



**Norfolk** County Council

## **Norfolk Minerals and Waste Local Plan Review**

### **Initial Consultation Feedback Report**

**July 2019**

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# Norfolk County Council

## Norfolk Minerals and Waste Local Plan Review

### Initial Consultation Feedback Report

**July 2019**

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## Introduction

This document contains the main issues raised in response to the Initial Consultation on the Minerals and Waste Local Plan Review. The consultation period ran for six weeks from 29 June to 13 August 2018.

The table below details the number of responses received to each part of the Initial Consultation document and to each proposed site or area of search for mineral extraction.

Section Name	Respondents	Objectors	Support	Object	Comment	Total Representations
1. Introduction/whole document	15	1	0	1	15	16
2. The consultation process	0	0	0	0	0	0
3. The process so far	2	0	0	0	2	2
4. What Happens next	0	0	0	0	0	0
5. Norfolk Spatial Portrait	1	0	1	0	0	1
Q1: Minerals and Waste Local Plan Vision	11	1	4	1	6	11
Q2: Waste management strategic objectives	3	0	3	0	0	3
Q3: Minerals strategic objectives	9	1	3	1	5	9
<b>General policies</b>						
Q4: Policy MW1 Presumption in favour of sustainable development	8	1	3	1	4	8
Q5: Policy MW2 Development management criteria	18	2	4	2	15	21
Q6: Policy MW3 Transport	7	0	0	0	7	7
Q7: Policy MW4 Climate change mitigation and adaption	10	0	1	0	9	10
Q8: Policy MW5 The Brecks protected habitats and species	4	0	3	0	1	4
Q9: Policy MW6 Agricultural soils	8	1	2	1	5	8
<b>Waste management policies</b>						
Q10: Policy WP1 Waste management capacity to be provided	4	0	0	0	4	4
Q10a: Alternative growth scenario for LACW	1	0	0	0	1	1
Q10b: Alternative growth scenario for C&I waste	1	0	0	0	1	1
Q11: Policy WP2 spatial strategy for waste management facilities	9	1	2	1	6	9

Section Name	Respondents	Objectors	Support	Object	Comment	Total Representations
Q11a: Alternative spatial strategy options	1	0	0	0	1	1
Q12: Policy WP3 land uses potentially suitable for waste management facilities	11	0	1	0	10	11
Q12a: Should specific sites be allocated for waste management facilities?	2	0	1	0	1	2
Q13: Policy WP4 Recycling or transfer of inert and CD&E waste	4	0	0	0	4	4
Q14: Policy WP5 Waste transfer stations, MRFs, ELV and WEEE facilities	3	0	0	0	3	3
Q15: Policy WP6 transfer and treatment of hazardous waste	1	0	1	0	0	1
Q16: Policy WP7 household waste recycling centres	4	0	1	0	5	6
Q17: Policy WP8 Composting	1	0	1	0	0	1
Q18: Policy WP9 Anaerobic digestion	1	0	1	0	0	1
Q19: Policy WP10 Residual waste treatment facilities	2	0	0	0	2	2
Q20: Policy WP11 Disposal of inert waste by landfill	3	0	2	0	1	3
Q21: Policy WP12 Non-hazardous and hazardous landfill sites	1	0	1	0	0	1
Q22: Policy WP13 Landfill mining and reclamation	2	0	1	0	1	2
Q23: Policy WP14 Water Recycling Centres	2	0	0	0	2	2
Q24: Policy WP15 Whitlingham WRC	5	0	0	0	5	5
Q25: Policy WP16 Design of waste management facilities	6	0	2	0	4	6
Q26: Policy WP17 Safeguarding waste management facilities	2	0	0	0	2	2
<b>Minerals specific policies</b>						
Q27: Policy MP1 Provision of minerals extraction	10	6	4	6	1	11
Q28: Policy MP2 Spatial strategy for minerals extraction	13	4	5	4	4	13
Q29: Policy MP3 Borrow pits	2	0	0	0	2	2
Q30: Policy MP4 Agricultural and potable water reservoirs	3	0	2	0	1	3



Section Name	Respondents	Objectors	Support	Object	Comment	Total Representations
Q31: Policy MP5 Core River Valleys	5	0	1	0	4	5
Q32: Policy MP6 Cumulative impacts and phasing of workings	3	0	2	0	1	3
Q33: Policy MP7 Progressive working, restoration and afteruse	11	1	3	1	7	11
Q34: Policy MP8 aftercare	4	0	2	0	3	5
Q35: Policy MP9 concrete batching and asphalt plants	2	0	0	0	2	2
Q36: Policy MP10 safeguarding port and rail facilities; concrete, asphalt and recycled aggregate facilities.	5	0	1	0	4	5
Q37: Policy MP11 Mineral Safeguarding Areas and Mineral Consultation Areas	4	0	1	0	3	4
Q38: Policy MP12 Energy minerals	0	0	0	0	0	0
Q39: Implementation, monitoring and review	1	0	0	0	1	1
<b>Appendices</b>						
Appendix 1: Existing Core Strategy and DM Policies	0	0	0	0	0	0
Appendix 2: Existing mineral site specific allocations and AOS policies	1	0	0	0	1	1
Appendix 3: Existing waste site specific allocations policies	0	0	0	0	0	0
Appendix 4: Development excluded from safeguarding	2	0	0	0	2	2
Appendix 5: Safeguarded mineral infrastructure	1	0	0	0	1	1
Appendix 6: Safeguarded mineral extraction sites	0	0	0	0	0	0
Appendix 7: Safeguarded waste management facilities	1	0	0	0	1	1
Appendix 8: Safeguarded water recycling centres	0	0	0	0	0	0
Appendix 9: Forecast waste arisings	0	0	0	0	0	0
<b>Proposed mineral sites</b>						
Q40: Site MIN 12 Beetley	12	3	0	3	9	12
Q41: Site MIN 51 & 13 Beetley	12	3	2	3	7	12
Q42: Site MIN 08 Beetley	8	4	0	4	4	8

Section Name	Respondents	Objectors	Support	Object	Comment	Total Representations
Q43: Site MIN 23 Beeston with Bittering	13	9	0	9	4	13
Q44: Site MIN 200 Carbrooke	6	0	0	0	7	7
Q45: Site MIN 116 Cranworth	8	5	0	5	3	8
Q46: Site MIN 35 Quidenham	25	19	1	19	6	26
Q47: Site MIN 102 Snetterton	6	3	0	3	5	8
Q48: Site MIN 201 Snetterton & Quidenham	7	3	0	3	5	8
Q49: Site MIN 55 Attlebridge	3	0	0	0	3	3
Q50: Site MIN 202 Attlebridge	8	1	1	1	6	8
Q51: Site MIN 48 Felthorpe	13	9	0	9	4	13
Q52: Site MIN 37 Frettenham & Buxton with Lammas	7	1	0	1	6	7
Q53: Site MIN 64 Horstead with Stanninghall	8	2	2	2	4	8
Q54: Site MIN 65 Horstead with Stanninghall	9	2	1	2	6	9
Q55: Site MIN 96 Spixworth, Horsham St Faith & Newton St Faith	6	1	0	1	5	6
Q56: Site MIN 203 Burgh Castle	7	2	1	2	4	7
Q57: Site MIN 38 Fritton and St Olaves	335	327	2	348	6	356
Q58: Site MIN 06 Middleton	5	0	0	0	6	6
Q59: Site MIN 45 East Rudham	10	1	2	1	9	12
Q60: Site MIN 204 Feltwell	11	1	0	1	11	12
Q61: Site MIN 19 & MIN 205 Pentney	11	2	1	2	9	12
Q62: Site MIN 74 Tottenhill	7	3	0	3	4	7
Q63: Site MIN 76 Tottenhill	7	1	0	1	7	8
Q64: Site MIN 77 Tottenhill	8	1	0	1	7	8
Q65: Site MIN 206 Tottenhill	9	1	1	1	7	9
Q66: Site MIN 32 West Dereham	6	2	0	2	4	6
Q67: Site MIN 40 East Winch	10	2	0	2	10	12
Q68: Site SIL 01 Bawsey	7	0	2	0	6	8
Q69: Area of Search AOS E Wormegay, Shouldham, Marham, Shouldham Thorpe	51	43	1	44	8	53
Q70: Area of Search AOS F Runcton Holme & Stow Bardolph	3	0	0	0	3	3
Q71: Area of Search AOS I Runcton Holme	4	0	0	0	4	4

Section Name	Respondents	Objectors	Support	Object	Comment	Total Representations
Q72: Area of Search AOS J Tottenhill and Wormegay	5	0	0	0	6	6
Q73: Policy MP13 Areas of search for silica sand extraction	6	2	2	2	2	6
Q74: Site SIL 02 Marham and Shouldham	386	374	1	386	12	399
Q75: Site MIN 69 Aylmerton	11	3	1	3	7	11
Q76: Site MIN 71 Holt	23	14	1	17	8	26
Q77: Site MIN 115 North Walsham	9	0	0	0	9	9
Q78: Site MIN 207 Edgefield	6	0	2	0	4	6
Q79: Site MIN 208 East Beckham	5	1	0	1	4	5
Q80: Site MIN 209 Earsham	26	17	2	18	7	27
Q81: Site MIN 210 Earsham	25	16	2	17	7	26
Q82: Site MIN 211 Earsham	25	17	2	18	6	26
Q83: Site MIN 25 Haddiscoe	29	20	2	20	7	29
Q84: Site MIN 92 Heckingham	9	2	0	2	8	10
Q85: Site MIN 212 Mundham	5	0	0	0	5	5
Q86: Site MIN 79 Swardeston, Swainsthorpe & Stoke Holy Cross	6	1	0	1	5	6
Q87: Site MIN 80 Swardeston	5	1	0	1	4	5
<b>TOTAL</b>	<b>856</b>	<b>810</b>	<b>91</b>	<b>977</b>	<b>450</b>	<b>1518</b>

### Background documents

Document name	Respondents	Objectors	Support	Object	Comment	Total representations
Waste Management Capacity Assessment	2	0	1	0	1	2
Draft Habitats Regulations Assessment	1	0	0	0	1	1
Sustainability Appraisal	1	0	0	0	1	1

As shown in the table above, most of the responses received were objections to proposed site MIN 38 at Fritton (348 objections received from 327 objectors) and SIL02 at Shouldham and Marham (386 objections received from 374 objectors). Most of the objections to these two sites were submitted in the form of a standard letter. In addition, a petition signed by 113 local residents was received objecting to proposed site MIN 71 at Holt and a petition signed by 19 local residents was received objecting to proposed sites MIN 209, 210 and 211 at Earsham. However, in deciding which sites are suitable to allocate, the key consideration is the planning issues raised in the consultation responses, not the number of objectors.

The main issues raised in the consultation responses from organisations and individuals, on each section of the Initial Consultation document, along with the Norfolk County Council Planning Officer's response, are contained in this report.

The following specific consultation bodies responded to the consultation:

- Borough Council of King's Lynn and West Norfolk
- Breckland Council
- Broadland District Council
- Great Yarmouth Borough Council
- Norwich City Council
- South Norfolk Council
- Broads Authority
- Cheshire East Council
- North Yorkshire County Council
- Peterborough City Council
- West Suffolk Councils (Forest Heath & St Edmundsbury)
- Environment Agency
- Natural England
- Historic England
- Anglian Water Services Ltd
- Essex and Suffolk Water
- National Grid
- Ministry of Defence (Defence Infrastructure Organisation)
- Beetley Parish Council
- Beeston with Bittering Parish Council
- Burgh Castle Parish Council
- Chedgrave Parish Council
- Earsham Parish Council
- Felthorpe Parish Council
- Fritton with St Olaves Parish Council
- Gressenhall Parish Council
- Haddiscoe Parish Council
- Holt Town Council
- Horstead with Stanninghall Parish Council
- Marham Parish Council
- Quidenham Parish Council
- Salhouse Parish Council
- Shouldham Parish Council
- Swannington with Alderford and Little Witchingham Parish Council
- West Winch Parish Council
- Norfolk County Council – Lead Local Flood Authority
- Norfolk County Council – Historic Environment Service
- Norfolk County Council – Waste Disposal Authority
- Norfolk County Council – Highway Authority
- Norfolk County Council – Natural Environment Team (landscape, ecology, arboriculture)

The following general consultation bodies responded to the consultation:

- The Broads Society
- Norfolk Wildlife Trust
- Norfolk Geodiversity Partnership
- CPRE Norfolk
- Woodland Trust
- Mineral Products Association
- Norfolk Coast Partnership

### Acronyms

AONB – Area of Outstanding Natural Beauty

AQMA – Air Quality Management Area

ASNW – Ancient Semi-Natural Woodland

BEIS – Department for Business, Energy and Industrial Strategy

BGS – British Geological Survey

BMV – Best and Most Versatile

CD&E – construction, demolition and excavation

C&I – commercial and industrial

CWS – County Wildlife Site

DPD – Development Plan Document

EEFM – East of England Forecasting Model

EHO – Environmental Health Officer

ELV – End-of-Life Vehicle

HGV – Heavy Goods Vehicle

HRA - Habitats Regulations Assessment

IDB – Internal Drainage Board

IRZ -Impact Risk Zone

LAA -Local Aggregate Assessment

LACW – Local Authority Collected Waste

LLFA – Lead Local Flood Authority

LNR - Local Nature Reserve

LPA – Local Planning Authority

M&WLPR -Minerals and Waste Local Plan Review

MPA -Minerals Planning Authority

MRF – Material Recycling Facility

NCC – Norfolk County Council

NNR -National Nature Reserve

NPPF – National Planning Policy Framework

NPPG – National Planning Practice Guidance

NPPW – National Planning Policy for Waste

ONS – Office of National Statistics

PAWS – Plantation on Ancient Woodland

PEDL – Petroleum Exploration and Development Licence

PRoW – Public Right of Way

RDF -Refuse Derived Fuel

SA -Sustainability Appraisal

SAC -Special Area of Conservation

SEA -Strategic Environmental Assessment

SHMA – Strategic Housing Market Assessment

SPA -Special Protection Area

SSA – Site Specific Allocations

SSSI – Site of Special Scientific Interest

WDI – Waste Data Interrogator

WEEE -Waste Electrical and Electronic Equipment

WFD -Water Framework Directive

WPA -Waste Planning Authority

**REPRESENTATIONS RECEIVED TO THE INITIAL CONSULTATION DOCUMENT**

**1. Introduction - including comments received about the document as a whole**

Representations received relevant to the whole document	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93219</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We welcome the opportunity to comment on the initial consultation of the Minerals and Waste Local Plan Review (M&amp;WLPR) prepared by your authority, and have submitted comments on specific policies and proposed site allocations through the on-line consultation process. In this letter we have some general comments to make about the following M&amp;WLPR documents:</p> <ul style="list-style-type: none"> <li>• main M&amp;WLPR initial consultation document, dated May 2018;</li> <li>• Initial Sustainability Appraisal of the M&amp;WLPR, dated May 2018; and</li> <li>• Draft Habitats Regulations Assessment of M&amp;WLPR, dated May 2018.</li> </ul> <p>Comments on the consultation</p> <p>Norfolk County Council is to be congratulated on the quality of the consultation documents that have been produced. Natural England considers that the M&amp;WLPR undertaken to date has been detailed, comprehensive and written in accordance with the then current legislation and policy. Norfolk County Council has a good overall picture of what is required to protect and safeguard our natural environment whilst fulfilling its role as the county's minerals and waste authority.</p> <p>However, since these consultation documents were produced in May 2018, the planning and legislative landscape has altered with the revised National Planning Policy Framework (NPPF) published; and a recent judgement from the European Court of Justice which clarified the use of mitigation measures in Habitats Regulations Assessments (HRAs). As a result, the documents listed above will need to be revised to reflect these changes. We provide more detailed comments on these specific matters below and in attached annexes.</p> <p>National Planning Policy Framework (NPPF)</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted. The Preferred Options document will take these changes (revised NPPF and recent HRA judgements) into account.</p>

Representations received relevant to the whole document	Norfolk County Council Planning Officer's response
<p>The revised National Planning Policy Framework (NPPF) was published on 24 July 2018. Updated Planning Practice Guidance (PPG) has also been issued by MHCLG to support various aspects of the NPPF. We recommend that the initial consultation documents are revised to reflect any relevant changes. Some key points from the updated NPPF that are relevant here include:</p> <ul style="list-style-type: none"> <li>• Sets out a definitive list of environmental assets which may provide a strong reason to restrict development (including National Parks, Areas of Outstanding Natural Beauty (AONBs), European sites, Sites of Special Scientific Interest (SSSIs) and irreplaceable habitats)</li> <li>• Provides stronger protection for ancient woodland, ancient and veteran trees with development to be "wholly exceptional"</li> <li>• Includes strengthened policies on biodiversity net gain and encouraging opportunities to achieve net environmental gains</li> <li>• Identifies green infrastructure as a strategic policy area</li> <li>• Clarifies that the scale and extent of development within National Parks and AONBs should be limited.</li> </ul> <p>Protected landscapes Several allocations are either within protected landscapes or lie close to their boundaries or 'settings' which means that the highest sensitivity must be afforded to the landscape. It would be advisable to include a specific policy for protected landscapes within the Plan to reflect their protection as both the Norfolk Coast AONB and The Broads, which has the equivalent status of a national park, may be impacted by minerals development. Any proposal which may affect a protected landscape or its setting should be subject at application stage to a Landscape and Visual Impact Assessment (LVIA) for all stages of the operation.</p> <p>The LVIA should consider how a proposal may impact the statutory purposes for which a protected landscape is designated, including impacts on landscape character and tranquillity, together with full details of mitigation and restoration. All restoration measures proposed will need to be in keeping with the local landscape character. Consideration should be given to each landscape character's sensitivity and its capacity to accommodate the proposed development. The requirement for a LVIA and mitigation measures should be identified in the Plan for each relevant allocation.</p>	<p>Noted. The Preferred Options document will take the revised NPPF and PPG into account.</p> <p>Protected landscapes: Whilst there is not a specific policy on protected landscapes in the Minerals and Waste Local Plan, there is a national policy on protection of designated landscapes in the NPPF, therefore there is no need to duplicate this national policy. However, the development management criteria policy MW2 states that proposals for minerals development must demonstrate that the development would not have an unacceptable impact on the appearance, quality and character of the landscape. The supporting text to this policy states that an LVIA will need to be provided at the planning application stage where a proposal is likely to have an effect on an AONB, The Broads or is within a Core River Valley. This is also stated in Norfolk County Council's 'Local List for Validation of Planning</p>

<b>Representations received relevant to the whole document</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Further information needs to be provided for these allocations which demonstrates that impacts to protected landscape features have been avoided where possible, and mitigation measures put in place for those impacts which cannot be avoided, and a programme of monitoring agreed to ensure the measures are effective. The views of the relevant organisation for each protected landscape need to be taken into account fully on these proposed allocations.</p> <p>Designated sites: The assessment of a proposal on nearby designated sites, including SSSIs, must include a consideration of likely changes to hydrology and increased disturbance of sensitive species from noise, lighting, vibration etc. Suitable mitigation might include avoidance of the breeding season, provision of screening etc. If there is any landfilling with material other than inert waste, the impact of attracting gulls and corvids into the area will also need to be considered. The impact assessment should provide evidence that there will be no adverse effects on the nationally and internationally designated features from dust blow, changes to hydrology etc. The requirement to include this information at application stage should be made clear in each relevant allocation.</p> <p>Restoration: Natural England expects that all minerals and waste developments should achieve a net gain for nature primarily through the creation or enhancement of Priority Habitats and linkages to local ecological networks. Where possible, schemes should clearly demonstrate how they can deliver connections with strategic green infrastructure (GI) corridors and known ecological networks, in order to achieve biodiversity net gain; and avoid severing these where it is feasible to do so. We advise that, in general, a restoration scheme should contain the following:</p> <ul style="list-style-type: none"> <li>i. restoration objectives which clearly describe how the scheme contributes to net gain for geodiversity and/or biodiversity, within a recognisable landscape context;</li> <li>ii. direct ecological links to any existing habitats, green infrastructure networks etc;</li> <li>iii. access links to Public Rights of Way and national trails, where appropriate.</li> </ul> <p>Quality GI, delivered in a coherent manner across all the districts, is an essential requirement to meet the needs of the expanding population, and to ensure that sites designated for wildlife do</p>	<p>Applications' which provides further guidance on the LVIA requirements.</p> <p>Noted. The requirement for an LVIA and mitigation measures has been included in the draft site allocation policies where relevant. The detail of an LVIA is a matter for the planning application stage.</p> <p>Designated sites: Noted. The site allocation assessments have included assessment of a proposal on nearby designated sites, including from hydrology and disturbance. Policy MW2 states that mineral proposals must demonstrate that the development would not have an unacceptable impact on the natural environment. Norfolk County Council's Local List for Validation of Planning Applications requires a Biodiversity Survey and Report to be submitted at the planning application stage and a Hydrogeological Risk Assessment where necessary. There are no proposals currently for any mineral sites to be restored within non-inert waste.</p> <p>Restoration: Noted. The policy on restoration of minerals sites (MP7) states that preference will be given to restoration that contributes to identified green infrastructure corridors. In the Preferred Options document the policy will be amended to also refer to ecological networks. Policy MP7 also refers to a preference for restoration that enhances Norfolk's biodiversity and opportunities to improve public access and to implement the NCC Rights of Way Improvement Plan.</p>



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<p>not suffer adversely from increased recreational activities, including dog walking. There may be scope to include provision for this in mineral allocations.</p> <p>Agri-environment schemes: Minerals sites may be under existing Higher Level Stewardship agreements before minerals are extracted and may be returned to agricultural use following landfilling. We advise early contact by agreement holders with Natural England to discuss individual cases so that any payments can be amended accordingly.</p> <p>Local Sites: We trust that consultation is being undertaken with relevant parties in relation to Local Sites of geodiversity and biodiversity interest.</p> <p>Soils: The M&amp;WLPR should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our well-being and prosperity. Decisions about minerals development and restoration should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with the NPPF.</p> <p>Where minerals underlie the best and most versatile agricultural land (Grades 1, 2 and 3a in the Defra Agricultural Land Classification (ALC) (system) it is particularly important that restoration and aftercare preserve the long-term potential of the land as a national, high quality resource. Where alternative after-uses (such as forestry and some forms of amenity, including nature conservation) are proposed on the best and most versatile agricultural land, the methods used in restoration and aftercare should enable the land to retain its longer-term capability, thus remaining a high quality resource for the future.</p> <p>Comments on proposed minerals allocations: We have submitted our comments on specific allocations electronically online. Where we have not commented on a proposed site, you may assume that we have no comment to make. This does not mean, however, that there are no impacts for biodiversity or landscape.</p>	<p>Noted. The policy on restoration of minerals sites (MP7) states that preference will be given to restoration that contributes positively to identified green infrastructure corridors. It also states that the restoration proposal must demonstrate that due consideration has been given to opportunities to improve public access.</p> <p>Agri-environment schemes: Noted.</p> <p>Local sites: The Norfolk Geodiversity Partnership, Norfolk Wildlife Trust and Norfolk County Council's Natural Environment Team have been consulted on the Local Plan.</p> <p>Soils: Noted. The Plan includes a specific policy on soils (MW6) which we consider covers the issues raised. The restoration policy MP7 will be amended in the Preferred Options document to also state that preference will be given to restoration that reinstates best and most versatile agricultural land where it occurs.</p> <p>Noted.</p>
<p><b>(Comment)</b> Representation ID: 93170 Respondent: <b>Broads Authority (Natalie Beal) [16282]</b> Main document</p>	<p>Noted. In the Preferred Options document, the site allocation policies state that an archaeological assessment may initially be desk based, but may</p>

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<p>* The Broads has been identified by Historic England as an area with exceptional potential for waterlogged archaeology. Any excavation within or close to the executive area will require particularly robust archaeological evaluation prior to consenting and not rely on a brief desk based evaluation and conditions.</p> <p>* For the avoidance of doubt, perhaps say that this covers the entire county of Norfolk.</p> <p>* Perhaps something about how it fits with our Local Plans? Something about how Authorities consulted if application in or near to area? We would like to understand how our special qualities and our policies that could be of relevance would be considered in decision making.</p> <p>* Page 16, 28 - the Broads has a status equivalent to a national park.</p> <p>* Page 23 - suggest A3 landscape.</p> <p>* Page 28: Typographical error: 'Landscape Character Assessments have been carried by the Local Planning Authorities in Norfolk and they consider where locally designated landscapes of importance are situated'.</p> <p>* Page 39: Typographical error: 'and/or the volumes of waste in each ARE so low that it would be unviable for a full range of waste management facilities to exist in every area'.</p> <p>* Page 41: Typographical error: 'end-of-LIFE vehicles'</p> <p>* Page 46: Typographical error: '...have similar locational requirements due to their potential to impact on local amenity and the ENVIRONMENT'.</p>	<p>need to be followed up with field surveys and trial trenching. This would be determined on the advice of the Norfolk Historic Environment Service. Norfolk County Council's 'Local List for Validation of Planning Applications' also states that a field evaluation is required for sites of archaeological interest.</p> <p>The document is called the Norfolk Minerals and Waste Local Plan, but the introduction can state that it covers the entire county of Norfolk more explicitly if necessary.</p> <p>Noted. The relevant LPA is always consulted on planning applications for minerals or waste development within their area and planning applications are assessed against relevant policies in the LPA's Local Plan as well as policies in the Minerals and Waste Local Plan because together they form the Development Plan for the area. The introduction of the plan can be amended to specifically state this if necessary.</p> <p>Page 16, 28: Noted.</p> <p>Page 23: The key diagram will be produced on a larger scale in the Preferred Options consultation document.</p> <p>Page 28: typo has been corrected.</p> <p>Page 39: typo has been corrected.</p> <p>Page 41: typo has been corrected.</p> <p>Page 46: typo has been corrected.</p>

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<p>* Page 49: Typographical error: correct to 'of waste electrical and electronic equipment (WEEE)'</p> <p>* WP17 and MP10 and MP11 - will you provide GIS layers of these facilities and consultation zones?</p> <p>* Page 61: Typographical error: 'the most recently available DATA'</p> <p>* The areas on page 67 - the Broads is not mentioned. Presumably this is because silica sand only occurs in West Norfolk Borough?</p> <p>* Page 77: Typographical error: correct to 'will be made on a case by case basis'.</p> <p>* Page 78: Typographical error: 'Carstone is also a SCARCE resource in Norfolk and therefore it is appropriate for the entire carstone resource to be safeguarded as part of the MSA'</p> <p>* Page 78 - reference to peat. Whilst extraction is not supported in the NPPF, what about the removal of peat as part of the development related to minerals and waste? Peat has many important qualities and the Authority has a policy relating to peat. How will this be used in determining applications in the Broads? As well as that, you may wish to look at policies relating to peat in terms of its removal and how it is to be treated in relation to its properties.</p> <p>* Page 81 - are there any areas in Norfolk that could be investigated for unconventional hydrocarbons?</p>	<p>Page 49: typo has been corrected.</p> <p>WP17 and MP10 and MP11 – yes, GIS layers of the safeguarded sites and mineral resources and the consultation zones will be provided.</p> <p>Page 61: typo has been corrected.</p> <p>Page 67: Yes, silica sand only occurs in West Norfolk and therefore no mention has been made of the Broads.</p> <p>Page 77: typo has been corrected.</p> <p>Page 78: typo has been corrected.</p> <p>Page 78: Any peat extraction would only be incidental to the primary extraction because national policy states that planning authorities should not grant planning permission for peat extraction. Any planning application within the Broads Authority area would be determined in accordance with both the Minerals and Waste Local Plan Policies and also any relevant Development Plan policies in the Broads Local Plan and therefore the Broads Authority's policy relating to peat would be taken into account in the determination of relevant planning applications.</p> <p>Page 81: As stated in the consultation document, licence blocks in Norfolk have been offered for tender for Petroleum Exploration and Development Licences by BEIS but no licences have been applied for in Norfolk. Therefore, there are areas in Norfolk that could be investigated for unconventional</p>

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<p>General comment: headers and paragraph numbering would make the document easier to read - pages of text with no breaks was difficult to read.</p>	<p>hydrocarbons, but there has not been any interest in doing so currently.</p> <p>The Initial Consultation document used headers throughout the majority of the document. Paragraph numbering has been added for the Preferred Options consultation.</p>
<p><b>(Comment)</b> Representation ID: 93120</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms A Crotty) [18343]</b></p> <p>Overall the Norfolk Minerals and Waste Local Plan is a very thorough and accurate document. My only comments are that trees have been considered under the headings of landscape or ecology throughout the document, rather than under a separate arboriculture heading. Having said this, I am happy for the document to remain as it is.</p> <p>However as far as I can see, no reference has been made with regards to Arboricultural Impact Assessments (AIA) in the initial conclusions. I feel that where hedgerow trees or woodlands are adjacent to a proposed site that the offset from them needs to be determined at the very least by an annotated Tree Protection Plan or a full AIA to ensure root protection for the long term retention of the trees. For sites where an LVIA has been recommended (e.g MIN71) this would also need to include a full AIA.</p>	<p>Noted.</p> <p>Where specific comments have been made advising that an Arboricultural Impact Assessment would be required at the planning application stage, then this requirement has been included in the draft site policy for those sites concluded suitable to be allocated for mineral extraction. In addition, Norfolk County Council's Local List for the Validation of Planning Applications states that an Arboricultural Impact Assessment is required if the proposal has the potential to affect any trees or hedges with a trunk with a diameter of 75mm or more at 1.5m above ground level on or off site.</p>
<p><b>(Comment)</b> Representation ID: 93112</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms C Keightley) [18344]</b></p> <p>In our opinion the plan is fit for purpose. We have a few comments / recommendations regarding some of the proposed sites and areas of search.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93104</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b></p> <p>Landscape - The plan is very thorough and I broadly feel that Landscape has been considered in an accurate and suitable manner.</p>	<p>Noted</p>

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<p>Public Rights of Way - Where PRoW are adjacent or within the site, consideration should be given to insure that impacts are minimal. Where works will have a direct impact on the PRoW, discussions will need to take place with NCC to agree a suitable temporary diversion and subsequent reinstatement.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93080  Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b>  An additional site has very recently been drawn to the Company's attention, Mansom Plantation, please find attached a completed pro forma, location plan and preliminary geological report (additional detail is expected shortly). On the basis of geological investigations to date this site appears to contain approximately 1.5 million tonnes of coarse sand and gravel lying in close proximity to the County's main aggregate market, Norwich, and with direct access to the A140. Part of the site is also subject to an extant permission for leisure development. As such the Company propose its identification in the Development Plan as a Specific Site for mineral extraction.   The Company has as yet not been able to consider in detail the potential environmental constraints that relate to this site. It would be happy to discuss with the Minerals Planning Authority expanding the evidence base for this site if would assist the Authority in its deliberations.</p>	<p>Noted. The proposed site at Mansom Plantation has been assessed by Planning Officers and will be consulted on as part of the Preferred Options consultation on the Minerals and Waste Local Plan Review.</p>
<p><b>(Comment)</b> Representation ID: 93056  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  This consultation response is a response by Officers of the County Council in its capacity as the Waste Disposal Authority (WDA) for Norfolk. It has therefore focussed exclusively on policies relating specifically to waste management and there are no comments on those elements of the review relating to Minerals.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93003  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of</p>	<p>Noted</p>

Representations received relevant to the whole document	Norfolk County Council Planning Officer's response
<p>the local planning process. Our comments below should be read with our detailed comments in the attached table.</p> <p>Summary</p> <p>At this early stage in the plan process, we have identified in detail in the attached table the changes that we recommend. However, looked at as a whole we have identified two key issues to address for the next iteration of the plan, which we summarise below:</p> <p>a) Evidence-based allocations: the aim should be to avoid harm in the first instance before minimising or mitigating (Planning Practice Guidance, paragraph 019 reference ID 18a-019-20140306 revision date 06 03 2014). A proposed allocation needs to be based on evidence and should seek to avoid harm to heritage assets in the first instance, then set out how it could be mitigated against if the harm is unavoidable and the public benefits justify that harm under paragraphs 194, 195, or 196 of the National Planning Policy Framework. The following sites do not meet that threshold: MIN 79 and 80, SIL 02, MIN 40, MIN 32, MIN 19 and 205, MIN 48 and MIN 116. Of those, SIL 02 (a large preferred area immediately abutting a complex of highly graded heritage assets) along with AOS E, MIN 19 and MIN 205; MIN 48 (which incorporates a scheduled monument) and MIN 79 (with other development considerations) are most concerning. We would expect some level of heritage impact assessment to be done on the most sensitive sites in order for them to be allocated.</p> <p>When areas are included in allocations, preferred areas or areas of search which cannot be developed adds confusion and complexity to the planning system. Once the principle of development is established through inclusion within a site allocation, preferred area or area of search, it is more difficult to rebut the presumption in favour of development owing to the assumption that, in an evidence and plan-led system, these aspects are factored into the allocation. As such all sensitive sites should be assessed and the results of that assessment inform whether or not there is an allocation, preferred area or area of search; what size and location it can be and what policy requirements, including mitigation measures, need to be embedded to conserve or enhance the historic environment.</p> <p>b) Lack of specific local historic environment policy protection: policy MW2 is too generic to provide specific local criteria and/or requirements against which planning applications will be assessed. This could be addressed through an historic environment policy or through specific site</p>	<p>a) Noted. The Initial Consultation document includes all of the sites proposed by mineral operators, landowners and agents so that they can be consulted on. The inclusion of these sites within the documents did not necessarily mean that they were considered suitable for allocation and the consultation document included an 'initial conclusion' on each proposed site regarding its suitability for future mineral extraction. For example, sites MIN 32, MIN 116, MIN 48, MIN 19 &amp; MIN 205 were concluded to be unsuitable to allocate in the Initial Consultation document. (MIN 79 and MIN 80 have since been withdrawn from the M&amp;WLP process.) Specific issues raised about individual proposed sites are covered in the section of the Feedback Report on that particular site. We consider that the assessment of sites required by Historic England has taken place as part of the M&amp;WLPR process and informed the site conclusions and draft site policies.</p> <p>b) Policy MW2 (Development Management Criteria) has been amended to state that proposals for minerals or waste management development will be permitted where sufficient information is submitted to demonstrate that the development would not have an unacceptable impact on the historic environment, as identified through a Heritage and Archaeology Statement, including heritage and</p>

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<p>allocation policies that specify requirements such as impact assessments, avoidance and mitigation measures, archaeological investigation, progressive working, and aftercare requirements. Many of these already have been identified in the Sustainability Appraisal Annex B. This particularly affects sites MIN 35, MIN 38, and MIN 203, though we have identified where many more proposed allocations should incorporate this information.</p> <p>Conclusion As you develop the minerals and waste plan, we would welcome discussing further the points raised in our representations.</p> <p>In preparation of the forthcoming minerals and waste local plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.</p> <p>Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p>	<p>archaeological assets and their settings. It is considered that this policy contains sufficient detail.</p> <p>Specific issues raised about individual sites are covered in the section of the Feedback Report on that particular site. Where appropriate, the draft site policies for mineral allocations include requirements for a Heritage Statement and an Archaeological assessment to be submitted at the planning application stage. If a site is concluded to be unsuitable to allocate then there is not an associated site policy as the site would not be included in the final Local Plan. The plan includes a policy on progressive working, restoration and afteruse. Where appropriate, the draft site policies for mineral allocations also include requirements for particular restoration schemes to be submitted at the planning application stage.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

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<p><b>(Object)</b> Representation ID: 92939</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>Page 8, 4th para</p> <p>The M&amp;WLPR does not include policies covering the historic environment with the exception of MP13 on areas of search for silica sand extraction.</p>	<p>Where appropriate, the draft site policies for mineral allocations include requirements for a Heritage Statement and an Archaeological assessment to be submitted at the planning application stage.</p> <p>The Development Management Criteria policy states that proposals for minerals or waste management development will be permitted where sufficient information is submitted to demonstrate that the development would not have an unacceptable impact on the historic environment, as identified through a Heritage and Archaeology Statement, including heritage and archaeological assets and their settings.</p>
<p><b>(Comment)</b> Representation ID: 92920</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>Planning Advice Service</p> <p>We trust the advice we have given is useful and will contribute to the soundness of the emerging local plan. We will continue to provide further advice and comments at future statutory stages of the emerging local plan. Should you wish us to review any draft policies and text as well as technical documents and background studies, such as strategic flood risk assessments or water cycle studies which may be used to support your plan, we can offer this as part of our planning advice service.</p> <p>This service will ensure that your evidence documents fully support the local plan and ensure that environmental issues are addressed in an effective and timely way contributing to sustainable development. As part of the planning advice service we will provide you with a single point of contact who will co-ordinate access to our technical specialists, who will be able to provide bespoke advice and help you prepare any supporting documents. We will be pleased to provide you with an estimated cost for any work we would undertake as part of the service.</p>	<p>Noted</p> <p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92541</p>	



