

Norfolk Minerals and Waste Local Plan

Minerals Site Specific Allocations Development Plan Document (DPD) – Single Issue Silica Sand Review

Statement of Consultation

February 2016



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T. McCabe - Executive Director
Community and Environmental Services
Norfolk County Council
County Hall
Martineau Lane
Norwich
NR1 2SG

www.norfolk.gov.uk



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Introduction

1.1 Under the Planning and Compulsory Purchase Act 2004 (as amended), the County Council is required to produce a Minerals and Waste Local Plan. The Norfolk Minerals and Waste Local Plan consists of three adopted development plan documents (DPDs) and a Policies Map:

- Core Strategy and Minerals and Waste Development Management Policies DPD 2010-2026 (adopted September 2011)
- Waste Site Specific Allocations DPD (adopted October 2013)
- Minerals Site Specific Allocations DPD (adopted October 2013)

1.2 The purpose of the Silica Sand Review of the adopted Minerals Site Specific Allocations DPD is to address an identified shortfall, of 2.5 million tonnes, in the tonnage of silica sand resources in allocated sites compared with the target identified in the adopted Plan. The requirement for a Silica Sand Review is included in the Minerals Site Specific Allocations DPD.

1.3 This 'Statement of Consultation' is for the Silica Sand Review of the Minerals Site Specific Allocations DPD. The Silica Sand Review has been through two consultation stages. The first consultation stage, referred to as the Initial Consultation, took place during March and April 2015. The second stage, referred to as the Preferred Options stage, took place during November and December 2015.

1.4 This statement sets out how these consultations were carried out. Details required are:

- Who was invited to make comments;
- How they were invited;
- A summary of the main issues raised by respondents; and
- How any representations have been taken into account.

1.5 For each of the consultation stages there are sections indicating:

- The specific, general and other consultation bodies who were contacted and invited to make representations;
- The inspection points where the consultation documents were available for public viewing;
- A copy of the letter/email sent to consultees inviting representations
- A copy of the public notice from the Eastern Daily Press; and
- The number of people and organisations that responded to each consultation and the number of responses received.

1.6 Sections 2.6 and 3.6 highlight the main issues raised in the representations received during the two public consultation stages and how they have been taken into account in the Pre-submission document.

2. Initial Consultation 2015

The function of the Initial Consultation document was to set out the scope and purpose of the Norfolk Silica Sand Review of the Minerals Site Specific Allocations DPD and to gather views on the potential methodology for identifying and assessing specific sites, preferred areas and/or areas of search on which silica sand extraction could take place during the plan period to 2026.

The Initial Consultation included background information and 18 questions on the following topics:

- spatial portrait of silica sand in Norfolk and its uses
- internationally designated sites (Special Protection Areas, Special Areas of Conservation and Ramsar sites)
- Sites of Special Scientific Interest (SSSIs)
- Ancient Woodland
- historic environment and heritage assets
- amenity
- agricultural land classification
- flood risk
- previous workings and current permissions
- extent of deposits
- electricity and gas transmission and waste infrastructure
- landowner willingness
- criteria to be used to define land as a Preferred Area or Area of Search

Consultees were invited to respond to these questions and provide information/evidence to support their response.

The consultation ran for six weeks from 9 March to 20 April 2015. This consultation used the following methods of engagement:

- A letter/email was sent to the consultees (a copy of the letter and the list of consultees can be found in this document)
- The documents were made available on the County Council's website
- An e-consultation portal on the County Council's website enabled direct online responses to be made;
- Copies of the documents were available for public viewing at 47 libraries, ten Council Face-to-face locations and nine Local Planning Authority offices (including County Hall).
- Attendance by a council officer at the Leziate Quarry Liaison Meeting 31 March 2015, at which representatives of Leziate, East Winch and Middleton Parish Councils, and Sibelco UK Ltd were present and a short presentation and Question and Answer session took place.

2.1 Initial consultation 2015: list of consultees

a. Specific consultation bodies

- Local Planning Authorities in Norfolk
- Local Planning Authorities adjoining Norfolk:
 - Suffolk County Council
 - Cambridgeshire County Council
 - Lincolnshire County Council
 - East Cambridgeshire District Council
 - Fenland District Council
 - Forest Heath & St Edmundsbury Council (West Suffolk)
 - Mid Suffolk District Council
 - Waveney District Council
 - South East Lincolnshire Planning Authority (South Holland and Boston Borough)
- Other relevant Mineral Planning Authorities:
 - Essex County Council
 - Hertfordshire County Council
 - Central Bedfordshire, Bedford Borough & Luton Borough Council Shared Minerals Planning Service
 - Thurrock Council
 - Southend-on-Sea Borough Council
 - Peterborough City Council
 - Kent County Council
 - North Lincolnshire Council
 - North Yorkshire Council
 - Nottinghamshire County Council
 - Staffordshire County Council
 - Surrey County Council
 - Worcestershire County Council
 - Cheshire East Council
- All Parish and Town Councils in Norfolk
- All Parish and Town Councils adjoining Norfolk (see Table 1)
- Anglian Water Services Ltd
- Amec E & I Ltd for National Grid Plc
- BT Group plc
- Defence Infrastructure Organisation
- Department for Transport
- East of England Local Government Association
- English Heritage (now Historic England)
- Environment Agency
- Essex and Suffolk Water
- Natural England
- Highways Agency (now Highways England)
- Norfolk County Council Highway Authority
- Homes and Communities Agency

- Marine Management Organisation
- Public Health Norfolk
- West Norfolk Clinical Commissioning Group
- South Norfolk Clinical Commissioning Group
- Norwich Clinical Commissioning Group
- North Norfolk Clinical Commissioning Group
- HealthEast (Great Yarmouth and Lowestoft Clinical Commissioning Group)
- Mobile Operators Association
- Vodafone Ltd
- Virgin Media
- Hutchinson 3G UK Ltd
- T-mobile, Orange and EE
- National Grid plc
- Police and Crime Commissioner for Norfolk
- The Coal Authority
- UK Power Networks
- Norfolk Community Health and Care (NHS Trust)
- NHS England (East Anglia Area Team)
- Network Rail Infrastructure Ltd
- Office of the Rail Regulator

Table 1: Parish and Town Councils adjoining Norfolk

In Suffolk	In Suffolk
<ul style="list-style-type: none"> • Barnby Parish Council • Barnham Parish Council • Barsham & Shipmeadow Parish Council • Beccles Town Council • Blundeston & Flixton Parish Council • Brandon Town Council • Brome & Oakley Parish Council • Bungay Town Council • Carleton Colville Parish Council • Elveden Parish Council • Euston Parish Council • Flixton, St Cross, St Margaret & South Elmham Parish Council • Hinderclay Parish Council • Hopton cum Knettishall • Hoxne Parish Council • Lakenheath Parish Council • Mendham Parish Council • Mettingham Parish Council • North Cove Parish Council • Oulton Parish Council • Palgrave Parish Council • Redgrave Parish Council 	<ul style="list-style-type: none"> • Santon Downham Parish Council • Somerleyton, Ashby & Herringfleet Parish Council • Stuston Parish Council • Syleham Parish Council • Thelnetham Parish Council • Weybread Parish Council • Worlingham Parish Council • Wortham and Burgate Parish Council
	In Cambridgeshire
	<ul style="list-style-type: none"> • Christchurch Parish Council • Elm Parish Council • Leverington Parish Council • Little Downham Parish Council • Littleport Parish Council • Manea Parish Council • Newton parish Council • Tydd St Giles Parish Council • Wisbech St Mary Parish Council
	In Lincolnshire
	<ul style="list-style-type: none"> • Sutton Bridge and Wingland Parish Council

b. General consultation bodies; and

c. other consultation bodies (residents or other persons carrying on business in the LPA)

- Norfolk Coalition of Disabled People (NCODP) operating as Equal Lives
- West Norfolk & Fenland Muslims
- West Norfolk and District Chinese Association
- King's Lynn Asian Community Society
- Norfolk Secular and Humanist Group
- Norfolk Philippine Support Group
- Norfolk African Community Association
- Norfolk and Norwich Asian Society
- East of England Faiths Agency
- Church of England
- National Federation of Gypsy Liaison Groups
- Water Management Alliance
- Waveney, Lower Yare and Lothingland Internal Drainage Board
- East Harling Internal Drainage Board
- Downham Market Group of IDBs
- Ely group of Internal Drainage Boards
- Middle Level Commissioners
- Woodland Trust
- Norfolk Wildlife Trust
- RSPB
- Ramblers Association
- Discover Suffolk
- National Trust
- Sustrans
- New Anglia LEP
- Wild Anglia (Local Nature Partnership)
- Norfolk Rural Community Council
- Norfolk Geodiversity partnership
- Norfolk Fire and Rescue Service
- Norfolk Local Access Forum (NCC)
- Norfolk Coast Partnership
- Norfolk Chamber of Commerce and Industry
- National Farmers Union
- Marinet Ltd
- King's Lynn Civic Society
- Health and Safety Executive
- Forestry Commission
- Federation of Small Businesses
- Country Land and Business Association
- Breaking New Ground
- CAA: Norwich International Airport
- Norfolk Association of Local Councils
- Equality and Human Rights Commission
- Freight Transport Association Ltd
- Greenpeace
- Grimston Fen & Allotment Trust

- Norfolk and Norwich Archaeological Society
- Norfolk Farming and Wildlife Advisory Group (FWAG)
- CPRE Norfolk
- Norwich Friends of the Earth
- Garden History Society
- West Dereham Heritage Group
- Norfolk Rivers Trust
- Grimston, Congham & Roydon Residents Association
- Norfolk and Norwich Racial Equalities Council
- Age UK Norfolk
- Norfolk Older People's Strategic Partnership Board
- King's Lynn and West Norfolk Youth Advisory Board
- NCC Lead Local Flood Authority

Mineral operators

- Breedon Aggregates Ltd
- Brett Group
- British Aggregates Association
- Cemex UK
- Carter Concrete Ltd
- Earsham Gravels Ltd
- East Anglian Stone Ltd
- Frimstone Ltd
- Folkes Plant and Aggregate
- Longwater Gravel Co Ltd
- Lignacite Ltd
- Middleton Aggregates Ltd
- Mineral Products Association
- Sibelco UK Ltd
- Tharros Ltd
- Silverton Aggregates Ltd
- West Norfolk Super Lime
- Mr William George
- John Brown (Gazeley) Ltd
- Lafarge Tarmac
- The Silica and Moulding Sands Association
- Bathgate Silica Sand Limited
- Garside Sands
- Hanson Aggregates
- Mansfield Sand Company Limited

Land agents/consultants

- Stephen M Daw Limited
- Simon Westaway Associates
- D K Symes Associates
- Martin Smith Partnership
- Pike Partnership
- Clover Planning
- PDE Consulting Ltd
- Chartered Planning Consultancy Ltd
- Bidwells
- WYG Planning and Design
- David L Walker Chartered Surveyors
- Mills and Reeve
- David Lock Associates
- M Falcon Property Solutions
- Mineral Services Ltd
- Thos Wm Gaze
- Case & Dewing
- Irelands
- Hugh Ferrier Chartered Surveyors
- Barry L Hawkins
- Strutt & Parker
- Atkins
- Durrants
- Brown & Co
- J Cheetham Contracting
- Birketts LLP
- Wardell Armstrong LLP
- Watsons
- Knight Benjamin & Co
- Howards Commercial
- Golder Associates
- The Landscape Partnership Ltd
- RPS Planning, Transport & Environment
- Terence O'Rourke Ltd
- KEW Environment & Training Consultancy Ltd
- Lanpro Services
- Leathes Prior (Solicitors)
- Pegasus Planning Group
- David Jarvis Associates Ltd
- Cruso & Wilkin
- Heaton Planning
- Colliers International
- Martineau
- Shiels Flynn Limited
- Martin Robeson Planning Practice
- SLR Consulting Limited
- BNP Paribas Real Estate-
- Historic Landscape Management Ltd
- Small Fish
- Fenn Wright
- La Ronde Wright

Local residents

We also wrote to around 240 individuals. These people were contacted because they had responded to earlier consultations regarding proposed silica sand extraction sites during the production of the Minerals Site Specific Allocations Development Plan Document.

**County Councillors at the
time of the Initial
Consultation in 2015**

Mr A D Adams
Mr S Agnew
Mr C Aldred
Mr S Askew
Mr M J M Baker
Mr R Bearman
Mr R Bird
Mr W Borrett
Dr A Boswell
Mr B Bremner
Mrs J D Brociek-Coulton
Mr A J Byrne
Mr M R H Carttiss
Mr M Castle
Mrs J R M Chamberlin
Mr M J B Chenery of Horsbrugh
Mr J Childs
Mr S M Clancy
Mr R Coke
Mr D J Collis
Ms E C Corlett
Mrs H Cox
Mr D M Crawford
Mr A C Dearnley
Mrs M Dewsbury
Mr N D Dixon
Mr J Dobson
Mr T East
Mr T FitzPatrick
Mr C W Foulger
Mr T Garrod
Ms D Gihawi
Mr P C J Gilmore
Mr A C Grey
Mrs S C Gurney
Mr P Hacon
Mr B J Hannah
Mr D G Harrison
Mr S Hebborn
Mr H Humphrey
Mr B J M Iles
Mr T Jermy
Mr C Jordan
Mr J M Joyce
Miss A Kemp
Mr M Kiddle-Morris
Mr J Law
Mrs J Leggett

Mr B W C Long
Mr I J Mackie
Mr I A C Monson
Mr J Mooney
Ms E Morgan
Mr S Morphew
Mr G Nobbs
Mr W Northam
Mr R E Parkinson-Hare
Mr J Perkins
Mr A J Proctor
Mr D J Ramsbotham
Mr W Richmond
Mr D Roper
Mr M Sands
Mr E G Seward
Mr N C Shaw
Mr M Smith
Mr R A Smith
Mr P J Smyth
Mrs M F Somerville
Mr B H A Spratt
Mr M Storey
Dr M Strong
Mrs A Thomas
Mr D M Thomas
Mr J W Timewell
Mrs J Virgo
Mrs C M Walker
Mr J M Ward
Mr B Watkins
Ms S J Whitaker
Mr A M White
Mr M J Wilby
Mrs M Wilkinson

2.2 Public notice of consultation in EDP on 9 March 2015

**Norfolk County Council
Town and Country Planning (Local Planning) (England)
Regulations 2012
Norfolk Minerals and Waste Local Development Framework:
Minerals Site Specific Allocations Development Plan
Document (DPD)
Single Issue Silica Sand Review
Initial Consultation and Sustainability Appraisal
Scoping Report**

Norfolk County Council is carrying out a Single Issue Silica Sand Review of the adopted Norfolk Minerals Site Specific Allocations DPD. The first stage in this review is the publication of the Initial Consultation document and the Sustainability Appraisal Scoping Report for consultation. **The consultation period will be for six weeks from 9 March 2015 until 5pm on 20 April 2015.**

The Silica Sand Review is needed to address the predicted shortfall, of 2.6 million tonnes, in the quantity of silica sand extraction sites allocated in the Minerals Site Specific Allocations Plan.

