



21<sup>st</sup> December 2015

### **Silica Sand Review: Preferred Options consultation**

Owing to the lack of information that we hold on the ecological value of the wider countryside we have restricted our comments to impacts on County Wildlife Sites and on East Winch Common, which is a NWT reserve. The NBIS county habitat map may help to fill in gaps other knowledge in these areas.

#### **Site proposed for silica sand extraction**

##### **SIL01 – Mintlyn South:**

This site is adjacent to County Wildlife Sites and areas of land not designated as CWS but likely to be of CWS value in Leziate Country Park. Excavation should seek to minimise adverse impacts on adjacent CWS and on the country park and include mitigation proposals. Restoration should be to habitat types similar to adjacent restored mineral workings and should enable the restored area to have the potential to be included within the country park, in future.

#### **Areas of Search that have been defined for further consideration:**

##### **AoS01a – land west of Snettisham**

We are pleased to see that it is proposed to amend the boundary of the AoS in order to avoid impacts on CWS at Shepherds Port Meadow and Life Wood. These two CWS are on edges of AoS and exclusion would have minimal impact on the AoS.

##### **AoS01b – land south of Heacham**

We support the conclusion that this AOS is not suitable for allocation. Much of the area of search lies within CWS, which are dominated by coastal habitats and by floodplain grazing marsh. Excavation within these sites is likely to have a severe adverse impact on these habitats and restoration of the habitats currently on site is unlikely to be achieved.

##### **AoS02 – land east of Hillington**

We support the conclusion that the Babingley River Valley should be removed for the AOS. Parts of the river upstream of the AOS are designated as County Wildlife Site and the river has been subject to ecological restoration in recent years, which should lead to improved wildlife value throughout the river.

##### **AoS10 – land in the vicinity of West Bilney Wood**

The northern section of the AoS is within 500m of East Winch Common SSSI, which includes sensitive wetland habitats. The consultation document recognises this in the ecology section but does not flag up in the conclusion. Any application would need to ensure no adverse impact on the SSSI, particularly with regard to hydrological impacts. River Nar SSSI is also within close vicinity to the south

CWS 429 (south of West Bilney Wood) lies within this AoS and there are a number of adjacent CWS including CWS 532 (Pentney Lakes). Any allocation should seek to avoid impacts on CWS 429 and avoid damaging adjacent CWS.

Owing to the range of potential ecological impacts we are of the view that this allocation is likely to be unsuitable given the current boundaries of the AOS



21<sup>st</sup> December 2015

**AoS11 – land to the north of Shouldham**

We are pleased to see that it is proposed to CWS 424 and 323 will be removed from the AOS. We can understand the rationale for still including CWS 425 within the AOS as this would fragment the AOS. However, it is acknowledged that this is a large AOS and in our view there should be strong presumption to avoid damage to this site.

**AoS12 – land to the north of Stow Bardolph**

We support the proposal to remove CWS 365, which forms part of a complex of woodlands, from the AOS, owing to this CVWS also being in the vicinity of parkland .

We note that hydrological impacts on CWS have been flagged up and excavation should only proceed in the vicinity of this CWS, if damage can be avoided.

**AoS18 – land at Mintlyn Wood**

CWS 418 lies within this AoS. This CWS includes a variety of habitats including areas that were formerly quarried. The priority should be to avoid allocating CWS. However, if this area were to be allocated, restoration should be to similar habitat types and should enable the restored area to have the potential to be included in future within the adjacent country park.

**AoS19 – land West of 70 Acre plantation**

CWS 416 lies partly within this AoS. The CWS includes a variety of habitats including areas that were formerly quarried. The priority should be to avoid allocating CWS. However, if this area were to be allocated, restoration should be to similar habitat types and should enable the restored area to have the potential to be included in future within the adjacent country park.

**AoS20 – land to the east of South Runcton**

We do not have any information on the ecological value of this area

**AoS21 – land to the east of Tottenhill**

We do not have any information on the ecological value of this area. Excavation should ensure no adverse impact on hydrology of CWS 385

Regards

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