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<p>Agent: <b>Lichfields (Ms S Innes) [18008]</b> Respondent: <b>Bourne Leisure Ltd [18009]</b></p> <p>Bourne Leisure operates more than 50 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain and is therefore a significant contributor to the national tourist economy, as well as local visitor economies. The sites are managed by a number of subsidiary companies which include Haven, Butlins and Warner Leisure Hotels. Within Norfolk, Bourne Leisure operates four Haven holiday parks: Caister-on-Sea Holiday Park, Seashore Holiday Park, Wild Duck Holiday Village and Hopton Holiday Village. All four of these parks are located within the local planning authority area of Great Yarmouth.</p> <p>Many of the Company's hotels and holiday sites are located in rural and/or coastal areas and these environments are one of the key draws for these holidays. The Company's operations are also major contributors to local and regional economies, both directly and indirectly. It is therefore vitally important to Bourne Leisure that both the environments within which their sites are located are protected and enhanced, to help the Company to continue to attract customers, and that planning policies also support their regular investment to provide new and improved facilities. This investment is also required to respond to changing market conditions. For many of the Company's holiday locations, improvements may necessitate the expansion of sites in order to improve the quality of accommodation, decrease densities, or increase the range of facilities in order to respond to visitors' requirements and to extend the holiday season.</p>	<p>Noted</p> <p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92530</p> <p>Agent: <b>Wood E&amp;I Solutions Ltd (Ms H L Bevins) [18003]</b> Respondent: <b>National Grid [611]</b></p> <p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North</p>	<p>Noted</p> <p>Noted</p>

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<p>London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>General information:</p> <p>Electricity Transmission</p> <p>National Grid has five high voltage overhead lines (listed below) within Norfolk County Council's administrative area. These form an essential part of the electricity transmission network in England and Wales.</p> <p>Line Ref. Description</p> <p>4YM Route 400kV two circuit route from Norwich substation in South Norfolk to Bramford substation in Mid Suffolk.</p> <p>PHC Route 132kv one circuit route from Norwich substation in South Norfolk to Norwich Trowse in South Norfolk</p> <p>PGG Route 132kv one circuit route from Norwich substation in South Norfolk to Norwich Trowse in South Norfolk</p> <p>4VV Route 400kV two circuit route from Norwich substation in South Norfolk to Walpole substation in Kings Lynn and West Norfolk.</p> <p>4ZM Route 400kV two circuit route from Bicker Fen substation in Boston to Walpole substation in Kings Lynn and West Norfolk.</p> <p>National Grid has provided information in relation to electricity transmission assets via the following internet link:  <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></p> <p>The following substation is also located within the administrative area of Norfolk County Council:  Walpole substation - 132Kv  Necton substation - 400Kv</p> <p>Gas Transmission: National Grid has seven high pressure gas transmission pipelines within the</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

Representations received relevant to the whole document	Norfolk County Council Planning Officer's response
<p>administrative area of Norfolk County Council.</p> <p>Pipeline Feeder Detail:</p> <p>FM05 Yelverton to Stowmarket</p> <p>FM05 Bacton to Yelverton</p> <p>FM03 Bacton to Roudham Heath</p> <p>FM02 Brisley to Wisbech Nene East</p> <p>FM04 Kings Lynn Comp to Wisbech Nene East</p> <p>FM04 Gt Ryburgh to Kings Lynn Comp</p> <p>FM27 Bacton to Kings Lynn</p> <p>National Grid has provided information in relation to gas transmission assets via the following internet link:  <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></p> <p>National Grid requests that any High Pressure Major Accident Hazard Pipelines (MAHP) are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to retain our existing transmission pipelines in situ.</p> <p>National Grid may have a Deed of Easement for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area. If further information is required in relation to an easement please contact Spencer Jefferies, Development Liaison Officer.</p> <p>If you require any further information in relation to the above please contact National Grid's Plant Protection team via <a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a></p> <p>Electricity Distribution</p> <p>UK Power Networks owns and operates the local electricity distribution network in Norfolk County Council. Contact details can be found at <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a>.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

Representations received relevant to the whole document	Norfolk County Council Planning Officer's response
<p>Appendices - National Grid Assets Please find attached in: * Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid Transmission assets outlined above.</p> <p>Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:</p> <ul style="list-style-type: none"> <li>▪ National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;</li> <li>▪ Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and</li> <li>▪ A sense of place - design guidelines for development near high voltage overhead lines.</li> <li>▪ T/SP/SSW22 - Specification for safe working in the vicinity of National Grid high pressure gas pipelines and associated installations - requirements for third parties. <a href="http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968">http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968</a></li> <li>▪ IGE/SR/18 - Safe working practices to ensure the integrity of gas pipelines and associated installations.</li> <li>▪ HS(G)47 - Avoiding Danger from Underground Services.</li> </ul> <p>Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details to your consultation database.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92522 Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b></p> <p>In a number of places policies are worded as aspirations, rather than requirements, consideration should be given to moving such wording to the supporting text, or strengthening the wording in the policy itself.</p>	<p>Noted. South Norfolk Council made specific wording suggestions to a number of policies and their comments and our responses are included in the sections of the Feedback Report relevant to each particular policy. The policy wording has been amended where it was considered necessary.</p>

Representations received relevant to the whole document	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92492</p> <p>Respondent: <b>Anglian Water Services Ltd (Mr S Patience) [16454]</b></p> <p>Proposed Mineral Extraction Sites</p> <p>It is noted that a number of Anglian Water assets are located within the site boundary for a number of sites identified in Part 2 of the Plan. Therefore, we would ask that the policy wording for these sites exclude any existing assets from the proposed working area for mineral extraction to ensure that we can continue to operate and maintain these assets for our customers.</p>	<p>Noted. The policy wording for mineral sites concluded to be suitable to allocate, but that contain Anglian Water assets (usually pipelines) includes the following requirement: "A sufficient stand-off distance around the water main/foul sewer within the site or diversion of the water main at the developer's cost and to the satisfaction of Anglian Water".</p>
<p><b>(Comment)</b> Representation ID: 92369</p> <p>Respondent: <b>Peterborough City Council (Mr C Stanek) [16452]</b></p> <p>Thank you for consulting Peterborough City Council on your Minerals and Waste Local Plan Initial Consultation. We have no specific comments to make at this stage relating to the overall content of the draft Plan.</p> <p>We would however draw attention to the revised National Planning Policy Framework and the implications for Plan Making, such as requiring Plans to clearly state which policies are 'strategic' and which are 'local'. This may require a re-ordering of policies for the Preferred Options draft Plan, such that all strategic policies are grouped in one section, and all local policies grouped in a subsequent section.</p> <p>The council will continue to cooperate with Norfolk through our Duty to Cooperate, including in fora such as the East of England Aggregate Working Party and the East of England Waste Technical Advisory Board. Please keep the council informed of all future stages of Plan preparation.</p>	<p>Noted.</p> <p>Noted. The Preferred Options version of the plan will clearly state which policies are 'strategic'. All other policies will be considered to not be strategic policies. We do not consider that the policies will need to be reordered to be able to achieve this.</p> <p>Noted.</p>
<p><b>(Comment)</b> Representation ID: 92367</p> <p>Respondent: <b>Cheshire East Council (Ms S Gibbon) [17976]</b></p> <p>No comment</p>	<p>Noted</p>

## 2. The consultation process

No comments received

## 3. The process so far

Representations received about the process so far	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93031  Agent: <b>Heaton Planning Ltd (Mr S Warren)</b> [18336] Respondent: <b>Brett Group [7915]</b>  Section 3 sets out the methodology for site assessments - including landscape, ecology, highways etc.  For Historic Environment and Archaeology:  * Details of known assets  * Proposals for protection / mitigation  * Support from Norfolk County Council's Historic Environment Service and whether this is dependent on appropriate protection / mitigation.  For Sustainability Appraisal:  * Ensures that potential environmental effects are given full consideration alongside social and environmental issues.  * Sustainability appraisal an integral element of the preparation of the MWLP review ... informing in a comprehensive way of the likely impacts of proposed planning policies and specific sites / preferred areas and areas of search.  What is not clear from the methodology is the balance applied to the impacts alongside the economic and social benefits. The revised NPPF (2018) is clear at Chapter 2 that achieving sustainable development means that the planning system has three overarching objectives, economic, social and environmental, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). Para 32 of NPPF (2018) states:  "Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Paragraph 32 of the NPPF is noted.</p>

Representations received about the process so far	Norfolk County Council Planning Officer's response
<p>should demonstrate how the plan has addressed the relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, where possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."</p> <p>The methodology does not clearly provide a balance of the impacts - a number of sites clearly have numerous environmental sensitivities but do not constitute an objection on their own right. There should be some consideration of the cumulative impact of such effects.</p>	<p>No examples have been provided of the sites referred to in this comment. An assessment of each proposed mineral extraction site, potential impacts and mitigation measures has been carried out, both in the Initial Consultation document and the Sustainability Appraisal. The economic benefit of mineral extraction has also been taken into account. The draft conclusion for each site has been reached by taking all of these factors into account and therefore considers potential cumulative impacts.</p>
<p><b>(Comment)</b> Representation ID: 92940  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  Page 10 and 11</p> <p>We note that the assessment of proposed sites includes landscape and historic environment considerations. We note that each site has the site characteristics set out in the plan. However, we are concerned that despite the clear identification of heritage assets, many of the minerals sites are close to and in one case include a designated heritage asset. Some of these concerns could be addressed through improved policy wording, introduction into policy of specific mitigation measures which have been identified in the Sustainability Appraisal, or the use of heritage impact assessments to define site boundaries at this stage. We also recommend further cumulative assessment, particularly for MIN 19, MIN 205, AOS E and SIL 02. We note that on some of the mapping some designated heritage assets appear to be missing.</p>	<p>The Initial Consultation document includes all of the sites proposed by mineral operators, landowners and agents so that they can be consulted on. The inclusion of these sites within the documents did not necessarily mean that they were considered suitable for allocation and the consultation document included an 'initial conclusion' on each proposed site regarding its suitability for future mineral extraction. For example, sites MIN 32, MIN 116, MIN 48, MIN 19 &amp; MIN 205 were concluded to be unsuitable to allocate in the Initial Consultation document. Specific issues raised about individual proposed sites are covered in the section of the feedback report on that particular site.</p> <p>The designated heritage assets are all mapped, however, due to the scale of the map within the printed document they may have not been very clear. However, these heritage designations were also shown on an interactive map on the consultation website which could be viewed at a range of scales.</p>

#### 4. What happens next

No comments received

#### 5. Norfolk Spatial Portrait

Representations received about the Norfolk Spatial Portrait	Norfolk County Council Planning Officer's response
<p>(Support) Representation ID: 92941 Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b> page 17: We welcome the commitment that harm to the significance of heritage assets should be avoided in the design and location of new minerals or waste management development.</p>	Noted



## 6. The Strategy – Vision and Strategic Objectives

### Question 1: Minerals and Waste Local Plan Vision

Representations received about the Minerals and Waste Local Plan Vision	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 93171  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  Historic environment is in the draft waste management (WS07) and minerals strategic objectives (MS07 and MS08), which NCCES fully supports.</p>	Noted
<p><b>(Comment)</b> Representation ID: 93017  Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b>  We have the following comments and suggestions to make:  Minerals and Waste Local Plan Vision to 2036:  3rd para - All mineral workings will be covered by progressive restoration schemes  This is not in accordance with para 205 of the NPPF (2018) which recommends restoration should be at the earliest opportunity. It is not always possible to put in place a progressive restoration scheme, we recommend the wording is amended to be in accordance with NPPF.  7th para - Minerals development and waste management facilities will be located, designed and operated without adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.  This is unreasonable, it would be very difficult for a mineral operation not to have some form of adverse impact, it is the degree of impact which is important. Para 204(f) of the NPPF (2018) seeks to ensure that permitted operations do not have an unacceptable adverse impact. This is reiterated within para 205 (c) of the NPPF (2018). We recommend the wording is amended to be in accordance with NPPF.</p>	<p>The 3<sup>rd</sup> paragraph of the vision “all minerals workings will be recovered by progressive restoration schemes” is considered to be appropriate because a progressive restoration scheme is a way to ensure that restoration takes place at the earliest opportunity.</p> <p>The text has been amended to refer to unacceptable adverse impacts in accordance with the NPPF.</p>
<p><b>(Support)</b> Representation ID: 92942  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p>	Noted

Representations received about the Minerals and Waste Local Plan Vision	Norfolk County Council Planning Officer's response
<p>We welcome reference in the vision to minerals and waste development being located, designed and operated without adverse impacts on the natural built and historic environment.</p>	
<p><b>(Comment)</b> Representation ID: 92546  Agent: Lichfields (Ms S Innes) [18008] Respondent: <b>Bourne Leisure Ltd [18009]</b></p> <p>Bourne Leisure considers that in order to set out a comprehensive and robust vision for the future of minerals and waste in Norfolk, it is important to recognise the role of Norfolk's local economy and how sectors outside minerals and waste may be affected by the proposals in the Plan. Paragraph 80 of the National Planning Policy Framework (NPPF, July 2018) requires planning policies to "help create conditions in which businesses can invest, expand and adapt". It goes on to state that both local business needs and wider development opportunities should be taken into account in supporting economic growth and productivity.</p> <p>Bourne Leisure therefore considers that an amendment to the Plan's vision is necessary so that the potential impacts are recognised of the location, design and operation of minerals development and waste management facilities, in terms of the effects they could have on the local economy, including, for example, on tourism accommodation and related visitor facilities. The inclusion of this amendment within the vision of the emerging Plan would also ensure that it better aligns with its draft policies, such as Policy MW2, where there is greater consideration of the role of the local economy.</p> <p>Bourne Leisure suggests that the Plan's vision is amended to include additional text as follows (new text in CAPITALS):</p> <p>"Minerals development and waste management facilities will be located, designed and operated without adverse impacts on the amenity of local communities, the natural, built and historic environment, THE LOCAL ECONOMY OR the landscape and townscape of Norfolk."</p>	<p>Adverse impacts on businesses (such as tourist accommodation and visitor facilities) are not a material planning consideration given that the planning system is not in place to protect private interests of one another. The vision correctly refers to the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk, to ensure that a proposed development would not unacceptably impact on the amenities and existing use of land which ought to be protected in the public interest. Therefore the wording of the vision will not be amended to refer to the local economy.</p>
<p><b>(Comment)</b> Representation ID: 92496  Respondent: <b>Mineral Products Association (Mr M North) [17995]</b></p> <p>We agree with the principle of the vision but suggest change in wording to make clear to the lay reader that there is a statutory duty on Norfolk CC re the supply of aggregates. Suggested wording</p>	

Representations received about the Minerals and Waste Local Plan Vision	Norfolk County Council Planning Officer's response
<p>below;</p> <p>Proposed Changes (new text in CAPITALS):</p> <p>"Norfolk will continue to be self-sufficient in the production of sand &amp; gravel, whilst making an important contribution to the national production of silica sand. A steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Plan to meet the forecast need for sand and gravel, carstone, and silica sand AS REQUIRED BY NATIONAL POLICY."</p> <p>In respect of the safeguarding vision mention should be made of the agent of change now in the revised NPPF (para 182);</p> <p>Proposed Changes (new text in CAPITALS)</p> <p>"Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the storage, handling, processing and transportation of minerals will also be safeguarded from incompatible development. THE 'AGENT OF CHANGE' PRINCIPLE WILL BE APPLIED TO ANY NEW PROPOSED DEVELOPMENT IMPACTING ON SAFEGUARDED AREAS OR SITES."</p>	<p>The text has been amended as suggested.</p> <p>As the 'agent of change' principle is contained in the NPPF it is not considered necessary to repeat it in the vision. Policies MP10 and MP11 on safeguarding mineral sites and infrastructure contain the requirement that "development proposals within 250 metres of a safeguarded site/minerals related facilities should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction / facilities." It is considered that this adequately covers the 'agent of change' principle.</p>
<p><b>(Comment)</b> Representation ID: 92470</p> <p>Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b></p> <p>The Vision should refer the provision of minerals supply to be in accordance with and as required by National Policy</p> <p>Mineral Safeguarding should refer to paragraph 182 of the revised National Planning Policy Framework such that the applicant for adjacent development ('agent of change') should be required to provide suitable mitigation to take account of existing and allocated development.</p>	<p>The text has been amended to refer to national planning policy.</p> <p>As the 'agent of change' principle is contained in the NPPF it is not considered necessary to repeat it in the vision. Policies MP10 and MP11 on safeguarding mineral sites and infrastructure contain the requirement that "development proposals within 250 metres of a safeguarded site/minerals related facilities should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction / facilities." It is considered that this adequately covers the 'agent of change' principle.</p>

Representations received about the Minerals and Waste Local Plan Vision	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 92374</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>We strongly support the requirement in the Vision for progressive restoration schemes that enhance biodiversity. Equally, we support the positive contribution minerals planning makes to biodiversity improvements in the county promoted in MSO9 and the creation of opportunities for wider public engagement with nature in MSO10.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92354</p> <p>Respondent: <b>Aggregate Industries UK Ltd (Ms K Hannaford-Hill) [17973]</b></p> <p>Minerals and Waste Local Plan Vision implies sand and gravel sales shall remain within Norfolk, It is hoped Norfolk will support sand and gravel demand within the region in addition to being self-sufficient.</p>	<p>The vision states that Norfolk will continue to be self-sufficient in the production of sand and gravel. The relative weight and value of sand and gravel means that this mineral does not normally travel significant distances, and cross county boundary movements are likely to be as a result of the proximity of mineral workings to the market and therefore transport costs, regardless of their relationship to any administrative boundary or lack of potential supply in another area. Neighbouring MPAs plan to supply the demand in their own areas, by allocating sites, and therefore Norfolk does not need to make planned provision to supply additional aggregates. The most recently available data (from 2014) on aggregate movements showed that 80-90% of the land-won sand and gravel consumed in Norfolk was from mineral workings in Norfolk, whilst 10-20% of Norfolk's production was exported to Suffolk.</p>
<p><b>(Support)</b> Representation ID: 92060</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>Agree</p>	<p>Noted</p>

Representations received about the Minerals and Waste Local Plan Vision	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92012  Respondent: <b>CPRE Norfolk (Mr Michael Rayner) [17775]</b>  We are concerned by the commitment to be self-sufficient in sand and gravel in part as the demand for these materials could exceed a realistic county supply. Whilst this is a vision and not a firm commitment we still have a concern with the aim to "make an important contribution to the national production of silica sand".</p>	<p>The most recently available data (from 2014) on aggregate movements showed that 80-90% of the land-won sand and gravel consumed in Norfolk was from mineral workings in Norfolk. Policy MP1 contains the forecast need for sand and gravel provision within the county and takes into account previous rates of sand and gravel production in Norfolk. It is considered that the demand for these minerals will not exceed a realistic county supply within the plan period to 2036.</p> <p>The most recently available data for national silica sand production (2014) shows that Norfolk produced 20% of all silica sand production in Great Britain and 60% of the silica sand production used for glass manufacture sourced in Great Britain. The silica sand deposit being worked at Leziate is one of two in England where silica sand of sufficient purity and grade for the manufacture of colourless glass is extracted. A silica sand processing plant site and railhead are located at Leziate. The National Planning Policy Framework states that Mineral Planning Authorities should maintain a stock of permitted reserves of silica sand of at least 10 years to support existing plant and equipment. Therefore, Norfolk is expected to continue to make an important contribution to the national production of silica sand.</p>
<p><b>(Comment)</b> Representation ID: 91955  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b></p>	<p>The first paragraph has been amended to include the text 'as required by national planning policy'.</p>

<b>Representations received about the Minerals and Waste Local Plan Vision</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Reference to Norfolk's statutory obligation as set out within national policy for the supply of minerals in a sustainable manner should be included. In addition the 'adverse impacts' referred to in paragraph seven, would be better referred to as 'significant adverse impacts'. Paragraph eight is prescriptive when stating 'and will be designed and located', it is therefore suggested that the relevant words should be extended to 'and where possible will be designed and located'.</p>	<p>The text has been amended to refer to 'unacceptable adverse impacts' in accordance with paragraphs 204 (f) and 205 (b) of the NPPF.</p> <p>It is considered appropriate for the vision to be that "minerals development and waste management ...will be designed and located to reduce the risk from climatic effects, such as flooding" as this is in accordance with the NPPF (para 155).</p>

**Question 2: Waste Management Strategic Objectives**

Representations received about the Waste Management Strategic Objectives	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 93172                      Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>                      We agree with the proposed strategic objectives.</p>	Noted
<p><b>(Support)</b> Representation ID: 92943                      Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>                      We welcome draft waste management strategic objective WS07 to ensure that the locations of waste facilities are sustainably designed, constructed and operated to reduce potential adverse effects on the natural, built and historic environment.</p>	Noted
<p><b>(Support)</b> Representation ID: 92061                      Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>                      Agree</p>	Noted

**Question 3: Minerals Strategic Objectives**

Representations received about the Minerals Strategic Objectives	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 93173                      Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>                      We agree with the proposed strategic objectives for minerals.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93071                      Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b>                      MSO10: As currently drafted this objective appears to establish a mandatory requirement for any restoration scheme to increase public access and enhance biodiversity. There could be circumstances, however, where this requirement is not appropriate, such as limiting public access when seeking to establish an ecologically slanted restoration or where the land is best and most versatile agricultural land and returning that land back to agricultural production may be the primary driver behind its restoration. The following revision is therefore proposed:                      "WHERE APPROPRIATE, increase public access to the countryside and enhance biodiversity through enhancing the amenity value of land when restoring extraction sites."                      The above would also better reflect the phrasing of Policy MW2.</p>	<p>MSO10: It is recognised that it is not always appropriate to increase public access to sites following restoration. The wording of the objective has been amended to start with the words 'Where appropriate' as suggested.</p>
<p><b>(Comment)</b> Representation ID: 93018                      Agent: <b>Heaton Planning Ltd (Mr S Warren) [18336]</b> Respondent: <b>Brett Group [7915]</b>                      We have the following comments to make:                      MSO4 - requiring the justification for the potential sterilisation of minerals from competing development interests is supported.                      MSO6 - the adverse impacts should be amended to unacceptable adverse impacts to conform with NPPF.                      MSO7 - para 204(g) of the NPPF (2018) recognises that some noisy short term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction. MSO7 should be reworded to conform with NPPF.</p>	<p>MSO4. Support noted                      MSO6. The text has been amended to refer to unacceptable adverse impacts in accordance with the NPPF.                      MSO7. We consider that the objective is in conformity with the NPPF as even the unavoidable noisy short term</p>



Representations received about the Minerals Strategic Objectives	Norfolk County Council Planning Officer's response
<p>MSO8 - could you provide some clarification on 'providing for sustainable patterns of minerals transportation'. As is stated on page 29 of the consultation document the majority of minerals and waste sites in Norfolk are served by Heavy Goods Vehicles, with the majority of bulk materials likely to continue being transported by road as this is currently the most feasible mode of transport. We do not believe Objective MSO8 is deliverable.</p> <p>MSO9 - a mineral operator cannot always guarantee a positive contribution to natural, built and historic environment, particularly when the operator does not own the land with the landowner seeking different aspirations. The objective should be to seek to positively contribute.</p> <p>MSO10 - we do not consider this objective to be deliverable as an operator cannot be in a position to increase public access for every restoration scheme. The objective should be to seek to increase public access.</p>	<p>activities should be carried out in a way that minimises and mitigates amenity impacts.</p> <p>MSO8. We recognise that the majority of minerals sites are served by HGVs and that this is likely to continue to be the most practicable transport option. Therefore, we have amended the objective to state 'providing for sustainable patterns of minerals transportation where practicable'.</p> <p>MSO9: It is noted that following the restoration and aftercare period of a mineral extraction site, the landowner of the site could decide to change the subsequent afteruse of the site. Therefore, the objective will be amended to refer to 'the restoration scheme and aftercare' instead of 'afteruse'.</p> <p>MSO10. The wording of the objective has been amended to start with the words 'Where appropriate'.</p>
<p><b>(Support)</b> Representation ID: 92944</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>We welcome the draft minerals strategic objectives MSO6 and MSO9. We welcome the requirements to positively contribute, to mitigate against adverse cumulative impacts, and to provide high quality progressive and expedient restoration.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92497</p> <p>Respondent: <b>Mineral Products Association (Mr M North) [17995]</b></p> <p>The following adjustments are suggested to the following objectives;</p> <p>Proposed Changes (new text in CAPITALS)</p> <p>MSO2. To provide a steady and adequate supply of industrial minerals by identifying adequate mineral extraction sites/areas within Norfolk sufficient to meet the forecast need AND STOCKS OF PERMITTED RESERVES OF SILICA SAND OF AT LEAST 10 YEARS PRODUCTION</p>	<p>MSO2: As this detail is provided in the NPPF it is not considered necessary to repeat it in the objective on providing a steady and adequate supply of industrial mineral. Providing stocks of permitted reserves is also dependent on suitable planning applications being submitted.</p>

Representations received about the Minerals Strategic Objectives	Norfolk County Council Planning Officer's response
<p>FOR INDIVIDUAL SILICA SITES OR AT LEAST 15 YEARS WHERE SIGNIFICANT NEW CAPITAL IS CAPITAL IS REQUIRED and safeguarding existing infrastructure.</p> <p>MSO4. To safeguard silica sand, carstone, and sand and gravel resources for future use. Avoiding unnecessary sterilisation by encouraging the extraction of minerals prior to other development taking place where practicable and using minerals in construction on the land from which they are extracted. THE 'AGENT OF CHANGE' PRINCIPLE WILL BE APPLIED TO ANY NEW PROPOSED DEVELOPMENT IMPACTING ON SAFEGUARDED AREAS OR SITES.</p> <p>MSO5. To promote the sustainable transport of minerals by rail, road and water, including the safeguarding of railheads and wharfs for the import of minerals to and export of minerals from Norfolk. THE 'AGENT OF CHANGE' PRINCIPLE WILL BE APPLIED TO ANY NEW PROPOSED DEVELOPMENT IMPACTING ON SAFEGUARDED SITES.</p> <p>MSO10. WHERE PRACTICAL increase public access to the countryside and enhance biodiversity through enhancing the amenity value of land when restoring extraction sites.</p>	<p>MSO4 &amp; MSO5: As the 'agent of change' principle is contained in the NPPF it is not considered necessary to repeat it in the objectives on safeguarding. Policies MP10 and MP11 on safeguarding mineral sites and infrastructure contain the requirement that "development proposals within 250 metres of a safeguarded site/minerals related facilities should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction / facilities." It is considered that this adequately covers the 'agent of change' principle.</p> <p>MSO10: The wording of the objective has been amended to start with the words 'Where appropriate'.</p>
<p><b>(Comment)</b> Representation ID: 92471</p> <p>Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b></p> <p>The following amendments are proposed (in CAPITALS):</p> <p>MSO2. To provide a steady and adequate supply of industrial minerals by identifying adequate mineral extraction sites/areas within Norfolk sufficient to meet the forecast need AND STOCKS OF PERMITTED RESERVES OF SILICA SAND OF AT LEAST 10 YEARS PRODUCTION FOR INDIVIDUAL SILICA SITES AND AT LEAST 15 YEARS FOR SILICA SAND SITES WHERE SIGNIFICANT NEW CAPITAL IS REQUIRED and safeguarding existing infrastructure. (To accord with NPPF 2018 paragraph 208 footnote 68)</p> <p>MSO4. To safeguard silica sand, carstone, and sand and gravel resources for future use. Avoiding unnecessary sterilisation by encouraging the extraction of minerals prior to other development taking place where practicable and using minerals in construction on the land from which they are extracted. THE 'AGENT OF CHANGE' PRINCIPLE WILL BE APPLIED TO ANY NEW PROPOSED DEVELOPMENT IMPACTING ON SAFEGUARDED AREAS OR SITES.</p>	<p>MSO2: As this detail is provided in the NPPF it is not considered necessary to repeat it in the objective on providing a steady and adequate supply of industrial mineral. Providing stocks of permitted reserves is also dependent on suitable planning applications being submitted.</p> <p>MSO4 &amp; MSO5: As the 'agent of change' principle is contained in the NPPF it is not considered necessary to repeat it in the objectives on safeguarding. Policies MP10 and MP11 on safeguarding mineral sites and infrastructure contain the requirement that "development proposals within 250 metres of a safeguarded site/minerals related</p>

Representations received about the Minerals Strategic Objectives	Norfolk County Council Planning Officer's response
<p>MSO5. To promote the sustainable transport of minerals by rail, road and water, including the safeguarding of railheads and wharfs for the import of minerals to and export of minerals from Norfolk. THE 'AGENT OF CHANGE' PRINCIPLE WILL BE APPLIED TO ANY NEW PROPOSED DEVELOPMENT IMPACTING ON SAFEGUARDED SITES.</p> <p>MSO8. To ensure that mineral development addresses and minimises the impacts it will have on climate change by: REDUCING greenhouse gas emissions during the winning, working and handling of minerals, SEEK TO PROVIDE sustainable patterns of minerals transportation, and WHERE POSSIBLE integrating features consistent with climate change mitigation and adaption into the design of restoration and aftercare proposals.</p> <p>MSO9. To positively contribute to the natural, built and historic environments with high quality, progressive and expedient restoration to achieve a beneficial after use. The after use will protect and enhance the environment, including landscape and biodiversity improvements.</p> <p>Comment: the restoration of mineral sites can deliver landforms to facilitate different after uses of land, however mineral planning has no role in the after use of itself.</p> <p>MSO10. WHERE PRACTICAL to increase public access to the countryside and enhance biodiversity through enhancing the amenity value of land when restoring extraction sites.</p>	<p>facilities should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction / facilities.” It is considered that this adequately covers the ‘agent of change’ principle.</p> <p>MSO8: We recognise that the majority of minerals sites are served by HGVs and that this is likely to continue to be the most practicable transport option. Therefore, we have amended the objective to state ‘providing for sustainable patterns of minerals transportation where practicable’. We do not consider that any other changes are required to the objective.</p> <p>MSO9: It is noted that following the restoration and aftercare period of a mineral extraction site, the landowner of the site could decide to change the subsequent afteruse of the site. Therefore, the objective will be amended to refer to ‘the restoration scheme and aftercare’ instead of ‘afteruse’.</p> <p>MSO10: The wording of the objective has been amended to start with the words ‘Where appropriate’.</p>
<p><b>(Support)</b> Representation ID: 92375</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>We strongly support the requirement in the Vision for progressive restoration schemes that enhance biodiversity. Equally, we support the positive contribution minerals planning makes to biodiversity improvements in the county promoted in MSO9 and the creation of opportunities for wider public engagement with nature in MSO10.</p>	<p>Noted</p>

Representations received about the Minerals Strategic Objectives	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92013  Respondent: <b>CPRE Norfolk (Mr Michael Rayner) [17775]</b>  CPRE Norfolk agrees that development should be sustainable but is concerned that sustainability could be used as an argument to allocate otherwise unsuitable sites.</p>	<p>The National Planning Policy Framework states that plans and decisions should apply a presumption in favour of sustainable development.</p>
<p><b>(Comment)</b> Representation ID: 91956  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b>  MSO1. In order to deliver the 'steady and adequate supply of aggregate minerals' the text could be enhanced by including reference to the need to provide appropriate policies to achieve the objective.  MSO6. The proposed wording refers to 'while protecting people from harm'. This is assessed in practice by considering the impact upon the environment and human health therefore the wording should be changed to 'while developing policies to assess the impact upon the environment and human health'.  MSO9. It may be that the after use is the same as the original use, therefore it is suggested that the sentence is changed to read 'The after use will, where possible, protect and enhance the environment, including landscape and biodiversity improvements'.</p>	<p>MSO1. The text states that a steady and adequate supply of minerals will be provided by identifying adequate mineral extraction sites/ areas to meet the need. It is not considered necessary to explicitly state that sites will be identified in planning policies.  MSO6. It is not considered necessary to explicitly state that this objective will be implemented through the use of the policies within the Minerals and Waste Local Plan when determining planning applications as this is the case with all of the objectives.  MSO9. Even if the afteruse is the same as the original use (for example, agriculture) there is still an objective for the restoration to include landscape and biodiversity improvements, for example, increased hedgerow and tree planting.</p>

## General Policies

### Question 4. Policy MW1: Presumption in favour of Sustainable Development

Representations received about Policy MW1: Presumption in favour of sustainable development	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93019            Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b>            Policy MW1 - 1st bullet should be UNACCEPTABLY adverse, to conform with NPPF and reflect the advice within Section 8 of the Consultation Document, page 25, 4th paragraph.</p>	<p>There is no longer a requirement to include this policy in local plans as it duplicates the NPPF and therefore the policy will be deleted and replaced with appropriate supporting explanatory text.</p>
<p><b>(Comment)</b> Representation ID: 92945            Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>            Whilst we welcome the strategic policy on sustainable development, paragraph 193 of the National Planning Policy Framework is clear that great weight should be given to the conservation of a heritage asset with the weight increasing with importance. This is irrespective of the potential level of harm to its significance. Given that paragraphs 193-195 set a stronger requirement for justifying harm than bullet point 1 in Policy MW1, we are assuming that bullet point two referring to other policies in the Framework applies, but it is not clear. As there is a lack of any policy on the historic environment, this is concerning.</p>	<p>Noted. However, there is no longer a requirement to include this policy in Local Plans as it duplicates the NPPF and therefore the policy will be deleted and replaced with appropriate supporting explanatory text.</p>
<p><b>(Comment)</b> Representation ID: 92896            Respondent: <b>West Winch parish council (Mrs J Leamon) [18325]</b>            Development Wording - Presumption in Favour            Development presumption must not be 'in favour' when there are obvious reasons to object. The wording gives developers advantage over local issues.</p>	<p>The National Planning Policy Framework states that plans and decisions should apply a presumption in favour of sustainable development and details how that presumption should be applied.</p>
<p><b>(Support)</b> Representation ID: 92498            Respondent: <b>Mineral Products Association (Mr M North) [17995]</b>  <b>(Support)</b> Representation ID: 92472            Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b>            This policy is supported. We also welcome the recognition in the preamble that the 3 pillars of sustainability have equal standing.</p>	<p>Noted. However, there is no longer a requirement to include this policy in Local Plans as it duplicates the NPPF and therefore the policy will be deleted and replaced with appropriate supporting explanatory text.</p>

Representations received about Policy MW1: Presumption in favour of sustainable development	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92100 Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b></p> <p>This largely duplicates policy contained in the NPPF. As such it is not necessary and conflicts with plan-making guidelines about duplication. It is suggested that it is deleted, and perhaps reworded into appropriate supporting explanatory text.</p>	<p>Noted. Whilst there was previously a requirement to include a policy on the Presumption in Favour of Sustainable Development in Local Plans, this is no longer required and therefore the policy will be deleted and replaced with appropriate supporting explanatory text.</p>
<p><b>(Support)</b> Representation ID: 92062 Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>The text could be amended in the first paragraph, second sentence to read as follows: "It will always work proactively with applicants, statutory consultees and other relevant parties..."</p>	<p>Noted. However, there is no longer a requirement to include this policy in Local Plans as it duplicates the NPPF and therefore the policy will be deleted and replaced with appropriate supporting explanatory text.</p>
<p><b>(Object)</b> Representation ID: 91901 Respondent: <b>Mr Ian James [17668]</b></p> <p>Policy MW1 states that planning permission would aim to be granted unless the adverse impacts of granting permission significantly outweigh the benefits. This principle is acceptable for small scale building projects, where effects are very localised, in keeping with the local environment and typically part of the natural growth of urban areas. It is also acceptable for major projects like road building where compensation arrangements are a major part of land acquisition.</p> <p>However, in the case of mineral exploitation and waste management:</p> <ul style="list-style-type: none"> <li>- The area of land being developed is usually very small.</li> <li>- The benefits are perceived as being important to large numbers of people across the County.</li> <li>- The impact is often limited just to local residents, yet this impact is extreme in terms of visual, noise and devaluing of property.</li> </ul> <p>On this basis, the proposed policy would view that the impact on local residents and business in rural sparsely populated areas with never be sufficient enough to outweigh the benefits of a mineral and waste site development proposal.</p> <p>Policy MW5 provides a number of bird species with a 1500m buffer zone as protection. It seems only reasonable that residents of an area which is sparsely populated, and who have chosen to live there for peace and tranquillity should not risk having a mineral/waste site appear on their doorstep and should be protected with a specific buffer zone, perhaps say 1000m. The proposed</p>	<p>The statement referred to in Policy MW1 - that, where there are no policies relevant to the application or relevant policies are out-of-date, then the Council will grant planning permission unless material conditions indicate otherwise, taking into account whether: "Any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as whole" was a requirement taken from the National Planning Policy Framework. It is recognised that the public benefits of development may occur over a wider area than the potential amenity impacts. However, a planning application would need to demonstrate that there would not be an unacceptable adverse impact on the landscape or on local amenity (including noise and dust). Property values are not a material planning consideration.</p>