The above documents can be viewed on the Norfolk County Council website at www.norfolk.gov.uk/nmwdf. Direct online representations are the preferred method of response.

Representations can also be sent by email, post or fax to the following address: Planning Services, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH
Email: LDF@norfolk.gov.uk
Fax: 01603 223219 (marked for the attention of Planning Services)
If you have any queries please call 0344 800 8020.

Copies of the documents will be made available for public inspection, within normal opening hours during the consultation period, at all the public libraries and Council Face-to-Face centres in Norfolk, and are available from Planning Services, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH. Copies will also be made available for public inspection, during office hours, at:

Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH
Breckland District Council, Elizabeth House, Walpole Loke, East Dereham, NR19 1EE
Broadland District Council, Thorpe Lodge, Yarmouth Road, Norwich, NR7 0DU
Great Yarmouth Borough Council, Town Hall, Great Yarmouth, NR30 2QF
Borough Council of King's Lynn and West Norfolk, King's Court, Chapel Street, King's Lynn, PE30 1EX
North Norfolk District Council, Holt Road, Cromer, NR27 9EL
Norwich City Council, City Hall, Bethel Street, Norwich, NR2 1NH
South Norfolk Council, South Norfolk House, Swan Lane, Long Stratton, NR15 2XE
The Broads Authority, Yare House, 62-64 Thorpe Road, Norwich, NR1 1RY

2.3 Wording of letter/email to consultees inviting comments

NORFOLK MINERALS SITE SPECIFIC ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD) Single Issue Review of Silica Sand - Initial Consultation Document

I am writing to inform you that the Initial Consultation on the Single Issue Silica Sand Review of the Norfolk Minerals Site Specific Allocations Plan will take place over a six week period from 9 March to 20 April 2015 (inclusive), and I would welcome your comments.

I am writing to you because you responded regarding potential Silica Sand extraction sites during the previous minerals plan-making process which took place from 2008 to 2013.

The Minerals Site Specific Allocations Plan (adopted by full Council on 28/10/2013) contains a requirement for a Silica Sand Review of the Plan to be completed by 2016. The review is needed to address the predicted shortfall, of 2.6 million tonnes, in the quantity of silica sand extraction sites allocated in the Plan. It is predicted that around 750,000 tonnes of silica sand will be extracted from Norfolk per annum. It is expected that no more than one or two additional specific sites will need to be allocated over the plan period (to 2026) to meet the shortfall. If suitable sites are not submitted through the Silica Sand Review process then Preferred Areas and/or Areas of Search for future silica sand extraction will need to be designated instead.

The Initial Consultation document contains a number of questions regarding the approach that the County Council propose to take in the assessment of specific sites and, if necessary, in the designation of preferred areas/areas of search for future silica sand extraction.

In accordance with the Planning Inspector's comments on the Minerals SSA Plan, "The review will also help ensure that attention is focused on suitable extraction areas within the silica sand resource area. Uncertainty and unwarranted pressure on unsuitable sites would be avoided."

Copies of the Initial Consultation Document, and the Sustainability Appraisal Scoping Report, are available for public inspection, free of charge, within normal opening hours up to and including 20 April 2015, at all public libraries and Council Face-to-Face centres in Norfolk, and at:

- Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2SG
- Breckland District Council, Elizabeth House, Walpole Loke, East Dereham, NR19 1EE
- Broadland District Council, Thorpe Lodge, Yarmouth Road, Norwich, NR7 0DU
- Great Yarmouth Borough Council, Town Hall, Great Yarmouth, NR30 2QF
- Borough Council of King's Lynn and West Norfolk, King's Court, Chapel Street, King's Lynn, PE30 1EX
- North Norfolk District Council, Holt Road, Cromer, NR27 9EL
- Norwich City Council, City Hall, Bethel Street, Norwich, NR2 1NH
- South Norfolk Council, South Norfolk House, Swan Lane, Long Stratton, NR15 2XE
- The Broads Authority, Yare House, 62-64 Thorpe Road, Norwich, NR1 1RY

All documents are also available on Norfolk County Council's website at www.norfolk.gov.uk/nmwdf

Where possible the County Council would prefer representations to be made directly to www.norfolk.gov.uk/nmwdf; however responses by post, fax and email will also be

accepted. **All comments, in whatever form, should be made by 5pm on 20 April 2015.**

After the current consultation period finishes, the next stage in the preparation of the Silica Sand Single Issue Review will be the publication of the Preferred Options Document, which is planned to take place in summer 2015.

Any enquiries should be made to LDF@norfolk.gov.uk or to Caroline Jeffery, at the address on this letter. Please also contact Norfolk County Council if you do not wish to receive any further correspondence regarding the Silica Sand Review.

Yours sincerely

Caroline Jeffery
Principal Planner (Minerals and Waste Policy)

2.4 List of inspection points

Table 2: Norfolk libraries

Acle	Great Yarmouth	Poringland
Attleborough	Harleston	Reepham
Aylsham	Hellesdon	Sheringham
Blofield	Hethersett	Sprowston, Norwich
Brundall	Hingham	St William's Way, Norwich
Caister	Holt	Stalham
Costessey	Hunstanton	Swaffham
Cromer	King's Lynn	Taverham
Dereham	Loddon	Thetford
Dersingham	Long Stratton	Tuckswold
Diss	Martham	Watton
Downham Market	Mile Cross, Norwich	Wells
Earlham, Norwich	Mundesley	West Earlham, Norwich
Fakenham	North Walsham	Wroxham
Gaywood, King's Lynn	Norwich – Millennium	Wymondham
Gorleston	Library	
	Plumstead Road, Norwich	

Table 3: Local Planning Authority inspection venues

Norfolk County Council County Hall, Martineau Lane, Norwich, NR1 2SG	Great Yarmouth Borough Council Town Hall, Hall Plain, Great Yarmouth, NR30 2QF
North Norfolk District Council Council Offices, Holt Road, Cromer, NR27 9EN	Norwich City Council City Hall, Bethel Street, Norwich, NR2 1NH
Breckland Council Elizabeth House, Walpole Loke, East Dereham, NR19 1EE	Borough Council of King's Lynn & West Norfolk Kings Court, Chapel Street, King's Lynn, PE30 1EX
Broadland District Council Thorpe Lodge, 1 Yarmouth road, Norwich, NR7 0DU	South Norfolk Council South Norfolk House, Swan Lane, Long Stratton, NR15 2XE
Broads Authority Yare House, 62-64 Thorpe Road, Norwich, NR1 1RY	

Table 4: Council face-to-face locations

Attleborough Learning Centre Church Street, Attleborough, NR17 2AH	Broadland District Council Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU
Harleston Information Plus 8 Exchange Street, Harleston, IP20 9AB	Diss Council Information Centre Town Council Offices, 11-12 Market Hill, Diss, IP22 4JZ
Downham Market Council Information Centre - The Priory Centre 78 Priory Road, Downham Market, PE38 9JS	Fakenham Connect Oak Street, Fakenham, NR21 9SR
Priory House Reception 9 Austin Street, Kings Lynn, PE30 1EB	King's Lynn Council Information Centre King's Court, Chapel Street, King's Lynn, PE30 1EX
The Vauxhall Centre Johnson Place, Norwich, NR2 2SA	Wensum Lodge Adult Education Centre 169 Kings Street, Norwich, NR1 1QW

2.5 Summary of Initial Consultation responses

We received comments on the Silica Sand Review from the following 17 organisations and one individual:

- Environment Agency
- Natural England
- Historic England
- Highways England
- Norfolk Wildlife Trust
- Sibelco UK
- Borough Council of King's Lynn and West Norfolk
- Norfolk Coast Partnership
- Grimston Parish Council
- Leziate Parish Council
- Snettisham Parish Council
- South Wootton Parish Council
- Middleton Parish Council
- Marine Management Organisation
- Equality and Human Rights Commission
- Anglian Water
- Worcestershire County Council
- North Yorkshire County Council

We also received 'no comment' responses from the following nine organisations:

- North Norfolk District Council
- Norwich City Council
- Breckland District Council
- Broadland District Council
- South Norfolk District Council
- Surrey County Council
- Office of Rail Regulation
- Bradwell Parish Council
- Middle Level Commissioners (IDB)

We received comments on the Sustainability Appraisal Scoping Report from the following seven organisations:

- Environment Agency
- Sibelco UK
- Natural England
- Historic England
- South Norfolk District Council
- Broads Authority
- Norwich City Council (no comment)

Table 5: Initial Consultation 2015: summary of consultation responses

Question topic	Respondents	Representations
1. Silica sand shortfall	5	5
2. Roydon Common and Dersingham Bog Ramsar	7	7
3. The Wash and North Norfolk Coast SAC, SPA and Ramsar	5	5
4. SSSI qualifying features	5	5
5. SSSI distances	5	5
6. ancient woodland	3	3
7. heritage assets distances	5	5
8. heritage assets consultation	5	5
9. amenity impacts	4	4
10. allocated housing sites	4	4
11. agricultural land	4	4
12. flood risk	4	4
13. previous silica sand workings	3	3
14. carstone resource	4	4
15. silica sand geology	4	4
16. landowner willingness	2	2
17. preferred areas and areas of search	6	6
18. any other issues	24	27
Total	28	102

Table 6. Sustainability Appraisal Scoping Report: summary of consultation responses

Section	Respondents	Representations
Task A1: relationship with other plans, policies and programmes	5	5
Task A1: Key messages in review of plans, policies and programmes	1	1
Task A2: Sustainability baseline summary	5	5
Task A2: Description of current sustainability baseline	4	5
Task A2: Evolution of the sustainability baseline	2	2
Task A3: sustainability problems, issues and recommendations	3	3
Task A4: Development of SA/SEA Objectives	5	6
Total	7	27

Table 7: Main issues raised in response to the Initial Consultation and how they have been taken into account

Key Issues Raised	Norfolk County Council officer response
<p>1. Should the Silica Sand Review plan to meet the revised shortfall of 2.45 million tonnes over the plan period, or should a different quantity be planned for?</p>	
<p>An individual raised the concern that meeting the revised shortfall should not take precedence over the protection of important landscape, ecology and archaeological sites.</p> <p>Sibelco UK said that, provided the Minerals Site Specific Allocations Plan is reviewed in 2018 and the end date of the Plan is then extended by at least five years to 2031, then Sibelco is content that the current review seeks to fill the identified shortfall to 2026.</p>	<p>The assessment of the Plan through Sustainability Appraisal will ensure that potential impacts of the Silica Sand Review are taken into account. The Habitats Regulations Assessment of the Silica Sand Review will ensure that it will not adversely affect the integrity of European designated nature conservation sites.</p> <p>The Silica Sand Review will plan to meet the shortfall of 2.45 million tonnes in the period to 2026. However, once a permitted reserve estimate for silica sand is available for 31/12/2014 then the shortfall figure will be revised. The Minerals Site Specific Allocations Plan is proposed to be reviewed in 2018 and at that point the current end date of the plan (2026) will be extended by at least five years.</p>
<p>2. Should enhanced evidence on the potential effects of silica sand extraction on the Roydon Common and Dersingham Bog SAC and Roydon Common and Dersingham Bog Ramsar sites be provided in areas closer than 2km from the SAC/Ramsar, or should a different distance from these sites be used?</p>	
<p>Natural England said that these sites are fed by diffuse groundwater systems (and also surface water). This means that the special features, for which they are designated, are sensitive and vulnerable to changes in water flow and levels and in water chemistry. Using distance criteria alone will not necessarily identify any potential adverse hydrological impacts. Natural England recommends using a hydrological catchment based approach for these designated sites, and avoiding the water catchment area(s). As we consider that most proposals in the vicinity of these sites are likely to have a significant effect on the internationally important interest features of the site, either alone or in combination with other plans and projects, a proposer of a site allocation would need</p>	<p>In accordance with the consultation response from Natural England, the hydrological catchment areas for Roydon Common and Dersingham Bog SAC will be used to determine the area within which enhanced evidence on the potential effects of silica sand extraction on these sites will be required to be provided by the site proposer.</p> <p>Preferred areas and/or areas of search for silica sand extraction defined by Norfolk County Council will exclude the hydrological catchments of Roydon Common and Dersingham Bog SAC. Norfolk County Council is aware that a Habitats Regulations Assessment of the Silica Sand Review is likely to be required.</p>

Key Issues Raised	Norfolk County Council officer response
<p>to demonstrate clearly, through sound scientific evidence, that there would be no adverse impacts on the international sites. Norfolk County Council would need to undertake a Habitats Regulations Assessment before any new allocation could be accepted.</p> <p>Environment Agency agreed with Natural England's response.</p> <p>Norfolk Wildlife Trust said that all areas in the vicinity of Roydon Common and Dersingham Bog should be excluded from the outset. Otherwise distance criteria for enhanced evidence should relate to hydrological catchments surrounding the designated sites. As a result it may be necessary for NCC to carry out work to establish catchment related criteria in order to inform the Habitats Regulations Assessment for the review.</p> <p>Sibelco UK said that 2km is an excessive distance to impose around these areas and 250 metres to 500 metres would be more reasonable if "enhanced evidence" is deemed necessary. Large areas of the Leziate Beds are excluded by a 2km zone.</p> <p>Grimston Parish Council suggested that a distance of 2.5 km should be used instead. An individual suggested that a distance of 5km should be used.</p>	<p>In response to the comments from Sibelco, we highlight that Natural England, the Environment Agency and NWT are in agreement in their consultation responses that the hydrogeological catchments of Roydon Common and Dersingham Bog SAC should be used to determine those areas which should either be excluded from preferred areas/areas of search for silica sand extraction or enhanced evidence provided for specific sites to determine that there will be no likely significant adverse effects on the SAC. The area of the hydrogeological catchments is likely to be greater than 500 metres. It is accepted that this may exclude large areas of the Leziate Beds, but Norfolk County Council has a statutory duty to meet the requirements of the Habitats Directive in relation to the Silica Sand Review.</p> <p>No information was provided in these responses to justify why the specific distances of 2.5km or 5km should be used.</p>
<p>3. Should enhanced evidence on the potential effects of silica sand extraction on the Wash and North Norfolk Coast SAC, The Wash SPA and The Wash Ramsar be provided in areas closer than 250 metres from the SAC/SPA/Ramsar, or should a different distance from these sites be used?</p>	
<p>Natural England said that a 500 metre distance may be more appropriate to avoid noise and lighting from extraction activities disturbing birds, which are the main features of the designated sites in The Wash.</p>	<p>Enhanced evidence will be required for sites within 250 metres of The Wash and sites at a greater distance where the proposer of the site considers that there is the potential for adverse impacts to The Wash.</p>

