landscapes. Looking at the policy itself, there is cross-reference to GP2 but should there also be reference to GP4 as the criteria in that could inform the design. <p>It seems there are some typographical errors. The ones I have noticed are as follows:</p> <p>2.2 – competing rather than completing</p> <ul style="list-style-type: none"> • Page 9, aim 3 – ‘other development other forms of development’ • 4.10 – in doing so will seek • 5.6 b – constraints rather than constrains • 5.11 – included at in the Plan • 5.25 – that this to will be based upon • 6.6 – ‘found by following the link’ • 6.16 – ‘demolition of excavation’ should this be ‘demolition or excavation’?
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	<ul style="list-style-type: none"> • 6.20 – do you mean depose or dispose? • 6.23 – think you mean ‘Many much smaller EfW systems’? • 6.24 – ‘the residual is either than landfilled’ – do you mean ‘then’? • WP11 – should the sentence including GP4 be criteria d)? • 6.33 – ‘when large facilities such as the Energy from’. • 6.34 – do you mean ‘impact upon waste management’ rather than development? • 8.15 – do you mean ‘in situ’ rather than ‘in sit’? <p><u>Comments from landscape consultant</u></p> <p>There are no new mineral sites proposed within the vicinity of the Broads Authority administrative area. The likelihood for potential landscape effects on the Broads in therefore significantly low.</p> <p>There are however a number of safeguarded sites within and in proximity to the Broads area which will require landscape consideration.</p> <p>Policy GP4 outlines the general environmental criteria to be addressed by any forthcoming application, as deemed appropriate by the planning authority. GP4 is considered to be reasonably comprehensive and the local validation requirements should pick up on the detail of what is required to satisfy each of the environmental criteria for any given scheme.</p> <p>Having briefly reviewed the local validation requirements, and although not strictly subject of this consultation, there is scope to include greater detail in what is to be expected of submissions. For example, existing vegetation often plays a significant role in mitigating the effects of minerals and waste development, and is also often subject of removal to facilitate such development. The current validation requirements require submissions to mark vegetation for retention and removal but require no assessment of quality. It may therefore be difficult to establish appropriate and proportionate mitigation for loss of landscape features; a BS5837 Trees in relation to design, demolition and construction survey could provide qualitative information. It may therefore be timely for the local minerals and waste planning authority to revisit validation requirements to bring in line with the changes in policy.</p> <p>The proposed minerals policies cover cumulative effects, progressive working and restoration although there is no specific policy in relation to design / siting of mineral sites within the landscape.</p> <p>Proposed waste policy WP17 makes provision for design of waste management facilities. A policy similarly applicable to minerals sites or a general policy to cover design principles could be considered.</p> <p><u>Sustainability Appraisal</u></p> <p>Key documents – there are no Broads Authority documents there. Suggest the Core Strategy, Development Management DPD, Sites Specifics Local Plan and emerging new Local Plan are referred to. Then there is a Flood Risk SPD and various guides. There is the Broads Plan as well.</p> <p>2.3.4 – the Broads has a status equivalent to a National Park.</p>
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