<b>Representations received about Policy MW1: Presumption in favour of sustainable development</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>development in Quidenham is an example of a site that would blight the peace and tranquillity of local residents, with some houses adjacent to the site and the village of Eccles with 500m.</p> <p>Policy MW1 should be amended such that planning permission for development of new sites would only be approved where there is negligible impact on local residents.</p> <p>Consideration should be given to establishing a formal buffer zone to residential properties in rural areas in order to protect their amenity.</p>	<p>However, there is no longer a requirement to include this policy in Local Plans as it duplicates the NPPF and therefore Policy MW1 will be deleted and replaced with appropriate supporting explanatory text.</p> <p>The buffer zone in Policy MW5 is regarding built development (not mineral extraction), due to the predation of the protected bird species by cats being associated with buildings. This means that the protected bird species will not nest within a certain distance of built development, which reduces their breeding success. It is considered that a fixed buffer zone between housing and minerals or waste management development is not appropriate and that the other policies in the plan deal appropriately with potential amenity impacts.</p>

**Question 5. Policy MW2: Development Management Criteria**

Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93174</p> <p>Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b></p> <p>We agree with the proposed policy, but with the following comments:</p> <p>It is good that MW2 includes the historic environment. However, some rewording is probably needed to bring policy in line with paragraph 199 of NPPF (2018). For example the opening sentence of MW2 could read "will be permitted where it can be demonstrated that, <u>with appropriate mitigation in place</u>, development would not have an unacceptable impact...". The final sentence of MW2 could read "...creation of recreation opportunities and <u>the enhancement and increased understanding</u> of the natural, historic and built environment and surrounding landscapes."</p> <p>It is good that there is a specific section on heritage assets (p28-29). Suggested rewording of final paragraph of Historic Environment section on p.29. "Information about archaeological sites and <del>material finds</del> <u>previously identified and recorded</u> in Norfolk is held in the Norfolk Historic Environment Record. However, not all archaeological remains are <u>currently</u> known about and <del>recorded</del> <u>proposed development sites have potential to contain previously unidentified heritage assets of, as yet, undetermined significance</u>. To safeguard <del>presently unknown remains</del> <u>both known and previously unrecorded heritage assets</u>, an archaeological <u>desk-based assessment, and in many cases a field evaluation</u>, should be carried out by the developer <del>if an area is likely to be of high archaeological potential (as implied by the Historic Environment Record)</del>. <u>These assessments must should be carried out before prior to the submission of a planning application is submitted as this the information that they provide will help determine the suitability of the proposal, appropriate mitigation measures and methods of working, and suitable conditions if planning permission is granted</u>".</p>	<p>The opening sentence refers to 'development' and it is considered that as a planning application for minerals or waste management development would include the proposed mitigation measures (such as building design, screen planting or restoration proposals). Therefore the proposed mitigation measures are encompassed by the term 'development' and the text does not need to be changed.</p> <p>There is no requirement in the NPPF or PPG for a development to increase the understanding of the historic environment unless the relevant heritage asset will be lost. Therefore, the text does not need to be changed.</p> <p>The final paragraph of the Historic Environment section has been reworded as requested (para 8.30 in the Preferred Options). A Heritage and Archaeology Statement is required, by the Local List for Validation, for any application that includes or is adjacent to an area with known or high potential for archaeological interest. For such applications the statement should include both a desk-based assessment and field evaluation.</p>
<p><b>(Comment)</b> Representation ID: 93168</p> <p>Respondent: <b>Broads Authority (Natalie Beal) [16282]</b></p> <p>Page 26, MW2 could mention dark skies. You could refer to the CPRE Night Blight data as well as our dark skies policy and zones.</p>	<p>p. 26 Dark skies only represent one potential impact from light pollution, it is considered that the more inclusive term allows light pollution in general to be addressed</p>



Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p>Page 27: Dark skies are important in the Broads and elsewhere. Perhaps more could be said about lighting: directing lighting downwards and away from properties and only lighting if needed and temporary versus permanent illumination.</p> <p>Page 27: 'A baseline ecological survey will be necessary where biodiversity features are present on a proposed site. Such surveys are essential in identifying what exists on a proposed mineral or waste management site and establishing whether such features should be retained and managed'. This is a bit confusing and seems to say that a survey would be needed to see if there are biodiversity features on a proposed site to then need a survey? We recommend that all sites would require baseline ecological survey and assessment of the presence of rare and protected species.</p> <p>Page 28: 'Local recreation assets, including Public Open Space and other outdoor facilities such as country parks, are protected in District, Borough and City Local Plans'. Also protected in the Local Plan for the Broads.</p> <p>Page 29: 'whilst others designated at a local level are subject to protection through District, Borough and City Local Plans'. Also mention the Local Plan for the Broads.</p>	<p>p. 27 The Local List for Validation requires all applications where external lighting is proposed to submit both lighting details, and in the case of major development a lighting assessment; this would address all aspects of potential light pollution, not just Dark skies.</p> <p>p. 27 The Local List for Validation requires all sites to provide a Biodiversity Survey and Report where they contain features which provide or could provide a habitat for wildlife, as well as those where a protected species is known to occur on site, or where the site has a natural environment designation within, or adjacent to it. The supporting text has been revised to highlight these existing requirements.</p> <p>p. 28 This sentence has been amended to include the Local Plan for the Broads.</p> <p>p. 29 This sentence has been amended to include the Local Plan for the Broads.</p>
<p><b>(Support)</b> Representation ID: 93020</p> <p>Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b></p> <p>Policy MW2 is supported - the policy is in line with NPPF, in particular the final requirement on restoration recognising that environmental enhancements sought where appropriate. However, this is contrary to the earlier Vision and Objectives. The Vision and Objectives should be amended to seek conformity throughout the plan and with NPPF.</p>	<p>The Vision and objectives are consistent with the NPPF, paragraph 170 states 'Planning policies and decisions should contribute to and enhance the natural and local environment...' In MW2, the term 'where appropriate' recognises that certain enhancements will only be suitable on certain sites, enhancements will always be sought, only the type of enhancement will be subject to a test of 'appropriateness'.</p>

Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92947 Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>'Heritage assets' section, page 28 It would be clearer and more consistent if the section was entitled 'historic environment' rather than 'heritage assets'. We would note that under the existing policy hierarchy the National Planning Policy Framework covers designated and non-designated heritage assets although the statutory protection is focused on designated heritage assets.</p> <p>page 31 'cumulative impacts' The first paragraph should be reworded to read that the" ... natural, built and historic environment. .. " are considerations for cumulative impacts for consistency and accuracy.</p>	<p>The section titled 'heritage assets' has been retitled to 'historic environment' as requested.</p> <p>The Heritage and Archaeology Statement required by the Local list for validation includes the term 'Heritage Asset', this encompasses both designated and non-designated heritage assets, and is consistent with the definition of 'Heritage Assets' included within the glossary of the NPPF.</p> <p>Cumulative impacts - the paragraph has been reworded to include reference to the historic environment as requested.</p>
<p><b>(Object)</b> Representation ID: 92946 Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>This policy remains unsound as it does not meet the requirements of paragraph 204(f) of the Framework. In fact, Policy MW2 appears to be a similar list of areas to cover in paragraph 204 (or former paragraph 143) but provides limited historic environment criteria against which planning applications will be assessed so as to ensure that there are no unacceptable adverse impacts. We note the inclusion of cumulative impacts within the definition and the requirement to enhance, where possible, the historic environment. This can be contrasted with MP13 which provides specific policy provisions for the historic environment in respect of areas of search but we would note that MP13 also relies upon the provisions in MW2.</p> <p>As this policy underpins all the other policies in the plan we are concerned that, as drafted, this policy undermines the plan. An alternative approach would be to increase the historic environment specific criteria in every relevant policy, however, this would be a repetitive process given the plan should be read as a whole.</p>	<p>The supporting text has been revised to highlight the requirements and criteria of the Heritage and Archaeology Statement required by the Local List for Validation of applications.</p> <p>In addition, all mineral extraction sites that are proposed to be allocated have an associated draft site policy in the Preferred Options document. The draft site policy includes requirements that will need to be met at the planning application stage in relation to protection of the historic environment.</p>
<p><b>(Comment)</b> Representation ID: 92897 Respondent: <b>West Winch parish council (Mrs J Leamon) [18325]</b></p>	<p>Human health: The policy states that planning applications will need to demonstrate that there will not be an unacceptable impact on local amenity</p>

<b>Representations received about Policy MW2: Development Management Criteria</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Human Health Risks: Human health risks must be a major consideration in waste development as the eventual cost to the NHS and UK is huge. Health effects can be disastrous. Robust Health Policies must be in place.</p> <p>Water Resources: Norfolk is the driest County in the UK for water resources. Cumulative usage totals must be taken into account in any planning.</p> <p>Recreation: Would you need to include the fact (just for information) that there is a Public Consultation process on anything which would affect Public Rights of Way (PROWs).</p>	<p>and health (i.e. noise levels, odour, air quality, dust, litter, light pollution and vibration).</p> <p>The planning system ensures that new development is appropriate for its location – taking account of the effects of pollution on health and the potential sensitivity of the area to adverse effects from pollution. In doing so the focus of the planning system should be on whether the development itself is an acceptable use of the land, and the impacts of those uses, rather than any control process, health and safety issues or emissions themselves where there are subject to approval under relevant pollution control regimes. National Planning Policy states that waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.</p> <p>Water resources: The policy states that planning applications will need to demonstrate that there will not be an unacceptable impact (including cumulative impact in combination with other existing and permitted development) on the quantity of water for resource purposes within water bodies.</p> <p>Recreation: the temporary stopping up and diversion of the PROW network for mineral extraction would form part of the development proposal which would be subject to public consultation; the supporting text has been revised to clarify this.</p>

Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p>Land and Soil Resources: Stronger wording and protection must be given to Grade 1, 2 and 3a land classification. Norfolk is an agricultural and rural County. It will be crucial for growing our own food in the future - more so, if we leave the European Union. Also, the UK may need to be more self-sufficient with food growing.</p>	<p>Land and soil resources: There is a specific policy MW12 regarding agricultural soils which does give sufficient protection to grade 1, 2 and 3a agricultural land.</p>
<p><b>(Comment)</b> Representation ID: 92549  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p><b>Water Quality</b>  This section addresses water as a resource, but does not expand upon pollution in relation to environmentally sensitive locations. We suggest the following wording could be used (new text in CAPITALS):  As well as flood risk, the effect of minerals and waste management development on all water bodies should be addressed IN ACCORDANCE WITH THE WFD. This includes the quality and quantity of surface water and groundwater. A further consideration could be the protection of sources of drinking water, identified via designated Source Protection Zones. Development proposals must therefore prevent the pollution of surface water and groundwater by FUELS, chemicals and other contaminants (E.G. SEDIMENTS), AND INCLUDE POLLUTION PREVENTION PLANNING FOR INCIDENTS SUCH AS FIRES (AND THE RISKS POSED BY CONTAMINATED FIRE FIGHTING WATER), COLLISIONS AND VANDALISM. Minerals development must also ensure there will be no significant change to groundwater or surface water levels, including careful monitoring of any 'dewatering' operations (whereby water is pumped out of a pit to allow dry working below the water table) to ensure no adverse impacts on surrounding water availability AND/OR THE WATER ENVIRONMENT.</p> <p>Point b) should be expanded to recognise the sensitive areas in Norfolk such as the Broads and SSSIs. Suggested wording would be: The quality of surface waterbodies and groundwater, with particular regard to preventing the deterioration of their existing status, and the quantity of water for resource purposes within water bodies AND IN ENVIRONMENTALLY SENSITIVE AREAS THAT MAY BE AFFECTED BY WATER QUANTITY AND QUALITY;</p>	<p>Water Quality (supporting text): The text has been amended as requested.</p> <p>Water quality (point b of policy): The policy wording has been amended as requested.</p> <p>Environmental Permit for dewatering: Additional text has been added to the supporting text to state</p>

Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p>Environmental Permit for Dewatering</p> <p>Dewatering for quarrying or mineral extraction purposes now falls under water abstraction licencing legislation. Any developer of a quarry or mineral extraction should contact the Environment Agency to discuss obtaining such a licence. The Environment Agency would normally expect dewatering water to be returned to the local aquifer within a short time period</p>	<p>that dewatering for mineral extraction purposes required a water abstraction licence from the Environment Agency.</p>
<p><b>(Comment)</b> Representation ID: 92548</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p><b>Flooding</b></p> <p>We are pleased to see that flood risk is a consideration in the policy, however it is limited to pluvial and fluvial. Tidal, groundwater and reservoir flooding should be considered. Therefore we recommend removing the words 'Pluvial and fluvial' so that all sources of flood risk are considered. Minerals and Waste sites have strong potential to offer betterment through reducing the runoff rates, thereby reducing the flow to adjoining watercourses. Each application should explore the potential for betterment in the site specific Flood Risk Assessment (FRA), particularly when it comes to restoration. Ideally the requirement for Minerals and Waste sites to provide flood risk betterment where possible should be identified in Policy MW2 and may be most appropriate in the last paragraph.</p> <p>The first paragraph on page 30 discusses the need to ensure flood risk is not increased. The NPPF states that all plans should use opportunities offered by new development to reduce the causes and impacts of flooding. The PPG, paragraph 050, states that authorities and developers should seek opportunities to reduce the overall level of flood risk in the area and beyond. There is great opportunity for minerals and waste development to provide flood risk betterment both locally and downstream, particularly during the restoration phase. It would be beneficial to see something in the plan that encourages opportunities for betterment.</p> <p>In order to comply with the Planning Practice Guidance, we would require any planning application to consider the following issues if a site is at risk of flooding; this includes a number of the sites that have been allocated within this Plan:</p> <ul style="list-style-type: none"> <li>• An FRA would be needed to demonstrate the risk of flooding to those working onsite and to ensure that flood risk is not increased.</li> <li>• Climate change should be considered to determine the risk to the site in the future. In areas that</li> </ul>	<p>Noted.</p> <p>The text has been revised so that all sources of flooding are considered; and the potential for the reduction of flood risk in the surrounding area and downstream, through betterment on restoration has been included in the policy and supporting text.</p>

Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p>benefit from defences, residual risk will need to be considered and what may happen in an overtopping or breach scenario. We would expect bunds and materials to be stored outside of the floodplain, otherwise we would expect flow paths to be considered to ensure there is no increase in flood risk and bunds to have gaps in for flood water.</p> <ul style="list-style-type: none"> <li>• We would recommend that a flood plan is prepared for the development, which should include an appropriate method of flood warning and evacuation, to ensure the safe use of the development in extreme circumstances.</li> <li>• Some of the allocated sites are extensions to existing sites. In this instance, appropriate measures should already be in place to manage flood risk. The application should however consider the impacts of extending the works and any site specific issues.</li> </ul> <p>Environmental Permit for Flood Risk Activities An environmental permit for flood risk activities may be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert.</p> <p>Application forms and further information can be found at: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a>. Anyone carrying out these activities without a permit where one is required, is breaking the law.</p> <p>The Local Plan should consider this when allocating development sites adjacent to a 'main river'. A permit may be required and restrictions imposed upon the work as a result in order to ensure the development does not have a detrimental impact upon the environment and flood risk.</p>	
<p><b>(Comment)</b> Representation ID: 92547 Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>The Water Framework Directive (WFD) is an important piece of legislation when reviewing planning applications. Applicants will need to demonstrate their activities will not lead to deterioration, taking account of WFD objectives and River Basin Management Plans.</p> <p>Biodiversity and geological conservation Much of this section is focused on the terrestrial environment. We would like to see the potential impacts of waste extraction on aquatic ecology addressed in the document. Aquatic ecology</p>	<p>Water Framework Directive: The importance of the Water Framework Directive is acknowledged. A WFD compliance assessment has been carried out for all sites contained within the Initial consultation document. The need for mineral and waste development to address water quality and quantity issues in accordance with the WFD is contained within the supporting text and the policy wording refers to the quality and quantity of water</p>

Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p>assessments should be carried out to determine the potential impacts on fish, invertebrates and aquatic habitat. The need for WFD assessments should be reiterated here.</p> <p>Developments are likely to encounter a number of protected species issues in Norfolk which they will need to address. Species records can be obtained from the Norfolk Biodiversity Information System (NBIS). This data can be used to inform desk based studies and future surveys.</p> <p>Land and Soil Resources We welcome this section but recommend that the last sentence is expanded to address soil erosion. Our proposed wording would be: The overall integrity of land and soil should be protected, with measures taken to prevent/control soil erosion where applicable, during working and long-term use of the site once it is fully restored</p>	<p>resources and the need to maintain status of waterbodies.</p> <p>Biodiversity and geological conservation: The Biodiversity Survey and Report required by the Local List for Validation would need to be carried out where development affects a feature which provides or could provide a habitat for wildlife; this would include waterbodies. A WFD compliance assessment would form part of this report for designated waterbodies.</p> <p>Land and soil resources: the word erosion has been added to the supporting text, so that the potential for this is addressed.</p>
<p><b>(Comment)</b> Representation ID: 92545</p> <p>Agent: Lichfields (Ms S Innes) [18008] Respondent: <b>Bourne Leisure Ltd [18009]</b></p> <p>Bourne Leisure owns and operates four holiday parks in Norfolk and as set out above, it is important for the Company to ensure these Parks have the ability to continue to attract customers and therefore bring wider economic and social benefits to Norfolk. Bourne Leisure therefore endorses draft Policy MW2 as it requires development proposals to demonstrate that there are no unacceptable impacts against a number of criteria including local amenity, the visual/landscape environment and the character and quality of the area. These are all key considerations that would affect holiday parks and their ability to continue to operate effectively.</p> <p>This approach is consistent with national policy, namely part (f) of paragraph 204 of the NPPF which requires planning policies to set out criteria to ensure permitted and proposed developments do not have unacceptable adverse impacts on the natural and historic environment or human health.</p> <p>Bourne Leisure does not suggest any amendments to this draft policy.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92541</p>	<p>Noted.</p>

Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p>Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b></p> <p>Several policies concerning particular development types refer back to 'General' Policy MW2; whilst the reason for this is understood, there are a number of other general policies (e.g. MW3 and MW4) that might be equally applicable across a range of development types, but may get overlooked when development specific policies just refer back to MW2. As the policies in the plan should be read as a whole, is it necessary to have the references back to the general Development Management policies?</p>	<p>While the Plan needs to be read as a whole, where there are policies for specific mineral or waste management developments regarding potentially suitable land, it is emphasised that the Development Management Criteria in MW2 would also apply. Where policies do not refer to specific mineral or waste management developments regarding potentially suitable land, it is not considered that this emphasis is required.</p>
<p><b>(Comment)</b> Representation ID: 92108</p> <p>Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b></p> <p>General point - it is not necessary or desirable for policies to cross-reference to general policy MW2. There is a danger that if you just refer to MW2 this implies that other policies are not relevant, and other policies (e.g. MW 3 and MW4) that might be equally applicable across a range of specific development types may be overlooked.</p>	<p>Noted.</p> <p>While the Plan needs to be read as a whole, where there are policies for specific mineral or waste management developments regarding potentially suitable land, it is emphasised that the Development Management Criteria in MW2 would also apply. Where policies do not refer to specific mineral or waste management developments regarding potentially suitable land it is not considered that this emphasis is required.</p>
<p><b>(Comment)</b> Representation ID: 92499</p> <p>Respondent: <b>Mineral Products Association (Mr M North) [17995]</b></p> <p>MW2 (b) needs redrafting as it is unclear. The last paragraph needs adjusting as follows; Proposed Changes (new text in CAPITALS) "Where appropriate AND PRACTICAL, enhancement of the environment would be sought, including, but not exclusively, the enhancement of the Public Rights of Way Network, creation of recreation opportunities and enhancement of the natural, historic and built environment and surrounding landscapes."</p>	<p>We consider that the term 'appropriate', which means suitable for the purpose or situation, encompasses whether or not it is practical or effective to do so. Therefore we consider that no change is required to the policy.</p>



Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92473</p> <p>Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b></p> <p>The last paragraph of this policy is proposed to be amended as follows: Where appropriate AND PRACTICAL, enhancement of the environment would be sought, including, but not exclusively, the enhancement of the Public Rights of Way Network, creation of recreation opportunities and enhancement of the natural, historic and built environment and surrounding landscapes.</p>	<p>We consider that the term 'appropriate', which means suitable for the purpose or situation, encompasses whether or not it is practical or effective to do so. Therefore we consider that no change is required to the policy.</p>
<p><b>(Comment)</b> Representation ID: 92428</p> <p>Respondent: <b>Woodland Trust (Ms V Bankes Price) [16231]</b></p> <p>The Woodland Trust is the largest woodland conservation charity in the UK and a leading voice in bringing to the attention of government, land owners and the general public the state of the UK's trees and woodland. We champion and deliver the most dynamic solutions to protect and revitalise our natural environment - the recreation of wooded landscapes on a national scale. We campaign to ensure that laws governing environmental protection are enforced and that the government is held to account on environmental pledges. We also campaign vigorously with the support of local communities, to prevent any further destruction of ancient woods. And, to further protect the UK's natural environment, we've built up an estate of our own managed woodland covering over 73 square miles across the UK, of which a third is irreplaceable ancient woodland. With a supporter base of half a million we were the first, and remain the most significant contributor to woodland protection, restoration and creation in the UK. We are experts in a natural resource that has the potential to transform the UK's natural environment and ensure its continued survival.</p> <p>Ancient woodland, veteran and ancient trees</p> <p>Ancient woodland, veteran and ancient trees are irreplaceable natural resources. Ancient Woodland is land that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. Ancient and veteran trees are especially important for wildlife. Along with their historical or</p>	<p>Noted</p> <p>Noted</p>

Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p>cultural significance, our ancient trees are loved by communities because of their special appearance, the rare fungi, plants and animals they support and the stories associated with them. Ancient and veteran trees can be classified due to the presence of ancient and veteran features. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable habitats from any form of disruptive development. Approximately one quarter of priority UK BAP species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value.</p> <p>Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas.</p> <p>National Policy The recently revised NPPF states: 175. When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and</p> <p>Footnote 58 elaborates: For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.</p> <p>We welcome the recognition of the importance of ancient woodland, aged and veteran trees for both biodiversity and landscape as set out in pages 27 and 28. However we would like to flag the revised wording set out in the NPPF, the term 'aged' has been replaced with 'ancient' as this is seen to better align with the practical interpretation of the NPPF.</p>	<p>Noted</p> <p>Noted</p> <p>Noted. The term 'aged' has been replaced with 'ancient' in the text as requested.</p>
<p><b>(Support)</b> Representation ID: 92376 Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b> MW2: We strongly support this policy, which provides important protection for locally designated sites, as well as supporting net gains for biodiversity through planning in section k, which</p>	<p>Support noted.</p>

Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p>encourages wherever possible that enhancement of the environment will be sought, as per paragraph 170 of the NPPF.</p>	
<p><b>(Support)</b> Representation ID: 92337  Respondent: <b>Borough Council of King's Lynn and West Norfolk (Ms F Pollard) [17968]</b>  I note that the consultation document contains Development Management Criteria that are relevant when considering air quality impacts:  Policy WM2 in particular states that 'Proposals for minerals development and/or waste management development will be permitted where it can be demonstrated that the development would not have an unacceptable impact (including cumulative impact in combination with other existing or permitted development) on:  a. Local amenity and health (including noise levels, odour, air quality, dust, litter, light pollution and vibration.'  We would support the wording of this policy especially as it considers cumulative impacts with other development. The discussion section (headed Pollution and Local Amenity Impacts) states that detailed controls are exercised through specific pollution prevention and control regimes. However, it should be noted that some mineral activities fall outside of the environmental permitting regime and therefore mitigation under planning system may become necessary as stated in the closing paragraph of this section.</p>	<p>Support noted.</p> <p>It is recognised that the Environmental Permitting regime does not cover some mineral activities, paragraph 8.13 quotes the NPPF, in that for activities which are covered by different regulatory regimes, planning decisions should not duplicate these controls. Where proposals are not covered by other regulatory regimes, planning conditions would provide control, to ensure no unacceptable impacts.</p>
<p><b>(Support)</b> Representation ID: 92066  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Natural England welcomes this policy which seeks to protect and enhance the natural environment and resources, and safeguard protected landscapes and public rights of way.</p>	<p>Support noted.</p>
<p><b>(Comment)</b> Representation ID: 91957  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b>  Within section (a.) the reference to health should be to specific items rather than be generic. In other words the health items should be noise and vibration, air quality, dust, odour and light pollution.</p>	<p>It is considered that potential health impacts should be considered in the round (the NPPF refers to 'human health' in relation to mineral operations and the NPPW refers to 'human health' in relation to waste management).</p>

Representations received about Policy MW2: Development Management Criteria	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 91938</p> <p>Respondent: <b>Lead Local Flood Authority (Norfolk County Council) (Ms Elaine Simpson) [17508]</b></p> <p>Policy MW2: We suggest that the wording of point d) is changed to include groundwater flooding. Mineral working can change local drainage networks, including groundwater flow (through creation of a void or dewatering) and so there should be no adverse impact on this source of flooding also. We note that the intention is that flood risk is not increased elsewhere by development through the provision of appropriate surface water management such as sustainable drainage (SuDS). We support this approach but highlight to all potential development that working of minerals may remove infiltration media (as part of the operation). Hence any drainage scheme may rely on connection to a watercourse which is not always apparent near to the scheme. We would also request that during the works and following reinstatement a drainage strategy is put forward that considers the changes to local drainage network e.g. interception of watercourses or drainage connections. Any current drainage arrangements should be maintained or diverted appropriately. Reinstatement of land can replace permeable material with less permeable, this along with the post development ground levels must not increase the risk of flooding elsewhere.</p>	<p>The text for Point (d) has been revised to include all sources of flooding. The supporting text has been revised to include reference to groundwater.</p>
<p><b>(Object)</b> Representation ID: 91900</p> <p>Respondent: <b>Mr Ian James [17668]</b></p> <p>Policy MW2 requires proposed developments to demonstrate that they do not have an unacceptable impact on the visual amenity of the area. The consultation discusses how visual impact should not detract from the nature of Norfolk countryside character. The consultation also discusses how pollution/emissions must be controlled by the relevant Environmental Agency and Environmental Health requirements.</p> <p>There is insufficient weight given by MW2 to the impact on local people. In this context, local is considered to be any person living or working within hearing, smelling or visual sight of the proposed development. Whilst Norfolk's character must be protected, the extraction of minerals from the ground generally has most impact on those in the immediate vicinity and not those living or visiting elsewhere in Norfolk. Local people, whether 1 or 1000 in numbers, should be given a level of protection from impact, particularly visual and noise, to the same extent as if their own</p>	<p>We consider that Policy MW2 does give sufficient protection to local people because it requires planning applications for minerals development and/or waste management development to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise, odour, air quality, dust, litter, light pollution and vibration). In terms of visual impact policy MW2 also requires planning applications to demonstrate that the development would not have an unacceptable impact on “the appearance, quality and character of the landscape, countryside and visual environment and any local features that contribute to its local distinctiveness”.</p>

<b>Representations received about Policy MW2: Development Management Criteria</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>land was SSSI or other highly sensitive land, or other protected wildlife. This is regardless of any long term plan to recover the land.</p>	<p>However, the loss of views is not a material planning consideration.</p> <p>Norfolk County Council's Local List for the Validation of Planning Applications requires the following documents to be submitted at the planning application stage, which would be used to assess the proposal against the requirements of the amenity, health and landscape aspects of policy MW2: dust assessment, noise assessment, lighting assessment (for applications proposing external lighting), landscape and visual impact assessment.</p> <p>If permission is granted, planning conditions may be imposed to help mitigate any impact on local amenity and the landscape.</p>

## Question 6. Policy MW3: Transport

Representations received about Policy MW3: Transport	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93167 Respondent: <b>Broads Authority (Natalie Beal) [16282]</b></p> <p>Page 33: 'All proposals for minerals development or waste management facilities must assess and consider positively the potential for non-HGV transportation of materials to and from the facilities, principally by rail or water'. Perhaps you might want to require an assessment that looks into this and shows their considerations? As written, an applicant does not seem to be required to do anything other than think about it.</p> <p>Page 33: 'The County Council will consider minerals and waste development proposals to be satisfactory in terms of access where anticipated HGV movements, taking into account any mitigation measures proposed, do not generate'. Wonder if this could be worded in a more simple way?</p>	<p>It is considered the requirement that proposals must assess non-HGV transportation of minerals would necessitate submission of details of that assessment in order to provide evidence for the determination of any application.</p> <p>Given the different issues which need to be assessed in relation to transport it is considered that the policy is currently drafted in an appropriate way. The transport policy in the current adopted Minerals and Waste Core Strategy is worded in a similar way and has been effective.</p>
<p><b>(Comment)</b> Representation ID: 93072 Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b></p> <p>MW3: Quarries by their nature have to be located where the mineral that is sought to be quarried occurs. This often places them in rural and/or remote areas where there is little or no access to public transport. This potential remoteness can also mean that travel to work distances are too great for employees to be reasonable expected to either cycle or walk to work. Furthermore, due to the demands of customers, quarries often commence daily operations early, before public transport commences operations itself, if any is available. As drafted Policy MW3 does not reflect these practicalities. The following revision is therefore proposed: -</p> <p>* "WHERE APPROPRIATE, measures to reduce car travel to the site by workers and visitors and encourage walking, cycling and use of public transport."</p>	<p>The last bullet point has been amended to state "Appropriate measures to reduce car travel to the site by workers and visitors and encourage walking, cycling and use of public transport." We consider that the term 'appropriate', which means suitable for the purpose or situation, encompasses whether or not it is practical or effective to do so.</p>
<p><b>(Comment)</b> Representation ID: 93066 Respondent: <b>West Suffolk Councils (Forest Heath District and St Edmundsbury Borough Councils) (Ms S Levantis) [18341]</b></p>	<p>Delivery and Servicing Plans are intended as management plans for businesses which receive the delivery of goods such as retail; and are intended to minimise the number of deliveries by HGV in large urban areas, by multi-drop vehicles. This may be</p>

Representations received about Policy MW3: Transport	Norfolk County Council Planning Officer's response
<p>In addition to Transport Statements and Transport Assessments, planning applications for new minerals development or waste management facilities, or proposals that generate an increase in traffic movements or traffic impact, may in some circumstances need to be accompanied by a Delivery and Servicing Plan (DSP) or Construction and Logistics Plan (CLP) to manage the movement of goods</p> <p>The HGV movements can be monitored through a DSP or CLP, so that remedial measures can be introduced should the highways impacts become unacceptable.</p> <p>In the same way that a Travel Plan provides a framework for 'measures to reduce car travel to the site by workers and visitors and encourages walking, cycling and use of public transport', a DSP or CLP can provide a framework to manage and monitor the impacts of HGVs on local highways.</p>	<p>carried out by having a hub located in an out of town centre where deliveries could be consolidated onto fewer vehicles. Therefore, it is not considered to provide advantages to mineral and waste developments where HGVs tend to carry single loads.</p> <p>Construction Logistics Plans are intended as a way of managing construction traffic for building projects, to minimise the number of vehicles movements during the construction phase, in a similar way to DSPs. It is not considered to provide advantages to mineral and waste developments where HGVs tend to carry single loads, CLPs are only intended for the construction phases of projects.</p>
<p><b>(Comment)</b> Representation ID: 92544</p> <p>Agent: Lichfields (Ms S Innes) [18008] Respondent: <b>Bourne Leisure Ltd [18009]</b></p> <p>Bourne Leisure endorses draft Policy MW3 for the requirement that proposals do not result in unacceptable traffic impacts, including in relation to pedestrians, other road users and air quality. The NPPF requires consideration of transport issues early in the plan-making and development proposals process so that, among other things, the potential impacts of development on transport networks can be addressed and any adverse environmental impacts of traffic and transport infrastructure can be avoided and mitigated (paragraph 102).</p> <p>The proposed policy approach is therefore consistent with national policy, as it aims to ensure that any mineral or waste development proposals will not have any adverse traffic impacts that could affect customers at Bourne Leisure's holiday parks in Norfolk. This is particularly important in relation to highway safety for guests and the air quality at and near to the Company's holiday parks.</p> <p>Bourne Leisure does not suggest any amendments to this draft policy.</p>	<p>Noted.</p>

Representations received about Policy MW3: Transport	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92500  Respondent: <b>Mineral Products Association (Mr M North) [17995]</b>  Suggested altered wording for the last bullet point of the policy as follows;  Proposed Changes (new text in CAPITALS)  "WHERE REALISTIC AND PRACTICAL measures to reduce car travel to the site by workers and visitors and encourage walking, cycling and use of public transport."  This alteration is made to prevent a dogmatic approach being taken. We have examples of cycle racks needing to be provided when it was clearly impractical for individuals to safely cycle to the site.</p>	<p>The last bullet point has been amended to state "Appropriate measures to reduce car travel to the site by workers and visitors and encourage walking, cycling and use of public transport." We consider that the term 'appropriate', which means suitable for the purpose or situation, encompasses whether or not it is practical or effective to do so.</p>
<p><b>(Comment)</b> Representation ID: 92474  Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b>  Suggested amendment to the last bullet point of this policy is proposed as follows: WHERE PRACTICAL AND REALISTIC measures to reduce car travel to the site by workers and visitors and encourage walking, cycling and use of public transport.</p>	<p>The last bullet point has been amended to state "Appropriate measures to reduce car travel to the site by workers and visitors and encourage walking, cycling and use of public transport." We consider that the term 'appropriate', which means suitable for the purpose or situation, encompasses whether or not it is practical or effective to do so.</p>
<p><b>(Comment)</b> Representation ID: 91958  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b>  I note the separate policy but perhaps this might be better included as a section within Policy MW2 to ensure that the transport proposals for a site do not have an unacceptable impact as opposed to the double negative 'do not generate: unacceptable risks ... etc'.</p>	<p>Noted.  Given the different issues which need to be assessed in relation to transport it is considered that the policy is currently drafted in an appropriate way. The transport policy in the current adopted Minerals and Waste Core Strategy is worded in a similar way and has been effective.</p>



**Question 7. Policy MW4: Climate change adaption and mitigation**

Representations received about Policy MW4: Climate change adaption and mitigation	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93166                      Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>                      Uses the word 'should' which is quite weak term. A stronger term similar to that uses in other policies (like will need to, must, is required to) might be better.                      Some aspects repeat MW2 - does that matter?</p>	<p>Noted. We have changed 'should' to 'will be expected to' which we consider strengthens the wording, while taking into account the fact that all mineral extraction and waste management operations will result in some level of emissions, in the same way as all other development.</p> <p>Proposals for mineral and waste development will need to comply with both MW4 and MW2, these policies are complementary, as are many other of the policies within the Plan.</p>
<p><b>(Comment)</b> Representation ID: 92550                      Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>                      Part F may be better suited in the flooding, water resources and water quality section on page 30. However, it is important that climate change is considered when assessing flood risk. Therefore this section could specify that: 'site specific FRAs should include an assessment of the impact of climate change on flood risk using appropriate climate change allowances'.</p>	<p>Noted. The flood risk criteria in MW2 has been revised to take into account climate change.</p>
<p><b>(Comment)</b> Representation ID: 92501                      Respondent: <b>Mineral Products Association (Mr M North) [17995]</b>                      MW4 (g) should be reworded as follows:                      Proposed Changes (new text in CAPITALS)                      "g) incorporate proposals for sustainable travel, including travel plans where PRACTICAL AND appropriate."</p>	<p>We consider that the term 'appropriate', which means suitable for the purpose or situation, encompasses whether or not it is practical or effective to do so. Therefore we consider that no change is required to the policy.</p>
<p><b>(Comment)</b> Representation ID: 92475                      Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b>                      Suggested amendments to the policy are proposed as follows:                      b) be planned so as to REDUCE carbon dioxide and methane emissions ON A SITE UNIT BASIS</p>	<p>b) where proposals are for the continued operation of a processing plant through the use of satellite extraction extensions; it is appropriate to consider the whole proposal not just the extension area, as</p>