Key Issues Raised	Norfolk County Council officer response
	Normal practice in Norfolk is for silica sand extraction sites to not have artificial lighting as all processing takes place at Leziate.
4. Should enhanced evidence areas for SSSIs be based on the sensitivity of qualifying features to the effects of mineral extraction, or should different criteria be used?	
All respondents, including statutory consultees agreed that the requirement for enhanced evidence should be based on the sensitivity of the qualifying features of the SSSI to the effects of mineral extraction.	The enhanced evidence areas will be based on the sensitivity of qualifying features of the SSSIs to the effects of mineral extraction.
5. Do you have information on the minimum distances from SSSIs within which an enhanced level of evidence would be required to ensure that harm is not caused to the qualifying features of a SSSI?	
Natural England responded that there is no one generic distance that can be prescribed for all the SSSIs because the special qualifying features of interest for which each SSSI has been notified will vary from site to site. Therefore no distance information was provided.	The enhanced evidence areas will be based on the potential for mineral extraction to have adverse impacts on the qualifying features of the SSSI. Different distances have been applied to sites with geological qualifying features compared with species or habitat features.
6. Should enhanced evidence on the potential effects of silica sand extraction on ancient woodland be provided in areas within 15 metres of the ancient woodland, as in the Four Acres appeal, or should a different distance from these sites be used?	
Natural England responded that careful consideration should be given as to whether the proposed 15 metre buffer is really adequate to allow a comprehensive assessment to be undertaken of potential impacts on ancient woodland from mineral working.	We recognise that in order to assess the impacts to ancient woodland from dust and potential changes to groundwater due to mineral extraction, a distance greater than 15 metres from the ancient woodland should be used. We therefore propose to use a distance of 250 metres as the area in which enhanced evidence would be required because it is considered that dust can be mitigated within this distance. This will also be used as a default distance for hydrology, although it may be that further information from consultees indicates that a greater distance is required.
7. Should enhanced evidence on the potential effects of silica sand extraction on heritage assets be provided in areas closer than 250 metres from the heritage asset, or should a different distance from these sites be used?	
Historic England (HE) said that it is important that non-designated heritage assets are acknowledged in the Silica Sand Review as well as designated heritage assets. Their protection is also required by the NPPF.	We recognise that the historic environment is made up of designated and non-designated assets and their respective settings. It was considered that, designated heritage assets would be of greatest significance, especially in the context of the

Key Issues Raised	Norfolk County Council officer response
<p>HE have concerns regarding the use of an arbitrary distance when assessing whether further detailed assessment would be required in relation to the impact on specific sites. The setting of one Heritage Asset will not be the same for another; setting will therefore be much wider than 250m in some instances and could be much smaller in others.</p> <p>As well as setting it is also important to understand the significance of any heritage assets affected. While a useful starting point, the use of distance or visibility alone as a gauge of impact is not appropriate. We would therefore object to the use of a 250m boundary as this would not result in robust evidence gathering. Each site would need to be judged on a site by site basis and the methodology adjusted to account for this.</p> <p>Sibelco UK said that heritage assets should be assessed on a case by case basis due to the many and varied types of heritage asset and the different ways in which a mineral development could potentially affect such an asset e.g. its setting. Buried heritage assets are not likely to be evident until at least pre-application assessment and more fully assessed during operational phases of development.</p> <p>An individual suggested that a distance of 500 metres should be used instead.</p>	<p>national importance of silica sand and its extraction. We recognise that non-designated heritage assets and assets subject to local listing also need to be considered and information on these will be considered in assessing sites and areas of search in future stages of the Silica Sand Review.</p> <p>Taking into account the consultation response from Historic England, enhanced evidence will be required for sites within 250 metres of a heritage asset, sites within the setting of a heritage asset and sites at a greater distance where the proposer of the site considers that there is the potential for adverse impacts to the significance of a heritage asset.</p> <p>As part of the assessment of sites proposed, officers will consult with bodies such as Historic England and the Norfolk Historical Environment Service. If it is considered that insufficient evidence has been provided to reach a conclusion on the acceptability of a site for allocation the proposer of the site will be asked to provide additional evidence. If proportionate evidence is not provided it is unlikely that an allocation could be justified.</p>
<p>8. Does consultation with Historic England and the Norfolk Historic Environment Service provide an appropriate method for ascertaining the likely archaeological importance of proposed Specific Sites, designated Preferred Areas and/or Areas of Search, and potentially acceptable methods of protection/mitigation?</p>	
<p>Historic England responded that once the evidence gathering is complete consultation with Historic England and the Norfolk Historic Environment Service is appropriate. We would also encourage you to work with local conservation and archaeology officers.</p> <p>Sibelco UK said that this consultation should be in conjunction with heritage specialists acting on behalf of the site promoter.</p>	<p>Noted</p>

Key Issues Raised	Norfolk County Council officer response
<p>Reference should also be made to the CBI Archaeological Investigations Code of Practice and 'Mineral Extraction and Archaeology: A Practice Guide'.</p>	
<p>9. Should enhanced evidence on the potential effects of silica sand extraction on amenity be provided in areas closer than 125 metres from sensitive receptors, recognising that this does not represent a potential standoff distance which will be determined on a case by case basis, or should a different distance be used?</p>	
<p>The Borough Council of King's Lynn and West Norfolk endorsed the proposal for enhanced evidence on amenity impacts to be provided in areas closer than 125 metres from sensitive receptors.</p> <p>An individual suggested that a distance of 500 metres should be used instead.</p> <p>Sibelco UK disagreed with the 125 metre distance and said the term 'sensitive receptor' needed defining. They said that all effects on sensitive receptors would be capable of mitigation during the planning application process and through Environmental Impact Assessment.</p>	<p>Evidence on the potential effects of silica sand extraction on amenity will be needed for specific sites proposed within 250 metres of sensitive receptors. This distance is consistent with the consultation areas used in Core Strategy Policy CS16, in which Local Planning Authorities should consult NCC on non-mineral development in proximity to mineral extraction sites. It is therefore considered that 250 metres from a modern extraction site, with appropriate mitigation measures controlled by condition, should not result in unacceptable amenity impacts. Sensitive receptors will be defined in the 'call for sites' information as including residential dwellings, schools, workplaces and healthcare facilities.</p> <p>Amenity impacts will be assessed in detail as part of a planning application. However, site allocations will also need to be assessed for their suitability, in terms of potential impacts on amenity, as part of the preparation of the plan.</p>
<p>10. Should allocated sites and sites with planning permission for non-mineral uses that are located in or adjacent to the silica sand resource be excluded from Preferred Areas or Areas of Search, or should a different approach be taken?</p>	
<p>Sibelco UK said that they are unclear how a Borough Council local plan could have allocations and consents for non-mineral development on land which would presumably be safeguarded for minerals if the land was otherwise to be considered by Norfolk County Council for Preferred Sites or Areas of Search. Sibelco is of the view that since the areas in question must be located where potential silica sand is present then these areas should not be excluded from any Preferred Sites or Areas of Search. These areas would also be subject to compliance with Core Strategy Policy CS16 on safeguarding.</p>	<p>The King's Lynn and West Norfolk 'Site Allocations and Development Management Policies Document' is expected to be examined and adopted prior to the examination and adoption of the Silica Sand Review. Non-minerals allocations will only be excluded from the preferred areas/areas of search for silica sand extraction subject to the non-mineral site allocations being contained in an adopted Plan.</p> <p>If the specific site allocations in the KL&WN Plan contain a silica sand resource that can be economically extracted prior to</p>

Key Issues Raised	Norfolk County Council officer response
<p>The Borough Council for King's Lynn and West Norfolk agree with this approach where allocated sites and sites with planning permission for non-mineral uses that are located in or adjacent to the silica sand resource will be excluded from Preferred Areas and Areas of Search. This approach from the County Council will enable future growth in the Borough planned in the areas set out in the Site Allocations and Development Management Policies.</p>	<p>mineral development taking place then this would be dealt with in accordance with policy CS16. NCC has requested the relevant specific site allocation policies in the KL&WN Plan to include a requirement for investigation and prior extraction in accordance with Core Strategy Policy CS16.</p>
<p>11. Should agricultural land grades 1, 2 and 3 be removed from consideration as potential Preferred Areas or Areas of Search for future silica sand extraction?</p>	
<p>Natural England recommends that agricultural land grades 1, 2, and 3a are considered as part of the criteria. In accordance with paragraphs 112 and 143 of the NPPF impacts to Best and Most Versatile (BMV) agricultural land should be avoided where possible, but where impacts cannot be avoided its long term potential should be maintained through site restoration.</p> <p>Norfolk Wildlife Trust said that the value of agricultural land should not be set equal within the plan to that of designated nature conservation sites of European and national importance, but considered as areas to be avoided where possible in accordance with paragraph 112 of the NPPF.</p> <p>Sibelco UK does not agree that Areas of Search should exclude all land with agricultural grades 1, 2 and 3, not least because there is likely to be no differentiation of grade 3 into 3A and 3B. To restrict potential supply of silica sand to only grade 4 and 5 land is likely to severely restrict opportunities to deliver the required tonnage for any plan period.</p>	<p>The sub-grades of 3a and 3b are not mapped and therefore it is not possible for NCC to differentiate between them when defining Areas of Search. Areas of Search for future silica sand extraction are now only planned to exclude agricultural land grades 1 and 2. These agricultural land grades affect a significantly smaller area of the silica sand resource.</p> <p>Policy DM16 of the adopted Norfolk Minerals and Waste Core Strategy explains how planning applications for mineral extraction on BMV agricultural land will be dealt with.</p>
<p>12. Should land in flood zones 2 & 3 be removed from consideration as potential Preferred Areas or Areas of Search for future silica sand extraction?</p>	
<p>The Environment Agency responded that sites in flood zones 2 and 3 do not need to be removed from consideration on flood</p>	<p>Land in flood zones 2 and 3 will not be excluded from Areas of Search when they are defined by NCC.</p>

Key Issues Raised	Norfolk County Council officer response
<p>risk grounds, however, a sequential approach should be taken to site selection. Silica sand extraction is 'water compatible' development and appropriate in all flood zones, subject to the findings of a Flood Risk Assessment.</p>	
<p>13. Are there any areas not shown as previous workings on the map which have been worked to the full extent of all commercially viable deposits of silica sand?</p>	
<p>Sibelco UK responded that there are areas shown as worked out on the map, but which are not currently exhausted of silica sand.</p>	<p>A map was subsequently requested and provided by Sibelco UK to show where the specific areas referred to in their response are located. This additional information will be taken into account when the Areas of Search are defined by NCC.</p>
<p>14. Should proposals for Specific Sites for silica sand extraction be considered from within the carstone resource, if suitable evidence is provided regarding the quality and grade of silica sand on the site?</p>	
<p>Sibelco UK responded that sites for silica sand extraction should be considered from within the carstone resource as this is effectively the sub-crop of the silica sand in the Leziate Beds lying beneath the carstone and other deposits. Specific sites should also be considered from within other deposits which overlie the Leziate Beds and the wider Lower Cretaceous silica sand resource as mapped by the BGS.</p>	<p>Norfolk County Council are willing to consider proposals for Specific Sites for silica sand extraction from outside the silica sand (Mintlyn and Leziate Beds) and carstone surface deposits, as mapped by the BGS, if suitable evidence is provided regarding the quality and grade of silica sand on the site.</p>
<p>15. Should defined Preferred Areas and Areas of Search only include the silica sand resource which is within the Leziate beds, or should the whole silica sand resource, as mapped by the BGS, be included?</p>	
<p>Sibelco UK responded that the whole silica sand resource must be the basis of defining Preferred Areas and Areas of Search since the Mineral Planning Authority is conducting a silica sand review and not a silica glass sand review.</p>	<p>Paragraph 146 of the NPPF and paragraph 27-090-20140306 of the NPPG mean that the requirement for Norfolk County Council to plan for silica sand is directly linked to the purpose of the processing plant operated by Sibelco at Leziate. The purpose of the processing plant is to produce industrial grade sand suitable for glass manufacture. Therefore the purpose of the Silica Sand Review is to meet the shortfall in allocated sites suitable for the production of glass sand as required by the existing processing facility. In addition, there exist permitted sites for silica sand extraction located in the Mintlyn Beds which are currently mothballed. Therefore, it is intended that preferred areas/areas of search for silica sand extraction defined by Norfolk County Council will only include the Leziate Beds, as mapped by BGS.</p>

Key Issues Raised	Norfolk County Council officer response
<p>16. If you are a landowner of over 10 hectares in the silica sand resources and would be unwilling for silica sand extraction to take place on your land under all circumstances, please respond to us with details and a plan showing your landholding.</p>	
<p>No landowners responded to this question. Sibelco UK asked whether all the evidence required to be provided to support an allocation would need to be provided by the landowner where the landowner is the site promoter. Sibelco UK asked whether a landowner would require a mineral operator to have an interest in developing the site that they are proposing for silica sand extraction because the delivery potential of a site is a requirement of the plan process.</p>	<p>The evidence required to support a specific site allocation would need to be provided by the landowner, if the site was being proposed by a landowner. We agree that specific sites that are allocated as part of the plan process must be deliverable. Landowners will not be required to have a mineral operator interested in developing their site in order to submit a site to the Silica Sand Review process, as it is not considered to be essential at the site allocation stage.</p>
<p>17. Is the approach to land to be excluded from Preferred Areas and Areas of Search appropriate, if these areas need to be defined through the Silica Sand Review process, or should an alternative approach be used?</p>	
<p>Snettisham Parish Council said that the extraction of minerals in the vicinity of Snettisham would be inappropriate due to the impact on agriculture, tourism, flooding and the ecology of The Wash, and Snettisham parish should therefore be excluded from areas for future silica sand extraction.</p> <p>The Norfolk Coast Partnership said that reference to the designated Norfolk Coast Area of Outstanding Beauty has been omitted from the Initial Consultation document. The County Council has a statutory duty of regard towards the AONB in developing plans and making decisions. Part of the silica sand resource is within the AONB. The AONB should be excluded from the defined area of search as mineral extraction would not be consistent with the purpose of the AONB. As a</p>	<p>The agricultural land in the parish of Snettisham is grade 3. Consultation responses have advised that it is not appropriate to exclude grade 3 agricultural land from preferred areas/areas of search for future silica sand extraction. Areas of Snettisham are in flood zones 2 and 3. However, silica sand extraction is considered to be 'water compatible' development and appropriate in all flood zones, subject to the findings of a Flood Risk Assessment. When assessing proposed specific site allocations and when defining a preferred area/area of search potential adverse impacts to The Wash will be taken into account.</p> <p>We agree that the Norfolk Coast AONB should have been included as a relevant national designation in the Silica Sand Single Issue Review Initial Consultation document and that the AONB should be excluded from the defined areas of search for silica sand extraction. We consider that the proposal for an LVIA to be undertaken for sites proposed within 5km of the AONB boundary is excessive at the site allocations stage. Therefore all sites proposed will be assessed by the County Council's Environment team for potential landscape impacts and</p>