Representations received about Policy MW4: Climate change adaption and mitigation	Norfolk County Council Planning Officer's response
<p>c) endeavour to SOURCE a minimum of 10 per cent of the energy used on site from decentralised and renewable or low-carbon sources.</p> <p>d) WHERE PRACTICAL AND RELEVANT to demonstrate the use of sustainable drainage systems, water harvesting from impermeable surfaces and layouts that accommodate waste water recycling</p> <p>e) WHERE RELEVANT TO take account of potential changes in climate including rising sea levels and coastal erosion</p> <p>g) incorporate proposals for sustainable travel, including travel plans where PRACTICAL AND appropriate.</p>	<p>the processing of mineral is a fundamental part of the proposal.</p> <p>c) It is considered that where mineral workings are sufficiently long term to justify the installation of renewables every effort should be made, where this is not possible, a statement that operators should source at least 10% of the energy required from renewables through an energy supplier, has been incorporated into the policy.</p> <p>d) Mineral proposals use water resources which are becoming increasingly scarce; therefore it is appropriate that they demonstrate how water use can be minimised. As mineral proposals almost inevitably result in some loss of green field infiltration as they involve hardstandings, and/or processing plants, SUDS would be a key part of ensuring that flood risk is not increased elsewhere, and should form part of the proposal in the same way as other development;</p> <p>e) as mineral extraction may result in permanent changes to landform, climate change and coastal erosion should be taken account of in application documents;</p> <p>g) We consider that the term 'appropriate', which means suitable for the purpose or situation, encompasses whether or not it is practical or effective to do so. Therefore we consider that no change is required to the policy.</p>
<p><b>(Comment)</b> Representation ID: 92364</p>	<p>Noted.</p>

Representations received about Policy MW4: Climate change adaption and mitigation	Norfolk County Council Planning Officer's response
<p>Respondent: <b>D K Symes Associates (Mr D K Symes) [146]</b></p> <p>It is recognised that Policy MW4 relates to both minerals and waste. Regarding the use of renewable energy there is more potential for waste developments than for mineral. In practice, mineral developments have extremely limited opportunities to use 'site specific' renewable energy sources (e.g. solar, panels, wind turbines, gas generation, etc.) and this needs to be recognised. Further, the choice of energy provider may already have a percentage generated by renewable and this should be given weight in meeting this policy.</p> <p>It is noted that the 'practicality' of meeting this element of the policy allows a degree of flexibility, however it would be helpful if the text could recognise that the opportunities for renewable are noticeably more constrained for mineral developments.</p> <p>As a final note, Policy MW2 does not refer to demonstrating that 'renewable' energy use is a development management criteria, suggesting that Policy MW4 should have greater flexibility.</p>	<p>It is considered that where mineral workings are sufficiently long term to justify the installation of renewables every effort should be made, where this is not possible, a statement that operators should source at least 10% of the energy required from renewables through an energy supplier, has been incorporated into the policy.</p> <p>Proposals for mineral and waste development will need to comply with both MW4 and MW2, these policies are complementary, as are many other of the policies within the Plan.</p>
<p><b>(Comment)</b> Representation ID: 92355</p> <p>Respondent: <b>Aggregate Industries UK Ltd (Ms K Hannaford-Hill) [17973]</b></p> <p>MW4 seeks a minimum of 10 % of energy used on site to be generated from decentralised and renewable or low-carbon sources. The geographical location of minerals sites, phased operation and temporary nature hinders the ability to implement the aims of MW4.</p>	<p>It is considered that where mineral workings are sufficiently long term to justify the installation of renewables every effort should be made, where this is not possible, a statement that operators should source at least 10% of the energy required from renewables through an energy supplier, has been incorporated into the policy.</p>
<p><b>(Comment)</b> Representation ID: 92101</p> <p>Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b></p> <p>The wording of this policy is a little unspecific, through the use of "should" and "minimise" and "endeavour", and potentially conflicts with other regimes such as Building Regulations. It is suggested that it is made clear at the beginning of the policy that measures will be encouraged, or expected, to go beyond normal "national" standards if at all feasible, but that this is not a requirement.</p>	<p>We have changed 'should' to 'will be expected to', which we consider strengthens the wording. Mineral operations are temporary, as are the buildings within them. Therefore, many aspects of Building Regulations in relation to climate change do not apply. Waste Management Facilities may be permanent; however, Building Regulations form a separate regulatory regime which the applicant would need to comply with separate to any planning conditions, in the same way that planning</p>

Representations received about Policy MW4: Climate change adaption and mitigation	Norfolk County Council Planning Officer's response
	applications do not seek to regulate foundation design, which forms part of Building Regulations.
<p><b>(Support)</b> Representation ID: 92068  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Natural England welcomes these proposals.</p>	Noted
<p><b>(Comment)</b> Representation ID: 91959  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b>  Section (c) which reads 'endeavour to generate a minimum of 10 percent of the energy used on site from decentralised and renewable or low carbon sources' should be amended to remove the reference to a percentage. This is because many operators already purchase energy from centralised low carbon renewable sources and therefore an overarching benefit to climate change mitigation is being achieved. Furthermore the policy states that 'evidence must be provided to the County Planning Authority' but does not give any criteria against which the County Planning Authority will assess the evidence.</p>	It is considered that where mineral workings are sufficiently long term to justify the installation of renewables every effort should be made, where this is not possible, a statement that operators should source at least 10% of the energy required from renewables through an energy supplier, has been incorporated into the policy.
<p><b>(Comment)</b> Representation ID: 91939  Respondent: <b>Lead Local Flood Authority (Norfolk County Council) (Ms Elaine Simpson) [17508]</b>  Policy MW4: We welcome that that this policy supports policy MW2 with the provision of flood risk assessments (FRA) and although not specifically stated we assume that this policy's intention is that any FRA will include appropriate consideration of the most up to date climate change allowances.  It is accepted that Mineral working is a water compatible development which can be undertaken in most areas at risk of flooding, however, we would highlight that any impacts should be considered during a planning application and appropriate measures. These measures may not be required until reinstatement when post development ground levels are considered in detail.</p>	<p>Based on comments by the Environment Agency, the wording of MW2 has been revised to include reference to climate change for flood risk, and that site specific FRAs will be required to take this into account.</p> <p>Part of the requirement for a site-specific FRA would be to ensure that the proposal would not increase the risk of flooding elsewhere. It may be that as part of the restoration former mineral workings are incorporated into flood alleviation schemes, as temporary flood storage or reservoirs, and can therefore provide benefits in reducing the likelihood of flooding.</p>

**Question 8. Policy MW5: The Brecks Protected Habitats and Species**

Representations received about Policy MW5: The Brecks Protected Habitats and Species	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 93067  Respondent: <b>Breckland District Council (Miss Sarah Robertson) [16040]</b></p> <p>Question 8: Breckland supports the inclusion of Policy MW5 'The Brecks Protected Habitats and Species' within the Local Plan, however would like to bring attention to additional evidence in relation to Stone Curlew buffer zones. As part of the Habitats Regulation Assessment to support the Breckland Local Plan revisions have been required to the buffer zones and policy to reflect areas within 3km of the SPA. Further information is available within the Breckland Habitat regulations Assessment on pages 30-32. However the issue can be summarised as follows:</p> <p>Evidence, explained within the HRA for the Breckland Local Plan, identifies 3km as a distance at which stone curlew outside the SPA could be associated with the SPA. Survey effort tends to be focussed on areas regularly used and good quality habitat, so the additional buffer 'orange cells' simply reflect a lack of data. The orange cells therefore represents a precautionary area, in light of our understanding of the distance outside the SPA the birds may be present, where checks are necessary and mitigation could be required if the checks identify regular use by nesting stone curlew.</p> <p>The orange cell areas could therefore comprise of some functionally linked land for Stone Curlews, however the data is incomplete. The Breckland HRA has therefore proposed an additional buffer zone to include these cells where there are data gaps and additional data checks or survey data may be required to check for use by Stone Curlews. The Breckland Local Plan has interpreted the additional 'orange cell' buffer area as a location where any site allocation would need to be supported by a project level HRA.</p> <p>It is recommended that the policy is revised to reflect these additional areas and the map 2 should also be updated. For your information, I have included the proposed modified Breckland policy and also map.</p>	<p>Noted.</p> <p>The map, policy and supporting text have been updated to take into account these changes.</p>
<p><b>(Support)</b> Representation ID: 92551  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>We support this policy's statement to protect the important flora and fauna within The Brecks. The allocated sites are mostly located away from sites supporting aquatic ecological features in Norfolk</p>	<p>The reason for a specific policy on the Brecks is due to the mapped mitigation zones and protection zones for Stone Curlews which extend wider than the Breckland SPA itself. The Broads have equivalent status to National Parks and therefore</p>

Representations received about Policy MW5: The Brecks Protected Habitats and Species	Norfolk County Council Planning Officer's response
<p>such as The Broads and North Norfolk Coast, but if any come forward in future then a further policy to address these features would assist in avoiding inappropriate development at these locations.</p>	<p>benefit from significant protection from non-energy mineral extraction proposals. The Broads and North Norfolk Coast SPA, SAC and Ramsar sites are protected in legislation and any minerals or waste management sites proposed in proximity to the Broads or North North Coast will be assessed through a Habitats Regulations Assessment if required. Policy MW2 also contains requirements for proposals to demonstrate that they will not result in unacceptable impacts, including to the natural environment.</p>
<p><b>(Comment)</b> Representation ID: 92359  Respondent: <b>D K Symes Associates (Mr D K Symes) [146]</b>  It would be helpful to clarify that 'mineral extraction' (including associated plant) is not classed as 'built development' (so does not fall to be considered under Policy MW5).</p>	<p>Stone Curlews, Woodlarks and Nightjars are all sensitive to buildings of any sort in relation to their behaviour. Therefore, 'built development' in this context does include mineral plant and processing sites. The policy text will be revised to make this clear.</p>
<p><b>(Support)</b> Representation ID: 92069  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Natural England welcomes and strongly supports this policy to protect Breckland SPA, given the mineral resources that occur in The Brecks.</p>	<p>Support noted</p>

**Question 9. Policy MW6: Agricultural soils**

Representations received about Policy MW6: Agricultural soils	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93165                      Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>                      Does MW6 repeats MW2?                      See previous comment about peat. Should peat be mentioned in this policy?</p>	<p>Policy MW6 does not repeat MW2, MW6 sets out detailed requirements for development in relation to Agricultural land grade; MW2 sets out overarching considerations.</p> <p>This policy uses the Agricultural Land Grades as mapped by Natural England and referred to in the NPPF and PPG. Peat is not a separate Agricultural Land Grade in itself and therefore is not specifically referred to in the policy.</p>
<p><b>(Support)</b> Representation ID: 93021                      Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b>                      Policy MW6 is supported. The final bullet point of Policy MW6 state, 'the benefit of restoring the land to another after-use can be shown to outweigh the loss of the agricultural use of the land.' This is supported and in accordance with NPPF. However, this approach needs to be reflected in strategic objective MSO9 which requires landscape and biodiversity improvements, this cannot always be the case, MSO9 should be amended to reflect Policy MW6.</p>	<p>Support noted. Objective MSO9 is that restoration and aftercare will protect and enhance the environment, including landscape and biodiversity improvements. It is considered that biodiversity and landscape improvements can be incorporated into most restorations schemes (for example, additional hedge and tree planting with wide field margins for a restoration primarily to agriculture). Therefore it is no necessary to amend MSO9.</p>
<p><b>(Object)</b> Representation ID: 92539                      Respondent: <b>Mr G Parker [18005]</b>                      In view of the recent scorching weather, and news that farmers will be under stress for years to come trying to provide for an ever increasing population, I must ask if this is really the time to commandeer so much agricultural land for building materials, when it will be at such a premium for its Primary Purpose?                      I must add, however that I am amazed that so much PRODUCTIVE land can be sacrificed in this way. The recent weather has changed the news, and the future looks bleak enough, and even worse if the bread basket of East Anglia is to be swallowed by solar farms and extraction sites.</p>	<p>The National Planning Policy Framework states that it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The NPPF also recognises that minerals can only be worked where they are found.</p> <p>This policy MW6 details the planning approach to be taken to mineral extraction sites proposed on agricultural land and details the requirements for soil management at sites on BMV agricultural land to enable the site to be restored back to agricultural use once mineral extraction has ceased.</p>

Representations received about Policy MW6: Agricultural soils	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92517 Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b> MW6 - would be more effective if it set out a hierarchy that sought development on the lowest grade of agricultural land first.</p> <p><b>(Comment)</b> Representation ID: 92102 Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b> The policy should seek to guide development to the lowest grade of land available, and not lump 3b, 4 and 5 together.</p>	<p>The Policy does contain a clear preference for lower quality agricultural land grades 3b and 4 (it does not refer to grade 5 land as there are only 110 hectares of grade 5 land, which are located either within or adjacent to the Breckland SPA). The policy also contains a requirement for proposals affecting Grade 1 land to show exceptional circumstances. Therefore, as there is only very limited areas of land in Norfolk which is grade 4, much of which would be unsuitable for mineral and waste development due to other designations and policies, mineral extraction in Norfolk would be largely limited to land which is in land grades 2 and 3. The largest areas of agricultural land in Norfolk are grade 3 and it is not known whether this land is grade 3a or 3b without carrying out a site specific soil survey. Following specific site surveys grade 3 may be sub-divided into 3a and 3b, and there is a preference within the policy for extraction and composting to take place on grade 3b. Mineral extraction is a temporary use of land and Defra has published guidance on the storage and restoration of agricultural soils which are incorporated into the policy. Together with the requirements in the restoration and aftercare policies, these ensure that restoration back to agriculture can provide land of equivalent quality; and on occasion soil quality may be improved, by the reduction in stone which reduces the droughtiness which is a negative factor in establishing agricultural land grades.</p>
<p><b>(Comment)</b> Representation ID: 92502 Respondent: <b>Mineral Products Association (Mr M North) [17995]</b> It should be noted that the industry has shown that Grade 1 land can be successfully restored to equivalent quality and the policy should reflect this or at least referenced in</p>	<p>Noted.</p> <p>The NPPF states (paragraph 170) that planning policies should contribute and enhance the natural and local environment by; recognising the wider benefits from natural capital and ecosystem services – including the</p>



Representations received about Policy MW6: Agricultural soils	Norfolk County Council Planning Officer's response
<p>supporting text. The wording of the policy needs adjusting as follows: Proposed Changes (new text in CAPITALS) "Where development is proposed on agricultural land, the County Council has a clear preference for locating new mineral extraction and associated activities, and composting facilities, on land of agricultural grades 3b, 4 and 5. Development proposals affecting Grade 1 agricultural land will only be permitted in exceptional circumstances, where it is demonstrated that there are no alternative locations for the development. In addition to the above, when minerals development, particularly extraction, is proposed on agricultural land of grades 1, 2 or 3a it will [delete only] be permitted where: * Provision is made for high standards of soil management that would enable restoration to a condition at least as good as its previous agricultural quality. To demonstrate this, soil and land quality surveys, and soil handling and replacement strategies (based upon Defra's 'Good Practice Guide for Handling Soils') must be submitted to the County Planning Authority" * The benefit of restoring the land to another after-use can be shown to outweigh the loss of the agricultural use of the land. [delete all of this bullet point] The NPPF does not require that exceptional circumstances need to be shown for best and versatile land to be worked. Furthermore, minerals can only be worked where they exist.</p>	<p>economic and other benefits of the best and most versatile agricultural land. There is a preference in the NPPF (paragraph 171) for development on areas of poorer quality land as opposed to BMV. As sand and gravel resources are extensive in Norfolk, and grade 1 is limited in area, it is considered appropriate for the policy to reflect this and the preference in national policy for development on lower grades of agricultural land. Therefore, the requirement for exceptional circumstances to be justified is considered an appropriate approach for Norfolk.</p>
<p><b>(Comment)</b> Representation ID: 92476 Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b> This policy should be applied flexibly since minerals can clearly only be worked where they exist and for silica sand for glass making the potential land is further restricted by virtue of the scarcity of this mineral.</p>	<p>It is noted that minerals can only be worked where they exist. The scarcity of locations for silica sand suitable for glass making is noted. However, the areas of the Leziate Beds include no grade 1 land and only just under 293 hectares (3.28% out of a total of 8,942 hectares) of grade 2 agricultural land and therefore is it not considered that this would form an unacceptable constraint to the working of the mineral.</p>

Representations received about Policy MW6: Agricultural soils	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 92070</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>The restoration of land following mineral extraction should not automatically default to agricultural after-use. It would be useful to amend the wording of the second bullet point of the policy to include the other types of after-use that would be considered acceptable including contributing to 'net gain' targets through the creation of new habitats and green infrastructure.</p>	<p>This policy should be read in conjunction with policy MP7: Progressive working, restoration and after-use, which includes other issues to be dealt with during restoration. These include the enhancement of biodiversity and positive contributions to Green Infrastructure. A restoration to agriculture can include such enhancements as part of the scheme, and there have been many examples in Norfolk of such restoration.</p>

## Waste Management Specific Policies

### Question 10. Policy WP1: Waste management capacity to be provided

Representations received about Policy WP1: Waste management capacity to be provided	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93068</p> <p>Respondent: <b>Breckland District Council (Miss Sarah Robertson) [16040]</b></p> <p>Question 10: The waste policy currently considers there is sufficient capacity to meet the need for waste facilities without further allocations. The growth rate has had regard to the Norfolk SHMAs. Is there sufficient capacity within the existing waste facilities using the standardised housing methodology for calculating new household growth? Further justification would be required for a criteria based approach to ensure the plan is positively prepared.</p>	<p>The Standardised Methodology uses the same 2014 ONS household projections as the SHMA. Taking into account the increase in the housing targets based on the Standard methodology would increase the number of households, but the forecast waste arisings would be within the range covered by the maximum capacity of existing waste management facilities. Following feedback on the option of only having a criteria-based approach to waste facilities a 'call for sites' for waste treatment facilities has been conducted and a small number of proposed sites have submitted. These sites have been assessed and will be consulted on as part of the Preferred Options but are not considered suitable to allocate in the document.</p>
<p><b>(Comment)</b> Representation ID: 92895</p> <p>Respondent: <b>West Winch parish council (Mrs J Leamon) [18325]</b></p> <p>Annual Growth Rate of Waste: Statistics of how many people are in the UK are taken from out of date surveys. The Policies are allowing for 1% - 1.5% annual growth rate of waste. Will this be sufficient in the light of Government Policies on reduction of plastic use, etc. People will be disposing of all items made of these materials. Plastic bottles could potentially be changed to glass in the future. Glass needs more protection with potentially more recycling material at the initial stage of transport to and from shops. Has this been taken into account with provision of adequate facilities. More needs to be done to collect and dispose of hard plastic. The Recycling Centre at King's Lynn had this facility which is no longer available.</p>	<p>Annual Growth rate of waste: The datasets used are the most up to date available and are those identified in national policy and guidance for preparing waste forecasts. Changes because of government policies would take place over a sufficiently long-term to be accommodated within the planned range for the growth of waste. Glass recycling requires specialised plants, which cover large geographical areas, of which there are none in Norfolk. Glass bottles and jars are currently packed for transport in the same way as plastic, it is not considered that this would change in the future. The only facility for the recycling of hard plastic in</p>

Representations received about Policy WP1: Waste management capacity to be provided	Norfolk County Council Planning Officer's response
<p>Waste Reduction at Source: Work needs to be done with Suppliers of goods to avoid unnecessary waste in the first place. A start has been made with alternative packaging but this should be intensified.</p> <p>UK and the European Union: If the UK leaves the European Union, has the full impact of import/export of waste been taken into account and the practical and financial effects.</p> <p>Public Education on Waste Issues: Education for the Public in clear and simple messages needs to be addressed. A lot of people are confused. For instance, we have heard in the past - it does not matter about washing items. Some people think if waste items are washed it wastes the resource of water. A lot of households tend to have dishwashers and not bowls of washing-up water which can be used to wash items. Bottle and jar tops - some leave them on, some leave them off.</p>	<p>England closed some years ago as it was not economically viable.</p> <p>Waste reduction at source: This is not a landuse planning matter.</p> <p>UK and the European Union: Current government advice is that the shipment of waste would continue when the UK leaves the EU.</p> <p>Public education on waste issues: This is not a landuse planning matter.</p>
<p><b>(Comment)</b> Representation ID: 92031</p> <p>Respondent: <b>Aggregate Industries UK Ltd (Ms K Hannaford-Hill) [17973]</b></p> <p>WP1 Waste Management Capacity to be provided - waste statistics are not comprehensive or robust therefore I believe flexibility should be built into the policy allowing sites to come forward based upon market need.</p>	<p>The waste capacity assessment has been prepared in accordance with national policy and guidance. The criteria-based policy approach to waste facilities would allow the sites to come forward and suitable sites to be permitted should there be a market need for them.</p>
<p><b>(Comment)</b> Representation ID: 92031</p> <p>Respondent: <b>Borough Council of King's Lynn and West Norfolk (Mr Geoff Hall) [9627]</b></p> <p>* The draft plan avoids explicitly planning for the anticipated amount of waste that might be generated (Policy WP1). Whilst this is justified to a point in the supporting text, it could be risky, especially if higher amounts of waste are generated. A lack of suitable sites being proposed is part of the issue, and the draft plan may generate sites. A more robust strategy should be put in place.</p>	<p>National Policy requires that sufficient waste management capacity for future arisings be planned for. Based on assessment of existing waste management capacity it has been concluded that sufficient capacity exists to meet future needs. Following feedback on the option of only having a criteria-based approach to waste facilities a 'call for sites' for waste treatment facilities has been conducted and a small number of proposed sites have been submitted. These sites have been assessed and will be consulted on as part of the Preferred Options but are not considered suitable to allocate in the document.</p>

**Question 10a. Do you consider that an alternative growth rate should be used for forecasting Local Authority Collected Waste growth?**

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93037</p> <p>Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b></p> <p>There is little to pick between the Norfolk SHMA and ONS projections in numerical terms and both can be argued to be realistic. However, the SHMA takes a reasonable and realistic view of the local picture on household growth. It appears the more appropriate tool in terms of the principles on which it is established and its projections seem sensible and realistic.</p> <p>The general approach of linking waste growth to growth in households is the most appropriate. The LACW figures from 2007/08 onwards as set out in the Waste Management capacity assessment look across the whole of Norfolk and show both increases and decreases between years. This highlights the inherent difficulty and uncertainty in attempting to establish an appropriate waste growth pattern using historical waste data that contains year on year fluctuations.</p> <p>Some limited analysis by the WDA has shown that waste per household levels tend to remain relatively static over longer periods of time even if they can be subject to short term fluctuations. It is reasonable to assume that it is the number of households that is fundamentally driving longer term trends in levels of waste. On that basis, using household growth is an appropriate principle.</p>	<p>Noted.</p>

**Question 10b. Do you consider that an alternative growth rate should be used for forecasting commercial and industrial waste growth?**

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93038</p> <p>Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b></p> <p>The WDA is less well placed to comment on forecasting commercial and industrial waste because it does not have the statutory responsibility for dealing with it or to compile data on it.</p>	<p>Noted</p>

**Question 11. Policy WP2: Spatial strategy for waste management facilities**

Representations received about WP2: Spatial strategy for waste management facilities	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93164  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>  Page 45: what is 'appropriate transport infrastructure'?  Page 45: is the five mile requirement as the crow flies or by road/path etc?</p>	<p>Appropriate transport infrastructure is as set out in W2.1 point b. All applications would be subject to consultation with the Highway Authority and their response would include whether the proposed highway access is considered appropriate.</p> <p>The five mile requirement is as the crow flies, this distance was used to take into account that any road link may be slightly longer. Due to the amount of planned growth between the major urban areas, and main towns the distances have been revised. The revised distances are 5 miles from major urban areas and 3 miles from main towns. The major urban areas and main towns are defined in the supporting text of the Plan.</p>
<p><b>(Comment)</b> Representation ID: 93039  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  We do not have any specific drafting to put forward as an alternative but would comment as follows.</p> <p>The consideration of proximity to urban settlements is, on the face of it, in the combined interests of the WDA and Norfolk's WCAs. In theory, this should reduce transportation costs for the WDA and increase the efficiency of collection rounds for the WCA. However, where waste treatment facilities operate at a more industrial scale (higher than 75,000 being an example given in the consultation document), waste will often travel from considerably further afield and be drawn from a far wider area than the immediate locality.</p> <p>We would therefore caution against the policy creating an unintended constraint on the development of waste treatment capacity at a larger scale. In general, sourcing a site that is available and suitable for a larger waste facility is more difficult than for smaller facilities and the</p>	<p>Noted.</p> <p>Noted. It is considered that the policy provides sufficient flexibility to ensure that the waste management industry has a wide enough range of</p>

Representations received about WP2: Spatial strategy for waste management facilities	Norfolk County Council Planning Officer's response
<p>WDA would want to see that there remains sufficient flexibility in this policy to ensure that the waste management industry has a wide enough range of options when considering sites suitable for such a facility.</p>	<p>options when considering sites suitable for a large-scale facility (see map accompanying policy WP2 in the Preferred Options document).</p>
<p><b>(Object)</b> Representation ID: 92948  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We are concerned that change from allocating sites for waste management to a criteria-based policy makes the impact on the historic environment hard to assess. Given the lack of historic environment policy to support this approach and a lack of evidence of the impact of this policy on the historic environment we currently cannot support this approach.</p>	<p>Allocating sites for waste management uses has not proved effective at delivering capacity due to the way the waste management industry operates. Norfolk County Council has carried out a 'call for waste sites' and only a small number of sites have been submitted. Assessment of potential impacts on the historic environment, and the identification of whether suitable mitigation could be implemented, form a key part of the criteria for the Development Management Policy MW2 to ensure that the historic environment is appropriately protected.</p>
<p><b>(Comment)</b> Representation ID: 92899  Respondent: <b>West Winch parish council (Mrs J Leamon) [18325]</b>  Distance of Sites: Policy WP2 states that new or enhanced waste management facilities should be located within 5 miles .... Whilst we can understand some reasons for this - as in travelling time, the conflicting effects are major risks to human health being closer to populated areas.  Transport Network: Ways of delivering goods and shopping are changing. Transport on our roads gets heavier every day, including huge HGVs. The road network in Norfolk is often congested and poorly maintained. It must be strongly stressed that impact on communities in unsuitable waste site locations for transport links should definitely be avoided.</p>	<p>Distance to sites: National guidance and policy is that waste management facilities operating within the various regulatory regimes do not cause major risks to human health. While it is the case that certain waste management facilities require a minimum threshold to be efficient; people and businesses generate waste and therefore placing waste management facilities within reasonable proximity to centres of population is appropriate, even though the majority of waste management facilities are not open to the public. Urban areas and towns also benefit from the greatest level of connectivity to the Strategic Highway Network, and other infrastructure.  Transport Network: WP2 contains a requirement for new or enhanced waste management facilities</p>

Representations received about WP2: Spatial strategy for waste management facilities	Norfolk County Council Planning Officer's response
	to be accessible via appropriate transport infrastructure. This means that they should be located in reasonable proximity to the Trunk roads and A roads, and that these roads should be able to be accessed by appropriate links. Trunk roads and A roads are the preferred routes for HGV traffic. Improvements to these roads and their maintenance by the Highways Authority of Highways England are not dealt with through the mineral and waste planning process.
<p><b>(Comment)</b> Representation ID: 92516  Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b>  WP2 - it is not entirely clear what the first part of this policy is seeking to achieve; if it is seeking sustainable locations within easy reach of centres of population (particularly those that the proposed facilities are serving), the text may need to be expanded to better reflect this.</p>	It is the case that certain waste management facilities require a minimum threshold to be efficient; people and businesses generate waste and therefore placing waste management facilities within reasonable proximity to centres of population is appropriate, even though the major of waste management facilities are not open to the public. Urban areas and towns also benefit from the greatest level of connectivity to the Strategic Highway Network, and other infrastructure.
<p><b>(Support)</b> Representation ID: 92487  Respondent: <b>Anglian Water Services Ltd (Mr S Patience) [16454]</b>  Anglian Water is generally supportive of the final paragraph of WP2 as drafted. However a distinction needs to be made between Water Recycling Centres which discharge to a watercourses and pumping stations which can convey foul flows between sewers rather than discharge to a watercourse as suggested.</p>	Noted. The text has been revised to address this.
<p><b>(Comment)</b> Representation ID: 92103  Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b></p>	Noted. The draft policy has been amended to remove the words 'at least'.



Representations received about WP2: Spatial strategy for waste management facilities	Norfolk County Council Planning Officer's response
<p>The meaning of the first sentence is unclear. It is unlikely that anywhere will be within five miles of more than one urban area or main town, and the reference to "at least one" implies that encouragement is being given to serving more than one area which could put the focus on a mid-point that poorly serves all areas.</p>	
<p><b>(Comment)</b> Representation ID: 92077  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  All new or enhanced waste management facilities should be in compliance with the land uses in Policy W3 and the development management criteria set out in Policy MW2.  Currently, it could be read that only the bulleted list of facilities needs to do this.</p>	<p>Noted. It is correct land new or enhanced waste management facilities should be in compliance with the types of land in Policy WP3 and the development management criteria set out in Policy MW2. The policy wording has been amended to make it clearer that this requirement applies to all applications for waste management facilities.</p>
<p><b>(Comment)</b> Representation ID: 92030  Respondent: <b>Borough Council of King's Lynn and West Norfolk (Mr Geoff Hall) [9627]</b>  * From Policy WP2 it would seem possible to locate waste management facilities away from the broad location that generated the waste. Thus necessitating potentially significant transport movements, and possibly generating resentment from recipient communities.  * Whilst not necessarily inappropriate for all types of waste where specialist facilities are needed, extremely careful thought should be given to general waste or significant quantities requiring movement.  * A better approach would seem to be one where the policy encouraged waste to be dealt with as near to the generating source as possible.</p>	<p>It is the case that certain waste management facilities require a minimum threshold to be efficient; people and businesses generate waste and therefore placing waste management facilities within reasonable proximity to centres of population is appropriate, even though the major of waste management facilities are not open to the public. Urban areas and towns also benefit from the greatest level of connectivity to the Strategic Highway Network, and other infrastructure. However, waste planning is based on at least a county scale, and the quantities of waste produced by even relatively large urban areas may not be sufficient to achieve the minimum threshold for some waste treatment and recovery processes.</p>

**Question 11a. Do you consider that Policy WP2 should be amended in line with any of the alternative options?**

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93057</p> <p>Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b></p> <p>On the basis of our comments in response to question 11, whilst understanding the additional complications it may present from a policy point of view, a principle as set out in alternative options 2 or 3 would reduce the risk of this policy placing undue restrictions on the location of industrial scale facilities.</p> <p>As respects the provision of Recycling Centres, some of the WDA's facilities are located near Key Service Centres. However, where new facilities have been developed in recent years, the tendency has been to seek sites closer to centres of population.</p>	<p>Increasing the distance within the policy would result in virtually all of Norfolk being covered which would render the policy ineffective. It is not considered that the distances currently within the policy would restrict locations for industrial scale facilities in an inappropriate way.</p> <p>Noted.</p>

**Question 12. Policy WP3: Land uses potentially suitable for waste management facilities**

Representations received about Policy WP3: Land uses potential suitable for waste facilities	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93175</p> <p>Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b></p> <p>We agree with the proposed policy, but with the following comments:</p> <p>Not all former airfields will necessarily be suitable for open air composting, especially those with high heritage value.</p>	<p>Noted. The draft policy also states that 'proposals must also comply with the development management criteria set out in Policy MW2. Policy MW2, which requires planning applications to demonstrate that the development would not have an unacceptable impact on the historic environment.</p>
<p><b>(Comment)</b> Representation ID: 93163</p> <p>Respondent: <b>Broads Authority (Natalie Beal) [16282]</b></p> <p>Page 46: 'Policy WP3: Land uses potentially suitable for waste management facilities'. This does not seem an ideal title for the policy; the policy seems to be more about where waste management facilities can go. Not all of the areas listed in the criteria are land uses in the typical sense; they are areas to which such facilities are directed towards.</p> <p>Page 46, do criteria d, e, f apply even if the proposal is not within 5 miles of a town as talked about in the previous policy? How do WP2 and WP3 work together?</p>	<p>The word 'uses' will be removed to avoid any potential confusion with 'land uses' in the sense of land use classes.</p> <p>The policies within the Plan work in conjunction with each other, so an application would be determined looking at whether it was compliant</p>

Representations received about Policy WP3: Land uses potential suitable for waste facilities	Norfolk County Council Planning Officer's response
	with each relevant policy; therefore waste developments should be located in accordance with the distances in Policy WP2 and the types of land contained in WP3.
<p><b>(Comment)</b> Representation ID: 93069  Respondent: <b>Breckland District Council (Miss Sarah Robertson) [16040]</b></p> <p>Question 12: The policy would support the development of waste facilities on general industrial areas. Breckland would not wish to see the economic potential of industrial areas reduced due to the provision of waste facilities. Breckland would wish the policy to have regard to the employment aspirations for the area. Of particular concern is the Snetterton General Employment Area which is a key priority for Breckland within the A11 Norwich to Cambridge Technology Corridor. Breckland is proposing allocations through its Local Plan which would deliver 3,174 jobs to the area. Policy ECO2 of the emerging Local Plan seeks to zone the employment area in order to meet these aspirations. Further to this, the Thetford Enterprise Park is also a key area on the A11 corridor and forms an important element of the growth strategy for the area. Breckland would wish to see the policy amended to reflect that important employment sites (including general employment areas such as Snetterton and the Thetford Employment Park) should not be prejudiced through development of waste sites.</p>	<p>The draft policy is in accordance with the National Planning Policy for Waste which states that Waste Planning Authorities should "Give priority to the re-use of previously developed land, sites identified for employment uses....".</p> <p>The draft policy also states that 'proposals must also comply with the development management criteria set out in Policy MW2, which requires planning applications to demonstrate that the development would not have an unacceptable impact on local amenity, health, the natural environment, built environment and historic environment.</p>
<p><b>(Comment)</b> Representation ID: 93040  Respondent: <b>Norfolk County Council – Waste Disposal Authority (Mr D Beenham) [18338]</b></p> <p>Whilst we would broadly agree with the general thrust of the policy, the WDA see no reason why a site that was formerly a landfill site could only be considered suitable for a waste management facility on a temporary basis (unless this is specifically referring to facilities built directly on the waste burial area). Nationally, there are examples of waste management facilities being developed on a site formerly operated as a landfill site, adjacent to closed landfill cells. The long standing association of the site with a waste management use has been advantageous in a number of ways and has proved a good fit with the broader site continuing to be in use as a waste management site but having changed to a cleaner, more modern method of waste management.</p>	<p>Landfilling of waste takes place to restore the void left by mineral workings by infilling the void with waste. Landfill sites therefore only occur where there are former mineral workings and minerals can only be worked where they occur, which is normally within the open countryside. However, other waste management activities would not normally be allowed in the open countryside and therefore former landfill sites would not necessarily be suitable for other waste management uses.</p>
<p><b>(Comment)</b> Representation ID: 93022  Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b></p>	<p>Minerals can only be worked where they occur, which is normally within the open countryside.</p>

Representations received about Policy WP3: Land uses potential suitable for waste facilities	Norfolk County Council Planning Officer's response
<p>Policy WP3 identifies that waste management facilities at existing mineral workings and landfill sites may be considered acceptable on a temporary basis with planning permission restricted to a cessation date for the mineral operation or landfill activities. We consider that greater flexibility should be provided within the Policy - there can be occasions when it is appropriate to retain a facility, for example recycling, that can benefit from the retention of infrastructure and continue to serve the markets established. We recommend Policy WP3 should provide greater flexibility and be amended accordingly.</p>	<p>Mineral workings are temporary uses of land and as such may be acceptable in the open countryside, this is not the case with waste management operations. Ancillary development such as recycling of inert and CD&amp;E waste would not normally be allowed in the open countryside and are only allowed temporarily to facilitate the timely phased restoration of the mineral workings.</p>
<p><b>(Comment)</b> Representation ID: 92898  Respondent: <b>West Winch parish council (Mrs J Leamon) [18325]</b>  Policy WP3: Land allocated for B2 and B8 uses may be situated near to populated areas where there are health risks to residents. These sites must not be assumed to be suitable.</p>	<p>The draft policy is in accordance with the National Planning Policy for Waste which states that Waste Planning Authorities should "Give priority to the re-use of previously developed land, sites identified for employment uses..." Proposals for waste management facilities would also be determined against policy MW2, which requires planning applications to demonstrate that the development would not have an unacceptable impact on local amenity and health.</p>
<p><b>(Comment)</b> Representation ID: 92515  Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b>  <b>(Comment)</b> Representation ID: 92104  Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b>  WP3 - in the list of potentially suitable land uses, 'within or adjacent to agriculture and forestry buildings' would appear to open up a wide range of sites to possible consideration, although it is understood that sites would need to meet the requirements of the general policies too. Permitted Development also opens up the scope for new build agricultural buildings, with relatively little input from the local planning authority. Consequently, could clause d) be caveated 'appropriately located' and 'in established use'?</p>	<p>The draft policy has been amended to be in line with the National Planning Policy for Waste and now states "within or adjacent to redundant agricultural or forestry buildings". It is considered that the requirements of Policy MW2 (Development Management Criteria) and Policy MW3 (Transport) in particular, would ensure that the sites were appropriately located to avoid unacceptable adverse effects.</p>
<p><b>(Comment)</b> Representation ID: 92488  Respondent: <b>Anglian Water Services Ltd (Mr S Patience) [16454]</b></p>	