Key Issues Raised	Norfolk County Council officer response
<p>precautionary approach, a landscape and visual impact assessment (LVIA) should be undertaken for any potential / proposed sites within 5km of the AONB.</p> <p>The Borough Council of King's Lynn and West Norfolk said that amenity areas and site allocations in the BC KL&WN Local Plan should be excluded from preferred areas/areas of search.</p> <p>Natural England considers that the water catchments around Roydon Common and Dersingham Bog SAC should be excluded from any area of search.</p> <p>Norfolk Wildlife Trust support the proposal to exclude areas in the vicinity of SSSIs from areas of search. For water dependent sites this should relate to the hydrological catchment of the site.</p> <p>Sibelco raised concerns regarding the exclusion of previous mineral workings which may not be fully worked out, the exclusion of agricultural land grades 1, 2 and 3, the exclusion of land in flood zones 2 and 3, and only including land within the Leziate Beds. All of these exclusions when defining preferred areas/areas of search unnecessarily restrict options and opportunities for future silica sand supply to meet a proven need.</p>	<p>based on this assessment, additional information on landscape impacts will be requested for any sites which are considered likely to have an adverse landscape impact on the AONB.</p> <p>The list of land to be excluded from preferred areas/areas of search does include sensitive receptors from amenity impacts and an area around them. Sensitive receptors will include residential dwellings, educational facilities, workplaces, healthcare facilities and leisure facilities. Site allocations in the BC KL&WN Local Plan will be excluded once the Local Plan has been adopted.</p> <p>Land within the hydrological catchments of Roydon Common and Dersingham Bog will be excluded from Preferred Areas/Areas of Search for silica sand extraction.</p> <p>Land in the vicinity of SSSIs, to be excluded from preferred areas/areas of search, will be based on the potential for mineral extraction to have adverse impacts on the qualifying features of the SSSI. Different distances will be applied to sites with geological qualifying features compared with species or habitat features.</p> <p>A map has subsequently been provided by Sibelco to show where the relevant previous mineral workings are located, which will be taken into account when preferred areas/areas of search for future silica sand extraction are defined.</p> <p>Taking into account the consultation responses, only grade 1 and 2 agricultural land will be excluded from preferred areas/areas of search for silica sand extraction. These agricultural land grades affect a significantly smaller area of the silica sand resource.</p> <p>In accordance with the consultation response from the Environment Agency, land in flood zones 2 and 3 will not be removed from consideration as potential preferred areas or</p>

Key Issues Raised	Norfolk County Council officer response
	<p>areas of search for future silica sand extraction.</p> <p>The preferred areas/areas of search are currently planned to only include the Leziate Beds, which contain silica sand suitable for glass sand because this is the type of silica sand needed for the existing processing plant. It is not considered appropriate for the preferred areas/areas of search to include other geological horizons or sub-crops beneath other deposits because these areas are less certain to come forward for silica sand extraction, based on the locations of previous extraction sites.</p>
<p>18. Are there any other issues that should be taken into account in the assessment of proposals for specific sites and in the definition of Preferred Areas and/or Areas or Search for silica sand extraction?</p>	
<p>Anglian Water said that their existing water mains/ sewer pipes within the boundary of a proposed site are protected by the provision of schedule 14 of the Water Industry Act 1991.</p> <p>The Equality and Human Rights Commission said that local authorities have an obligation under the Equality Act 2010 to consider the effect of their policies on people sharing particular shared characteristics.</p> <p>The Marine Management Organisation referred to the East Inshore and East Offshore Marine Plans, which are a material consideration for local authorities.</p> <p>An individual raised concerns regarding silica sand extraction near Roydon, Castle Rising and Grimston due to impacts on the landscape, Roydon Common and residential amenity. Concerns were also raised regarding silica sand extraction near Bawsey, Grimston and Leziate due to impact on archaeology and residential amenity.</p> <p>Leziate Parish Council said that the parish has suffered at the</p>	<p>Noted</p> <p>An Equality Impact Assessment will be carried out on the draft policies in the Silica Sand Single Issue Review of the Minerals Site Specific Allocations Plan at an appropriate stage in the process.</p> <p>The East Inshore and East Offshore marine Plans document is referred to in the Sustainability Appraisal Scoping Report and will be taken into account in the Silica Sand Review where relevant.</p> <p>Potential impacts on landscape, Roydon Common, archaeology and residential amenity will be taken into account in determining suitable areas for silica sand extraction. Sites allocated through this process will also need to apply for, and be granted, planning permission prior to any extraction taking place.</p> <p>The cumulative impacts of mineral extraction will be assessed as part of the Silica Sand Review process. Leziate Parish</p>

Key Issues Raised	Norfolk County Council officer response
<p>hands of the silica sand industry for many years.</p> <p>Grimston Parish Council said that silica sand extraction in the vicinity of the parish would have a devastating impact on their valley in all aspects, including landscape, ecology, geology, hydrology and Roydon Common SAC and Ramsar.</p> <p>The Norfolk Coast Partnership said that reference to the designated Norfolk Coast Area of Outstanding Beauty has been omitted from the Initial Consultation document. The County Council has a statutory duty of regard towards the AONB in developing plans and making decisions. Part of the silica sand resource is within the AONB. The AONB should be excluded from the defined area of search as mineral extraction would not be consistent with the purpose of the AONB. As a precautionary approach, a landscape and visual impact assessment (LVIA) should be undertaken for any potential / proposed sites within 5km of the AONB.</p> <p>Sibelco said that horticultural, sports and equestrian sands are not lower grade silica sands; they are high quality silica sands which have the correct physical and chemical properties for the specific end-use. These grades are often produced as co-products during the beneficiation of glass sand and other grades and require different and often separate grain size distributions. (para 6.2)</p> <p>Sibelco said that to require evidence of any time of agreement with a landowner for mineral extraction at the site allocation stage is unreasonable and unlikely to be deliverable.</p>	<p>Council will be consulted at each stage of this process.</p> <p>We can confirm that the impact of silica sand extraction on the AONB, and Roydon Common will be taken into account in determining suitable areas for silica sand extraction. The impact of silica sand extraction on the landscape and ecology outside of these designated areas will also be taken into account.</p> <p>We agree that the Norfolk Coast AONB should have been included as a relevant national designation in the Silica Sand Single Issue Review Initial Consultation document and that the AONB should be excluded from the defined areas of search for silica sand extraction. We consider that the proposal for an LVIA to be undertaken for sites proposed within 5km of the AONB boundary is excessive at the site allocations stage. Therefore all sites proposed will be assessed by the County Council's Environment team for potential landscape impacts and based on this assessment, additional information on landscape impacts will be requested for any sites which are considered likely to have an adverse landscape impact on the AONB.</p> <p>This statement in paragraph 6.2 will be amended if it is included in subsequent stages of the Silica Sand Review process.</p> <p>Deliverability is a key part of the allocations process and deliverability can only take place if a landowner is willing. We consider it prudent to require evidence to minimise the risk of a site being withdrawn. A site can be proposed without a formal agreement in place, however this will need to be considered</p>

Key Issues Raised	Norfolk County Council officer response
<p>The Environment Agency highlighted that the Northwest Norfolk Sandringham Sands are a Drinking Water Protected Area under the EU Water Framework Directive and will therefore need to be protected. They also stated if the restoration plans for extraction sites involve the importation of material, the operations will need to comply with Landfill Directive requirements.</p> <p>Highways England said that they would expect the consideration of the quality and character of road junctions at access points to the Strategic Road Network should be considered if there is expected to be intensification of their use.</p> <p>Historic England said that the site assessments should include the topic of Historic Environment, under which the topic of Archaeology would be contained. When considering heritage assets, non-designated heritage assets and unknown archaeological sites should be included as well as designated heritage assets.</p>	<p>when assessing deliverability.</p> <p>Compliance with Development Management Policy DM3 on groundwater and surface water will be required for all relevant planning applications. It is considered highly unlikely that a silica sand extraction site would be restored through becoming a non-hazardous landfill site. It is also considered unlikely that a silica sand extraction site would be restored through becoming an inert landfill. However, if either of these scenarios are proposed by the mineral extraction company, the Environment Agency's consultation comments will be taken into account in assessing their proposal.</p> <p>The impact of road transportation of silica sand on the Strategic Road Network junctions will be assessed as part of the Silica Sand Review where applicable. This will relate to the transportation of silica sand from the extraction site to the processing plant at Leziate.</p> <p>We agree with these comments from Historic England and will take them into account in the site assessments undertaken for the Silica Sand Review.</p>

Table 8: Main issues raised in response to the Sustainability Appraisal - Scoping Report and how they have been taken into account

Key Issues Raised	Norfolk County Council officer response
Task A1: relationship with other plans, policies and programmes	
<p>Additional documents that should be included in this section are:</p> <ul style="list-style-type: none"> * The Broads Plan 2011 * The Broadland Rivers Catchment Plan. * The Landscape Character Assessment for The Broads * The Landscape Sensitivity Study for The Broads * The recent consultations from Historic England * The Archaeology in the Broads Report * Environment Agency's 'Groundwater Protection: policy and practice (GP3)' * The Convention on the Protection of Archaeological Heritage of Europe (Granada Convention) * Planning (Listed Buildings and Conservation Areas) Act (1990) * Historic England- Conservation Principles, Policy and Guidance * Local Authority Local Lists (of non-designated heritage assets) * Neighbourhood Plans <p>Cheshire East Local Plan</p> <ul style="list-style-type: none"> * The House of Commons Select Committee for the Department for Business <p>Innovation and Skills report on the Extractive Industry (Oct 2014)</p> <ul style="list-style-type: none"> * The Government response to the BIS committee report on the Extractive Industry (February 2015) * The UK Mineral Extraction Industry (April 2015) - CBI Minerals Group (Draft) 	<p>The review of plans, policies and strategies will be amended to include the documents listed.</p>
Task A1: Key messages in review of plans, policies and programmes	
<p>Page 46: The situation with regards to Fracking and the Broads is currently unclear. There was an announcement that suggests fracking under the Broads is not sensible. Secondary legislation will define 'other protected areas'. Perhaps this can be clarified in this section?</p>	<p>The national planning policy position on The Broads and fracking is included in the table of key messages from plans, policies and programmes on page 46. If the national policy approach or legislation changes then the Sustainability Appraisal will be updated.</p>
Task A2: Sustainability baseline summary	
<p>All reference to 'English Heritage' should be changed within the</p>	<p>Reference to 'English Heritage' in the Sustainability Appraisal</p>

Key Issues Raised	Norfolk County Council officer response
<p>document to 'Historic England'.</p> <p>Natural England is satisfied that the Scoping Report for the Sustainability Appraisal (SA) has outlined the relevant baseline information with regard to the environment, particularly at this high level stage. The SA objectives are appropriate and cover the key sustainability issues in relation to biodiversity, geodiversity and soil in Norfolk.</p> <p>The Broads Authority suggested the following indicators for SA issues of particular relevance to the Broads.</p> <p>*Page 63. SA5. More relevant indicators could be:</p> <ul style="list-style-type: none"> - How many archaeological finds there are as a result of the minerals or waste developments - Heritage appraisals completed and findings acted upon - Permissions approved contrary to heritage expert advice - Restoration schemes that consider or enhance a heritage asset. - If archaeology is found, then interpretation as part of a restoration scheme. <p>* Page 63. SA6. Indicators could be schemes approved contrary to biodiversity or geodiversity expert advice. Also restoration schemes that benefit wildlife or aid interpretation of geodiversity.</p> <p>* Page 64. SA8 Indicators could be works near to or in protected landscapes, how these have been assessed and if permission is approved contrary to landscape expert advice.</p>	<p>will be changed to 'Historic England'.</p> <p>Noted</p> <p>Page 63 – SA5. We will investigate whether additional indicators can be recorded using the Historic Environment Record. We will not be including any of the indicators suggested on archaeology because finds are of variable significance and therefore not appropriate to record quantitatively. In addition, a lack of archaeology on site would not be a negative outcome for the site. We will not be including the suggested indicators regarding heritage assets because these issues would be considered in the consultation response from statutory consultees on the historic environment and inform whether or not they object to the proposed development. An additional indicator will be added as suggested, to monitor the number of planning permissions granted contrary to historic environment objections from statutory consultees.</p> <p>Page 63 – SA6. Additional indicators will be added as suggested.</p> <p>Page 64 - SA8. Additional indicators will be added as suggested, to monitor the number of planning permissions granted within or adjacent to the AONB, the Heritage Coast Area, the Broads Authority Executive Area, and Conservation Areas and to monitor the number of planning permissions granted contrary to landscape objections from statutory consultees.</p> <p>Page 65 – Additional indicator will be added on water quality</p>

Key Issues Raised	Norfolk County Council officer response
<p>* Page 65. Additional indicator of permissions granted contrary to EA advice on water quality grounds.</p> <p>How does the SA Scoping Report address the issue of Peat? Peat is important in terms of Carbon sequestration, biodiversity and archaeology.</p>	<p>as suggested.</p> <p>Peat has not been discussed in the SA Scoping Report because the NPPF states that planning permission should not be granted for peat extraction from new or extended sites.</p>
<p>Task A2: Description of current sustainability baseline</p>	
<p>Page 70 refers to the importance of Carbon Dioxide but on page 62 only methane is assessed in detail.</p> <p>Page 73. 5.2.4. The Drainage Mills in the Broads are important. Also the entire area of the Broads is an area of Exceptional Waterlogged Archaeology as identified by Historic England.</p> <p>Sibelco UK said that there is a contradiction between part of section 5.2.6 regarding adverse impacts of mineral extraction in river valleys and part of section 5.2.8 on page 84 which refers to opportunities for mineral extraction to increase flood storages areas.</p> <p>The Environment Agency said that part 5.2.8 of the Scoping Report should note that the 'Hydrogeological risk assessment' (HRA) is not just to protect groundwater quality; it is also primarily to protect the groundwater levels in the area around the quarry. The report should also make clear that the implementation of an impermeable barrier needs to be assessed by the Environment Agency to determine how the barrier blocks groundwater flow, which can cause both ecological damage and derogation down</p>	<p>Page 70 and 62 – climate change. The SA will be amended to include additional information on carbon dioxide emissions, using the 'DECC Local Authority carbon dioxide emissions estimates: 2005-2012' and the DECC 'UK greenhouse gas emissions national statistics 1990-2013'.</p> <p>Page 73 5.2.4. This section will be amended to include information regarding the historic environment of The Broads, as requested.</p> <p>The potential exists both for mineral workings to increase flood risk, if poorly designed working schemes are put in place which restrict flows onto the floodplain in high flow events, whilst equally, a well-designed restoration scheme can improve capacity. These circumstances exist in different time frames and are dependent on the quality of both the working and restoration scheme, so no contradiction exists.</p> <p>Section 5.2.8 of the Sustainability Appraisal will be expanded to include reference to groundwater levels as well groundwater quality.</p> <p>Section 5.2.8 of the Sustainability Appraisal will be amended, as requested, to provide further information on potential impacts of impermeable barriers on groundwater and the Environment Agency's assessment role.</p>