Representations received about Policy WP3: Land uses potential suitable for waste facilities	Norfolk County Council Planning Officer's response
<p>Anglian Water as a sewerage company is generally supportive of the final paragraph of WP3 as drafted. However evidence does not appear to have been provided for the proposal to limit the co-location of waste management uses to composting and anaerobic digestion on water recycling centre sites.</p> <p>Therefore it is suggested that Policy WP3 should be amended as follows:</p> <p>'f) water recycling centres [delete the text composting and anaerobic digestion only]</p>	<p>Water Recycling Centres (WRCs) have historically been located within the open countryside close to watercourses. Generally waste management facilities (other than landfill and or WRCs) would not be suitable in the open countryside. However, it is recognised that there may be synergies for composting and anaerobic digestion only, as an additional treatment process for the wastes received at WRCs.</p>
<p><b>(Comment)</b> Representation ID: 92147</p> <p>Respondent: <b>Norwich City Council (Ms Judith Davison) [17844]</b></p> <p>The explanatory text for Policy WP3 states that modern waste management facilities can require purpose built buildings and structures that are suited to industrial areas, however this is not reflected in the text of the policy itself. It would be helpful to add clarification into the policy wording, to require that waste management activities should take place within purpose designed facilities where appropriate - this would apply particularly to criteria (b) and (c), ie. land either in existing B2/B8 use or allocated as such.</p>	<p>Paragraph W3.1 states that modern waste management facilities 'can' require purpose designed buildings, some waste management operations can take place in standard industrial buildings. The criteria-based policies for each type of waste management operation specify whether the development would need to take place within purpose designed or suitably adapted facilities within the land specified in policy WP2.</p>
<p><b>(Support)</b> Representation ID: 92075</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>Natural England considers a criteria based policy is satisfactory and we support the requirement to comply with Policy MW2.</p>	<p>Noted</p>

**Question 12a. Do you consider that specific sites should be allocated for waste management facilities as well as criteria based policies?**

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93041                      Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>                      We would agree that the experience of having allocated 29 sites previously, having had none of them developed whilst permissions have been granted on other sites does point away from an approach of allocating sites and towards criteria based policies.</p>	<p>Noted.</p>
<p><b>(Support)</b> Representation ID: 91987                      Respondent: <b>Chedgrave Parish Council (Mrs Hayley Goldson) [17678]</b>                      Chedgrave Parish Council agrees that specific sites should continue to be allocated.</p>	<p>Norfolk County Council carried out a 'call for waste management sites' in January/February 2019 for permanent waste management sites of over 1 hectare and an estimated throughput of at least 50,000 tpa to be submitted for consideration in the Minerals and Waste Local Plan Review process. These sites have been assessed and will be consulted on as part of the Preferred Options but are not considered suitable to allocate in the document.</p> <p>However, the existing waste management capacity at sites in Norfolk is considered to be sufficient to accommodate the forecast waste arisings over the plan period. Therefore, it is considered that criteria-based policies are the most appropriate and flexible approach to enable a sufficient supply of sites to be provided during the plan period to meet Norfolk's needs.</p>

**Question 13.Policy WP4: Recycling or transfer of inert and CD&E waste**

Representations received about WP4: Recycling or transfer of inert and CD&E waste	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93042  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  On the basis that it does not fall to the WDA to commission services for these sorts of wastes beyond the small amounts collected at our recycling centres (for which existing offtake capacity is used) the WDA is not best placed to offer a useful comment on this question.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93023  Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b>  As with Policy WP3, Policy WP 4 seeks to restrict waste management operations to the life of the mineral operation. We do not consider that this is always necessary or appropriate and recommend that Policy WP4 is less restrictive.</p>	<p>Minerals can only be worked where they occur, which is normally within the open countryside. Ancillary development such as recycling of inert and CD&amp;E waste would not normally be allowed in the open countryside and are only considered appropriate in order to facilitate the timely phased restoration of the mineral working. Therefore, inert waste management operations will be restricted to no later than the cessation date of the planning permission for the mineral extraction.</p>
<p><b>(Comment)</b> Representation ID: 92518  Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b>  <b>(Comment)</b> Representation ID: 92105  Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b>  WP4, WP5, WP7 etc. - a number of policies refer back to WP3 stating that proposals 'may be acceptable on land within the identified uses in', the Policy could be more effective as 'will not be acceptable outside of land identified in'.</p>	<p>The draft policy wording has been amended for the relevant policies to state "will only be acceptable on the types of land identified within Policy WP3".</p>

**Question 14. Policy WP5: Waste transfer stations, materials recycling facilities, ELV facilities and WEEE recovery facilities**

<b>Representations received about WP5: Waste transfer stations, MRF, ELV and WEEE facilities</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93043  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  Our comments concerning this policy are along similar lines to those in question 12 albeit for slightly different reasons in some cases.  Whereas the consideration of the size of the facility in terms of its throughput capacity gave rise to our comments in question 12, here it is the specialist nature of the activities proposed when considering reprocessing of ELVs and WEEE in particular that would lead us to caution against the policy unintentionally constraining the development of these facilities should they be proposed.  As respects the development of MRFs, again, if they are particularly large in scale then we would reiterate our comments from question 12.  When considering waste transfer stations however, these issues are of less concern because transfer stations, by their nature, ought to be located close to where concentrations of households are found.</p>	<p>The draft policy refers to sites only be acceptable within purpose designed or suitably adapted facilities on land within the uses identified within Policy WP3 (land uses potentially suitable for waste management facilities). For the type of facilities listed within draft policy WP5 the suitable land uses include: land in existing waste management use, land in existing B2 and B8 use, land allocated for B2 and B8 use, land within or adjacent to redundant agricultural and forestry buildings, previously developed (brownfield) land. It is considered that this list is sufficiently inclusive as to not unreasonably constrain development locations for the facilities in policy WP5.</p>
<p><b>(Comment)</b> Representation ID: 92519  Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b>  <b>(Comment)</b> Representation ID: 92106  Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b>  WP4, WP5, WP7 etc. - a number of policies refer back to WP3 stating that proposals 'may be acceptable on land within the identified uses in', the Policy could be more effective as 'will not be acceptable outside of land identified in'.</p>	<p>The draft policy wording has been amended for the relevant policies to state "will only be acceptable on the types of land identified within Policy WP3".</p>



**Question 15. Policy WP6: Transfer, storage, processing and treatment of hazardous waste**

Representations received about Policy WP6: Hazardous waste facilities	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 93044  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  We would broadly agree with the proposed policy and have no further comments to make.</p>	<p>Noted</p>

**Question 16. Policy WP7: Household waste recycling centres**

Representations received about Policy WP7: Household waste recycling centres	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93162  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>  Regarding the location, these could be away from urban areas according to some criteria in WP3. Should these be located near to larger urban areas (i.e. near to the source of the waste)?</p>	<p>Applications for waste management uses would also be determined using a number of policies within the Plan, such as WP2 which sets out the Spatial Strategy for waste management facilities, and has a preference for locations within five miles of urban areas.</p>
<p><b>(Support)</b> Representation ID: 93045  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  Policy WP7 offers appropriate additional flexibility to that offered by WP3.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92520  Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b>  <b>(Comment)</b> Representation ID: 92107  Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b>  WP4, WP5, WP7 etc. - a number of policies refer back to WP3 stating that proposals 'may be acceptable on land within the identified uses in', the Policy could be more effective as 'will not be acceptable outside of land identified in'.</p>	<p>The policy wording has not been changed, as proposed by South Norfolk and Broadland Councils. This is because flexibility is needed in the policy to enable Norfolk County Council to meet its statutory duty (EPA 1990, section 51) to provide Household Waste Recycling Centres in locations which are reasonably accessible to persons resident in Norfolk.</p>
<p><b>(Comment)</b> Representation ID: 92514  Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b></p>	<p>This text has been removed.</p>

Representations received about Policy WP7: Household waste recycling centres	Norfolk County Council Planning Officer's response
<p>WP7 - Concerned that this may not be legally sound, in that it goes beyond the remit of the Minerals and Waste Local Plan by seeking developer contributions. It would also be difficult to 'retro-fit' new Household Waste Recycling Centres into identified growth locations, if it was not a requirement when those locations were identified. Consideration could be given to allocating sites in the Minerals and Waste Local Plan which have good access to the growth locations.</p>	
<p><b>(Comment)</b> Representation ID: 92098</p> <p>Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b></p> <p>The reference to an "appropriate level of developer contributions from new developments will be sought" goes beyond the remit of the Minerals and Waste Local Plan by seeking to be applied to non - mineral or waste development. As such it would make the plan fail the test of legal soundness. Such a policy might be appropriately located within the local Plan of a local planning authority such as a District Council. An example is policy CSU4 in BDC's Development Management DPD 2015.</p> <p>It would also be difficult to 'retro-fit' new Household Waste Recycling Centres into identified growth locations, if it was not a requirement when those locations were identified. Consideration could be given to allocating sites in the Minerals and Waste Local Plan which have good access to the growth locations.</p>	<p>This text has been removed.</p>

**Question 17. Policy WP8: Composting**

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 93046</p> <p>Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b></p> <p>We would broadly agree with the proposed policy and have no further comments to make.</p>	<p>Noted</p>

**Question 18. Policy WP9: Anaerobic Digestion**

Representations received about Policy WP9: Anaerobic digestion	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 93047  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  We would broadly agree with the proposed policy and have no further comments to make.</p>	<p>Noted</p>

**Question 19. Policy WP10: Residual waste treatment facilities**

Representations received about Policy WP10: Residual waste treatment facilities	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93048  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  The County Council in its capacity as the WDA, has a policy for the commissioning of residual waste treatment services that precludes the development of facilities in Norfolk that use incineration to treat residual waste in that the County Council as WDA is responsible for.  Our comments here are made in clear recognition that the function of the County Council as a planning authority is separate from its function as a WDA and given in a manner that is neutral about waste treatment technology.  There are few comments to make other than those already made in relation to policy WP3 in the response to question 11 earlier.  We agree that the facilities should only be treating residual waste.  We would agree that any proposed thermal treatment process should recover energy as a minimum and preferably heat also. Incineration without energy recovery would only be appropriate for small scale operations such as pet crematoria or clinical waste incineration, both of which we assume are outside of the scope of this policy.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92900  Respondent: <b>West Winch parish council (Mrs J Leamon) [18325]</b>  Incinerators and Similar Projects</p>	<p>Draft Policy WP10 states that residual waste treatment facilities need to meet the development management criteria in Policy MW2. Draft Policy MW2 states that proposals for waste management development will be permitted where it can be</p>

Representations received about Policy WP10: Residual waste treatment facilities	Norfolk County Council Planning Officer's response
<p>Any Policies referring to larger facilities must have stronger wording to protect the Public from harmful emissions and effects. They should not be situated within populated urban areas. Cumulative emissions from all surrounding other activities must be taken into account.</p>	<p>demonstrated that the development would not have an unacceptable impact (including cumulative impact in combination with other existing or permitted development) on local amenity and health (including air quality). National Planning Policy for Waste (NPPW) states that Waste Planning Authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.</p>

**Question 20. Policy WP11: Disposal of inert waste by landfill**

Representations received about Policy WP11: Disposal of inert waste by landfill	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93049  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  Since the WDA do not routinely commission services for this sort of waste we are not best placed to offer comments.</p>	<p>Noted</p>
<p><b>(Support)</b> Representation ID: 93024  Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b>  <b>(Support)</b> Representation ID: 91960  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b>  Policy WP11 is supported and could be extended by including the importation of inert waste where it is necessary for agricultural improvement.</p>	<p>Support noted. This policy is regarding the disposal of inert waste by landfill and therefore we do not consider that the importation of inert waste for agricultural improvement fits within this policy. For information, inert waste is limited to concrete, brick, tiles and ceramics, glass, soil and stones.</p>

**Question 21. Policy WP12: Non-hazardous and hazardous waste landfill**

<b>Representations received about Policy WP12: Non-hazardous and hazardous waste landfill</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Support)</b> Representation ID: 93050 Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b> We agree with the proposed policy wording.</p>	<p>Noted</p>

**Question 22. Policy WP13: Landfill mining and reclamation**

<b>Representations received about Policy WP13: landfill mining and reclamation</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93161 Respondent: <b>Broads Authority (Natalie Beal) [16282]</b> Are the areas of these landfills identified and are any in the Broads?</p>	<p>The locations of historic landfill sites are mapped by the Environment Agency. The Environment Agency maps shows that there are some historic landfill sites located within the Broads Authority Executive Area.</p>
<p><b>(Support)</b> Representation ID: 93051 Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b> The wording of the policy is pragmatic and appropriate.</p>	<p>Noted</p>

**Question 23. Policy WP14: Water Recycling Centres**

Representations received about Policy WP14: Water Recycling Centres	Norfolk County Council Planning Officer's response
<p>(Comment) Representation ID: 93052                      Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>                      No comments</p>	<p>Noted</p>
<p>(Comment) Representation ID: 92489                      Respondent: <b>Anglian Water Services Ltd (Mr S Patience) [16454]</b>                      Anglian Water is largely supportive of Policy WP14 as drafted but has some comments particularly in relation to making the policy more positive in enabling the continued operation and development of existing water recycling centres) to enable Anglian Water to fulfil our statutory obligations under the Water Industry Act 1991.                      It is therefore proposed that the first paragraph of Policy WLP14 be amended as follows (additional text in BOLD):                      'New or extended Water Recycling Centres OR IMPROVEMENTS TO EXISTING SITES AND SUPPORTING INFRASTRUCTURE (INCLUDING RENEWABLE ENERGY) WILL be acceptable IN PRINCIPAL where such proposals aim to:                      a) treat a greater quantity of wastewater; and/or                      b) improve the quality of discharged water; and/or                      c) reduce the environmental impact of operation.'</p>	<p>The text will be revised to include improvements to existing sites. However, Water Recycling Centres may be in locations which are necessary for the efficient treatment of wastewater but may not be appropriate locations for other operations. Therefore, proposals for other infrastructure at Waste Recycling Centres need to be determined on a case by case basis.</p>

**Question 24. Policy WP15: Whitlingham water recycling centre**

Representations received about Policy WP15: Whitlingham water recycling centre	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93053  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  No comments</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92490  Respondent: <b>Anglian Water Services Ltd (Mr S Patience) [16454]</b>  Policy WLP15 appears to be largely a continuation of Policy CS12 of the adopted Norfolk Minerals and Waste Core Strategy. We recognise the importance of Whitlingham Water Recycling Centre as a strategic asset and the need to work with the Greater Norwich authorities to develop an effective to shape operational enhancements from future technologies and planned investment to accommodate further growth.  Reference is made to Anglian Water developing a long term vision for Whitlingham Water Recycling Centre with the Greater Norwich Growth Board and the EA.  Anglian Water has recognised the need to take a long term view in relation to future investment at WRCs and within the foul sewerage network similar to the Water Resource Management Plan. The Minerals and Waste Local Plan Review should have regard to the WRLTP in relation to the planned investment within Norfolk County as part of next business and future business plans.  We are currently in the process of finalising a Water Recycling Long Term Plan (WRLTP) which will set out a long term strategy to identify the need for further investment by Anglian Water at existing Water Recycling Centres or within the foul sewerage catchments to accommodate the anticipated scale and timing of growth in the company area. This document once finalised will be used to inform future business plans including the plan for 2020 to 2025 which is expected to be approved by our economic regulator Ofwat in December 2019.  Policy WLP15 as drafted includes specific criteria which apply to all development proposals at Whitlingham WRC. It is unclear whether this would apply to all development proposals on this site - for example if the proposal did not generate any additional traffic movements. Therefore we would suggest that the wording of policy WLP15 should be reviewed to consider in what circumstances it would be applied and how it relates to Policy WP15 given that the development</p>	<p>The supporting text to this policy has been revised to refer to Anglian Water's 'Water Recycling Long Term Plan'.</p> <p>For the development criteria, only relevant issues would need to be addressed in determining a planning application, if an application did not generate traffic this would not be relevant.</p>

Representations received about Policy WP15: Whitlingham water recycling centre	Norfolk County Council Planning Officer's response
<p>plan is intended to be read as whole. As part of which consideration should be given to whether there is need for a separate policy as suggested.</p>	<p>Therefore, it is not considered that a separate policy to cover such applications is required.</p>
<p><b>(Comment)</b> Representation ID: 92513  Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b>  WP15 - elements of this policy would appear to be requests rather than requirements, for example could 'strong encouragement' to Anglian Water be included in the supporting text, and the policy be reworded to say, 'Any proposals for the improvement of WWRC must to be accompanied by a longer-term vision, produced in collaboration with ...'</p>	<p>The wording to the policy has been revised to as requested.</p>
<p><b>(Comment)</b> Representation ID: 92555  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  Water Recycling Centres have the potential to cause significant impact on the water environment, and inhibit the ability for water bodies to achieve 'good' status under the WFD. We therefore welcome Whitlingham Water Recycling Centre having a long term policy to ensure that further capacity is provided in line with further growth.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92097  Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b>  The majority of this policy is not worded as policy for land use and development, and would appear to be requests, for example Anglian Water being strongly encouraged to develop a long-term vision, and suggestions for the local liaison group and working relationships. Reference to these matters could perhaps be included in the supporting text with, possibly, the policy requiring the demonstration of how any improvement proposals fit into a long-term vision eg 'Any proposals for the improvement of WWRC must to be accompanied by a longer-term vision, produced in collaboration with ...' as this would likely be a consideration in the determination of any proposals.  As regards the Local Liaison Group, it might be worthwhile inviting other nearby Parish Councils in addition to the ones listed (eg Postwick and Thorpe St Andrew).</p>	<p>The wording to the policy has been revised as requested.</p>



**Question 25. Policy WP16: Design of waste management facilities**

Representations received about Policy WP16: Design of waste management facilities	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 93176  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the proposed policy. It is good to see the historic environment included in Policy WP16.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93160  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>  Should this include reference to MW2? That seems to have relevant and detailed criteria</p>	<p>Policy WP16 relates to the design of waste management facilities, whilst Policy MW2 does not contain detailed criteria on design. There are several Plan Policies which would be relevant to waste management and it is not necessary to cross-reference each one in order for them to be taken into account; therefore, policies have only been cross-referenced where they are mutually supportive and should be viewed together.</p>
<p><b>(Comment)</b> Representation ID: 93054  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  No comments</p>	<p>Noted</p>
<p><b>(Support)</b> Representation ID: 92949  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We welcome bullet d) in Policy WP16 on the use of design to protect, preserve and, where possible, enhance the historic environment.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92512  Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b>  <b>(Comment)</b> Representation ID: 92096  Respondent: <b>Broadland District Council (Mr J Walchester) [17810]</b>  This overlaps with MW2 and MW3. Therefore, this policy might be better placed in the General Policies part of the Plan, and used to cover waste and minerals proposals.</p>	<p>Mineral extraction is a temporary use of land as are buildings related to such operations. Whereas, waste management facilities are often a permanent use conducted in permanent buildings. Therefore, a design policy which relates to waste management facilities only is considered to be appropriate.</p>

**Question 26. Policy WP17: Safeguarding waste management facilities**

Representations received about Policy WP17: Safeguarding waste management facilities	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93055  Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b>  No comments</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92491  Respondent: <b>Anglian Water Services Ltd (Mr S Patience) [16454]</b>  Anglian Water as a sewerage company is generally supportive of the final paragraph of WP17 as drafted. However the policy should allow for a change of circumstance for example if the relevant sewerage company identifies that existing water recycling asset is no longer required for operational reasons e.g. directing foul flows elsewhere within the public sewerage network.   Also for clarity the policy should refer to 'sewerage company' as opposed to wastewater management company as drafted.</p>	<p>The policy has been amended as requested, to state: "The County Council will oppose development proposals which would prevent or prejudice the use of safeguarded facilities for those purposes unless suitable alternative provision is made, or the applicant demonstrates that those facilities no longer meet the needs of the waste management industry or the relevant sewerage company".</p> <p>The policy has been amended to refer to 'sewerage company' instead of wastewater management company as requested.</p>

## Minerals Specific Policies

### Question 27. Policy MP1: Provision for minerals extraction

Representations received about Policy MP1: Provision for minerals extraction	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 93073 Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b></p> <p>MP1: As currently drafted the Company believes that this policy would be found to be unsound as it does not reflect Government guidance regards the provision of sand and gravel and no material circumstances have been identified by the Plan that explain why the approach taken is appropriate. The following revision is proposed: -</p> <p>"For sand and gravel, specific sites to deliver at least 23,063,560 tonnes of resources will be allocated. The sand and gravel landbank will be maintained TO AT LEAST 7 years' supply (excluding any contribution from borrow pits for major construction projects)."</p> <p>The above phraseology better reflects guidance contained with paragraph 207f of the revised NPPF and is considered sound.</p>	<p>It is recognised that the NPPF para 207 f states that MPAs should maintain landbanks of at least 7 years for sand and gravel.</p> <p>It is also recognised that the PPG (para 27-084-201403006) states that there is no maximum landbank level and each application for minerals extraction must be considered on its own merits regardless of the length of the landbank.</p> <p>Therefore, the policy wording has been amended as suggested to "The sand and gravel landbank will be maintained at a level of at least 7 years' supply...".</p>
<p><b>(Support)</b> Representation ID: 93025 Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b></p> <p>NCC propose to use the last 20 years average of 1.98mtpa rather than the 10 year average of 1.41mtpa. The justification for this is to enable a sufficient quantity of sand and gravel resources to be available over the 20 year plan period and would take into account potential fluctuations in the economy. This positive approach to securing a steady and adequate supply of aggregates is supported.</p> <p>Policy MP1 - provision for minerals extraction including the need to allocate 23,063,560 tonnes of sand and gravel is supported. However, to be in accordance with NPPF, the policy should be amended so that it provides a sand and gravel landbank of AT LEAST 7 YEARS.</p>	<p>Support for using the 20 year average to forecast the need for sand and gravel over the plan period is noted.</p> <p>It is recognised that the NPPF para 207 f states that MPAs should maintain landbanks of at least 7 years for sand and gravel. It is also recognised that the PPG (para 27-084-201403006) states that there is no maximum landbank level and each application for minerals extraction must be considered on its own merits regardless of the length of the landbank.</p> <p>Therefore, the policy wording has been amended as suggested to "The sand and gravel landbank will be maintained at a level of at least 7 years' supply ....".</p>
<p><b>(Object)</b> Representation ID: 92912 Respondent: <b>Mr R Carter [17533]</b></p>	<p>Representations regarding the suitability of proposed site MIN 71 are covered in the section of the Feedback Report</p>

Representations received about Policy MP1: Provision for minerals extraction	Norfolk County Council Planning Officer's response
<p>I object to the initial conclusion that MIN 71 is a suitable site for the extraction of sand and gravel on the grounds that the Planning Authority is unable to demonstrate a need for extra resources of sand and gravel aggregates in Norfolk.</p> <p>Supply/Demand The apportionment targets set as Norfolk's share of the sub-national guideline figures have been missed by very wide margins every year for the last 20 years (averaging only 51.2% of apportionment in the last 10 years).</p> <p>Market forces have shown that demand levels are significantly lower than the supply apportionment levels, and that Core Strategy Policy CS1 supply figures need to be severely downgraded in line with demand.</p> <p>"Neighbouring Minerals Planning Authorities plan to supply the demand in their own areas, by allocating sites, and therefore Norfolk does not need to make planned provision to supply additional aggregates".(1)</p> <p>"Norfolk is a net importer of sand and gravel" (1)</p> <p>Norfolk quarries have supplied "90% of local consumption" whilst exporting between 30%-50% of production. (1)</p> <p>Norfolk should not be subsidising exported aggregates (reduced transport costs) for the benefit of surrounding Mineral Planning Authorities and Companies at the cost of the Norfolk Countryside and amenity of local residents.</p> <p>"Norfolk, due to its geology, has considerable sand and gravel resources", consequently, there are minimal short or medium term supply risks if demand does increase - however, there is a significant risk to the countryside, the tourism industry, residents and existing agricultural if unsuitable and unwarranted sites are opened.</p>	<p>which deals with site MIN 71. However, the forecast need for sand and gravel extraction is dealt with in Policy MP1.</p> <p>It is recognised that the current sub-national apportionment for Norfolk (2.57 million tpa) has not been met during the last 15 years, therefore the sub-national apportionments have not been used to forecast the need for aggregates in the Plan.</p> <p>Noted. The forecast need for aggregates in the Plan does not include any additional provision to meet the need of other MPAs.</p> <p>In 2014 (the most recent year for which there is data on the movement of minerals in and out of the County), Norfolk consumed 1,341,000 tonnes of land-won sand and gravel and produced 1,148,000 tonnes of land-won sand and gravel. Therefore Norfolk is a net importer of land-won sand and gravel. Norfolk is not producing more sand and gravel than it needs or subsidising exported aggregates for the benefit of surrounding MPAs or companies.</p> <p>Mineral Planning Authorities (MPAs) are required to plan for a steady and adequate supply of aggregate minerals. At the planning application stage proposals would need to demonstrate that they would not have an unacceptable adverse impact on the landscape and countryside, local amenity and agricultural land. Therefore, the planning application process would ensure that unsuitable sites are not permitted. The NPPF states that MPAs should</p>

Representations received about Policy MP1: Provision for minerals extraction	Norfolk County Council Planning Officer's response
<p>Methodology</p> <p>"The MPA does not think it prudent... to base allocation purely on a rolling average of 10 years sales as having regard to paragraph 14 of the NPPF, flexibility is required in allocations". (1) Instead, however, the MPA chose to base its allocation on a 20 year rolling average against the following guidance:</p> <ul style="list-style-type: none"> <li>- Guidelines from the NPPF in March 2012 para 145 state that "MPAs... determine their own levels of aggregate production based on a rolling average of 10 years sales data..."</li> </ul> <p>Guidance from the NPPG requires that LAAs should provide:</p> <p>"a forecast of the demand for aggregates based on both the rolling average of ten-year sales data and local information"</p> <p>It also stated that "The rolling average of 10 years sales data will inform the targets for mineral extraction data" (1)</p> <p>All these guidelines unequivocally call for the 10 year rolling average to be the basis to consider supply forecasts, and any variant of this would need to be justified by compelling reasons.</p> <p>The MPA has chosen to double the length of the recommended time-base against this advice, and to use a 20 year average, leading to the following supply differences -</p> <ul style="list-style-type: none"> <li>- based on a 20 year rolling average 1.98 million tpa would be needed.</li> <li>- based on a 10 year rolling average 1.41 million tpa would be needed</li> </ul> <p>The difference over a 20 year plan is some 11.4 million tonnes at 570,000 tonnes a year - this clearly stretches the meaning of the phrase 'flexible' beyond any reasonable interpretation.</p> <p>Conclusion</p> <p>The clear evidence is that existing supply levels of aggregates are significantly greater than demand exhibited by market forces in Norfolk, and any new policies/calculations should address this significant imbalance.</p>	<p>maintain landbanks of at least 7 years for sand and gravel. The NPPG states "There is no maximum landbank level and each application for minerals extraction must be considered on its own merits regardless of the length of the landbank".</p> <p>Methodology:</p> <p>The NPPF (2018) para 207 states that "MPAs should plan for a steady and adequate supply of aggregates by: a) preparing an annual Local Aggregates Assessment... to forecast future demand, based on a rolling average of 10 years' sales data and other relevant local information, and an assessment of all supply options;</p> <p>b) taking account of any published National and Sub National Guidelines of future provision which should be used as a guideline when planning for the future demand for and supply of aggregates."</p> <p>Guidance from the NPPG requires that LAAs should contain "a forecast of the demand for aggregates based on both the rolling average of 10-years sales data and other relevant local information".</p> <p>The NPPG also states that "Local Aggregate Assessments must also consider other relevant local information in addition to the 10 year rolling supply, which seeks to look ahead at possible future demand, rather than rely solely on past sales. Such information may include, for example, levels of planned construction and housebuilding in their area and throughout the country. Mineral Planning Authorities should also look at average sales over the last 3 years in particular to identify the general trend of</p>

Representations received about Policy MP1: Provision for minerals extraction	Norfolk County Council Planning Officer's response
<p>(1) figures/narrative quoted are from - 'Norfolk Minerals and Waste Local Plan: Monitoring report - Mineral data Local Aggregate Assessment and Silica Sand Assessment 2016 (published October 2017)</p>	<p>demand as part of the consideration of whether it might be appropriate to increase supply”.</p> <p>Therefore the guidance does not state that the forecast of future demand should be based <u>only</u> on the rolling average of 10-years sales data.</p> <p>The production figures have been updated for the Preferred Options stage to take into account 2018 data:</p> <ul style="list-style-type: none"> <li>• the 20 year rolling average is 1.868 million tpa and showing a downward trend</li> <li>• the 10 year rolling average is 1.36 million tpa and showing a downward trend</li> <li>• the three year rolling average is 1.58 million tpa and showing an upward trend.</li> </ul> <p>As stated in the Initial Consultation document, NCC had chosen to use the 20-year average because the plan covers a 20-year period (2017-2036). (As more recent mineral production data is now available, the plan will now cover an 18-year period from 2019-2036). The 20-year average is also being used because the most recent 10 years mainly covered an economic recession period, whereas the 20-year period included both an economic recession and growth period, covering a full economic cycle. It is recognised that the 20-year rolling average is higher than the 10-year rolling average for this reason. However, the three-year rolling average shows an upward trend and therefore it is considered that the 20-year average figure is more appropriate to use for both these reasons to ensure the plan is positively prepared.</p>

Representations received about Policy MP1: Provision for minerals extraction	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92529  Agent: SLR Consulting Ltd (Mr G Jenkins) [18001] Respondent: <b>Tarmac Trading Limited (Mr A Everard) [336]</b></p> <p>Notwithstanding this support for the resource calculation approach in Policy MP1, Tarmac objects to the indication that the sand and gravel landbank will be maintained at "between 7 years and 10 years supply". NPPF (July 2018) and the predecessor version of NPPF 2012 is clear in requiring the maintenance of sand and gravel landbanks of "at least 7 years" with no upper limit on the landbank. This is re-enforced in Planning Practice Guidance which confirms that "there is no maximum landbank level and each application must be considered on its own merits regardless of the length of the landbank" (ref ID27-084). The suggested wording of policy MP1 is contrary to NPPF and the plan would not be 'sound' based upon such a policy wording. In practical terms, strict adherence to the policy as worded would mean that an otherwise acceptable development could be refused if the landbank, at an arbitrary date of determination, was just above 10 years. This would be unreasonable. Policy MP1 should be revised to simply confirm a commitment to maintain a sand and gravel landbank of "at least 7 years", consistent with the requirements of NPPF.</p>	<p>Support for using the 20-year average to forecast the need for sand and gravel over the plan period is noted.</p> <p>It is recognised that the NPPF para 207 f states that MPAs should maintain landbanks of at least 7 years for sand and gravel. It is also recognised that the PPG (para 27-084-201403006) states that there is no maximum landbank level and each application for minerals extraction must be considered on its own merits regardless of the length of the landbank.</p> <p>Therefore, the policy wording has been amended as suggested to "The sand and gravel landbank will be maintained at a level of at least 7 years' supply ....".</p>
<p><b>(Support)</b> Representation ID: 92528  Agent: SLR Consulting Ltd (Mr G Jenkins) [18001] Respondent: <b>Tarmac Trading Limited (Mr A Everard) [336]</b></p> <p>Q27. Tarmac supports the approach of seeking to allocate sites to deliver at least an additional 23m tonnes of sand and gravel over the plan period (ref calculation in the table on page 30). This will make the plan more robust than an alternative approach of using a 10 year average for sales over the last 10 years, since this coincided with a recession in the aggregates industry (and economy in general) which suppressed sales to historically low levels. (It should also be noted that there appears to be an error in the 'alternative table' on page 64 where the figures for reserves and shortfall seem to be been transposed).</p>	<p>Support for using the 20-year average to forecast the need for sand and gravel over the plan period is noted.</p> <p>The 'alternatives options tables' for sand and gravel in the Initial Consultation were incorrect as they contained the wrong figure for the existing permitted reserve at 31/12/2016. This has been corrected and updated in the Preferred Options document.</p>
<p><b>(Object)</b> Representation ID: 92503  Respondent: <b>Mineral Products Association (Mr M North) [17995]</b></p>	<p><b>Sand and gravel &amp; carstone landbank:</b> It is recognised that the NPPF para 207 f states that MPAs should maintain landbanks of at least 7 years for sand and gravel</p>

Representations received about Policy MP1: Provision for minerals extraction	Norfolk County Council Planning Officer's response
<p>No as it does not accord with National Policy and is unsound. Suggested re wording as follows;</p> <p>Proposed Changes (new text in CAPITALS)</p> <p>"The strategy for minerals extraction is to allocate sufficient sites to meet the forecast need for both sand &amp; gravel and hard rock (carstone).</p> <p>For sand and gravel, specific sites to deliver at least 23,063,560 tonnes of resources will be allocated. The sand and gravel landbank will be maintained at A LEVEL OF AT LEAST 7 YEARS INCLUDING AT THE END OF THE PLAN PERIOD (excluding any contribution from borrow pits for major construction projects).</p> <p>For carstone, a site or sites to deliver at least 480,000 tonnes of resources will be allocated. The landbank for carstone will be maintained at a LEVEL OF AT LEAST 10 years' supply.</p> <p>For silica sand, sufficient sites and/or areas to deliver at least 12,380,000 tonnes of silica sand will be allocated. STOCKS OF PERMITTED RESERVES for silica sand will be maintained at "at least" 10 years' PRODUCTION FOR EACH INDIVIDUAL SILICA SAND SITE OR AT LEAST 15 YEARS WHERE SIGNIFICANT NEW CAPITAL IS REQUIRED."</p> <p>We would seek clarification "why it is considered appropriate" (page 63, para 1) for basing silica sand projections at 750,000 tpa when the current projections indicate average production over the past 3 years (785,400tpa) is much higher than the 10-year average and the figure upon which the plan projection is based. Basing a figure which is clearly lower than current sales is hardly forecasting (page 65). Further, para 2 on page 63 suggests that no planning applications for silica sand extraction have been submitted for over 10 years, although it is understood that a recent application has yet to be validated by the Council.</p> <p>With less than 4 years "stocks of permitted reserves" of silica sand, the supply issues are clearly critical.</p>	<p>and at least 10 years for carstone. It is also recognised that the PPG (para 27-084-201403006) states that there is no maximum landbank level and each application for minerals extraction must be considered on its own merits regardless of the length of the landbank. Therefore, the policy wording has been amended as suggested to "The sand and gravel landbank will be maintained to at least 7 years' supply .... " and "the carstone landbank will be maintained at a level of at least 10 years' supply ....".</p> <p>The period covered by the Minerals and Waste Local Plan Review is until the end of 2036. There is no requirement in the NPPF or PPG for the plan to allocate sites to enable a landbank of at least 7 years to exist at the end of the Plan period. A landbank of permitted reserves is calculated from the extant planning permissions for mineral extraction (not from the sites allocated in the local plan). The Town and Country Planning (Local Planning) England Regulations 2012 (as amended) requires the policies in plans to be reviewed every 5 years. This review process would ensure that sufficient sites were allocated to cover a new 15 year plan period before the current plan period to 2036 ended.</p> <p><b>Silica Sand:</b> A landbank is a stock of permitted reserves, therefore it is not considered that the suggested change to the policy wording is necessary. No information has been put forward by Sibelco UK Ltd that significant new capital investment is required at their Leziat processing plant site, therefore there is no justification to include the reference to a 15 year landbank in policy MP1. There is only one silica sand processing plant located in Norfolk, therefore there is no need to refer to 'at each silica sand</p>