Key Issues Raised	Norfolk County Council officer response
<p>gradient, and groundwater flooding up gradient.</p> <p>Historic England said that 'Cultural Heritage' should be amended to 'Historic Environment' because this encompasses all aspects of heritage such as the physical built heritage and the less tangible cultural heritage.</p> <p>Norfolk's non-designated heritage assets should also be explored and form part of the baseline information. Details of such assets are held on the Norfolk's Historic Environment Record (HER) and Local Lists compiled by Local Authorities. Non-designated assets make up an important and valued part of this and it is important they are acknowledged. Their protection is also required by the NPPF.</p> <p>This section should highlight the important contribution of the setting of heritage assets.</p> <p>There is also limited reference to known or unknown archaeological sites. Sites which have or have the potential for unknown archaeology should be acknowledged and explored, again the HER may provide data for such information.</p>	<p>'Cultural Heritage' will be amended to 'Historic Environment' as requested.</p> <p>As requested, the Sustainability Appraisal will be amended to include Norfolk's non-designated heritage assets.</p> <p>The SA will also be amended to highlight the important contribution of the setting of heritage assets, as requested.</p> <p>The SA will be amended to provide additional information on known and unknown archaeological sites, as requested.</p>
<p>Task A2: Evolution of the sustainability baseline</p>	
<p>Page 100, 5.3.7 - This section should refer to designated landscapes as well as the setting of designated landscape settings.</p> <p>Sibelco said that the final sentence of section 5.3.1 fails to note container glass sand (clear bottles and jars) which is an important end use of silica sand supplied from Norfolk.</p> <p>While there may be a preference to seek to locate mineral development on lower agricultural soil grades (3b, 4 and 5), for silica sand resources this will potentially further restrict developable areas.</p>	<p>Section 5.3.7 of the Sustainability Appraisal, regarding landscape, will be amended to also refer to designated landscapes and their settings.</p> <p>The final sentence of section 5.3.1 does not refer to container glass because this section refers to the effect on the sustainability baseline from planned growth allocated in Local Plans and therefore links the need for window glass to planned construction of housing.</p> <p>Section 5.3.7 – the paragraphs on agricultural land and mineral extraction on page 101 simply summarise the existing local and national policy. Preferred areas/areas of search for future silica sand extraction are now only planned to exclude agricultural land grades 1 and 2, which affect a significantly</p>

Key Issues Raised	Norfolk County Council officer response
<p>Table 11 (Cultural Heritage) - how can heritage assets be enhanced through restoration schemes, unless this could be to seek to provide access to available heritage assets? Routinely minerals development provides the funding necessary to fully investigate cultural heritage and archaeological finds, providing detailed insight in to historical environs.</p>	<p>smaller area of the silica sand resource. Heritage – The reference to enhancement of heritage assets through restoration schemes was intended to refer to enhancing the setting. It is recognised that mineral working can enable the investigation of heritage assets and archaeological finds and Table 11 will be amended to make this more explicit.</p>
<p>Task A3: sustainability problems, issues and recommendations</p>	
<p>Broads Authority comments on Table 11: * Air: is there merit in using the water for transport? Is avoiding AQMAs a recommendation? * Biodiversity: Is there scope in restoration benefitting biodiversity? * Landscape: Broads should be mentioned. Is there scope in exploring landscape buffers or landscaping to sites? * Cultural Heritage: talk about opportunities for understanding archaeology and geodiversity</p> <p>The Environment Agency agrees with the sustainability issues and problems identified so far. However, there is no mention of potential risks to human health from gas emissions from mineral extraction and waste management facilities.</p> <p>There is no consideration of previous land uses and risks to the water environment from previous land uses which may have caused pollution in the locations of proposed minerals or waste management facilities.</p> <p>Historic England agrees with the sustainability issues which have arisen with regard to the Historic Environment. We advise that the 'Cultural Heritage' topic is changed to 'Historic Environment' for consistency. There is also the potential for unknown archaeological sites to be unacceptably impacted or</p>	<p>The sections on air, biodiversity, landscape and cultural heritage in Table 11 will be amended as suggested.</p> <p>The Sustainability Appraisal will be amended as requested to include the risks to human health from gas emissions.</p> <p>The Sustainability Appraisal will be amended as requested to include the consideration of previous, potentially contaminating, landuses which may have caused pollution. However, it is considered that mineral extraction is most likely to take place on land that has not previously been developed.</p> <p>The 'Cultural Heritage' topic will be amended to 'Historic Environment', as requested.</p> <p>The table will be amended to include the issues raised</p>

Key Issues Raised	Norfolk County Council officer response
<p>damaged. It should be noted, that each site should be judged on a case by case basis and impacts to the historic environment will not always be able to be mitigated against. In addition, there may be the opportunity to use discovered sites, in terms of archaeology, as an educational resource.</p>	<p>regarding archaeology.</p>
<p>Task A4: Development of SA/SEA Objectives</p>	
<p>Page 114 - Table 14 SA5 - the issue of new archaeological finds should be included here.</p> <p>SA1: does not mention reducing contributions or adaptation to climate change.</p> <p>SA4: Accessibility to or of what? It is not clear how, as worded, this objective relates to Minerals and Waste.</p> <p>SA5: need to make it implicit that cultural heritage includes archaeology.</p> <p>Reference to the 'Cultural Heritage' topic should be changed to the 'Historic Environment'.</p> <p>Historic England recommends the inclusion of two additional factors for scoring policies against objective SA5:</p> <ul style="list-style-type: none"> * Would working the site impact on non-designated heritage assets? * Would working the site potentially impact on unknown archaeological sites? 	<p>Page 114 – Table 14 SA5 – an additional bullet point will be added as follows: “Would implementation of the policy potentially enable the discovery of new archaeological finds?”</p> <p>SA Objective 1 will be amended as follows: “SA1 - To adapt to and mitigate effects of climate change by reducing contributions to climate change.”</p> <p>SA Objective 4 will be amended to state “To improve accessibility to jobs, services and facilities and reduce social exclusion” to clarify this objective. Minerals and waste facilities create employment and restoration schemes may incorporate enhanced public access. Some waste management facilities are open for local residents to use.</p> <p>SA Objective 5 will be amended to refer to the historic environment instead of cultural heritage as this will more clearly include archaeology.</p> <p>Reference to the ‘Cultural Heritage’ topic will be amended to ‘Historic Environment’ as requested.</p> <p>The additional factors for scoring sites against Factors to be taken into account in scoring policies against objective SA5 will be amended as requested. These factors will be assessed through consultation with the Norfolk Historic Environment Service and Historic England.</p>

Key Issues Raised	Norfolk County Council officer response
<p>The Environment Agency supports the objectives, in particular objectives SA10 and SA12.</p> <p>Previous land uses should be taken into account when scoring sites and a desk study and assessment of risks to the water environment from these potential contaminating uses should be carried out to inform the scoring process.</p> <p>Table 13: SA1 and SA11 - We cannot see the relevance of the scoring in relation to local settlements in terms of silica sand extraction and reducing greenhouse gas emissions.</p> <p>The Table at the top of page 116 shows the same scoring (+) for "Positive Effect" and "Positive and Negative Effects". Should the latter be (+-) ?</p>	<p>Noted</p> <p>The scoring factors for sites assessed against objective SA10 will be amended to include previous land uses and the risk to the water environment from previous land uses due to the development of the site, as requested. .</p> <p>Agreed that for SA1 and SA11 the distance from settlements is not relevant in terms of silica sand extraction and reducing greenhouse gas emissions. The scoring will be amended to refer to the distance of silica sand extraction sites from the existing processing plant at Leziate.</p> <p>Agreed that the table at the top of page 116 will be corrected so that the positive and negative effects are shown by scoring +/-.</p>

3. Preferred Options Consultation 2015

The function of the Preferred Options Consultation was to gather views on the one proposed site and ten defined areas of search being considered for future silica sand extraction in the Silica Sand Review of the Minerals Site Specific Allocations DPD.

The Preferred Options Consultation document included background information, an assessment of the proposed site (SIL 01), an explanation of the methodology used to define the areas of search and an assessment of each of the ten defined areas of search and their suitability for silica sand extraction. The specific site and ten areas of search were all located in west Norfolk because the silica sand resource in Norfolk is only found in the west of the County. The Preferred Options Consultation also contained a draft specific site policy and a draft areas of search policy.

The areas of search and site contained in the Preferred Options document were:

Reference	Size (hectares)	Parish
AOS A	548	Ingoldisthorpe, Snettisham, Dersingham
AOS B	240	Heacham, Snettisham
AOS C	65	Hillington, Flitcham with Appleton
AOS D	142	East Winch, Pentney
AOS E	979	Wormegay, Shouldham, Marham, Tottenhill, Shouldham Thorpe
AOS F	234	Runcton Holme, Stow Bardolph
AOS G	34	Bawsey
AOS H	29	Bawsey
AOS I	52	Runcton Holme, Shouldham Thorpe, Tottenhill
AOS J	24	Tottenhill, Wormegay
Site SIL 01	21	Bawsey

The Preferred Options Consultation document was accompanied by an Initial Sustainability Appraisal (Parts A and B) and a Habitats Regulations Assessment (HRA) (Task 1). The Sustainability Appraisal assesses the environmental, social and economic impacts of the silica sand review. The purpose of the HRA (Task 1) is to assess the impacts of the Silica Sand Review against the conservation objectives of European designated nature conservation sites (SPAs, SACs and also Ramsar sites) and ascertain where the Plan would adversely affect the integrity of a site, how to amend the Plan to avoid any potentially damaging effects.

Consultees were invited to comment on the ten defined areas of search and the one specific site for future silica sand extraction. Consultees were also invited to comment on the Initial Sustainability Appraisal Report and the Habitats Regulations Assessment (Task 1).

The consultation ran for six weeks from 6 November to 21 December 2015. This consultation used the following methods of engagement:

- A letter/email was sent to the consultees (a copy of the letter and the list of consultees can be found in this document)
- The documents were made available on the County Council's website
- An e-consultation portal on the County Council's website enabled direct online responses to be made;
- Copies of the documents were available for public viewing at 47 libraries and nine Local Planning Authority offices (including County Hall).

3.1 Preferred Options consultation 2015: list of consultees

a. Specific consultation bodies

- Local Planning Authorities in Norfolk
 - Local Planning Authorities adjoining Norfolk:
 - Suffolk County Council
 - Cambridgeshire County Council
 - Lincolnshire County Council
 - East Cambridgeshire District Council
 - Fenland District Council
 - Forest Heath & St Edmundsbury Council (West Suffolk)
 - Mid Suffolk District Council
 - Waveney District Council
 - South East Lincolnshire Planning Authority (south Holland and Boston Borough)
 - Other relevant Mineral Planning Authorities:
 - Essex County Council
 - Hertfordshire County Council
 - Central Bedfordshire, Bedford Borough & Luton Borough Council
 - Shared Minerals Planning Service
 - Thurrock Council
 - Southend-on-Sea Borough Council
 - Peterborough City Council
 - Kent County Council
 - North Lincolnshire Council
 - North Yorkshire Council
 - Nottinghamshire County Council
 - Staffordshire County Council
 - Surrey County Council
 - Worcestershire County Council
 - Cheshire East Council
 - All Parish and Town Councils in Norfolk
 - All Parish and Town Councils adjoining Norfolk (see Table 1)
-
- Anglian Water Services Ltd
 - Amec E & I Ltd for National Grid Plc
 - BT Group plc
 - Defence Infrastructure Organisation
 - Department for Transport
 - East of England Local Government Association
 - Historic England
 - Environment Agency
 - Essex and Suffolk Water
 - Natural England
 - Highways England
 - Norfolk County Council Highway Authority
 - Homes and Communities Agency
 - Marine Management Organisation
 - Public Health Norfolk
 - West Norfolk Clinical Commissioning Group
 - South Norfolk Clinical Commissioning Group

- Norwich Clinical Commissioning Group
- North Norfolk Clinical Commissioning Group
- HealthEast (Great Yarmouth and Lowestoft Clinical Commissioning Group)
- Mobile Operators Association
- Vodafone Ltd
- Virgin Media
- Hutchinson 3G UK Ltd
- National Grid plc
- Police and Crime Commissioner for Norfolk
- The Coal Authority
- UK Power Networks
- Norfolk Community Health and Care (NHS Trust)
- NHS England (East Anglia Area Team)
- Network Rail Infrastructure Ltd
- Office of the Rail Regulator

b. General consultation bodies; and

c. Other consultation bodies (residents of other persons carrying on business in the LPA)

- Norfolk Coalition of Disabled People (NCODP) operating as Equal Lives
- West Norfolk Islamic Association
- West Norfolk and District Chinese Association
- King's Lynn Asian Community Society
- Norfolk Secular and Humanist Group
- Norfolk Philippine Support Group
- Norfolk African Community Association
- Norfolk and Norwich Asian Society
- East of England Faiths Agency
- Church of England
- National Federation of Gypsy Liaison Groups
- Water Management Alliance
- Waveney, Lower Yare and Lothingland Internal Drainage Board
- East Harling Internal Drainage Board
- Downham Market Group of IDBs
- Ely group of Internal Drainage Boards
- Middle Level Commissioners
- Woodland Trust
- Norfolk Wildlife Trust
- RSPB
- Ramblers Association
- Discover Suffolk
- National Trust
- Sustrans
- New Anglia LEP
- Greater Cambridgeshire and Greater Peterborough LEP
- Wild Anglia (Local Nature Partnership)
- Community Action Norfolk
- Norfolk Geodiversity partnership
- Norfolk Fire and Rescue Service
- Norfolk Local Access Forum (NCC)

- Norfolk Coast Partnership
- Norfolk Chamber of Commerce and Industry
- National Farmers Union
- Marinet Ltd
- King's Lynn Civic Society
- Health and Safety Executive
- Forestry Commission
- Federation of Small Businesses
- Country Land and Business Association
- Breaking New Ground
- CAA: Norwich International Airport
- Norfolk Association of Local Councils
- Equality and Human Rights Commission
- Freight Transport Association Ltd
- Greenpeace
- Grimston Fen & Allotment Trust
- Norfolk and Norwich Archaeological Society
- Norfolk Farming and Wildlife Advisory Group (FWAG)
- CPRE Norfolk
- Norwich Friends of the Earth
- The Gardens Trust
- Norfolk Gardens Trust
- West Dereham Heritage Group
- Norfolk Rivers Trust
- Grimston, Congham & Roydon Residents Association
- Norfolk and Norwich Racial Equalities Council
- Age UK Norfolk
- Norfolk Older People's Strategic Partnership Board
- King's Lynn and West Norfolk Youth Advisory Board
- NCC Lead Local Flood Authority

Mineral Operators

- Breedon Aggregates Ltd
- Brett Group
- British Aggregates Association
- Cemex UK
- Carter Concrete Ltd
- Earsham Gravels Ltd
- East Anglian Stone Ltd
- Frimstone Ltd
- Folkes Plant and Aggregate
- Longwater Gravel Co Ltd
- Lignacite Ltd
- Middleton Aggregates Ltd
- Mineral Products Association
- Sibelco UK Ltd
- Tharros Ltd
- Silverton Aggregates Ltd
- West Norfolk Super Lime
- Mr William George

- John Brown (Gazeley) Ltd
- Lafarge Tarmac
- The Silica and Moulding Sands Association
- Bathgate Silica Sand Limited
- Garside Sands
- Hanson Aggregates
- Mansfield Sand Company Limited

Land agents/consultants

- Stephen M Daw Limited
- Simon Westaway Associates
- D K Symes Associates
- Martin Smith Partnership
- Pike Partnership
- Clover Planning
- PDE Consulting Ltd
- Chartered Planning Consultancy Ltd
- Bidwells
- WYG Planning and Design
- David L Walker Chartered Surveyors
- Mills and Reeve
- David Lock Associates
- M Falcon Property Solutions
- Mineral Services Ltd
- Thos Wm Gaze
- Case & Dewing
- Irelands
- Hugh Ferrier Chartered Surveyors
- Barry L Hawkins
- Strutt & Parker
- Atkins
- Durrants
- Brown & Co
- La Ronde Wright
- J Cheetham Contracting
- Birketts LLP
- Wardell Armstrong LLP
- Watsons
- Knight Benjamin & Co
- Howards Commercial
- Golder Associates
- The Landscape Partnership Ltd
- RPS Planning, Transport & Environment
- Terence O'Rourke Ltd
- KEW Environment & Training Consultancy Ltd
- Lanpro Services
- Leathes Prior (Solicitors)
- Pegasus Planning Group
- David Jarvis Associates Ltd
- Cruso & Wilkin
- Heaton Planning
- Colliers International
- Shakespeare Martineau LLP
- Shiels Flynn Limited
- Martin Robeson Planning Practice
- SLR Consulting Limited
- BNP Paribas Real Estate-
Historic Landscape Management Ltd
- Small Fish
- Fenn Wright

Local residents

We also wrote to around 350 individuals. These people were contacted either because they had responded to earlier consultations regarding proposed silica sand extraction sites during the production of the Minerals Site Specific Allocations DPD or because their address was outside a settlement and in close proximity to one of the ten proposed areas of search.