Representations received about Policy MP1: Provision for minerals extraction	Norfolk County Council Planning Officer's response
	<p>site' in Policy MP1 because the 10 year landbank relates to the quantity of permitted silica sand reserves in Norfolk to supply the existing processing plant site.</p> <p>Policy MP1 states 'that the landbank for silica sand will be maintained to at least 10 years' supply where practicable', because the size of the landbank is reliant on suitable planning applications being submitted. Historically, for silica sand the landbank has been below 10 years because planning applications for new sites have not been submitted. For example, planning permission was granted for 7.5 million tonnes of silica sand extraction in September 2007. Since that time, based on the forecast 750,000 tpa extraction, the landbank has been continuously below 10 years, but a new application for 3 million tonnes of silica sand extraction was only submitted to Norfolk County Council in 2018 and, even if it is approved, the landbank would remain below 10 years.</p> <p>It is considered appropriate to base silica sand projections at 750,000 tpa because the ten-year rolling average for 2018 is 721,117tpa; while the three-year average for 2018 is 803,587tpa. It is considered that 750,000tpa provides a prudent level of flexibility taking both these averages into account.</p>
<p><b>(Object)</b> Representation ID: 92477  Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b>  No as it does not accord with National Policy and is unsound. Suggested wording for silica sand:  STOCKS OF PERMITTED RESERVES for silica sand will be maintained at 10 years'  PRODUCTION FOR EACH SILICA SAND SITE. Sufficient sites and/or areas to deliver at least 12,380,000 tonnes of silica sand will be allocated TO THE END OF THE PLAN PERIOD WITH</p>	<p>The purpose of policy MP1 is to set out the quantities of minerals that need to be allocated. There is only one silica sand processing plant located in Norfolk, therefore there is no need to refer to 'at each silica sand site' in Policy MP1 because the 10 year landbank relates to the quantity of permitted silica sand reserves in Norfolk to supply the existing processing plant site.</p>

<b>Representations received about Policy MP1: Provision for minerals extraction</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>FURTHER PROVISION TO ENSURE A STOCK OF PERMITTED RESERVES BEYOND THE PLAN PERIOD.</p> <p>In the table on page 63 in the preamble to Policy MP1 is should read:  B Silica sand permitted reserve at 31/12/2016</p>	<p>Policy MP1 states 'that the landbank for silica sand will be maintained at a level of at least 10 years' supply where practicable', rather than the proposed wording in the representation because the size of the landbank is reliant on suitable planning applications being submitted. Historically, for silica sand the landbank has been below 10 years because planning applications for new sites have not been submitted. For example, planning permission was granted for 7.5 million tonnes of silica sand extraction in September 2007. Since that time, based on the forecast 750,000 tpa extraction, the landbank has been continuously below 10 years, but a new application for 3 million tonnes of silica sand extraction was only submitted to Norfolk County Council in 2018 and, even if it is approved, the landbank would remain below 10 years.</p> <p>The period covered by the Minerals and Waste Local Plan Review is until the end of 2036. There is no requirement in the NPPF or PPG for the plan to allocate sites to enable a landbank of at least 10 years to exist at the end of the Plan period. A landbank of permitted reserves is calculated from the extant planning permissions for silica sand (not from the sites allocated in the local plan). The Town and Country Planning (Local Planning) England Regulations 2012 (as amended) requires the policies in plans to be reviewed every 5 years. This review process would ensure that sufficient sites were allocated to cover a new 15-year plan period before the current plan period to 2036 ended.</p>

Representations received about Policy MP1: Provision for minerals extraction	Norfolk County Council Planning Officer's response
	The table regarding the permitted reserve for silica sand has been updated to 31/12/2017 in the Preferred Options document.
<p><b>(Comment)</b> Representation ID: 92357  Respondent: <b>Aggregate Industries UK Ltd (Ms K Hannaford-Hill) [17973]</b>  MP1 Provision for Minerals Extraction - It is considered production capacity should be captured within this policy to ensure deliverability of a steady supply of mineral.</p>	<p>We do not consider that it is necessary to include production capacity within Policy MP1 because the text regarding the landbank has been amended to refer to 'at least' seven years supply and therefore no longer refers to a maximum landbank. However, we have taken the estimated annual extraction rate at each proposed site into account in determining how many sites would be required (based on their annual production capacity) to meet the forecast annual need for minerals. This ensures that sufficient sites will be allocated within the plan will be able to deliver a steady and adequate supply of mineral.</p>
<p><b>(Object)</b> Representation ID: 92014  Respondent: <b>CPRE Norfolk (Mr M Rayner) [17775]</b>  We have concerns about the open-ended nature of the amounts to be extracted. We would prefer to see realistic maxima added for each of the materials as well as the included "at least" figures.</p>	<p>Objection noted. The policy refers to an 'at least' quantity to reflect the requirement for Local Plans to be positively prepared. Whilst the minimum quantity to be allocated has been calculated (using the 20-year sales average for carstone and aggregates) it would be difficult to specify a maximum quantity to be allocated due to the varying sizes of the sites proposed for allocation. For example, the forecast need for additional carstone sites is 377,500 tonnes over the plan period. Only one site has been proposed and it considered suitable to allocate, which has an estimated mineral resource of 1,416,000 tonnes. This is significantly larger than the requirement, but is only one site.</p>
<p><b>(Support)</b> Representation ID: 91961  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b></p>	<p>The period covered by the Minerals and Waste Local Plan Review is until the end of 2036. There is no requirement</p>

Representations received about Policy MP1: Provision for minerals extraction	Norfolk County Council Planning Officer's response
<p>This policy is supported and to comply with National Guidance the landbank should be maintained throughout the Plan Period. Therefore, additional words to make it clear that the land bank of between 7 and 10-years supply will be maintained throughout and also at the end of the Plan Period would also be supported.</p>	<p>in the NPPF or PPG for the plan to allocate sites to enable a landbank of at least 7 years to exist at the end of the Plan period. A landbank of permitted reserves is calculated from the extant planning permissions for sand and gravel (not from the sites allocated in the local plan). The Town and Country Planning (Local Planning) England Regulations 2012 (as amended) requires the policies in plans to be reviewed every 5 years. This review process would ensure that sufficient sites were allocated to cover a new 15-year plan period before the current plan period to 2036 ended.</p>
<p><b>(Support)</b> Representation ID: 91702  Respondent: <b>North Yorkshire County Council (Mr Rob Smith) [16201]</b>  Support the policy MP1 especially in terms of silica sand provision. North Yorkshire imports silica sand for glass production from Norfolk so important to secure supply by the provision of new sites.</p>	<p>Noted</p>

**Question 28. Policy MP2: Spatial strategy for minerals extraction**

Representations received about Policy MP2: Spatial strategy for minerals extraction	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 93177                      Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>                      We agree with the proposed policy.</p> <p>(g) Reference to NPPF paragraph 132 needs updating - now paragraphs 193 – 194</p> <p>Silica sand text (p67-69) includes a section (j) on the historic environment. This is very similar to the section NCCES agreed as part of the recent silica sand review.</p>	<p>Noted. The reference to the relevant paragraph of the NPPF has been updated as required.</p>
<p><b>(Comment)</b> Representation ID: 93026                      Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b>                      Section 31 - Spatial strategy from minerals extraction                      Final para of page 66 states:                      "... Norfolk's urban areas and main towns are the locations where there will be the greatest need for a supply of aggregate for new housing development and associated infrastructure."                      Policy MP2: Spatial Strategy for mineral extraction                      "Within the resource areas identified on the key diagram, specific sites for sand and gravel ... should be located within 10 miles of one of Norfolk's urban areas or main towns and/or be well related to one of Norfolk's urban areas or main towns via appropriate transport infrastructure."                      Within the listed settlement hierarchy Great Yarmouth is in the highest tier as an urban area. This being the case we question the Council's approach to allocate one site within 10 miles of the Great Yarmouth urban area. We do not believe this secures a steady and adequate supply of sand and gravel to the Great Yarmouth area and the Council should be allocating additional reserves. These additional reserves should be secured through the allocation of land at MIN38 - Waveney Forest, Fritton.</p>	<p>The existing mineral landbank and the forecast future need for sand and gravel in Norfolk is calculated for the county as a whole. Therefore, the provision of mineral supply in a particular sub-county area is not relevant or material to the decision regarding which sites are appropriate for allocation or permission.</p>
<p><b>(Object)</b> Representation ID: 92950                      Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>                      We note the requirement for a 250-metre buffer around designated heritage assets which also trigger considerations of setting when defining areas of search. Whilst we understand the need</p>	<p>The 250-metre buffer around designated heritage assets excludes Areas of Search from being any closer than this, it does not exclude an assessment of setting for heritage assets at a greater distance. Several factors are relevant when defining the setting</p>

<b>Representations received about Policy MP2: Spatial strategy for minerals extraction</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>to set a numerical value, appropriate distance depends on a number of factors including topography, views and vistas, and landscape integrity. The impact on groups of assets and the spaces between them also are not considered. We appreciate that this policy should be read with MP13, however we remain concerned about Area of Search E and preferred area SIL 02 which both individually and combined potentially cause considerable harm to the significance of designated heritage assets which, in the case of SIL 02 are much closer than the 250m buffer.</p>	<p>of a heritage asset and more detailed information about how a mineral operation would be carried out would also be relevant in identifying the scale of potential impacts from extraction on setting and significance. Factors such as the height and location of bunds, the location within an Area of Search where extraction would be taking place, duration of the operations, phasing and restoration. Therefore, it would only be possible to accurately assess potential impacts on heritage assets and an appropriate distance for that particular mineral operation, at the point a planning application or specific site allocation was to come forward in the future for part of the Areas of Search.</p> <p>Historic England's concerns regarding Area of Search E and area SIL02 are responded to in the sections of the Feedback Report that specifically deal with AOS E and SIL 02.</p>
<p><b>(Comment)</b> Representation ID: 92553  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>We agree that each designated site and sensitive receptors will have different interest features and sensitivities. Therefore, proposed developments will need to be assessed to determine their potential impacts on the features for which each site is designated. Appropriate mitigation should be applied to reduce potential impacts. These may include planting buffer zones of trees around sites to act as dust suppression, and limit noise and light pollution from the development.</p>	<p>Noted. The potential impacts on SSSIs, of the specific sites and areas of search proposed for mineral extraction, have been assessed for each individual site/area in the draft Local Plan and mitigation measures and policy requirements proposed where appropriate. Planning applications for mineral extraction will need to demonstrate that the development would not have an unacceptable adverse impact on the natural and geological environment (including internationally, nationally or locally designated sites and irreplaceable habitats).</p>
<p><b>(Comment)</b> Representation ID: 92543</p>	

Representations received about Policy MP2: Spatial strategy for minerals extraction	Norfolk County Council Planning Officer's response
<p>Agent: Lichfields (Ms S Innes) [18008] Respondent: <b>Bourne Leisure Ltd [18009]</b></p> <p>Policy MP2 - Spatial Strategy for Minerals Extraction</p> <p>Bourne Leisure considers it is necessary that when establishing a spatial strategy for the extraction of minerals, all land uses are considered so that consideration is given to making environmental improvements and ensuring safe and healthy living conditions while endeavouring to make efficient use of land (NPPF, paragraph 117). The Company therefore considers that draft Policy MP2 should be amended so that tourism development is considered as a sensitive receptor to amenity impacts. The New Anglia Local Enterprise Partnership (LEP) identifies the visitor economy as a key sector for Norfolk's economy, as identified in their Economic Strategy (November 2017). As a result, it is key that any minerals and waste development does not have an adverse impact on tourism developments, as this would in turn impact on the sector's contribution to the local and wider economy. This is particularly important in relation to tourism accommodation, as it increasingly supports longer stays; if not considered appropriately in relation to the impacts of proposed minerals and waste development, harmful effects could result in a number of direct impacts - and critically, indirect impacts such as the loss of local jobs and reduced spend in local businesses.</p> <p>Bourne Leisure therefore suggests the following amendments to part (h) of the draft policy (new text in CAPITALS):</p> <p>"h. Sensitive receptors to amenity impacts (residential dwellings, educational facilities, workplaces, healthcare and TOURISM AND leisure facilities) and 250 metres around each sensitive receptor."</p>	<p>The proposed amendment is not considered necessary because (MP2, h) is part of the criteria used for defining Areas of Search for potential silica sand extraction sites, not any other mineral extraction. In Norfolk, silica sand only occurs within West Norfolk, and there are four Areas of Search within the silica sand resource. The sensitive receptors to amenity impacts already include workplaces and leisure facilities. It is considered that tourism accommodation would be likely to fall within the categories of either a workplace (e.g. hotel), residential accommodation (e.g. B&amp;B) or a leisure facility. In addition, when Areas of Search were defined, in the Silica Sand Single Issue Review, holiday caravan accommodation was taken into account within the leisure facilities category.</p> <p>The issue of adverse impacts on local businesses, is not a material planning consideration as the planning system is not in place to protect the private interests of one over another. The assessment of proposed specific site allocations and areas of search would examine whether the mineral extraction would unacceptably impact on amenity (through noise, dust emissions etc.) and any existing use of land which should be protected in the public interest.</p>
<p><b>(Object)</b> Representation ID: 92504</p> <p>Respondent: <b>Mineral Products Association (Mr M North) [17995]</b></p> <p>Areas of Search : There should be no buffers applied to the so-called planning constraints. The acceptability or not of approaching such constraints will be a matter for the EIA.</p>	<p>The reason that the criteria used to define areas of search for future silica sand extraction includes specified distances from around the planning constraints listed in the policy is because there is no detail currently available about the potential extraction sites and operations that may come</p>

Representations received about Policy MP2: Spatial strategy for minerals extraction	Norfolk County Council Planning Officer's response
<p>It is not clear what the term 'are least constrained' means in the last sentence of the policy and the sentence does not make sense.</p>	<p>forward within the areas of search. Therefore, the distances used to exclude land from the areas of search are those at which we consider that potential impacts could be mitigated to acceptable levels with the minimum of controls. Therefore, the areas of search are those parts of the resource that are least constrained and where a suitable planning application for silica sand extraction may be approved.</p> <p>It is recognised that at a planning application stage, when detailed assessments have been produced as part of an Environment Statement, mineral extraction may be considered suitable at closer distances on a case-by-case basis.</p> <p>The sentence has been amended to clarify that the designated areas of search for silica sand extraction will be those parts of the resource that are least constrained, based on the criteria contained in the list a-j contained in Policy MP2. The areas that are least constrained are those where, due to the distance from all of the planning constraints (a-j), a suitable future planning application for silica sand extraction may be approved.</p>
<p><b>(Object)</b> Representation ID: 92478 Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b></p> <p>The policy states: "Within the resource areas identified on the key diagram, specific sites or preferred areas for silica sand extraction should be located where they are able to access the existing processing plant and railhead at Leziate via conveyor, pipeline or off-public highway routes". This contradicts wording in proposed Policy MP13 and the Single Issue Silica Sand Review of the Minerals Site Specific Allocations DPD (adopted in December 2017) which</p>	<p>There is not a contradiction in relation to access, for specific sites and preferred areas there is a preference for access via conveyor, pipeline or off-public highway routes. As insufficient sites were put forward by the industry as part of the Silica Sand Single Issue Review the County Council had to designate Areas of Search. As it was unknown by the</p>



<b>Representations received about Policy MP2: Spatial strategy for minerals extraction</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>discussed highway routes from Areas of Search to the Leziate processing site.</p> <p>There should be no buffers applied to the so-called planning constraints. The acceptability or not of approaching such constraints will be a matter for the EIA.</p> <p>Agricultural land grades 1 and 2 should not be excluded. This contradicts Policy MW6 which should in all circumstances be adopted and applied flexibly.</p>	<p>County Council how the minerals industry may propose to transport mineral from an Area of Search to the existing processing plant at Leziate, the potential highway access routes were included in the Plan. However, the preference would be for minerals to be transported by one of the off-public highway methods.</p> <p>The reason that the criteria used to define areas of search for future silica sand extraction includes specified distances from around the planning constraints listed in the policy is because there is no detail currently available about the potential extraction sites and operations that may come forward within the areas of search. Therefore, the distances used to exclude land from the areas of search are those at which we consider that potential impacts could be mitigated to acceptable levels with the minimum of controls. Therefore, the areas of search are those parts of the resource that are least constrained and where a suitable planning application for silica sand extraction may be approved.</p> <p>It is recognised that at a planning application stage, when detailed assessments have been produced as part of an Environment Statement, mineral extraction may be considered suitable at closer distances on a case-by-case basis.</p> <p>Policy MW6 states that development on grade 1 agricultural land will only be permitted in exceptional circumstances, where it is demonstrated that there are no alternative locations for the development. In</p>

Representations received about Policy MP2: Spatial strategy for minerals extraction	Norfolk County Council Planning Officer's response
	<p>defining areas of search for future silica sand there is sufficient land within the silica sand resource that grade 1 land can be excluded from the areas of search. Policy MW6 also states that there is a clear preference for locating mineral extraction on land grades 3b and 4. Therefore excluding grade 1 and 2 agricultural land from the areas of search does not contradict policy MW6. Excluding agricultural grades 1 and 2 from the areas of search is also in accordance with the NPPF which states that, where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.</p>
<p><b>(Support)</b> Representation ID: 92429  Respondent: <b>Woodland Trust (Ms V Bankes Price) [16231]</b>  The Woodland Trust warmly welcomes Norfolk's proposed approach (set out on page 67) to Areas of Search for silica sand extraction; the 250m exclusion zone for dust is a best practice approach. As such we strongly support Policy MP2: Spatial Strategy for mineral extraction.</p>	<p>Noted</p>
<p><b>(Support)</b> Representation ID: 92079  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Natural England welcomes the recognition to exclude and protect the natural environment, resources and landscapes.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 92015  Respondent: <b>CPRE Norfolk (Mr Michael Rayner) [17775]</b>  We would like to see County Wildlife Sites included in the list of constrains under this policy.</p>	<p>The constraints listed within this policy are used to define areas of search for future silica sand extraction. Silica sand is recognised as a nationally important industrial mineral, whilst county wildlife sites are of county ecological importance. Therefore, it is not considered appropriate to automatically</p>

Representations received about Policy MP2: Spatial strategy for minerals extraction	Norfolk County Council Planning Officer's response
	exclude county wildlife sites from an area of search for a nationally important mineral.
<p><b>(Support)</b> Representation ID: 91962  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b>  The policy is supported but the Key Diagram which is on page 23 of the Initial Consultation and the scale of the Diagram does not allow detailed examination of the resource area. The Key Diagram should therefore be provided as a separate item as opposed to within the text so that it may be examined in more detail.</p>	<p>The Key Diagram will be produced at a larger scale within the Preferred Options document. However, it is not intended to be used for a detailed examination of the resource area (which is the same as the Mineral Safeguarding Areas) as it is not a map. At the pre-submission stage the policies map will contain the Mineral Safeguarding Areas in the form of 26 A4 maps. At the Initial Consultation and Preferred Options stages, the MSAs are shown on an interactive map on Norfolk County Council's website and therefore can be enlarged up to the scale of 1:50,000. Due to BGS licensing restrictions, the MSAs cannot be shown at a scale any greater than 1:50,000.</p>
<p><b>(Comment)</b> Representation ID: 91850  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>  The Broads, which has a status equivalent to a national park, may need to be listed as a planning constraint</p>	<p>The planning constraints listed in draft policy MP2 are only in relation to defining areas of search for future silica sand extraction. The silica sand resource (Leziate Beds) is only in west Norfolk and therefore it is not necessary to include the Broads in the list of planning constraints.</p>
<p><b>(Support)</b> Representation ID: 91703  Respondent: <b>North Yorkshire County Council (Mr Rob Smith) [16201]</b>  Support policy MP2, especially in terms of silica sand. Sites which are to be considered should have a reasonable probability of a planning application being approved.</p>	<p>Noted</p>

**Question 29. Policy MP3: Borrow pits**

Representations received about Policy MP3: Borrow pits	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92080  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  The policy could include a reference to MP2 to make it clear that damage must avoided to any of the features on the list of planning constraints listed under MP2.</p>	<p>The planning constraints listed in Policy MP2 (spatial strategy for minerals extraction) are only listed in relation to how Areas of Search for silica sand extraction will be defined and therefore cross-referencing policy MP2 would not be appropriate for applications for borrow pits.</p> <p>However, the policy on borrow pits has been amended to include reference to Development Management Policy MW2.</p>
<p><b>(Comment)</b> Representation ID: 91849  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>  There is no mention of the requirement for restoration.  In other policies you cross refer to a more detailed policy, but not in this policy. Presumably policy MW2 is of relevance and could be cross referred to?</p>	<p>The policy on borrow pits includes the requirement that the site will be restored by the completion of the related construction project</p> <p>The policy on borrow pits has been amended to include reference to Development Management Policy MW2.</p>

**Question 30. Policy MP4: Agricultural or potable water reservoirs**

Representations received about Policy MP4: Agricultural or potable water reservoirs	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 93027  Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b>  Policy MP4: Agricultural or potable water reservoirs is supported.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92360  Respondent: <b>D K Symes Associates (Mr D K Symes) [146]</b>  The encouragement for agricultural reservoirs is supported as this reflects the policy guidance from the EA. For clarity, it should be made clear that 'proven need' is for the reservoir, not the mineral extracted.</p>	<p>The policy has been amended to provide clarity that the proven need is for the reservoir, not the mineral extracted.</p>
<p><b>(Support)</b> Representation ID: 91963  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b>  This policy wording is supported and could usefully be extended to cover flood alleviation schemes that include the extraction of sand and gravel.</p>	<p>We do not consider that there is a need to amend the policy to cover flood alleviation schemes. If an application for a flood alleviation scheme, that included the extraction of sand and gravel, was submitted it would be determined in accordance with the relevant policies in the plan.</p>

**Question 31. Policy MP5: Core river valleys**

Representations received about Policy MP5: Core river valleys	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93028            Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b></p> <p>Policy MP5 seeks protection to the Core River Valleys that is over and above the protection offered in the NPPF to sites of national landscape and biodiversity importance. The policy should be caveated with 'So far as is practicable minerals development will be permitted ...' removing the word 'only'.</p>	<p>The purpose of Local Plans is to provide policies tailored to the specific characteristics of the Plan area. The NPPF states that 'Planning policies... should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes...'. River Valleys form a key and valued element of the Norfolk landscape and have formed part of the Development Plan since the 1990s. Previous mineral workings which have left large water bodies on the valley floors, degraded the landscape value of the valleys affected.</p> <p>While mineral can only be dug where it occurs, Norfolk contains extensive sand and gravel resources outside the River valleys, therefore it is considered appropriate that any proposal for mineral working within a Core River Valley would need to demonstrate that it could provide benefits and enhancements, as alternative locations outside the Core River Valleys would be available.</p>
<p><b>(Comment)</b> Representation ID: 92552            Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>Whilst recognising that mineral deposits have to be worked where they occur, new developments should be restricted to higher ground avoiding river valleys where possible to reduce the risk of mineral extraction impinging on groundwater.</p> <p>Various authorities are restoring sections of river valley throughout Norfolk in order to enhance the ecology and condition status of water bodies. Developments which impact the success of existing restoration schemes will hinder the water bodies' potential to reach good status. This is particularly relevant to proposed sites MIN 55, MIN 202 and MIN 58. The location of these sites is</p>	<p>Noted. The purpose of the Core River Valley policy is to seek enhancements if mineral extraction is proposed within them.</p> <p>MIN 55, MIN 202, and MIN 48 (there is no MIN 58) are not within the Core River Valley designation. All three sites are on higher ground and borehole records indicate that all three sites would be worked above the watertable. Therefore, only limited</p>

Representations received about Policy MP5: Core river valleys	Norfolk County Council Planning Officer's response
<p>close to an ongoing project to restore the River Wensum SSSI/ SAC/ SPA. If the developments are accepted there would be scope to work in partnership with the EA to create some enhancements which could include the use of natural flood management measures such as woody debris, planted berms, floodplain reconnection and tree planting.</p>	<p>opportunities may exist for some of the measures suggested.</p>
<p><b>(Support)</b> Representation ID: 92081  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Natural England welcomes this proposal to protect core river valleys, particularly with regard to the River Wensum and Nar.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92016  Respondent: <b>CPRE Norfolk (Mr Michael Rayner) [17775]</b>  We strongly hope that this policy will be sufficient to protect Norfolk's core river valleys from any inappropriate and environmentally/ecologically damaging site allocations.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 91848  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>  Who does the assessment? Does that need to be handed in with the planning application? How will you liaise with the Broads Authority if proposals come forward in the river valleys in the Broads rather than just consult? Why is the Broads not included in the core river valleys? Is a separate policy on the Broads required? Or is it the case that the Broads is not covered by this policy as the Broads Authority Executive Area is shown on the policies map as a landscape designation and so rivers and broads within the BEA not included under core river valleys policy, potentially affording greater protection i.e. development could be acceptable in Core River Valleys? This could usefully be clarified.  In other policies you cross refer to a more detailed policy, but not in this policy. Presumably policy MW2 is of relevance and could be cross referred to?</p>	<p>The assessment would form part of any future planning application, in the same way as any other planning application requiring assessments. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Landscape and Visual Impact Assessment to be submitted with planning applications for sites located within a Core River Valley. The LVIA would need to include details of how the proposal will enhance the form, local character and distinctiveness of the landscape and natural environment.</p> <p>The Core Valley Survey carried out in the 1990s identified the Core River Valleys which were not covered by other designations, and therefore unprotected. The Core River Valleys have formed part of Norfolk's Development Plan since the mid 1990s. As the Broads Authority Executive Area</p>

Representations received about Policy MP5: Core river valleys	Norfolk County Council Planning Officer's response
	<p>(BAEA) has equivalent protection to a National Park this was specifically excluded from the Survey. As the BAEA has specific protection from mineral development in National Policy, a specific policy is not required. The Core River Valley Policy is clear as to the areas it covers and no clarification is required. If a planning application within the BAEA was to be submitted in the future this would be consulted on in accordance with the regulations relating to applications.</p>



**Question 32. Policy MP6: Cumulative impacts and phasing of workings**

Representations received about Policy MP6: Cumulative impacts and phasing of workings	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 92336  Respondent: <b>Borough Council of King's Lynn and West Norfolk (Ms F Pollard) [17968]</b>  Policy MP6 specifically considers cumulative impacts of mineral sites which are located in close proximity and recommends mitigation. We would support the wording of this policy as other cumulative impacts (from non-mineral sites) are covered by policy WM2.</p>	<p>Noted</p>
<p><b>(Support)</b> Representation ID: 91964  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b>  This policy wording which is almost identical to Suffolk County Council Submission Draft June 2018 Policy MP5 is supported.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 91847  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>  What are the criteria or is there a checklist that helps ascertain if cumulative impacts are unacceptable?</p>	<p>There is not a checklist. The potential cumulative impacts that would be assessed are the same as those impacts that would be assessed for individual sites (as listed in policy MW2 – Development Management Criteria). Therefore, the assessment of whether cumulative impacts are acceptable or unacceptable would be undertaken in the same way as the assessment of individual site impacts, but taking into account the impact of the proposal in conjunction with other existing, permitted or allocated mineral extraction sites. A cross reference to the development management criteria in policy MW2 has been included within this policy for clarity.</p>

**Question 33. Policy MP7: Progressive working, restoration and after-use**

Representations received about Policy MP7: Progressive workings, restoration and after-use	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93074  Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b>  MP7: The Company wholly support the aim of retaining sample exposures of scientifically important geological exposures, but this must be tempered by health and safety considerations. There may be circumstances, such as high quarry faces or face instability where retention would not be appropriate. As such it is proposed that the policy be revised as follows: -  * Any important geology or geomorphology on the site will be retained in sample exposures for study purposes WHERE APPROPRIATE.</p>	<p>Noted. The policy wording has been amended to state "Any important geology or geomorphology on the site will be retained in sample exposures for study purposes where practical and safe to do so".</p>
<p><b>(Support)</b> Representation ID: 93059  Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b>  Policy MP7 is supported - it provides a balance in seeking progressive working, enhancements to landscape / biodiversity but is not mandatory. This is in contrast to some of the earlier policies and strategic objectives, such as MSO10.</p>	<p>Noted.  Policy MP7 states that 'Proposals for new mineral workings must be accompanied by a scheme for the phased and progressive working and restoration of the site throughout its life to ensure that the worked land is reclaimed at the earliest opportunity.'</p>
<p><b>(Object)</b> Representation ID: 92951  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  The policy makes no reference to how progressive working and restoration should be used to mitigate working, restoration the impact on the historic environment (The Framework, paragraph 204 (bullet points f and h)). As policy MP7 is relied upon by Policy MP13 and with the absence of specific provision for the historic environment in MW2, we cannot support the policy as currently drafted.</p>	<p>How a scheme of progressive work and restoration could best mitigate impacts would be determined on a case by case basis as part of the application process once the details of the working and restoration are known, but there is a general requirement to minimise the area of land occupied at any one time for mineral working. Other policies such as MW2 provide criteria for taking into account potential impacts on the Historic Environment, such as 'Proposals for minerals development and/or waste management development will be permitted where it can be demonstrated that the development would not have an unacceptable impact (including cumulative impact in combination with other existing</p>

Representations received about Policy MP7: Progressive workings, restoration and after-use	Norfolk County Council Planning Officer's response
	or permitted development) on the historic environment, including heritage and archaeological assets and their settings’.
<p><b>(Comment)</b> Representation ID: 92554  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  The aggregate industry has the potential to create opportunities for delivering the UK BAP targets for conserving habitats and species. Topsoil at sites post-extraction can be reinstated and used to create wildflower meadows rich in pollinating insects.  Where possible green corridors should be strategically placed to link wildlife sites, creating a larger area for biodiversity which is consistent with the Biodiversity 2020 strategy to advocate the creation bigger and less fragmented areas for wildlife.  Native crayfish Ark sites  Using mineral extraction sites can provide highly suitable, inexpensive Ark sites for the rapidly declining white clawed crayfish. Norfolk contains some of the few remaining white claw crayfish populations but these are under threat from disease and non-native crayfish. Extraction operations can create permanently filled water bodies, isolated from existing rivers containing invasive crayfish and the virulent crayfish plague. We would encourage the creation of Ark sites to be a component of aftercare, thereby the industry will be contributing to regional and national BAP targets, adding greater value to restoration strategy. There would be opportunities for working in partnership with the EA, Norfolk Rivers Trust and Buglife to establish Arks at sites post extraction.</p>	<p>Noted. The supporting text has been amended to encourage sites where restoration would result in a permanently filled waterbodies to consider the formation of crayfish Arks as part of that restoration.</p>
<p><b>(Comment)</b> Representation ID: 92505  Respondent: <b>Mineral Products Association (Mr M North) [17995]</b>  The following alterations are proposed to the policy;  Proposed Changes (new text in CAPITALS)  "Proposals for new mineral workings must be accompanied by a scheme for the phased and progressive working and restoration of the site throughout its life.  Restoration and after-use of mineral extraction sites and associated development will be determined on a case-by-case basis, prioritising the most appropriate after-use(s) for each site.</p>	<p>Policy MP7 has been amended to include restoration that “reinstates best and most versatile agricultural land” as suggested.</p>

Representations received about Policy MP7: Progressive workings, restoration and after-use	Norfolk County Council Planning Officer's response
<p>Restoration and after-use proposals may include agriculture, forestry, ecology, reservoirs, amenity or flood alleviation.</p> <p>Preference will be given to after-uses and restoration that:</p> <ul style="list-style-type: none"> <li>* enhance Norfolk's biodiversity (focussing on priority habitats and species in Norfolk),</li> <li>* contribute positively to identified Green Infrastructure corridors, and</li> <li>* create high-quality, locally distinctive landscapes</li> <li>* RESTORATION TO AGRICULTURAL LAND.</li> </ul> <p>The after-use and restoration proposal must demonstrate that:</p> <ul style="list-style-type: none"> <li>* The appropriate restoration and after-use is both feasible and achievable in the proposed time scales.</li> <li>* Due consideration has been given to opportunities to improve public access, particularly to implement the County Council's Rights of Way Improvement Plan.</li> <li>* Due consideration has been given to supporting the aims of the Green Infrastructure Strategy.</li> <li>* Any important geology or geomorphology on the site will be retained in sample exposures for study purposes ONLY WHERE PRACTICAL AND SAFE TO DO SO."</li> </ul>	<p>Policy MP7 has been amended to state: "Any important geology or geomorphology on the site will be retained in sample exposures for study purposes where practical and safe to do so" as suggested.</p>
<p><b>(Comment)</b> Representation ID: 92479</p> <p>Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b></p> <p>After use is noted several times in the policy but after use is not a matter for mineral planning. There is no mention of restoration to agricultural land</p> <p>The following suggested policy amendment is proposed: Any important geology or geomorphology on the site will be retained in sample exposures for study purposes ONLY WHERE PRACTICAL AND SAFE TO DO SO</p>	<p>Whilst it is recognised that some after-uses will require separate planning permission from the district planning authority, the most common after-uses for mineral sites in Norfolk (to agriculture, forestry, nature conservation and informal recreation which does not involve substantial public use) would not require separate planning permission. Therefore, the restoration and aftercare of the site to enable the proposed after-use would be dealt with by the MPA as part of the planning application for mineral extraction to ensure high quality restoration and aftercare takes place. The PPG refers to the after-use of mineral sites in relation to restoration and aftercare and states that a restoration strategy should identify the proposed after-use of the site. For</p>

Representations received about Policy MP7: Progressive workings, restoration and after-use	Norfolk County Council Planning Officer's response
	<p>example, if the proposed after-use is agriculture, then the restoration scheme and aftercare will need to enable an agricultural after-use.</p> <p>Policy MP7 has been amended to include restoration that “reinstates best and most versatile agricultural land” as suggested.</p> <p>Policy MP7 has been amended to state: “Any important geology or geomorphology on the site will be retained in sample exposures for study purposes where practical and safe to do so” as suggested.</p>
<p><b>(Support)</b> Representation ID: 92377  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  MP 7: We support the restoration requirements included in this policy, in particular the recommendation that sites that are to be restored to agriculture can still include biodiversity enhancements alongside their primary use. We also support the reference to the county's priority habitats and species and recommend that the policy makes further reference in the supporting text to the specific habitats and species that are present in the county for the benefit of plan users.</p>	<p>Noted. The supporting text has been amended to provide a link to the Norfolk biodiversity list of habitats and species.</p>
<p><b>(Comment)</b> Representation ID: 92358  Respondent: <b>Aggregate Industries UK Ltd (Ms K Hannaford-Hill) [17973]</b>  MP7 Progressive working, restoration and after-use - It is considered Best and Most Versatile soils should be recognised as a preferred afteruse.</p>	<p>Policy MP7 has been amended to include restoration that “reinstates best and most versatile agricultural land” as suggested.</p>
<p><b>(Support)</b> Representation ID: 92083  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Natural England strongly supports this policy and the opportunities it presents to deliver net gain through the creation of new habitats, green infrastructure etc.</p>	<p>Noted</p>

Representations received about Policy MP7: Progressive workings, restoration and after-use	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 91965  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b></p> <p>I note the inclusion of 'Due consideration has been given to opportunities to improve public access, particularly to implement the County Council's Rights of Way Improvement Plan', may I suggest that this is currently included within Minerals Strategic Objective MSO10 which reads 'To increase public access to the countryside and enhance biodiversity through enhancing the amenity value of land when restoring extraction sites' and therefore duplication in MP7 is not required?</p>	<p>MSO10 is a strategic objective of the Minerals and Waste Local Plan and it is not a planning policy. Therefore, there is a need for improvements to public access and PROW to be included within in a planning policy.</p>
<p><b>(Comment)</b> Representation ID: 91846  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b></p> <p>* As well as GI, ecological networks? There is ecological network work underway for the entire county which could be of relevance.  * The last part says 'The Green infrastructure Strategy' - which strategy is this? The strategy of the district in which the proposal is located?  * There is also a Norfolk-wide habitats map that could be of relevance.</p>	<p>Noted. The policy wording has been amended to refer to ecological networks as well as green infrastructure corridors.</p> <p>A Norfolk wide Green Infrastructure Strategy is under development, this will provide a countywide strategy which will replace the strategies for the district and borough authorities</p> <p>A Green Infrastructure and habitats map for Norfolk has been added to the supporting text.</p>