**County Councillors at the
time of the Preferred Options
Consultation in 2015**

Mr A D Adams
Mr S Agnew
Mr C Aldred
Mr S Askew
Mr M J M Baker
Mr R Bearman
Mr R Bird
Mr W Borrett
Dr A Boswell
Ms C Bowes
Mrs A Bradnock
Mr B Bremner
Mrs J D Brociek-Coulton
Mr A J Byrne
Mr M R H Carttiss
Mr M Castle
Mrs J R M Chamberlin
Mr M J B Chenery of Horsbrugh
Mr J Childs
Mr S M Clancy
Mr R Coke
Mr D J Collis
Ms E C Corlett
Mrs H Cox
Mr D M Crawford
Mr A C Dearnley
Mrs M Dewsbury
Mr N D Dixon
Mr J Dobson
Mr T East
Mr T FitzPatrick
Mr C W Foulger
Mr T Garrod
Mr P C J Gilmore
Mr A C Grey
Mrs S C Gurney
Mr P Hacon
Mr B J Hannah
Mr D G Harrison
Mr H Humphrey
Mr B J M Iles
Mr T Jermy
Mr C Jordan
Mr J M Joyce
Miss A Kemp
Mr M Kiddle-Morris
Mr J Law
Mrs J Leggett

Mr B W C Long
Mr I J Mackie
Mr I A C Monson
Mr J Mooney
Ms E Morgan
Mr S Morphew
Mr G Nobbs
Mr W Northam
Mr R E Parkinson-Hare
Mr J Perkins
Mr G R Plant
Mr A J Proctor
Mr D J Ramsbotham
Mr W Richmond
Mr D Roper
Ms C Rumsby
Mr M Sands
Mr E G Seward
Mr N C Shaw
Mr R A Smith
Mr P J Smyth
Mr B H A Spratt
Mr B Stone
Mrs M Stone
Mr M Storey
Dr M Strong
Mrs A Thomas
Mr J W Timewell
Mrs J Virgo
Mrs C M Walker
Mr J M Ward
Mr B Watkins
Ms S J Whitaker
Mr A M White
Mr M J Wilby
Mrs M Wilkinson

3.2 Public notice of consultation in EDP on 5 November 2015

**Norfolk County Council
Town and Country Planning (Local Planning) (England) Regulations
2012**

**Norfolk Minerals and Waste Local Development Framework:
Minerals Site Specific Allocations Development Plan Document (DPD)
Single Issue Silica Sand Review
Preferred Options Consultation**

Norfolk County Council is carrying out a Single Issue Silica Sand Review of the adopted Norfolk Minerals Site Specific Allocations DPD. The Silica Sand Review is needed to address the predicted shortfall, of 2.6 million tonnes, in the quantity of silica sand extraction sites allocated in the Minerals Site Specific Allocations Plan. Following an Initial Consultation stage and 'call for sites' earlier in 2015, the next stage in the process is the Preferred Options Consultation. The Preferred Options Consultation document contains one specific site for silica sand extraction and ten areas of search. They are all located in west Norfolk as this is where Norfolk's silica sand resource is found.

The Preferred Options Consultation document will be published along with an Initial Sustainability Appraisal Report (Parts A and B) and a Habitats Regulations Assessment (Task 1). **The consultation period will be for six weeks from 6 November 2015 until 5pm on 21 December 2015.**

The above documents can be viewed on the Norfolk County Council website at www.norfolk.gov.uk/nmwdf. Direct online representations are the preferred method of response.

Representations can also be sent by email, post or fax to the following address: Planning Services, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH

Email: LDF@norfolk.gov.uk

Fax: 01603 223219 (marked for the attention of Planning Services)

If you have any queries please call 0344 800 8020.

Copies of the documents will be made available for public inspection, within normal opening hours during the consultation period, at all the public libraries in Norfolk, and are available from Planning Services, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH. Copies will also be made available for public inspection, during office hours, at:

Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH

Breckland District Council, Elizabeth House, Walpole Loke, East Dereham, NR19 1EE

Broadland District Council, Thorpe Lodge, Yarmouth Road, Norwich, NR7 0DU

Great Yarmouth Borough Council, Town Hall, Great Yarmouth, NR30 2QF

Borough Council of King's Lynn and West Norfolk, King's Court, Chapel Street, King's Lynn, PE30 1EX

North Norfolk District Council, Holt Road, Cromer, NR27 9EL

Norwich City Council, City Hall, Bethel Street, Norwich, NR2 1NH

South Norfolk Council, South Norfolk House, Swan Lane, Long Stratton, NR15 2XE

The Broads Authority, Yare House, 62-64 Thorpe Road, Norwich, NR1 1RY

3.3 Wording of letter/email to consultees inviting comments

Norfolk Minerals Site Specific Allocations Development Plan Document (DPD): Single Issue Review of Silica Sand – Preferred Options Consultation Document

I am writing to inform you that the Preferred Options Consultation on the Single Issue Silica Sand Review of the Norfolk Minerals Site Specific Allocations Plan will take place over a six week period from **6 November to 21 December 2015** (inclusive), and I would welcome your comments.

The Minerals Site Specific Allocations Plan (adopted by full Council on 28/10/2013) contains a requirement for a Silica Sand Review of the Plan to be completed by 2016. The review is needed to address the predicted shortfall, of 2.5 million tonnes, in the quantity of silica sand extraction sites allocated in the Plan. It is predicted that around 750,000 tonnes of silica sand will be extracted from Norfolk per annum. It is expected that no more than one or two additional specific sites will need to be allocated over the plan period (to 2026) to meet the shortfall. The Silica Sand resource in Norfolk occurs entirely within the administrative boundary of the Borough Council of King's Lynn and West Norfolk.

Following an Initial Consultation on the Silica Sand Review, and a 'call for sites' earlier in 2015, the next stage in the process is the Preferred Options Consultation.

The Preferred Options consultation document contains one specific site for silica sand extraction and ten areas of search (AoS) which have been defined by planning officers. Areas of search are large areas within which permission for silica sand extraction may be granted on a smaller area of land. The Preferred Options document contains an explanation of how the ten areas of search have been defined and an assessment of the specific site and each of the areas of search. We would welcome your comments on the suitability of the specific site and ten areas of search for future silica sand extraction.

The areas of search and site contained in the Preferred Options document are:

Reference	Size (hectares)	Parish
AOS A	548	Ingoldisthorpe, Snettisham, Dersingham
AOS B	240	Heacham, Snettisham
AOS C	65	Hillington, Fritcham with Appleton
AOS D	142	East Winch, Pentney
AOS E	979	Wormegay, Shouldham, Marham, Tottenhill, Shouldham Thorpe
AOS F	234	Runcton Holme
AOS G	34	Bawsey
AOS H	29	Bawsey
AOS I	52	Runcton Holme, Shouldham Thorpe, Tottenhill
AOS J	24	Tottenhill
Site SIL 01	21	Bawsey

Copies of the Preferred Options Consultation Document, the Initial Sustainability Appraisal Report (Parts A and B) and the Habitats Regulations Assessment (Task 1), will be available for public inspection, free of charge, within normal opening hours from 6 November up to and including 21 December 2015, at all public libraries in Norfolk, and at:

- Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH
- Breckland District Council, Elizabeth House, Walpole Loke, East Dereham, NR19 1EE
- Broadland District Council, Thorpe Lodge, Yarmouth Road, Norwich, NR7 0DU
- Great Yarmouth Borough Council, Town Hall, Great Yarmouth, NR30 2QF
- Borough Council of King's Lynn and West Norfolk, King's Court, Chapel Street,

King's Lynn, PE30 1EX

- North Norfolk District Council, Holt Road, Cromer, NR27 9EL
- Norwich City Council, City Hall, Bethel Street, Norwich, NR2 1NH
- South Norfolk Council, South Norfolk House, Swan Lane, Long Stratton, NR15 2XE
- The Broads Authority, Yare House, 62-64 Thorpe Road, Norwich, NR1 1RY

All documents are also available on Norfolk County Council's website at www.norfolk.gov.uk/nmwdf

Where possible the County Council would prefer representations to be made directly to www.norfolk.gov.uk/nmwdf; however responses by post, fax and email will also be accepted. **All comments, in whatever form, should be made by 5pm on 21 December 2015.**

After the current consultation period finishes, the next stage in the preparation of the Silica Sand Single Issue Review will be the publication of the Pre-Submission document, which is planned to take place in spring 2016.

Any enquiries should be made to LDF@norfolk.gov.uk. Please also contact Norfolk County Council, using this email address, if you do not wish to receive any further correspondence regarding the Silica Sand Review.

Yours faithfully

Caroline Jeffery
Principal Planner (Minerals and Waste Policy)

3.4 List of Inspection Points for the Preferred Options Consultation

Norfolk Libraries (see Table 2)

Local Planning Authority Inspection Venues (see Table 3)

At the time of the Preferred Options Consultation there were no longer any Council face-to-face locations.

3.5 Responses to the Preferred Options Consultation

We received comments on the Silica Sand Review form the following 18 organisations and 11 individuals:

- Highways England
- Historic England
- Natural England
- Environment Agency
- National Grid
- Norfolk County Council – Highway Authority
- Norfolk County Council – Public Health
- Norfolk Coast Partnership
- Norfolk Wildlife Trust
- Anglian Water
- Sibelco UK
- Hillington Parish Council
- Shouldham Parish Council
- Snettisham Parish Council
- King’s Lynn and West Norfolk Borough Council
- Worcestershire County Council
- Kent County Council
- Surrey County Council

We also received ‘no comment’ responses from the following eight organisations:

- South Norfolk Council
- Breckland District Council
- Broadland District Council
- Peterborough City Council
- Waveney District Council
- Office of Rail and Road
- Ely Drainage Boards
- Old Catton Parish Council

We received comments on the Initial Sustainability Appraisal Report from the following three organisations: Kent County Council, Historic England and Natural England.

We received comments on the Habitats Regulations Assessment (Task 1) from Natural England.

Table 9: Preferred Options Consultation: summary of consultation responses

Section	Respondents	Support	Object	Comment	Representations
General comments	16	1	1	14	16
Chapter 1. Introduction	1	0	0	1	1
Chapter 4. What happens next	1	0	0	1	1
Chapter 8. Potential impacts of silica sand extraction and mitigation	1	0	0	1	1
Chapter 9. Site SIL 01	9	0	1	8	9
Chapter 10. Areas of Search Process	2	0	0	2	2
Area of Search A	7	0	2	5	7
Area of Search B	7	0	2	5	7
Area of Search C	7	0	2	5	7
Area of Search D	8	0	2	7	9
Area of Search E	7	0	0	7	7
Area of Search F	5	0	0	5	5
Area of Search G	6	0	1	5	6
Area of Search H	6	0	1	5	6
Area of Search I	5	0	0	5	5
Area of Search J	5	0	0	5	5
Total	30	1	12	82	95

Table 10: Supporting documents: summary of consultation responses

Document	Respondents	Support	Object	Comment	Representations
Initial Sustainability Appraisal Report	3	0	0	3	3
Habitats Regulations Assessment (Task 1)	1	0	0	1	1
Total	3	0	0	4	4

Table 11: Main issues raised in response to the Preferred Options Consultation and how they have been taken into account

Key Issue Raised	Norfolk County Council Officer response
General comments	
<p>1. Highways England state that it is unlikely that the Preferred Options document will affect the safety and operation of the Strategic Road Network and they will comment if required at the planning application stage.</p> <p>2. Worcestershire County Council states that the silica sand is Worcestershire was used in the foundry industry and is not suitable for glass-making.</p> <p>3. Kent County Council states that the approach being taken by NCC is in accordance with the relevant planning regulatory framework, national planning policy and guidance.</p> <p>4. Surrey County Council states that they have allocated one site and two areas of search for similar high quality silica sand in their Minerals Plan Core Strategy.</p> <p>5. Borough Council of King’s Lynn and West Norfolk do not object to the specific site or any of the areas of search, but raise general concerns regarding the impact on the historic environment, and increased traffic movements from silica sand extraction.</p> <p>6. A local resident raised concerns about silicosis from silica sand dust; emissions from increased vehicle movements; and the impact on aquifers.</p>	<p>1. Noted. Highways England will continue to be consulted on the Silica Sand Review and relevant planning applications.</p> <p>2. Noted</p> <p>3. Noted</p> <p>4. Noted</p> <p>5. Impacts on the historic environment have been assessed in the Preferred Options document. Any planning application submitted for silica sand extraction within an AOS would need to include a Landscape and Visual Impact Assessment, a Heritage Statement and an archaeological assessment.</p> <p>The Highway Authority and Highways England have been consulted. A Transport Statement or Assessment would need to be submitted with a planning application for silica sand extraction which would lead to an increase in traffic movements.</p> <p>6. An area of 250 metres from residential properties has been excluded from the areas of search. An air quality impact assessment would need to be submitted with any planning application for silica sand extraction within an AOS, including dust, together with suitable mitigation measures to address impacts.</p> <p>The Health and Safety Executive states that “No cases of silicosis have been documented among members of the general public in Great Britain, indicating that environmental exposures to silica dust are not sufficiently high to cause this occupational disease”.</p> <p>A Transport Statement or Assessment would also need to be submitted with a planning application for silica sand extraction which would lead to an increase in traffic movements.</p> <p>The specific site and areas of search are located on principal and secondary aquifers due to the geology underlying Norfolk. Any planning application submitted in these areas</p>

Key Issue Raised	Norfolk County Council Officer response
<p>7. The Environment Agency highlight that locations of water supplies that are outside a source protection zone may be held by the local district council. These water supplies will be given a default 50m protection zone to ensure there will be no impact from potential pollution.</p> <p>8. Historic England highlight the importance of restoration following extraction to minimise/ improve the impact on heritage assets and consider that funding through a planning obligation may also be appropriate. They state it is difficult to assess real impacts on the historic environment over such large areas of search, where smaller scale development could be achieved successfully in some parts, but not in others. They advise a reduction in the scale of some AOS where there would be a strong conflict with heritage assets. They highlight that their assessment has been mainly desk-based.</p> <p>9. Natural England support the criteria used to exclude or limit the extent of areas of search and reduce their impacts in relation to sensitive environmental receptors.</p>	<p>would need to include a Hydrogeological Risk Assessment.</p> <p>7. Noted. This would be a matter to be assessed within the detail of any future planning application.</p> <p>8. Planning applications for silica sand extraction within an area of search would need to include a comprehensive working and restoration plan, in accordance with policy DM14. The appropriateness of a planning obligation as a means to mitigate the impact of silica sand extraction on local heritage assets would be determined on a case-by-case basis at the planning application stage.</p> <p>Historic England's comments from July 2015 have been taken into account in the assessment of the defined areas of search and in particular, the boundaries of AOS E and AOS F will be significantly amended to take into account concerns raised regarding impacts on the historic environment. Planning applications for silica sand extraction within an area of search would need to include a 'Landscape and Visual Impact Assessment' and a Heritage Statement.</p> <p>9. Noted</p>
Site SIL01	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. BC King's Lynn and West Norfolk states that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties.</p> <p>3. Sibelco states that, in their view, the site could not certainly be expected to adversely affect CWS 416 as mitigation measures can be designed as appropriate. The adjacent CWS 418 is not likely to be adversely affected by dust deposition since this area has already been subject to mineral extraction.</p> <p>4. Norfolk Wildlife Trust states that excavation should seek to minimise impacts on adjacent CWS and on the country park.</p>	<p>1. Noted</p> <p>2. These constraints and mitigation measures have been included in the paragraph on Amenity/Environmental Health.</p> <p>3. If a planning application is made for silica sand extraction at SIL01, a Biodiversity Survey and Report would need to be submitted and include an assessment of impacts on the CWSs.</p> <p>4. If a planning application is made for silica sand extraction at SIL01, an Arboricultural Impact Assessment would need to be</p>

Key Issue Raised	Norfolk County Council Officer response
<p>Restoration should be to habitat types similar to the adjacent restored mineral workings with the potential for the restored site to be included within the adjacent country park.</p> <p>5. Natural England are satisfied that SIL01 would not have an adverse impact on any nearby designated sites and welcome the policy requirement for a Hydrogeological Risk Assessment to be undertaken.</p> <p>6. The Environment Agency states that there are sites of deciduous broadleaved woodland and records of protected species within the site.</p> <p>7. The Environment Agency states that a Water Framework Directive Assessment should be undertaken for Mintlyn Stream to ensure that silt does not enter the watercourse.</p> <p>8. The Environment Agency states that as the site is located on a principal aquifer, a Hydrogeological Risk Assessment will be required.</p> <p>9. Historic England raises concerns about the impact of silica sand extraction at SIL 01 on the setting of the grade II* listed 'Ruins of the Church of St Michael' to the east. Substantial existing tree planting prevents views of the existing pits from the church. Site SIL01 would extend southwards of the existing tree belt and the southern-most section would appear to be visible from the church remains and affect the setting of the church. An adjustment to the southern edge of the pit to move it north would reduce the visual impact and therefore could mitigate any harm in terms of paragraph 132 of the NPPF. Historic England highlight the importance of restoration following extraction to minimise/ improve the impact on heritage assets and consider that funding through a planning obligation may also be appropriate.</p> <p>10. A local resident raises concerns about the impact on Bawsey Lakes and Bawsey SSSI from the conveyor; the impact on wildlife, trees, footpaths and residential amenity from mineral extraction.</p>	<p>submitted along with a Biodiversity Survey and Report. Planning applications for silica sand extraction within an area of search would need to include a comprehensive working and restoration plan, in accordance with policy DM14.</p> <p>5. Noted</p> <p>6. If a planning application is made for silica sand extraction at SIL01, an Arboricultural Impact Assessment would need to be submitted, if the proposal could potentially affect trees or hedges and a Biodiversity Survey and Report would need to be submitted.</p> <p>7. The Mintlyn Stream is located approximately 900 meters south of SIL01. A WFD assessment will be carried out to inform the Pre-Submission version of the Silica Sand Review.</p> <p>8. The draft specific site policy includes a requirement for any planning application submitted for site SIL01 to include a Hydrological Risk Assessment.</p> <p>9. The concerns about the setting of the ruins of St Michael's Church are noted. A potential alternative to moving the southern edge of site SIL01 to the north could be to extend the existing tree planting further south to screen the site from the church remains. A planning application for silica sand extraction within SIL01 would need to be accompanied by a Landscape and Visual Impact Assessment and a Heritage Statement.</p> <p>Planning applications for silica sand extraction within SIL01 would need to include a comprehensive working and restoration plan, in accordance with policy DM14. The appropriateness of a planning obligation as a means to mitigate the impact of silica sand extraction on local heritage assets would be determined on a case-by-case basis at the planning application stage.</p> <p>10. The location of a conveyor from site SIL01 to the existing processing plant at Leziate is expected to be to the south of Bawsey Lakes and to follow a previous conveyor route used for the transport of</p>

Key Issue Raised	Norfolk County Council Officer response
	<p>mineral to the processing works. Bawsey SSSI is a geological SSSI and the 'impact risk zone' only extends 50 metres from the SSSI boundary. Proposed Site SIL01 and any conveyor route from the site would be more than 50 metres from Bawsey SSSI and therefore silica sand extraction in this location is not expected to have an adverse effect on Bawsey SSSI.</p> <p>If a planning application is made for silica sand extraction at SIL01, an Arboricultural Impact Assessment and a Biodiversity Survey and Report would need to be submitted. The draft policy for SIL01 includes a requirement for any planning application submitted for the site to include mitigation measures to deal appropriately with any amenity impacts.</p>
Area of Search A	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. Snettisham Parish Council are opposed to AOS A and raised concerns about the impact of mineral extraction on:</p> <ul style="list-style-type: none"> • Tourism, due to the flat, open aspect of the landscape and the tranquillity. The PC state that mitigation measures for landscape, noise and dust impacts would also have a visual impact • Users of the Norfolk Coast Path Trail, including views from the path. • Wildlife, including disturbance to the large flocks of birds that fly over the area and visit the area, including the RSPB reserve at Snettisham • Archaeology • HGV access onto the A149 increasing interruptions to traffic flows • Increasing flood risk 	<p>1. Noted</p> <p>2. The boundary of AOS A will be drawn 1km away from the coast and will also be drawn away from the AONB to both the north and the south. AOS A would therefore be further away from the proposed Norfolk Coast Path Trail. If a planning application is made for silica sand extraction within AOS A, a Landscape and Visual Impact Assessment would need to be submitted. The remaining area of AOS A will be closer to the A149 which is less tranquil due to existing traffic noise.</p> <p>If a planning application is made for silica sand extraction within AOS A, a Biodiversity Survey and Report would need to be submitted. A Habitats Regulations Assessment (HRA) will be carried out on AOS A to assess the potential impacts of silica sand extraction within this AoS and propose appropriate mitigation measures. If the Task 2 HRA concludes that mineral extraction within this AoS would have likely significant effects on the qualifying features of The Wash and North Norfolk Coast, then the area of search could not be allocated for future mineral extraction.</p> <p>The boundary of AOS A will be drawn back from the coast and therefore will exclude the duck decoy and majority of the historic sea defences. An archaeological assessment</p>

Key Issue Raised	Norfolk County Council Officer response
<p>3. Norfolk Coast Partnership states that it would be problematic to identify a site for extraction within AOS A that did not impact the setting of the AONB. They state that the public has the right to expect to enjoy The Wash and North Norfolk Coast SPA and SAC in a high quality landscape context. The NCP state that there would be potential impacts on the England Coast Path, historic environment, archaeology, geomorphology, settlements and tranquillity, which are part of what makes the area attractive to visitors and provides the basis of a significant part of the local economy. The NCP conclude that AOS A is an area of great sensitivity which would present significant difficulties in trying to find suitable sites for mineral extraction within the AoS and that the AOS is unsuitable for allocation.</p>	<p>and Heritage Statement would need to be submitted with any planning application for silica sand extraction within AOS A.</p> <p>NCC, as Highway Authority stated that acceptable access could be achieved onto the A149 via existing side roads (except Beach Road) subject to junction mitigation and highway network improvements, which would be assessed at the planning application stage.</p> <p>If a planning application is made for silica sand extraction within AOS A, a site specific flood risk assessment would need to demonstrate that extraction of minerals in this location would not exacerbate flood risk. The Environment Agency suggests that spoil material from excavations could possibly be used to raise the existing flood defences in future. They also suggest that excavation spoil could be deposited to deflect potential flooding (due to a breach) away from the properties to the north and east of AOS A.</p> <p>3. The boundary of AOS A will be drawn 1km away from the coast. The boundary of AOS A will also be drawn away from the AONB to both the north and the south. If a planning application is made for silica sand extraction within AOS A, a Landscape and Visual Impact Assessment would need to be submitted. After the boundary of AOS A has been drawn away from the coast and the AONB, it will be further away from the proposed England Coast Path. The remaining area of AOS A will therefore be closer to the A149 which is less tranquil due to existing traffic noise.</p> <p>A Task 2 Habitats Regulations Assessment (HRA) will be carried out on AOS A to assess the potential impacts of silica sand extraction on The Wash and North Norfolk Coast designated sites and propose appropriate mitigation measures. However, a HRA does not consider the quality of the landscape context for the designated sites.</p> <p>Potential impacts on the historic environment, archaeology, geomorphology and nearby settlements have been assessed in the PO document. The draft area of search policy includes requirements to assess and mitigate any adverse impacts.</p>

Key Issue Raised	Norfolk County Council Officer response
<p>4. Norfolk Wildlife Trust is pleased that the boundary of the AOS will be amended to exclude CWSs at Shepherd's Port Meadow and Life Wood.</p> <p>5. BC King's Lynn and West Norfolk raise concerns about potential conflicts with flood defences, surface water drainage and a caravan park. They state that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties and the caravan park. A drainage plan will be required and restoration must take account of flood risk.</p> <p>6. The Environment Agency states that the AOS is at high risk of flooding from the sea and is a flood Hazard Zone. Extraction of minerals in AOS A would need to demonstrate that flood risk would not be exacerbated. There is the potential for spoil from excavations to be used in flood defences or to reduce the risk to properties due to a breach. Evacuation measures should be in place in case a breach occurs. King's Lynn IDB is redeveloping the pumping station at the outfall of Wolferton creek and mineral extraction in AOS A would have a significant impact upon their system.</p> <p>7. The Environment Agency states that there are protected habitats and species within the AOS and adjacent to the AOS, including The Wash.</p> <p>8. The Environment Agency states that a Water Framework Directive Assessment should be undertaken for the Ingol.</p> <p>9. The Environment Agency states that as the AOS is located on a principal aquifer, a Hydrogeological Risk Assessment will be required.</p> <p>10. Anglian Water states that there is a foul sewer and a mains water pipeline within a small section of AOS A to the east of the A149 and a mains water pipeline along Beach Road.</p>	<p>4. We confirm that the boundary of the AOS will be amended to exclude CWS 475, CWS 476 and CWS 473.</p> <p>5. The boundary of AOS A will be drawn back from the coast and back from the existing flood defences. The amenity constraints and mitigation measures have been included in the paragraph on Amenity/Environmental Health. The boundary of the AoS will be drawn at least 250 metres away from the caravan parks.</p> <p>6. The location of the flood Hazard Zone is noted. Silica sand extraction is considered to be water compatible development in the NPPG. If a planning application is made for silica sand extraction within AOS A, a site specific FRA would need to be submitted in accordance with Policy DM4 and the NPPF and it would need to include evacuation measures. The potential for the use of extraction spoil to reduce flood risk would be more appropriately considered at the planning application stage. King's Lynn IDB was consulted on the Preferred Options document and did not respond.</p> <p>7. If a planning application is made for silica sand extraction within AOS A an Arboricultural Impact Assessment would need to be submitted, if the proposal could potentially affect trees and hedges, and a Biodiversity Survey and Report would need to be submitted. An Appropriate Assessment will be undertaken on the Silica Sand Review to ensure no adverse effects on the integrity of The Wash designated sites.</p> <p>8. A WFD assessment will be carried out to inform the Pre-Submission version of the Silica Sand Review.</p> <p>9. The draft area of search policy includes a requirement for any planning application submitted within an area of search to include an HRA.</p> <p>10. The boundary of AOS A will be amended so that there are no areas of AOS A to the east of the A149 and will also be amended to the south of Beach Road. Following these amendments there will not be any Anglian Water assets in AOS A.</p>

Key Issue Raised	Norfolk County Council Officer response
Area of Search B	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. Snettisham Parish Council, the Norfolk Coast Partnership and Norfolk Wildlife Trust all agree with the conclusion that AOS B is not suitable for allocation due to landscape, historic environment and wildlife constraints and designations.</p> <p>3. BC King's Lynn and West Norfolk raise concerns about potential conflicts with flood defences, surface water management, sewerage treatment works, leisure and tourism uses. They state that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties. A drainage plan will be required and restoration must take account of flood risk.</p> <p>4. The Environment Agency states that the area is at high risk of flooding and in a flood Hazard Zone; the proposal would significantly increase flood risk.</p> <p>5. The Environment Agency states that protected habitats and species are present within AOS E.</p> <p>6. The Environment Agency states that a Water Framework Directive Assessment should be undertaken for the Heacham River.</p> <p>7. The Environment Agency states that as the AOS is located on a principal aquifer, a Hydrogeological Risk Assessment will be required.</p> <p>8. Anglian Water states that there is a waste water treatment works and a terminal sewerage pumping station within the boundary of AOS B.</p>	<p>As stated in the Preferred Options Consultation document, Area of Search B is considered unsuitable to be taken forward and will not be included in the Pre-Submission document.</p>
Area of Search C	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. Hillington Parish Council and the Norfolk Coast Partnership agree with conclusion that the AOS is not suitable for allocation.</p>	<p>As stated in the Preferred Options Consultation document, Area of Search C is considered unsuitable to be taken forward and will not be included in the Pre-Submission document.</p>