### Question 34. Policy MP8: Aftercare

Representations received about Policy MP8: Aftercare	Norfolk County Council Planning Officer's response
<p><b>(Support)</b> Representation ID: 92378  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  MP 8: We support the inclusion of an aftercare policy to ensure that restoration habitats are established to a sufficient standard post-extraction.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92086  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  'Geological' should be added to the possible list of after-uses in the first sentence.</p>	<p>A geological exposure would not be classed as an after-use per se. However, where a geological exposure is included in a restoration proposal, the aftercare management should include periodic cleaning of the face of the exposure. Provision of geological exposures for study, where safe and practical to do so are included in the Policy MP7, as part of restoration proposals.</p>
<p><b>(Support)</b> Representation ID: 92084  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Natural England agrees that good restoration design and sufficiently financed aftercare are crucial to deliver long term benefits.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 91966  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b>  The second paragraph refers to planning conditions and to matters which could be covered within the outline aftercare strategy, therefore for clarity it would be simpler to simply state that 'The outline aftercare strategy should include measures required following the annual aftercare inspection and the subsequent submission of a finalised version of the annual aftercare report detailing the actions required'.</p>	<p>Noted. The policy text has been amended for clarity to state: "Planning conditions and/or longer term planning obligations will be used to ensure that a detailed annual management report is provided. The annual management report must include any measures required, following the annual aftercare inspection, to achieve the outline aftercare strategy."</p>
<p><b>(Comment)</b> Representation ID: 91845  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b></p>	<p>Noted. The five year aftercare period is specifically relevant to restoration to agriculture, it is recognised that restoration with biodiversity benefits would</p>

<p>To gain the ecological benefits outlined for many of the sites an outline aftercare strategy for a minimum of ten years, rather than five years is required prior to the determination of the planning application</p>	<p>require a longer aftercare period. The policy wording has been amended to state "...an outline aftercare strategy for at least five years is required...". The supporting text has been amended to state that an aftercare period of longer than five year could be required for restoration schemes that are not to agriculture.</p>
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**Question 35. Policy MP9: Concrete batching and asphalt plants**

<p><b>Representations received about Policy MP9: Concrete batching and asphalt plants</b></p>	<p><b>Norfolk County Council Planning Officer's response</b></p>
<p><b>(Comment)</b> Representation ID: 93030  Agent: Heaton Planning Ltd (Mr S Warren) [18336] Respondent: <b>Brett Group [7915]</b>  Policy MP9 limits the use to the life of the quarry, it is sometimes beneficial to retain the use of ancillary facilities after the mineral operation has been completed making full use of a developed access and transport links, and facilitating an existing market.</p>	<p>Whilst it is noted that there would be an existing access and transport links to a quarry site and an existing market, these ancillary developments would not normally be allowed in the open countryside. Therefore the purpose of this policy is to ensure that the ancillary developments are removed once mineral extraction has ceased. Therefore no changes are proposed to this policy.</p>
<p><b>(Comment)</b> Representation ID: 91844  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>  It is not clear if the works then need to be removed and form part of the restoration works or are moth-balled. This could usefully be clarified.</p>	<p>Planning permissions for these developments will be temporary and therefore the removal of the plant and restoration of the site would form an integral part of the temporary planning permission. This is a standard requirement of temporary planning permissions, therefore no changes are proposed to this policy.</p>



**Question 36. Policy MP10: Safeguarding of port and rail facilities, and facilities for the manufacture of concrete asphalt and recycled materials**

Representations received about Policy MP10: Safeguarding of facilities	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93075</p> <p>Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b></p> <p>MP10: Paragraph b of this policy does not specifically refer to facilities for the handling of primary won aggregate; this oversight should be remedied as follows: -</p> <p>b) Existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of PRIMARY, substitute, recycled and secondary aggregate material.</p>	<p>Policy MP11 safeguards mineral extraction sites and by default, handling and processing of the primary mineral on site. Paragraph a) of Policy MP10 deals with the distribution of primary mineral. Therefore, no changes are proposed to policy MP10.</p>
<p><b>(Comment)</b> Representation ID: 92506</p> <p>Respondent: <b>Mineral Products Association (Mr M North) [17995]</b></p> <p>The wording should be adjusted as follows to 'apply the agent' of change principle;</p> <p>Proposed Changes (new text in CAPITALS)</p> <p>"b) Existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of PRIMARY, substitute, recycled and secondary aggregate material.</p> <p>Development proposals within 250 metres of the above minerals related facilities should demonstrate that they would not prevent or prejudice the use of those facilities. THE 'AGENT OF CHANGE' PRINCIPLE WILL BE APPLIED TO ALL SUCH DEVELOPMENT."</p>	<p>Policy MP11 safeguards mineral extraction sites and by default, handling and processing of the primary mineral on site. Paragraph a) of Policy MP10 deals with the distribution of primary mineral. Therefore, no changes are proposed to policy MP10.</p> <p>The policy already states that "Development proposals within 250 metres of the above minerals related facilities should demonstrate that they would not prevent or prejudice the use of those facilities." We consider that this sentence adequately covers the agent of change principle; therefore, no changes are proposed to this policy. However, the supporting text has been revised to refer to the 'agent of change' principle.</p>
<p><b>(Comment)</b> Representation ID: 92480</p> <p>Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b></p> <p>The 'agent of change' principle will be applied to all development in proximity to safeguarded sites.</p>	<p>The policy already states that "Development proposals within 250 metres of the above minerals related facilities should demonstrate that they would not prevent or prejudice the use of those facilities." We consider that this sentence adequately covers the agent of change principle; therefore, no changes are proposed to this policy. However, the supporting</p>

Representations received about Policy MP10: Safeguarding of facilities	Norfolk County Council Planning Officer's response
	text has been revised to refer to the 'agent of change' principle.
<p><b>(Support)</b> Representation ID: 91704</p> <p>Respondent: <b>North Yorkshire County Council (Mr Rob Smith) [16201]</b></p> <p>Support the policy MP10, minerals related infrastructure should be safeguarded from other forms of incompatible development to ensure the infrastructure is available to support the supply and processing of minerals.</p>	Noted
<p><b>(Comment)</b> Representation ID: 92149</p> <p>Respondent: <b>Norwich City Council (Ms Judith Davison) [17844]</b></p> <p>The safeguarded Trowse Railhead and adjacent Lafarge plant are located in east Norwich adjacent to the Deal Ground site (allocated in Norwich's Site Allocations Plan under policy R9, with extant consent for 670 units of housing) and in close proximity to other allocated sites including the Utilities site (R10), Gothic Works (R11), and Land adjacent to the Football club (CC16 - part developed). The adopted Joint Core Strategy identifies east Norwich as a priority for regeneration in policy JCS12. Whilst the need to safeguard the railhead under policy MP10 is accepted, the minerals and waste local plan should acknowledge its proximity to sensitive residential users and to the Deal Ground and other sites with major regeneration potential including Carrow Works. This could be acknowledged in the explanatory text for MW2 and/or MP10.</p>	<p>The safeguarded Trowse railhead is an existing, active site, and has been for many decades. The allocations mentioned, were all allocated with full knowledge of the railhead operations, and any future development of these sites would need to provide appropriate mitigation, under the 'agent of change' principle so as to not prejudice the continuing railhead operations. The supporting text to MP10 has been revised to reflect this national policy.</p>

**Question 37. Policy MP11: Mineral Safeguarding Areas and Mineral Consultation Areas**

Representations received about Policy MP11: MSAs and MCAs	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92507  Respondent: <b>Mineral Products Association (Mr M North) [17995]</b>  Wording of the policy should be altered to incorporate the 'agent of change' principle as follows;  Proposed Changes (new text in CAPITALS)  "The County Council will safeguard existing, permitted and allocated mineral extraction sites from inappropriate development proposals. Minerals Consultation Areas are delineated on the Policies Map and extend to 250 metres from each safeguarded site. Development proposals within 250 metres of a safeguarded site should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction, AND THE AGENT OF CHANGE PRINCIPLE WILL BE APPLIED IN ALL SUCH CASES. The County Council will object to development proposals which would prevent or prejudice the use of safeguarded sites for mineral extraction."</p>	<p>The policy already states that "Development proposals within 250 metres of a safeguarded sites should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction." We consider that this sentence adequately covers the agent of change principle; therefore, no changes are proposed to this policy. The supporting text will be revised to include reference to the 'agent of change' principle.</p>
<p><b>(Comment)</b> Representation ID: 92481  Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b>  The 'agent of change' principle will be applied to all development in proximity to safeguarded sites.</p>	<p>The policy already states that "Development proposals within 250 metres of a safeguarded sites should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction." We consider that this sentence adequately covers the agent of change principle; therefore, no changes are proposed to this policy. The supporting text will be revised to include reference to the 'agent of change' principle.</p>
<p><b>(Comment)</b> Representation ID: 91967  Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b>  The Policies Map is embedded in the text and cannot be enlarged with reasonable clarity to view the detail of the Safeguarding areas. It should therefore be included as a separate appendix. The second paragraph is not understood, partly because of the typing error within the fifth word but also because it is confusing that the MPA has determined that the Minerals Consultation Area is the same as the Minerals Safeguarding Area for safeguarding minerals resources. Page 77 of the Initial Consultation clearly states that a mineral resource as identified by the BGS is a Mineral</p>	<p>The map showing the mineral safeguarding areas is shown at a small scale in the hard copy of the document. At the pre-submission stage the policies map will contain the mineral safeguarding areas in the form of 26 A4 maps. At the Initial Consultation and Preferred Options stages, the mineral safeguarding areas are shown on an interactive map on Norfolk County Council's website and therefore</p>

Representations received about Policy MP11: MSAs and MCAs	Norfolk County Council Planning Officer's response
<p>Safeguarding Area and any development within 250m of a Mineral Safeguarded Area falls within a Minerals Consultation Area.</p>	<p>can be enlarged up to the scale of 1:50,000. Due to BGS licensing restrictions, the mineral safeguarding areas cannot be shown at a scale any greater than 1:50,000.</p> <p>The typing error in the second paragraph of the policy has been corrected (from safeguarding to safeguard).</p> <p>It is correct that MSAs for mineral resources will cover the same area as MCAs. However, for specific sites a MCA will extend 250m from the boundary of the safeguarded site. This is consistent with both the policy and supporting text.</p>
<p><b>(Support)</b> Representation ID: 91705</p> <p>Respondent: <b>North Yorkshire County Council (Mr Rob Smith) [16201]</b></p> <p>Support policy MP11. It is important to safeguard economically viable minerals for alternative forms of development to maintain the future supply of the minerals. Particularly support the safeguarding of silica sand as it is a nationally scarce resource.</p>	<p>Noted</p>

**Question 38. Policy MP12: Energy minerals**

**No comments received**

**Question 39: Implementation, Monitoring and Review**

<b>Representations received</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>(<b>Comment</b>) Representation ID: 92508 Respondent: <b>Mineral Products Association (Mr M North) [17995]</b> The Targets/trigger levels do not conform with land bank policy requirements or those for stock of permitted reserves, either in the proposed Policy MP1 or the NPPF.</p>	<p>Noted. It is recognised that the NPPF states a 10-year landbank for crushed rock. The text will be revised to reflect this in the Preferred Options document.</p>

## Appendices to the policies

### Appendix 1 - Existing Core Strategy and Development Management Policies

No comments received

### Appendix 2 - Existing Minerals Site Specific Allocations and Areas of Search Policies

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92952 Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b> We note the typographical error regarding the Areas of Search policy will be replaced by Policy MP13 not MP14.</p>	<p>Noted. This has been corrected in the Preferred Options document.</p>

### Appendix 3 - Existing Waste Site Specific Allocations Policies

No comments received

### Appendix 4 - Development excluded from safeguarding provisions

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93169 Respondent: <b>Broads Authority (Natalie Beal) [16282]</b> What about moorings and river bank stabilisation and other such applications that occur in the Broads but probably not elsewhere in Norfolk?</p>	<p>There are only very limited areas of the Broads Authority Executive Area which are covered by safeguarded mineral resources. If the development mentioned is above the minimum site area and covers safeguarded mineral resources, it would be appropriate for an application to consider this and will therefore not be excluded from safeguarding provisions.</p>
<p><b>(Comment)</b> Representation ID: 92542 Agent: Lichfields (Ms S Innes) [18008] Respondent: <b>Bourne Leisure Ltd [18009]</b> Bourne Leisure considers it necessary that development relating to caravans, chalets and touring pitches be added to the table at Appendix 4. There is no reason why this sort of</p>	<p>While it may be that the pitches and associated roadways may not result in needless sterilisation of a site, or significant groundworks into mineral resources; the same</p>

Representations received	Norfolk County Council Planning Officer's response
<p>development would inhibit the use of a site for sand and gravel extraction in the future any differently than other development listed in the table, including for example, the minor infilling of development in towns and villages and the extension to existing settlements of no more than 2ha. The inclusion of caravan, chalet and touring pitch development in this table would also give Bourne Leisure and any other holiday park operators confidence that any future planning applications for the four holiday parks across the Plan area would be determined as efficiently and effectively as possible Bourne Leisure therefore suggest that the table at Appendix 4 is amended to also include "Caravans (static and touring), tents and chalets and any other caravan park development that is 'minor'" as development excluded from safeguarding provisions.</p>	<p>may not be the case for some buildings and leisure facilities associated with caravan park development. Therefore, it is considered that it remains appropriate for such development to be considered on a case-by-case basis regarding mineral safeguarding.</p>

#### Appendix 5 - Safeguarded Mineral Infrastructure (as at May 2017)

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93076  Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b>  Both the Company's Norwich (Broadsman Close) or Brandon (Mundford Road) railheads appear not to have be identified within this appendix as safeguarded facilities. It is requested that both are added to the appendix.</p>	<p>These sites do not operate under mineral planning permissions for railheads granted by Norfolk County Council; and are therefore not safeguarded under the Norfolk Minerals and Waste Local Plan. This is consistent with concrete batching plants which have the benefit of a Local Planning Authority planning permission.</p>

#### Appendix 6 - Safeguarded Mineral Extraction Sites (as at May 2017)

No comments received

#### Appendix 7 - Safeguarded Waste Management Facilities (as at May 2017)

Representations received	Norfolk County Council Planning Officer's response
<p>(<a href="#">Comment</a>) Representation ID: 93077</p> <p>Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b></p> <p>Neither the Company's Costessey recycling facility nor the adjacent landfill appear to be identified within this appendix as safeguarded waste management facilities. It is requested that both are added to the appendix.</p>	<p>The Costessey recycling facility operates under a planning permission granted by the Local Planning Authority and is therefore not safeguarded under the Norfolk Minerals and Waste Local Plan. This is consistent with concrete batching plants which have the benefit of a Local Planning Authority planning permission.</p> <p>The adjacent mineral working is safeguarded as a mineral working, with restoration using some inert waste to achieve acceptable land profiles, it is not a landfill site for waste disposal.</p>

#### Appendix 8 - Safeguarded Water Recycling Centres (as at May 2017)

No comments received

#### Appendix 9 – Forecast Waste Arisings

No comments received



## Breckland sites

MIN 12 land north of Chapel Lane, Beetley

Representations received about site MIN 12	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93178            Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>            We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93121            Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>            The Highway Authority considers the site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site.</p>	<p>Noted. The draft site policy states that a conveyor must be used to transport the mineral to the existing plant site. The existing access to the plant site will continue to be used.</p>
<p><b>(Comment)</b> Representation ID: 92953            Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>            We note the existing mineral working in the area of MIN 08, MIN 12, MIN 13 and MIN 51 but would highlight the highly graded heritage assets nearby- grade I St Mary Magdalene at Beetley with the tower visible from the flat landscape that makes up the proposed allocation and the scheduled deserted medieval village at Bittering. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. The tower of the church of St Mary Magdalen at Beetley is visible from the site. However, the immediate setting of the church includes a number of houses built in the 1980s. The scheduled deserted medieval village at Bittering is over 2.5km from the proposed site. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p>
<p><b>(Comment)</b> Representation ID: 92928            Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>            At sites MIN 12, MIN 08 and MIN 45, the excavated void is to be utilised for waste disposal or recovery, so a robust risk assessment will be required. We would expect waste disposal here to meet all best practice techniques. Due to the sensitivity of groundwater (within an SPZ3) it will not be possible to accept reduced liner thickness or design at this site. The aquifers on site must be adequately protected from potential contamination, and if this site is progressed we will be heavily involved to ensure environmental protection.</p>	<p>The site is proposed to be restored at a lower level and returned to agriculture. Therefore there is no proposal for the site to be utilised for waste disposal or recovery.</p>

Representations received about site MIN 12	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 91940 Respondent: <b>Lead Local Flood Authority (Norfolk County Council) (Ms E Simpson) [17508]</b></p> <p>MIN12 - Beetley - We would like to highlight that we are aware of reports of external flooding (2017) in the village on Fakenham Road. As the site is at the top of two catchments, half of the proposed site drains towards the village and half away. Any proposal would need to consider this during its design.</p>	<p>Noted. The Development Management Policy DM2 applies to all planning applications for mineral extraction sites and requires a planning application to demonstrate that the development would not have an unacceptable impact on flood risk. As site MIN 12 is over 1 hectare in size, a site specific Flood Risk Assessment would be required at the planning application stage.</p>
<p><b>(Comment)</b> Representation ID: 92414 Respondent: <b>Cllr M Kiddle-Morris [17980]</b></p> <p>MIN12 is a third extension to an existing quarry situated to the north of Rawhall Lane. The existing conveyor system can be extended to transport the extracted sand and gravel to the processing plant at the original quarry site, all HGV movements would be from the processing plant on Rawhall Lane. Reserves indicate that MIN12 could be operated until 2036 and if adequate mitigation measures were put in place extraction at the site would have little or no additional impact than that already experienced in Beetley. I agree with the initial conclusion.</p>	<p>Noted. The draft site policy states that a conveyor must be used to transport the mineral to the existing plant site. The existing access to the plant site will continue to be used.</p>
<p><b>(Comment)</b> Representation ID: 92400 Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes. Whilst we hold no specific knowledge on the following sites, we broadly support the restoration proposals proposed for MIN 12, MIN 13, MIN 51, MIN 200 and MIN 65.</p>	<p>Noted</p> <p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92142 Agent: Mr B Leigh [1531] Respondent: <b>Beetley parish council [779]</b></p> <p>The Parish Council agrees with the initial assessment. This would be another extension to the existing quarry in East Bilney and the conveyor belt,</p>	<p>Noted. The draft site policy states that a conveyor must be used to transport the mineral to the existing plant site. The existing access to the plant site will continue to be used.</p>

Representations received about site MIN 12	Norfolk County Council Planning Officer's response
<p>which is currently being extended to the site to the north which has been granted permission, could be extended to this site. This would not increase HGV movements as all would continue to access and egress the existing processing plant. Provided adequate mitigation measures are specified during extraction there would be minimal impact to Beetley.</p>	
<p><b>(Comment)</b> Representation ID: 92134  Respondent: <b>Gressenhall parish council (Mrs L Jarrett) [7945]</b>  MIN12- Gressenhall Parish Council have no adverse comments to make.</p>	Noted
<p><b>(Object)</b> Representation ID: 92536  Respondent: <b>Mr G Parker [18005]</b>  In view of the recent scorching weather, and news that farmers will be under stress for years to come trying to provide for an ever increasing population, I must ask if this is really the time to commandeer so much agricultural land for building materials, when it will be at such a premium for its Primary Purpose?  I am very concerned about the noise pollution which will inevitably accompany an extraction site within 250 metres of my house.  I must add, however that I am amazed that so much PRODUCTIVE land can be sacrificed in this way. The recent weather has changed the news, and the future looks bleak enough, and even worse if the bread basket of East Anglia is to be swallowed by solar farms and extraction sites.</p>	<p>The site is currently in agricultural use. Following mineral extraction, the proposed restoration of the site is back to agriculture. Therefore, whilst the site would be out of agricultural use for a number of years, it would not be a permanent loss of agricultural land.  The draft site policy requires a noise and dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health.</p>
<p><b>(Object)</b> Representation ID: 92130  Respondent: <b>Mr Stephen Parkinson [17828]</b>  I am concerned about this new proposed development, due to the noise from the plant machinery as noise can travel and living within 250 meters from the location this seems a concern, even within working hours. Also this will cause large amounts of dust that can travel in the air, which will become a problem or may be a health problem even when being controlled and dampened by a driven water bowser.</p>	<p>The draft site policy requires a noise assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health.</p>

Representations received about site MIN 12	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92010</p> <p>Respondent: <b>Mr Richard Phillips [7682]</b></p> <p>The site is an open area relatively close to Beetley, Old Beetley and Gressenhall. Any extraction would be intrusive in terms of visibility, noise and traffic movements.</p>	<p>The extraction area is proposed to be set back from the buildings on Chapel Lane on the south west corner and set back from the dwellings on Church Lane on the north west corner to reduce landscape and amenity impacts. The draft site policy states that a detailed landscaping and screening scheme must be developed.</p> <p>This site is proposed as an extension to an existing mineral working and the number of vehicle movements is therefore expected to remain the same as existing, but continue for a longer period.</p>

**MIN 51 & MIN 13 land west of Bilney Road, Beetley**

Representations received about site MIN 51 & 13	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93179                      Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>                      We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93122                      Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>                      The Highway Authority considers the site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site.</p>	<p>Noted. The site access is proposed to be onto Rawhall Lane just before it joins the C225 Bilney Road and then join the B1146 Fakenham Road. This is the same access route as the Middleton Aggregates processing plant site which is also on Rawhall Lane. A plant site is proposed to be located in the SW corner of site MIN 13 therefore the mineral extracted from this site would be processed within the site.</p>
<p><b>(Comment)</b> Representation ID: 93081                      Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>                      The landscape features within this site, including hedgerow oaks and blocks of woodland are significant in the landscape and should be protected during working of the site. These should also be used as focal points for restoration. The restoration should reflect and strengthen the retained features.</p>	<p>The draft site policy states that a boundary hedges must be thickened and the small areas of woodland within the site should be safeguarded and used as the focal point for restoration. The draft site policy also requires a progressive restoration scheme to provide wide field margins, new hedgerows and additional woodland.</p>
<p><b>(Comment)</b> Representation ID: 92954                      Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>                      We note the existing mineral working in the area MIN 08, MIN 12, MIN 13 and MIN 51 but would highlight the highly graded heritage assets nearby- grade I St Mary Magdalene at Beetley with the tower visible from the flat landscape that makes up the proposed allocation and the scheduled deserted medieval village at Bittering. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>There are distant views of the tower of the church of St Mary Magdalen at Beetley from the proposed site, which is over 1.6km away. There are a significant number of trees in between and the immediate setting of the church includes a number of houses built in the 1980s. The scheduled deserted medieval village at Bittering is over 1.1km from the proposed site. It is therefore considered that the setting of these heritage assets would not be affected. The draft policy states that a Heritage Statement will be required at the planning</p>

Representations received about site MIN 51 & 13	Norfolk County Council Planning Officer's response
	application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.
<p><b>(Comment)</b> Representation ID: 92935</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>Sites MIN 40, MIN 19, MIN 205, MIN 201, MIN 35, MIN 51, MIN 13, and MIN 32 propose low level restoration using inert material to restore the site. Whilst these sites do not lie within an SPZ we would expect groundwater to be sufficiently protected. This would involve a robust waste acceptance criteria. We would expect diligence is maintained to ensure non-inert wastes are not accepted at this site. If deposition will be sub-water table, as at sites MIN 200 and MIN 102, the applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water'.</p>	<p>Noted. The deposition of inert waste as part of the site restoration would not be into water as the site will be worked dry above the water table.</p>
<p><b>(Object)</b> Representation ID: 92695</p> <p>Respondent: <b>Gressenhall parish council (Mrs L Jarrett) [7945]</b></p> <p>MIN51 and 13 - Gressenhall Parish Council consider these applications to be premature whilst mineral is extracted from the east side of Fakenham Road with a proposed extension to run until 2040 (MIN12)</p>	<p>Site MIN 51 and MIN 13 are proposed by a different mineral operator (Longwater Gravel) to site MIN 12 (Middleton Aggregates) and the proposal is that both sites would be operational during the same time period.</p>
<p><b>(Object)</b> Representation ID: 92537</p> <p>Respondent: <b>Mr G Parker [18005]</b></p> <p>In view of the recent scorching weather, and news that farmers will be under stress for years to come trying to provide for an ever increasing population, I must ask if this is really the time to commandeer so much agricultural land for building materials, when it will be at such a premium for its Primary Purpose?</p> <p>I am very concerned about the noise pollution which will inevitably accompany an extraction site within 250 metres of my house.</p> <p>I must add, however that I am amazed that so much PRODUCTIVE land can be sacrificed in this way. The recent weather has changed the news, and the future looks bleak enough, and even worse if the bread basket of East Anglia is to be swallowed by solar farms and extraction sites.</p>	<p>The site is currently in agricultural use. Following mineral extraction, the proposed restoration of the site is back to agriculture. Therefore, whilst the site would be out of agricultural use for a number of years, it would not be a permanent loss of agricultural land.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Policy states that proposals for minerals development will need to</p>

Representations received about site MIN 51 & 13	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92415 Respondent: <b>Cllr M Kiddle-Morris [17980]</b></p> <p>MIN51 &amp; MIN 13: The proposer of the site has indicated a potential start date for extraction at these sites of 2020. There is no mention in the initial assessment of a processing plant, any on site plant would mean the close proximity of 2 such plants. If MIN12 were to be allocated as well as these 2 sites the cumulative impact on the area would be unacceptable. I disagree with the initial conclusion.</p>	<p>demonstrate that the development would not have an unacceptable impact on local amenity and health.</p> <p>The proposer of the site intends a processing plant to be located within the SW corner of MIN 13. This does mean that there would be two plant sites located within approximately 500m of each other. However, the nearest property is over 400m from the proposed plant site location. The proposed extraction rate would produce an additional 10 HGV out movements per day. The draft Development Management Policy DM2 requires a planning application to demonstrate that the development would not have unacceptable impacts, including in combination with other existing or permitted development.</p>
<p><b>(Comment)</b> Representation ID: 92399 Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.</p> <p>Whilst we hold no specific knowledge on the following sites, we broadly support the restoration proposals proposed for MIN 12, MIN 13, MIN 51, MIN 200 and MIN 65.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92143 Agent: Mr B Leigh [1531] Respondent: <b>Beetley parish council [779]</b></p> <p>At the previous Minerals and Waste Framework both sites were assessed as not suitable. No mention is made of a processing plant on site if sited there would be two plants in close proximity. This would not be acceptable. If no processing plant is to be sited at these sites then gravel extraction will have to be transported. The C225 is not suitable for this and the B1146 is</p>	<p>Site MIN 51 was found acceptable previously and is currently an allocated site in the Minerals Site Specific Allocations DPD. Site MIN 51 and MIN 13 are now proposed to be worked as one site in a phased manner. The site access is proposed to be onto Rawhall Lane just before it joins the C225 Bilney Road and then join the B1146 Fakenham</p>

Representations received about site MIN 51 & 13	Norfolk County Council Planning Officer's response
<p>not guaranteed to be used. The Parish Council feels that the cumulative effect of these two sites plus MIN12 would not be acceptable. The initial conclusion is not agreed with.</p>	<p>Road. This is the same access route as the Middleton Aggregates processing plant site which is also on Rawhall Lane. There would only be 100m before vehicles could access the B1146. The proposed extraction rate would produce an additional 10 HGV out movements per day. The draft Development Management Policy DM2 requires a planning application to demonstrate that the development would not have unacceptable impacts, including in combination with other existing or permitted development.</p>
<p><b>(Support)</b> Representation ID: 92024</p> <p>Respondent: <b>Longwater Gravel Co. Ltd. (Mr Simon Smith) [9381]</b></p> <p>Summary: Longwater Gravel is a small scale quarry operator and our proposed new quarry at MIN51/13 is necessary to meet the needs of our growing customer base in the Dereham area. The quarry will annually produce 70,000 tonnes and employ 10 people. We have already commenced work to secure an abstraction licence from the Environment Agency and we are fully committed to submitting an application for planning permission which will meet all of the requirements set out in M&amp;WLP and MIN 51/13 within the next two years.</p> <p>I write to confirm that Longwater Gravel agree with and support Norfolk County Council's initial conclusion to allocate MIN 51 and MIN 13.</p> <p>Longwater Gravel Company is a small scale quarry operator which specialises in small deliveries of sand and gravel to a customer base which includes local builders, groundworkers and the general public. We also supply sand and gravel to a number of small volume readymixed concrete producers.</p> <p>The proposal for Longwater Gravel to develop and operate a small, low volume quarry at MIN 51/13 is driven by the need for us to further support our growing customer base in and around Dereham and in the area to the west of Norwich. The quarry, if granted planning permission, would directly employ 4 full time staff and indirectly employ a further 6. We plan to produce around 70,000 tonnes per year, the majority of which would be transported by our fleet of small</p>	<p>Noted. The annual tonnage is detailed in the consultation documents.</p> <p>Noted</p> <p>Noted</p> <p>The additional information provided about the proposed operation of the mineral extraction site is noted.</p>



Representations received about site MIN 51 & 13	Norfolk County Council Planning Officer's response
<p>delivery vehicles and a small number of HGV's. Access to the quarry would be via Rawhall Lane through a new entrance located on the north east boundary. The main operations area, where the gravel washing plant, loading areas, weighbridge, etc. will be sited, would be located in the southwest corner of MIN 13. Phased working and restoration of the quarry would commence in MIN 13 and move in a west-east direction towards Bilney Road. Once all reserves in MIN 13 have been exhausted, extraction and restoration operations will commence in MIN 51, again working in a west-east direction with the operations area remaining located in MIN 13. Soils which are stripped to enable access to the sand and gravel would be stored in grassed bunds along the northern and eastern margins which would assist in screening views of the operations area. On completion of sand and gravel extraction, the land would be restored to agricultural use at a lower level and to achieve this a small quantity of material such as soil may need to be imported to assist with constructing an acceptable restoration profile. The overall timescale to complete extraction and restoration from MIN 51/13 would be around 16 years.</p> <p>We have already commenced work on the development of a quarry at MIN 51/13 and to date this work includes the drafting of legal agreements with landowners and negotiation with the Environment Agency to secure an abstraction licence for water for gravel washing. The Environment Agency has now issued a permit to Longwater Gravel to install and test a new borehole at the site which will provide data to determine if an abstraction licence can be issued. If we can secure an abstraction licence, then work will immediately commence on a planning application which will fully comply with the requirements as set out in MIN 51/13.</p> <p>We have asked Small Fish Consultants to assess the site and our proposals against the emerging Minerals and Waste Local Plan and they will comment separately.</p>	<p>The proposed quarry access is noted and this information is contained in the consultation documents.</p> <p>The proposed restoration of the site is noted and this information is contained in the consultation documents.</p> <p>Noted</p> <p>Noted</p>
<p><b>(Support)</b> Representation ID: 92023</p> <p>Agent: Small Fish (Mr Mark Thompson) [17778] Respondent: <b>Longwater Gravel Co. Ltd. [9380]</b></p> <p>Longwater Gravel Ltd would like to confirm that it does agree with the initial conclusion to allocate Min13/Min51. In support of this opinion, Longwater Gravel would like to draw attention to the following points in relation to the emerging policies.</p> <p>Policy MP2: Spatial Strategy for mineral extraction</p>	<p>Noted</p>

Representations received about site MIN 51 & 13	Norfolk County Council Planning Officer's response
<p>Specific sites for sand and gravel or carstone extraction should be located within 10 miles of one of Norfolk's urban areas or main towns (detailed in the supporting text) and/or be well-related to one of Norfolk's urban areas or main towns via appropriate transport infrastructure - Dereham is classed as a main town and the site is connected to Dereham via the Fakenham Road B1146 HGV route, with Dereham being only 4.5km away. Furthermore, Fakenham is only 11km away via the B1146 and this is also a main town.</p> <p>Policy MP5: Core River Valleys: The Sites are not in a core river valley.</p> <p>Policy MP6: Cumulative impacts and phasing of workings  There has been concern in the past that the cumulative impacts of operating Min 13 and Min 51 at the same time could be unacceptable.  Policy MP6 makes it clear it is down to the applicant to, "demonstrate that the adverse cumulative impacts can be adequately mitigated" as part of a future planning application.  Longwater Gravel is confident that this can be demonstrated. Combined, or cumulatively, the estimated extraction rate will be 70,000 tonnes per annum. This low rate of extraction has been chosen with a view to minimising any cumulative impact. For example, the low extraction rate of 70,000 tonnes generates only 10 HGV out movements per day between the sites, which is around one per hour. As these will almost immediately join the B1146 HGV route which carries a large volume of traffic, the increase is unlikely to be noticeable. Other cumulative impacts of the sites will be assessed as the application is development, such as through the dust and noise assessments.</p> <p>It should be noted that the extraction rate chosen is lower than the extraction rate of many other potential sites; Min 12 (80,000), Min 35 (80,000) Min 201 (200,000 to 250,000), Min 202 (140,000), Min 37 (85,000), Min 65 (200,000), Min 96 (150,000), Min 38 (85,000 to 120,000), Min 06 (80,000), Min 45 (100,000) etc. Compared to these single sites, the cumulative impacts of Min 13 and Min 51 will be relatively modest.</p> <p>This acceptability will be demonstrated by the future planning application.</p> <p>Policy MP7: Progressive working, restoration and after-use and Policy MP8: Aftercare</p>	<p>Noted and this information is contained in the consultation documents.</p> <p>Noted and this information is contained in the consultation documents.</p> <p>The proposed extraction rate and vehicle movements are noted and this information is contained within the consultation documents.</p>

Representations received about site MIN 51 & 13	Norfolk County Council Planning Officer's response
<p>The site is proposed to be restored at a lower level and returned to arable agricultural. Due to the expected depth of extraction, it is likely that restoration to arable will require the use of imported inert material to provide a suitable profile. Lagoons are likely to be retained as ponds with planting to create wet woodland habitat. Hedgerow interspersed with oaks will be planted along the northern boundary alongside Rawhall Lane. There should therefore be some longer term ecological benefits. The application will be accompanied by an after-care plan.</p> <p>Policy MW2: Development Management Criteria  The sites are in compliance with emerging Policy MW2: Development Management Criteria. For ease of reference, these criteria are set out below with comments against each one.</p> <p>a. Local amenity and health (including noise levels, odour, air quality, dust, litter, light pollution and vibration) - There should be no unacceptable amenity impacts given the distances to the nearest properties. Longwater Gravel will however, prepare both dust and noise assessments and undertake any proposed mitigation measures as part of a future planning application.</p> <p>b. The quality of surface waterbodies and groundwater, with particular regard to preventing the deterioration of their existing status, and the quantity of water for resource purposes within water bodies - There will be no impact on hydrogeology or water resources as it will be worked dry. There will be no impact on watercourses such as the Blackwater because of distances and drainage. The minerals will be processed on site and so the sand and gravel to be processed will not be transported across the nearby watercourses.</p> <p>c. The capacity of existing drainage systems - The site is not in an Internal Drainage Board area.</p> <p>d. Pluvial and fluvial flood risk - There are no concerning flood risk issues given the land use proposed.</p> <p>e. The best and most versatile agricultural land - Being Grade 3, the land is not the best and most versatile.</p> <p>f. Aircraft safety due to the risk of bird strike and/or building height and position - The site is not within an aerodrome safeguarding zone.</p> <p>g. The safety and capacity of the road and any other transport network - Highway access from the site should be satisfactory and an appropriate financial contribution to the B1146 Fakenham</p>	<p>Proposed restoration is noted and this information is contained within the consultation documents.</p> <p>a. Noted</p> <p>b. Noted. This information on hydrology and water resources is contained in the consultation documents.</p> <p>c. Noted. This is stated in the consultation documents.</p> <p>d. The consultation document states that the site is in Flood Zone 1 for flooding from rivers and has a medium probability of surface water flooding. It also notes that sand and gravel extraction is considered to be a 'water compatible' land use. Due to the site being over 1 hectare in size a site-specific Flood Risk Assessment will be required at the planning application stage.</p> <p>e. The site is grade 3 agricultural land. Grade 3a is BMV agricultural land, whilst Grade 3b is not. Therefore, without a soil survey it is currently unknown whether the site is BMV agricultural land or not.</p> <p>f. Noted. This is stated in the consultation documents.</p>