Key Issue Raised	Norfolk County Council Officer response
<p>3. BC King's Lynn and West Norfolk raise concerns about conflict with existing tourism and leisure uses at Gatton Waters caravans and fishery. They state that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties and Gatton Waters.</p> <p>4. Norfolk Wildlife Trust supports the conclusion that the Babingley River Valley should be removed from the AOS.</p> <p>5. The Environment Agency states that the AOS is partially at medium risk and high risk of flooding. A detailed flood risk assessment will be needed and a sequential approach should be taken to site development.</p> <p>6. The Environment Agency states that there are protected species within AOS D.</p> <p>7. The Environment Agency states that a Water Framework Directive Assessment should be undertaken for the Babingley River.</p> <p>8. The Environment Agency states that as the AOS is located on a principal aquifer and across the Babingley River, a Hydrogeological Risk Assessment will be required.</p> <p>9. Anglian Water states that there is a mains water pipeline along West Newton Road.</p>	
Area of Search D	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. Local residents state that the AOS is unsuitable due to appalling access onto the A47 from Common Road and the impact on wildlife.</p> <p>3. BC King's Lynn and West Norfolk states that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties. They also raised concerns about cumulative impacts with AOS E.</p> <p>4. Norfolk Wildlife Trust considers that the allocation is unsuitable due to the proximity to CWSSs, East Winch Common SSSI and</p>	<p>1. Noted</p> <p>2. The Highway Authority considers that junction improvements are likely to be required for silica sand extraction to take place within AOS D. Planning permission would not be granted if the number of vehicle movements proposed was unacceptable to the Highway Authority and Highways England.</p> <p>3. These constraints and mitigation measures have been included in the paragraph on Amenity/Environmental Health. Policy DM15 will be used to assess the cumulative impacts of relevant planning applications.</p> <p>4 & 5. A Hydrogeological Risk Assessment would be required to be submitted with any planning application within AOS D to address</p>

Key Issue Raised	Norfolk County Council Officer response
<p>the River Nar SSSI.</p> <p>5. The Environment Agency states that there are protected habitats and species adjacent to AOS D.</p> <p>6. The Environment Agency states that the site is partially at high risk of flooding and a flood risk assessment (FRA) will be needed.</p> <p>7. The Environment Agency states that a Water Framework Directive Assessment should be undertaken for the County Drain.</p> <p>8. The Environment Agency states that, as the AOS is located on a principal aquifer and close to watercourses a Hydrogeological Risk Assessment (HRA) will be required.</p> <p>9. Anglian Water states that there is a mains water pipeline along Common Road.</p> <p>10. National Grid states that AOS D is crossed by overhead power lines and is in close proximity to a gas transmission pipeline. Advice is provided regarding development in proximity to the pipeline and overhead powerlines.</p>	<p>impacts on groundwater dependent environmental designations. The boundary of AOS D will be amended east of Common Road and therefore further from CWS 532. If a planning application is made for silica sand extraction within AOS D, a Biodiversity Survey and Report and an Arboricultural Impact Assessment would need to be submitted.</p> <p>6. If a planning application is made for silica sand extraction within AOS D, a site specific FRA would need to be submitted in accordance with Policy DM4 and the NPPF.</p> <p>7. A WFD assessment will be carried out to inform the Pre-Submission version of the Silica Sand Review.</p> <p>8. The draft area of search policy includes a requirement for any planning application submitted within an area of search to include an HRA.</p> <p>9. Noted</p> <p>10. Advice noted. The gas transmission pipeline is located over 750 metres north the boundary of AOS D. The overhead electricity lines and towers cross AOS D at the south.</p>
Area of Search E	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. Shouldham Parish Council states that it should be taken into account that Shouldham Warren is used by the public for many leisure activities and sporting events. They also state that access to Shouldham Warren for extraction vehicles should be gained via the A134 and not through Shouldham village.</p> <p>3. BC King's Lynn and West Norfolk states that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties. They also raised concerns about cumulative impacts with AOS D and AOS J.</p> <p>4. Norfolk Wildlife Trust states that there should be a strong presumption to avoid damage to CWS 425 which is within AOS E.</p>	<p>1. Noted</p> <p>2. Comments noted. It is not intended that the whole of the AoS would come forward for silica sand extraction. If a planning application is submitted for mineral extraction within AOS E, highways access via Shouldham village would not be acceptable.</p> <p>3. These constraints and mitigation measures have been included in the paragraph on Amenity/Environmental Health. Policy DM15 will be used to assess the cumulative impacts of relevant planning applications.</p> <p>4. If a planning application is made for silica sand extraction within AOS E, an Arboricultural Impact Assessment and a Biodiversity Survey and Report would need</p>

Key Issue Raised	Norfolk County Council Officer response
<p>5. The Environment Agency states that the AOS is partially at high risk of flooding and is within a flood Hazard Zone. A flood risk assessment will be needed.</p> <p>6. The Environment Agency states that there are protected habitats and species within and adjacent to AOS E.</p> <p>7. The Environment Agency states that a Water Framework Directive Assessment should be undertaken for the Nar downstream of Abbey Farm.</p> <p>8. The Environment Agency states that as the AOS is located on a principal aquifer and close to the River Nar, a Hydrogeological Risk Assessment (HRA) will be required.</p> <p>9. Anglian Water states that there is a waste water treatment works (WWTW) and an in-line sewerage pumping station close to the southern edge of AOS E. There is a WWTW close to the north western part of the AOS. There are a number of Anglian Water mains water pipelines within AOS E.</p> <p>10. National Grid states that AOS E is crossed by Intermediate Pressure/ High Pressure gas distribution pipeline and advice is provided regarding development in proximity to the pipeline.</p>	<p>to be submitted. Any planning application would be determined in accordance with Policy CS14 and Policy DM1 which cover Environmental Protection and Nature Conservation.</p> <p>5. Silica sand extraction is considered to be water compatible development in the NPPG; however, a sequential approach will be taken to the selection and development of areas of search. If a planning application is made for silica sand extraction within AOS E, a site specific FRA would need to be submitted in accordance with Policy DM4 and the NPPF.</p> <p>6. If a planning application is made for silica sand extraction within AOS E, a Biodiversity Survey and Report would need to be submitted.</p> <p>7. The River Nar is located 250 meters north of the northern-eastern boundary of AOS E. A WFD assessment will be carried out to inform the Pre-Submission version of the Silica Sand Review.</p> <p>8. The draft area of search policy includes a requirement for any planning application submitted within an area of search to include an HRA.</p> <p>9. Noted.</p> <p>10. Advice noted. The gas distribution pipeline is located across the southern-western part of AOS E. It is not intended that the whole of the AoS would come forward for silica sand extraction. The areas of search form locations within which mineral operators could develop extraction proposals for much smaller areas to meet the expected shortfall.</p>
Area of Search F	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. BC King's Lynn and West Norfolk states that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties. They also raised concerns about cumulative impacts with AOS I.</p>	<p>1. Noted</p> <p>2. These constraints and mitigation measures have been included in the paragraph on Amenity/Environmental Health. Policy DM15 will be used to assess the cumulative impacts of relevant planning applications.</p>

Key Issue Raised	Norfolk County Council Officer response
<p>3. Norfolk Wildlife Trust supports the proposals to remove CWS 365 from AOS F.</p> <p>4. The Environment Agency states that the AOS is partially at high risk and medium risk of flooding. A detailed flood risk assessment will be needed and a sequential approach should be taken to site development.</p> <p>5. The Environment Agency states that as the AOS is located on a principal aquifer, a Hydrogeological Risk Assessment will be required.</p> <p>6. Anglian Water states that there are a number of Anglian Water mains water pipelines within the boundary of AOS F.</p>	<p>3. I confirm that CWS 365 will be removed from AOS F.</p> <p>4. If a planning application is made for silica sand extraction within AOS F, a site specific FRA would need to be submitted in accordance with Policy DM4 and the NPPF.</p> <p>5. The draft area of search policy includes a requirement for any planning application submitted within an AoS to include a Hydrological Risk Assessment.</p> <p>6. Noted.</p>
Area of Search G	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. A local resident raises concerns about the impact on Bawsey Lakes and Bawsey SSSI from the conveyor; the impact on wildlife, trees, footpaths and residential amenity from mineral extraction.</p> <p>3. BC King's Lynn and West Norfolk states that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties. They also raised concerns about cumulative impacts with AOS H.</p> <p>4. Norfolk Wildlife Trust states that CWS 418 should be avoided and restoration should be to similar habitats with potential to be included in the adjacent country park.</p> <p>5. The Environment Agency states that there are sites of deciduous broadleaved woodland and records of protected species within AOS G.</p> <p>6. The Environment Agency states that a Water Framework Directive Assessment should be undertaken for Mintlyn Stream to ensure that silt does not enter the watercourse.</p> <p>7. The Environment Agency states that as the AOS is located on a principal aquifer, a Hydrogeological Risk Assessment will be required.</p> <p>8. There is an Anglian Water mains water</p>	<p>An existing permitted silica sand extraction site is located within part of AOS G. Once the land within the existing mineral working has been removed from AOS G, the remaining proportion of AOS G is only 13 hectares. In the process used to define all the areas of search in the Preferred Options Consultation document, the minimum size that is considered to be a deliverable area of search is 20 hectares. Therefore, as the remaining portion of AOS G is below 20 hectares, AOS G will not be included in the Pre-Submission document.</p>

Key Issue Raised	Norfolk County Council Officer response
pipeline within the boundary of AOS G.	
Area of Search H	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. A local resident raises concerns about the impact on Bawsey Lakes and Bawsey SSSI from the conveyor; the impact on wildlife, trees, footpaths and residential amenity from mineral extraction.</p> <p>3. BC King's Lynn and West Norfolk states that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties. They also raised concerns about cumulative impacts with AOS G.</p> <p>4. Norfolk Wildlife Trust states that CWS 416 should be avoided and restoration should be to similar habitats with potential to be included in the adjacent country park.</p> <p>5. The Environment Agency states that there are sites of deciduous broadleaved woodland and records of protected species within AOS H.</p> <p>6. The Environment Agency states that a Water Framework Directive Assessment should be undertaken for Mintlyn Stream to ensure that silt does not enter the watercourse.</p> <p>7. The Environment Agency states that as the AOS is located on a principal aquifer, a Hydrogeological Risk Assessment will be required.</p> <p>8. There is an Anglian Water mains water pipeline within the boundary of AOS H.</p>	<p>Site SIL 01 is located over a portion of AOS H. Once the land within SIL 01 has been removed from AOS H, the remaining proportion of AOS H is only 16 hectares. In the process used to define all the areas of search in the Preferred Options Consultation document, the minimum size that is considered to be a deliverable area of search is 20 hectares. Therefore, as the remaining portion of AOS H is below 20 hectares, AOS H will not be included in the Pre-Submission document.</p>
Area of Search I	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. BC King's Lynn and West Norfolk states that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties.</p> <p>3. The Environment Agency states that there are sites of deciduous broadleaved</p>	<p>1. Noted</p> <p>2. These constraints and mitigation measures have been included in the paragraph on Amenity/Environmental Health.</p> <p>3. If a planning application is made for silica sand extraction within AOS I, an Arboricultural Impact Assessment would</p>

Key Issue Raised	Norfolk County Council Officer response
<p>woodland within AOS J.</p> <p>4. The Environment Agency states that, as the AOS is located on a principal aquifer, a Hydrogeological Risk Assessment will be required.</p> <p>5. There is an Anglian Water mains water pipeline within the boundary of AOS I, along Runcton Road.</p>	<p>need to be submitted, if the proposal could potentially affect trees or hedges.</p> <p>4. The draft area of search policy includes a requirement for any planning application submitted within an AoS to include a Hydrogeological Risk Assessment.</p> <p>5. Noted</p>
Area of Search J	
<p>1. The Highway Authority states that their comments on highway access have been taken into consideration.</p> <p>2. BC King's Lynn and West Norfolk states that a buffer, dust management plan and noise management plan will be required to mitigate impacts to residential properties.</p> <p>3. Norfolk Wildlife Trust stated that excavation should ensure no adverse impact on hydrology of CWS 385.</p> <p>4. The Environment Agency states that there are sites of deciduous broadleaved woodland within AOS J.</p> <p>5. The Environment Agency states that, as the AOS is located on a principal aquifer, a Hydrogeological Risk Assessment will be required.</p> <p>6. There is an Anglian Water mains water pipeline within the boundary of AOS J, along the A134.</p>	<p>1. Noted</p> <p>2. These constraints and mitigation measures have been included in the paragraph on Amenity/Environmental Health.</p> <p>3. The draft area of search policy includes a requirement for any planning application submitted within an AoS to include a Hydrogeological Risk Assessment.</p> <p>4. If a planning application is made for silica sand extraction within AOS J, an Arboricultural Impact Assessment would need to be submitted, if the proposal could potentially affect trees or hedges.</p> <p>5. The draft area of search policy includes a requirement for any planning application submitted within an AoS to include a Hydrogeological Risk Assessment.</p> <p>6. Noted</p>

Table 12. Main issues raised in response to the Initial Sustainability Appraisal Report and how they have been taken into account

Key Issue Raised	Norfolk County Council Officer response
<p>Kent County Council considers that the methodology used accords with the relevant planning regulatory framework, the NPPF and NPPG.</p> <p>Natural England agrees with the sustainability appraisal objectives and how they have been scored in the report.</p> <p>Historic England has no further comments to make on the Sustainability Appraisal Scoping report.</p>	<p>Noted</p>

Table 13. Main issues raised in response to the Habitats Regulations Assessment (Task 1) and how they have been taken into account

Key Issue Raised	Norfolk County Council Officer response
<p>Natural England agrees with the conclusion of no likely significant effect from any of the areas of search on Roydon Common & Dersingham Bog SAC and Ramsar sites.</p> <p>Natural England concurs with the conclusion of the assessment that NCC cannot rule out the likelihood of significant effects arising from the AOS A and AOS B, either alone or in-combination in relation to The Wash and North Norfolk SAC, The Wash Ramsar and The Wash Special Protection Area (SPA), and notes that it mainly relates to disturbance to birds (which are designated features) using agricultural land outside the designated sites.</p> <p>Natural England advises that the Appropriate Assessment must contain clear conclusions, and clear recommendations in relation to bird disturbance about how the plan should change in terms of the AOS allocations and/or mitigation measures. It needs to demonstrate how any necessary measures that have been identified have been incorporated into the plan to be in a position to conclude no likely significant effect or no adverse effect on integrity.</p>	<p>Noted.</p> <p>As stated in the Preferred Options Consultation document, AOS B is considered unsuitable to be taken forward and will not be included in the Pre-Submission document. Therefore a Task 2 Appropriate Assessment will not be carried out on AOS B.</p> <p>A Task 2 Appropriate Assessment will be undertaken on AOS A and the advice provided by Natural England will be taken into account in this assessment.</p>