Representations received about site MIN 51 & 13	Norfolk County Council Planning Officer's response
<p>Road/Rawhall Lane junction improvements will be made if required to make the proposal acceptable in planning terms.</p> <p>h. The appearance, quality and character of the landscape, countryside and visual environment and any local features that contribute to its local distinctiveness - The site is not in or near any landscape designations. The site is fairly flat and would be relatively easy to screen from views from surrounding roads and properties. The site contains interesting landscape features; the internal hedgerow oaks and the block of woodland and rough grass lie within the centre of the site are notable features in this open landscape and these will be protected by a the working scheme. A low level restoration scheme to arable agriculture with appropriate wide field margins and additional woodland should be acceptable in landscape terms and will result in a landscape gain.</p> <p>i. Public Open Space, the definitive Public Rights of Way network and outdoor recreation facilities - There will be no impact on any of these assets.</p> <p>j. Land stability - There are no issues regarding land stability.</p> <p>k. The natural and geological environment (including internationally, nationally or locally designated sites and irreplaceable habitats) - Nature conservations designations will not be affected, especially given the stand-off distances and the quarry being worked dry. Restoration will be back to agricultural use, although this will include ensuring a long-term ecological gain. Lagoons will be retained as ponds with planting to create wet woodland habitat and hedgerow interspersed with oaks will be planted along the northern boundary alongside Rawhall Lane. Additional woodland will also be provided. Potential impacts on geodiversity will be assessed and appropriate mitigation identified as part of any future application. The application is likely to propose retaining some open faces for scientific study during the operational stages, and potentially after restoration providing this does not detract from the character of the area. Longwater Gravel will suggest a 'watching brief' is used during the extraction phase in case features of potential geodiversity interest are uncovered.</p> <p>l. The historic environment, including heritage and archaeological assets and their settings - There should be no unacceptable impact on any of the heritage assets in the surrounding area, but Longwater Gravel will ensure that the planning application is accompanied by a Heritage Statement which will assess the potential for impacts and identify appropriate mitigation</p>	<p>g. Noted. The highway access and potential need for financial contributions for junction improvements are contained in the draft site policy.</p> <p>h. Noted. This landscape information is contained in the consultation documents.</p> <p>i. Noted.</p> <p>j. Noted.</p> <p>k. Noted. The restoration information is contained in the consultation documents. The geodiversity requirements are contained within the draft site allocation policy.</p> <p>l. Noted. The requirement for a Heritage Assessment and an archaeological assessment to be submitted at the planning application stage is contained within the draft site allocation policy.</p>

Representations received about site MIN 51 & 13	Norfolk County Council Planning Officer's response
<p>measures if required. There is the potential that unknown archaeology exists on the site and an assessment of the significance of archaeological deposits will be carried out at the planning application stage. It is recognised that the archaeology assessment may initially be desk-based but may need to be followed up with field surveys and trial-trenching.</p> <p>m. The character and quality of the area, in which the development is situated, through poor design - Long term the character of the area will be retained if not enhanced through a high quality restoration scheme. In the short term some screening will likely be required during working, although key features that add to the character of the area such as the hedgerow oaks and the block of woodland will be protected by the working scheme.</p> <p>Policy MW3: Transport</p> <p>The sites are in compliance with emerging Policy MW3: Transport. For ease of reference, these criteria are set out below with comments against each one.</p> <p>All proposals for minerals development or waste management facilities must assess and consider positively the potential for non-HGV transportation of materials to and from the facilities, principally by rail or water - this potential will be assessed, but given the absence of such facilities nearby such as rail sidings, the current assumption is that this will be unlikely.</p> <p>a) Unacceptable risks to the safety of road users and pedestrians - The proposed highway access into the sites using Rawhall Lane is considered to be suitable by the Highway Authority and an appropriate financial contribution to the B1146 Fakenham Road/Rawhall Lane junction improvements will be made if required to make the proposal acceptable in planning terms.</p> <p>b) Unacceptable impacts on the capacity and/or efficiency of the highway network (including the trunk road network). There are no capacity issues on the local road network.</p> <p>c) Unacceptable impacts on air quality (particularly in relation to any potential breaches of National Air Quality Objectives and impacts on any Air Quality Management Areas) - The site is not in or near an Area Quality Management Area.</p> <p>d) Unacceptable physical impacts on the highway network (e.g. road or kerbside damage) - The Fakenham Road is a designated lorry route and so suitable for HGV traffic. The short route to the</p>	<p>m. Noted. These requirements for screening, restoration and protection of the existing woodland blocks are contained in the draft site policy.</p> <p>Noted.</p> <p>a. Noted. This information is contained in the consultation documents</p> <p>b. Noted</p> <p>c. Noted. This information is contained in the consultation documents.</p> <p>d. Noted.</p>

Representations received about site MIN 51 & 13	Norfolk County Council Planning Officer's response
<p>Fakenham Road is a metaled adopted road and is wide enough for two-HGVs to pass and a new site access junction with Rawhall Lane will be created in accordance with design standards.</p> <p>Any future planning application will be accompanied by either a Transport Statement or Transport Assessment, this being agreed with the Highway Authority in advance. This will show that:</p> <ul style="list-style-type: none"> <li>* Suitable highway access and egress on Rawhall Lane can be achieved in accordance with published highway design guidance;</li> <li>* That there is a short and suitable route to the nearest major road, this being the Fakenham Road and Longwater Gravel is content that this will be captured in a Routing Agreement if required;</li> <li>* The application has considered the needs and safety of other road users, including cyclists, horse riders and pedestrians; and</li> <li>* Appropriate and realistic measures to reduce car travel to the site by workers and visitors will be implemented.</li> </ul> <p>Policy MW5: The Brecks Protected Habitats and Species: The sites are not in the Special Protection Area SPA or the Stone Curlew buffer zone</p> <p>Policy MW6: Agricultural soils: The soil is Grade 3. It is not known at the moment whether this is Grade 3a or 3b. This will be determined during the development of a future planning application. If it is Grade 3a then a suitable soil handling management plan will be developed as part of the application. Restoration will be to agricultural land and so there will, in the long-term, be no loss to agriculture.</p> <p>Summary: The combined site is in a good location for mineral extraction, being close to appropriate transport infrastructure and main towns. There appear to be few if any constraints, such as amenity or nature conservation designations, although impacts will be assessed where appropriate, such as through noise and dust assessments. The low extraction rate should make any cumulative impacts acceptable, although this will also be thoroughly assessed during the application. In addition to the benefit of extracting sand and gravel to support the construction sector, there will be additional ecological and landscape gains upon restoration.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

**MIN 08**                      **land north of Stoney Lane, Beetley**

<b>Representations received about site MIN 08</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93123  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site to be unacceptable if access is proposed onto Stoney Lane or Bilney Road as they are both narrow sub-standard roads. Access would need to be through the existing access via MIN 13 and MIN 51.</p>	<p>Noted. The text within the consultation document has been amended to reflect this. However, the site is considered to be unsuitable to allocate for the reasons detailed in the consultation document: because the site is less deliverable than other sites and the site is unlikely to be operational during the plan period.</p>
<p><b>(Comment)</b> Representation ID: 92955  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We note the existing mineral working in the area of MIN 08, MIN 12, MIN 13 and MIN 51 but would highlight the highly graded heritage assets nearby- grade I St Mary Magdalene at Beetley with the tower visible from the flat landscape that makes up the proposed allocation and the scheduled deserted medieval village at Bittering. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>There are distant views of the tower of the church of St Mary Magdalen at Beetley from the proposed site, which is over 1.6km away. There are a significant number of trees in between and the immediate setting of the church includes a number of houses built in the 1980s. The scheduled deserted medieval village at Bittering is over 1.3km from the proposed site. It is therefore considered that the setting of these heritage assets would not be affected. However, the site is considered to be unsuitable to allocate for the reasons detailed in the consultation document: because the site is less deliverable than other sites and the site is unlikely to be operational during the plan period.</p>
<p><b>(Comment)</b> Representation ID: 92929  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  At sites MIN 12, MIN 08 and MIN 45, the excavated void is to be utilised for waste disposal or recovery, so a robust risk assessment will be required. We would expect waste disposal here to meet all best practice techniques. Due to the sensitivity of groundwater (within an SPZ3) it will not be possible to accept reduced liner thickness or design at this site. The aquifers on site must be adequately protected from potential contamination, and if this site is progressed we will be heavily involved to ensure environmental protection.</p>	<p>Noted. However, the site has not been proposed for waste disposal or recovery after extraction at the current time. The site is considered to be unsuitable to allocate for the reasons detailed in the consultation document: because the site is less deliverable than other sites and the site is unlikely to be operational during the plan period.</p>

Representations received about site MIN 08	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92696  Respondent: <b>Gressenhall parish council (Mrs L Jarrett) [7945]</b>  MIN08- Gressenhall Parish council consider this application to be even more premature than MIN51 and 13, none of which should be worked until MIN12 is exhausted.</p>	<p>The site is considered to be unsuitable to allocate for the reasons detailed in the consultation document: because the site is less deliverable than other sites and the site is unlikely to be operational during the plan period.</p>
<p><b>(Comment)</b> Representation ID: 92144  Agent: Mr B Leigh [1531] Respondent: <b>Beetley parish council [779]</b>  The Parish Council agrees with the initial conclusion that this site is not suitable for allocation for all the same reasons as MIN51 and MIN13.</p>	<p>Noted. The site is considered to be unsuitable to allocate for the reasons detailed in the consultation document: because the site is less deliverable than other sites and the site is unlikely to be operational during the plan period.</p>
<p><b>(Object)</b> Representation ID: 92416  Respondent: <b>Cllr M Kiddle-Morris [17980]</b>  MIN08: This site should not be allocated for the same reasons as given for MIN51 &amp; MIN13 as follows: There is no mention in the initial assessment of a processing plant, any on site plant would mean the close proximity of 2 such plants. If MIN12 were to be allocated as well as MIN 13, MIN 51 or MIN 08 the cumulative impact on the area would be unacceptable.</p>	<p>Noted. No details have been provided regarding whether there would be a processing plant on site MIN 08. The site is considered to be unsuitable to allocate for the reasons detailed in the consultation document: because the site is less deliverable than other sites and the site is unlikely to be operational during the plan period.</p>
<p><b>(Object)</b> Representation ID: 92011  Respondent: <b>Mr Richard Phillips [7682]</b>  The site is too close to Gressenhall village, the road access is unsuitable and even if restrictions are put on the access routes to be used this site will inevitably result in lorries using the narrow roads through Gressenhall.</p>	<p>The settlement of Gressenhall is 530m away from the proposed site boundary. The Highway Authority have stated that the site access would need to be via the fields to the north and then onto the Fakenham Road. However, the site is considered to be unsuitable to allocate for the reasons detailed in the consultation document: because the site is less deliverable than other sites and the site is unlikely to be operational during the plan period.</p>
<p><b>(Object)</b> Representation ID: 92538  Respondent: <b>Mr G Parker [18005]</b>  In view of the recent scorching weather, and news that farmers will be under stress for years to come trying to provide for an ever increasing population, I must ask if this is really the time to commandeer so much agricultural land for building materials, when it will be at such a premium</p>	<p>The site is currently in agricultural use. Following mineral extraction, the proposed restoration of the site is back to agriculture. Therefore, whilst the site would be out of agricultural use for a number of years, it would not be a permanent loss of agricultural land. There are no residential properties</p>



<b>Representations received about site MIN 08</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>for its Primary Purpose?  I am very concerned about the noise pollution which will inevitably accompany an extraction site within 250 metres of my house.  I must add, however that I am amazed that so much PRODUCTIVE land can be sacrificed in this way. The recent weather has changed the news, and the future looks bleak enough, and even worse if the bread basket of East Anglia is to be swallowed by solar farms and extraction sites.</p>	<p>within 250m of the proposed site. However, the site is considered to be unsuitable to allocate for the reasons detailed in the consultation document: because the site is less deliverable than other sites and the site is unlikely to be operational during the plan period.</p>

## MIN 23

## land north of Back Lane, Beeston

Representations received about site MIN 23	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93159</p> <p>Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b></p> <p>The Highway Authority considers the site is not acceptable due to the proposed access onto Mileham Road which is sub-standard with poor visibility at the junction.</p>	<p>Noted. The site assessment has states that the Highway Authority consider that the proposed site access onto Mileham Road is not acceptable as the road is sub-standard with poor visibility at the junction. The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p>
<p><b>(Comment)</b> Representation ID: 93082</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b></p> <p>I support the conclusion that this site would be unsuitable due to landscape impacts. Screening or bunding used to mitigate these impacts would be intrusive and due to the sloping topography, would be unlikely to be effective.</p>	<p>Noted. The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p>
<p><b>(Comment)</b> Representation ID: 92956</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>No comment</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92925</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>At sites MIN 6, MIN 204, MIN 23 and MIN 116 it is not stipulated if these sites are to be utilised for waste disposal or recovery. If either of the options are progressed a robust risk assessment will be required. We would expect waste disposal here to meet all best practice techniques. Whilst the site does not lie within an SPZ we would expect groundwater to be sufficiently protected.</p>	<p>No details on the proposed restoration of the site have been provided. However, the site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p>
<p><b>(Object)</b> Representation ID: 91935</p> <p>Respondent: <b>Beeston with Bittering parish council (Mr C Brindley) [17711]</b></p> <p>I write with regards site MIN23 that is included in the above consultation and which is adjacent to the village of Beeston.</p>	<p>Objection noted. The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston. The sloping nature of the site would make screening difficult and bunds</p>

Representations received about site MIN 23	Norfolk County Council Planning Officer's response
<p>The parish council has considered the above consultation and taken specific note of the detailed comments provided for this site in the consultation.</p> <p>The parish council objects to the inclusion of this site in the consultation and therefore agrees with the conclusion reached by the County Council that the site is UNSUITABLE for inclusion in the revised plan.</p> <p>The site is within 120 metres of residential properties on Back Lane and is in open countryside. It would be highly visible in the village and therefore completely unsuitable. The proposed site access from Mileham Rd is similarly unsuitable for any volume of HGV's and the parish council therefore welcomes the highways authority reaching this conclusion.</p> <p>Please therefore remove MIN23 from further consultations as this revised plan emerges.</p>	<p>or screening risk being intrusive in their own right. The Highway Authority considers the site is not acceptable due to the proposed access onto Mileham Road which is sub-standard with poor visibility at the junction.</p> <p>The site has been proposed for sand and gravel extraction by Norfolk Gravel (trading at RG Carter Ltd) in response to a 'call for sites' for the Minerals and Waste Local Plan Review process. Norfolk County Council is required to assess all of the site submitted for their suitability for mineral extraction during the plan period.</p>
<p><b>(Object)</b> Representation ID: 92407</p> <p>Respondent: <b>Clr M Kiddle-Morris [17980]</b></p> <p>MIN23: The allocation of this site would be unacceptable for the reason given in the assessment. I agree with the initial conclusion.</p>	<p>Objection noted. The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p>
<p><b>(Object)</b> Representation ID: 92132</p> <p>Respondent: <b>Mrs S Boston [17831]</b></p> <p>We are not happy with this proposal because of its detrimental effect on the landscape and its close proximity to residential properties in Beeston.</p> <p>The noise whilst working would be unacceptable that close to the village.</p> <p>This will also reduce property values along Back Lane/Mill Drift.</p>	<p>Objection noted. The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p> <p>Property values are not a material planning consideration.</p>
<p><b>(Object)</b> Representation ID: 92034</p> <p>Respondent: <b>Mr &amp; Mrs Marchant [9358]</b></p> <p>We are residents of Beeston with a house on Back Lane that would be within 250 metres of the land north of Back Lane, that was considered for mineral extraction.</p> <p>This site is totally incompatible with the close proximity of over 70 properties along Back Lane, The Street and Chapel Lane. With the wind from the north, we hear noise from the existing quarry adjacent to Punch Farm, from generators and stone tipping and that site is over 2000</p>	<p>Objection noted. The site has been proposed for sand and gravel extraction by Norfolk Gravel (trading at RG Carter Ltd) in response to a 'call for sites' for the Minerals and Waste Local Plan Review process. Norfolk County Council is required to assess all of the sites submitted for their suitability for mineral extraction during the plan period.</p>

Representations received about site MIN 23	Norfolk County Council Planning Officer's response
<p>metres from the houses along the Street and Back Lane. The noise from a closer site would be unbearable as would be the dust pollution. As the site is on an upward slope there is no way the residents could be effectively shielded from the noise and dust pollution. The adverse effects of the noise and dust pollution on the health of the local population could be catastrophic. Don't the County planners ever consider the effect of their plans on the existing population? In this case they obviously did not.</p> <p>From the rear of our house, we have a beautiful country view of a gentle upward sloping cultivated field. We do not want to look out on a hole in the ground. The thoughtless planners could then decide to fill the hole with waste! More noise, machinery, fumes, smells, methane, rodents, changing our wonderful view to an industrial hell.</p> <p>MIM 23 has once been rejected as being unsuitable for mineral extraction, since then nothing has changed except there are now more people living along the street. This plan should be rejected for ever.</p>	<p>The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p> <p>No details on the restoration of the site have been provided. However, the site is not proposed to be used for a landfill site for degradable waste.</p>
<p><b>(Object)</b> Representation ID: 91931</p> <p>Respondent: <b>Mr C S Winter [4119]</b></p> <p>I reside at the Stables, Back Lane, Beeston. Although for some unknown reason I did not receive a copy of your notification dated 26 June 2018, as I have done previously, I am directly affected by the proposals being located between The Hawthorns, and Street Farm in Back Lane.</p> <p>Many years ago now when a similar proposal raised its ugly head, all my then immediate neighbours wrote in against this site as being totally unsuitable. We also attended a rather fractious meeting at Breckland Councils offices, which ended in total disarray. Thankfully however the site was not one chosen for which we were obviously all very pleased about at the time.</p> <p>As Mark Greene has already penned an excellent email to you I do not intend to reiterate what he has already stated in some detail. I just wish to add my name to any list of objectors that you already hold. Incidentally, I am given to understand that my Parish Council also voted against this site during their last meeting on the 31 July 2018.</p>	<p>Objection noted. A consultation letter was sent to this address in June 2018.</p> <p>The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p>
<p><b>(Object)</b> Representation ID: 91895</p> <p>Respondent: <b>Mr Mark Greene [17664]</b></p> <p>I am a resident of Beeston (Breckland) and a Parish Councillor for Beeston with Bittering.</p>	

<b>Representations received about site MIN 23</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Having read the Initial Consultation Minerals Sites I would like to comment regarding "MIN 23 - land north of Back Lane, Beeston"</p> <p>This site is and always will be completely inappropriate for mineral extraction for very tangible reasons which cannot by any reasonable measure be mitigated by the council, land owners or contractors extracting minerals:</p> <ol style="list-style-type: none"> <li>1. The proposed site is far too close to residential property. An established mineral extraction business (East Anglian Stone) is situated further away from the proposed site and you can hear their machinery and generators from residential properties in Beeston already. The precise volume is very subject to wind direction on any given day and is very noticeable if travelling along a SE trajectory. There is literally no practical measures that can be taken to offset the noise and air pollution, you would have to build a bank so enormously high to have any effect it surely is impractical to do so. The result would be an endless conflict between residents, Environmental Health and the contractors probably ending in litigation.</li> <li>2. The proposed site is also far too close equine live stock sensitive to air and noise pollution which risks injury to the animals and people if they are agitated by unnatural noise. The location of grazing land/paddocks is potentially much closer than the stated distances to residential dwellings and you should examine the property boundaries from both Street Farm and Jallis House on Back Lane for a more accurate view.</li> <li>3. There is already a proposed or pending application by East Anglian Stone to extend their mineral extraction on the northern boundary of the proposed site which will add to noise and air pollution as is. We have on the Parish Council received objections and concerns for this activity which is far less disruptive than the proposed mineral extraction in this consultation.</li> <li>4. When I had planning approved to build a 20m x 40m riding ménage it came with conditions for a full archaeology survey for reasons of heritage protection and documentation to a sensitive area. The proposed mineral extraction in this area (probably only a few hundred metres away) is orders of magnitude above the land disruption I required so I would expect even greater scrutiny and care to be taken which must come at an enormous cost less the contractor be allowed to take massive short cuts on the archaeology study.</li> <li>5. One of Beeston's characteristics and features of the area is the land contours and subtle hill of the neighbourhood, right where the proposed mineral extraction site is planning to effectively level off the land. Whilst Beeston with Bittering is not registered as an area of outstanding</li> </ol>	<p>Objection noted. The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p> <ol style="list-style-type: none"> <li>1, 2 &amp; 6. Norfolk County Council's Local List for the Validation of Planning Applications requires a proposal for mineral extraction to submit a dust assessment and a noise assessment at the planning application stage. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health.</li> <li>3. Planning application Number C/3/2018/3002, submitted by East Anglian Stone, for an extension to Punch Farm Quarry for sand and gravel extraction was granted by Norfolk County Council in February 2019. Beeston with Bittering Parish Council did not object to the planning application.</li> <li>4. Norfolk County Council's Local List for the Validation of Planning Applications requires any proposal within an area with known or high potential for archaeological interest to submit an archaeology statement at the planning application stage. A field evaluation is also likely to be required at the planning application stage for sites of archaeological interest.</li> <li>5. The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</li> </ol>

Representations received about site MIN 23	Norfolk County Council Planning Officer's response
<p>natural beauty the proposed mineral extraction at this site would noticeably alter the character of the area in a highly visible and negative way.</p> <p>6. The length of time for the proposed mineral extraction is approximately 10 years, that is a totally unreasonable length of time for residents to be impacted by the sustained noise and air pollution of a mid Norfolk rural village.</p> <p>7. Breckland Planning Authority recently permitted the building of four new residential properties north of The Street (Beeston) which back on to the proposed mineral extraction site, they are being built at the moment. It really isn't acceptable to allow building of new housing next or adjacent to a substantial mineral extraction site. If NCC wanted to seriously consider this site for mineral extraction you should have directed Breckland to not permit the building of further residential dwellings in this area for obvious reasons.</p> <p>The "MIN 08 - land north of Stoney Lane, Beetley" site looks to be more appropriate, you have alternative sites so I would urge you to reject "MIN 23 - land north of Back Lane, Beeston" site this time and forever more as being inappropriate for such large scale mineral extraction.</p>	<p>7. As the proposed mineral extraction site is not allocated in an adopted Local Plan Norfolk County Council would not have commented on a planning application for residential development within the vicinity of the proposed site.</p>
<p><b>(Object)</b> Representation ID: 91892</p> <p>Respondent: <b>Mr K Gore [17672]</b></p> <p>As a resident of Beeston village I wish to object to the proposal to increase mineral extraction at the rear of Back Lane Beeston.</p> <p>Mineral extraction already covers a vast area of Beeston village surroundings and extending this facility would do the village no favours. Also this increase in mineral extraction would involve further heavy traffic and noise and pollution within the village boundaries and further decimation of land within Beeston village.</p>	<p>Objection noted. The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p>
<p><b>(Object)</b> Representation ID: 91800</p> <p>Respondent: <b>Mrs. Denise Gore [17591]</b></p> <p>I wish to make known my objection to the proposed sites for mineral extraction to the rear of Back Lane in Beeston. I am concerned in the first place as to how big the proposed site is and its close proximity to the village of Beeston. My second concern is the noise that would affect the residences in the village if approval for mineral extraction was granted.</p>	<p>Objection noted. The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p>
<p><b>(Object)</b> Representation ID: 91696</p>	

<b>Representations received about site MIN 23</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Respondent: <b>Mr R Gussman [9352]</b></p> <p>I would like it to be registered that I protest strongly to the proposals For a Sand and Gravel site [at Beeston] in the M&amp;WLP Review.</p> <p>Not only will it destroy valuable agricultural land but create huge disturbances to the local communities. No doubt it will also reduce the valuation of the properties in this area. Will you be willing to compensate for this.?</p>	<p>Objection noted. The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston.</p> <p>Property values are not a material planning consideration.</p>

**MIN 200**      **land west of Cuckoo Lane, Carbrooke**

<b>Representations received about site MIN 200</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93180  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93124  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and continued routing arrangements; improvements to Mill Lane are also likely to be required.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93083  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  Screening will be particularly important with this site so as to minimise views and retain the setting of nearby listed buildings.</p>	<p>Noted. The draft policy states that a detailed landscaping and screening scheme will be required at the planning application stage, so that views from Mill Lane, Cuckoo Lane and from the direction of Carbrooke, are acceptable and the settings of nearby listed buildings are protected.</p>
<p><b>(Comment)</b> Representation ID: 92957  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We would highlight the close proximity to the grade II windmill. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p>
<p><b>(Comment)</b> Representation ID: 92938  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  Sites MIN 40, MIN 19, MIN 205, MIN 201, MIN 35, MIN 51, MIN 13, and MIN 32 propose low level restoration using inert material to restore the site. Whilst these sites do not lie within an SPZ we would expect groundwater to be sufficiently protected. This would involve a robust waste acceptance criteria. We would expect diligence is maintained to ensure non-inert wastes are not accepted at this site. If deposition will be sub-water table, as at sites MIN 200 and MIN 102, the applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water'.</p>	<p>The site is expected to be worked dry (above the water table) and dewatering is not proposed at the site. The existing adjacent site is currently worked dry. Therefore, if inert waste material was to be used to restore the site then it would <b>not</b> be sub-water table.</p>
<p><b>(Comment)</b> Representation ID: 92564</p>	



Representations received about site MIN 200	Norfolk County Council Planning Officer's response
<p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>In this section we have provided guidance on the pollution prevention measures that we would expect to be considered at these allocated sites.</p> <p>MIN 200, Land west of Cuckoo Lane Carbrooke</p> <p>It is unclear whether de-watering is proposed. There is mention of the proximity to Scoulten Mere Wetland SSSI. If no de-watering is to take place then there would be no impacts, however if de-watering is to take place, by inference, there may be impacts. We welcome the recommendation for a hydrogeological impact assessment to determine if de-watering is acceptable, and if not then the mineral may have to be worked wet. With this proviso we agree with the conclusions that the site is likely to be suitable for complete sands and gravel extraction. The need for hydrogeological impact assessment should be added to the list of the requirements that need addressing in the initial conclusion.</p> <p>We are aware of the proposed restoration of this site. The site lies within an SPZ 2 so it is recognised that sufficient protection of groundwater is required at the site. Groundwater has been identified at the base of excavation, and de-watering is a potential issue.</p> <p>As such any waste management development must employ pollution prevention measures where possible. The aquifers on site must be adequately protected from potential contamination, and any waste management development will require robust risk assessment. When this site is progressed, we will be heavily involved to ensure environmental protection.</p>	<p>The site is expected to be worked dry (above the water table) and dewatering is not proposed at the site. The existing adjacent site is currently worked dry. The draft policy states that a hydrogeological risk assessment will be required at the planning application stage.</p> <p>The proposed restoration of the site is to a nature conservation afteruse with open grassland. If inert waste material was to be used to restore the site then it would not be sub-water table.</p>
<p><b>(Comment)</b> Representation ID: 92402</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes .</p> <p>Whilst we hold no specific knowledge on the following sites, we broadly support the restoration proposals proposed for MIN 12, MIN 13, MIN 51, MIN 200 and MIN 65.</p>	<p>Noted</p>

**MIN 116**      **land at Woodrising Road, Cranworth**

<b>Representations received</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93156  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is not acceptable because Wood Rising Road is sub-standard and narrow and this road is also not on a lorry route.</p>	<p>Noted. One of the reasons that the site is considered to be unsuitable to allocate is because the local road network is sub-standard and narrow.</p>
<p><b>(Comment)</b> Representation ID: 93084  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  I am in support of the initial conclusion for this site. Impacts on nearby dwellings/ Public Rights of Way and the local landscape would be unacceptable. Although bunding and advanced planting is proposed, I feel this would not be sufficient and the bunding itself is likely to be unnecessarily intrusive.</p>	<p>Noted. Two of the reasons that the site is considered to be unsuitable to allocate is because visual and amenity impact on nearby dwellings would be unacceptable and local landscape impacts would be unacceptable.</p>
<p><b>(Object)</b> Representation ID: 92958  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  This site is in open flat farmland opposite the grade II Hurdle Makers cottage. A brief heritage impact assessment should be undertaken for this site to assess its suitability and, if so, location, and appropriate mitigation and restoration measures.</p>	<p>Noted. The site is considered to be unsuitable to allocate for a number of reasons, including unacceptable visual and amenity impact on the nearby dwellings and unacceptable landscape impacts.</p>
<p><b>(Comment)</b> Representation ID: 92926  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  At sites MIN 6, MIN 204, MIN 23 and MIN 116 it is not stipulated if these sites are to be utilised for waste disposal or recovery. If either of the options are progressed a robust risk assessment will be required. We would expect waste disposal here to meet all best practice techniques. Whilst the site does not lie within an SPZ we would expect groundwater to be sufficiently protected.</p>	<p>Noted. The site is considered to be unsuitable to allocate for a number of reasons, including unacceptable visual and amenity impact on nearby dwellings, unacceptable landscape impacts and a sub-standard and narrow local road network. The site is also considered to be less deliverable than other proposed mineral extraction sites.</p>
<p><b>(Object)</b> Representation ID: 91905  Respondent: <b>Mrs Catherine Basey-Fisher [17683]</b>  Dust pollution- negative health impact  Noise pollution- loss of amenity space  Vibration pollution- loss of amenity space</p>	<p>Noted. The site is considered to be unsuitable to allocate for a number of reasons, including unacceptable visual and amenity impact on nearby dwellings, unacceptable landscape impacts and a sub-standard and narrow local road network. The</p>

Representations received	Norfolk County Council Planning Officer's response
<p>Visual intrusion - loss of amenity space  Unsatisfactory traffic / infrastructure links- danger to life and loss of recreational spaces and public rights of way  Reduction in air quality- increase in pollutants and dangerous mineral dusts in the air  Site visual not only to those houses in view, but also to all passers by, as the proposed site on top of a hill.  The whole site is unsustainable and intrusive on all counts and should not proceed</p>	<p>site is also considered to be less deliverable than other proposed mineral extraction sites.</p>
<p><b>(Object)</b> Representation ID: 91699  Respondent: <b>Michael Dalton [17494]</b>  Our home is on the eastern boundary of the proposed site. The prevailing wind is from the west and we would suffer greatly from dust being blown around and in the house. During site working hours it is likely we would not be able to be outside in the garden or be able to have windows open.  Noise would also be an issue as this is a very quiet area.  This part of Norfolk has no artificial lighting so, at night, the sky is black. The artificial lighting necessary to operate or secure the site would destroy that.</p>	<p>Noted. The site is considered to be unsuitable to allocate for a number of reasons, including unacceptable visual and amenity impact on nearby dwellings, unacceptable landscape impacts and a sub-standard and narrow local road network. The site is also considered to be less deliverable than other proposed mineral extraction sites.</p>
<p><b>(Object)</b> Representation ID: 91692  Agent: Miss Anna Brookman [17483] Respondent: <b>Gorhambury Estate Company Limited [17484]</b>  We agree with the initial conclusion that the site is unsuitable for allocation within the Minerals and Waste Local Plan.  The roads in this area are all incredibly narrow, with the C159 Woodrising Road east being the widest road in the area. Grove Farmhouse is accessed from Pye Lane, but the residents tend to use Woodrising Road to access the B1108 rather than the single vehicle width Pye Lane. An additional 18 HGV movements through this area would detrimental both to other road users, and the surface.  The information provided states that a right turn lane would be required at the junction of Woodrising Road with the B1108. Due to the bend in the B1108 as it approaches this junction from the west, joining it is already difficult as it is not possible to see vehicles coming from your right until quite late, promoting additional right hand turning vehicles, especially HGVs, at this point would cause a number of safety issues.  As owners of Grove Farmhouse, our client feels that the use of the site for minerals extraction</p>	<p>Noted. The site is considered to be unsuitable to allocate for a number of reasons, including unacceptable visual and amenity impact on nearby dwellings, unacceptable landscape impacts and a sub-standard and narrow local road network. The site is also considered to be less deliverable than other proposed mineral extraction sites.</p>

Representations received	Norfolk County Council Planning Officer's response
<p>would have a considerable negative impact on the quality of life for the tenants who reside in the property. Extraction of minerals is noisy and dusty, and this property is situated within 250 meters of the extraction site and would experience the effects of this on a daily basis.</p> <p>Summary: The proposed access route to the site is not suitable for increased amounts of HGVs. The turning on the B1108, left or right, is difficult, with poor visibility to the right due to a bend in the road, increased, large vehicles here would cause additional problems. Extraction would have a detrimental effect on neighbouring properties due to the extraction process and the additional large vehicles using the local roads.</p>	
<p><b>(Object)</b> Representation ID: 91691 Respondent: <b>Mrs Rachel Gale [17485]</b></p> <p>I strongly object to the proposal. I moved into the countryside for a quiet and peaceful lifestyle. The project will generate a noise, dust and additional traffic. The roads are small and not designed to carry a lot of traffic let alone 18 HGVs per day on top of Farming machinery. 18 HGVs will equate to 36 for a travel to and return. There are a number of dangerous potholes which are repaired regularly and they crack and break almost as quickly as they are filled which makes the road already unsafe without the additional traffic.</p>	<p>Noted. The site is considered to be unsuitable to allocate for a number of reasons, including unacceptable visual and amenity impact on nearby dwellings, unacceptable landscape impacts and a sub-standard and narrow local road network. The site is also considered to be less deliverable than other proposed mineral extraction sites.</p>

**MIN 35 land at Heath Road, Quidenham**

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93181  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted. However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Comment)</b> Representation ID: 93127  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to road improvements and access onto Heath Road.</p>	<p>Noted. However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Comment)</b> Representation ID: 93070  Respondent: <b>Breckland District Council (Miss Sarah Robertson) [16040]</b>  Question 46: Site MIN35 Land at Heath Road Quidenham. Whilst located within Quidenham parish, this site is directly adjacent to the Snetterton General Employment Area, which is a strategic site for economic development within Breckland on the A11 corridor. At present the assessment does not appear to make reference to the proximity of the site to the GEA, and Breckland would wish to see this acknowledged within the assessment.  The access to the site is through the General Employment Areas to the A11. Further information is requested in relation to the operating hours of the quarry. This is in relation to the potential for weekend extraction. The site is in close proximity to the Snetterton Race Track, and at weekends when the circuit predominantly operates visitor traffic will also be using the access routes to the A11. Regard should be had to this in any transport assessment.</p>	<p>MIN 35 has an adjacent northern boundary with the Snetterton GEA in the existing Breckland Development Plan as the closed landfill site as Snetterton and mineral void are included within the GEA. However, in the emerging Breckland Local Plan the closed landfill and mineral void are excluded from the GEA and therefore MIN 35 shares no direct boundaries with the GEA. The former landfill to the north-west and the woodland to the south-west offer separation. The amenity section of the assessment has been revised to include reference to the proximity of Oakwood Industrial Estate to MIN 35 as the nearest employment area to the site.  The hours of operation of a mineral working are generally 5.5 days per week with working on Saturday mornings. However, this would be a matter for consideration as part of any future planning application, supported by evidence including a Transport Assessment.  However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92959</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>MIN 35 is in close proximity to scheduled Gallows Hill tumulus which was did not appear to be marked on the map. We would expect assessment criteria to be set in policy for this site requiring a full level of assessment within 1km. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. Gallows Hill tumulus was marked on the map, however, due to the scale of the map within the printed document it may have not been very clear. However, this heritage designation was also shown on an interactive map on the consultation website which could be viewed at a range of scales. Due to the location of a railway line and modern industrial buildings in much closer proximity to the tumulus than the proposed extraction site, it is not considered that the proposed extraction site would adversely affect the setting of the tumulus. In additional the proposed mineral working would be temporary and would then be restored back to arable agriculture.</p> <p>NCC's 'Local List for the Validation of Planning Applications' would require a Heritage Statement to be submitted at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Comment)</b> Representation ID: 92934</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>Sites MIN 40, MIN 19, MIN 205, MIN 201, MIN 35, MIN 51, MIN 13, and MIN 32 propose low level restoration using inert material to restore the site. Whilst these sites do not lie within an SPZ we would expect groundwater to be sufficiently protected. This would involve a robust waste acceptance criteria. We would expect diligence is maintained to ensure non-inert wastes are not accepted at this site. If deposition will be sub-water table, as at sites MIN 200 and MIN 102, the applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water'.</p>	<p>Noted. The site is proposed to be restored at a lower level and returned to arable agriculture. The restoration would involve partial infilling with inert waste only. The site would be worked dry (above the water table).</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>



Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92261</p> <p>Respondent: <b>Quidenham Parish Council (Mr P Lotarius) [17925]</b></p> <p>I am writing as Chairman of Quidenham Parish Council, in which the proposed site is situated. This is a very sensitive site being close to main village and has caused concern to residents in the past. We therefore held a meeting of the Parish to gauge opinion, given that several years have passed. I was anxious to encourage them to read the assessment in full so that any comments they have would relate directly to this document. I know several people have already provided their comments on-line.</p> <p>The comments of the Parish Council are as follows:</p> <p>General: Whilst the document is factual in its assessment, it does not provide the reader with a full picture of the site.</p> <ul style="list-style-type: none"> <li>- This site sits between the Industrial Snetterton Heath and the village of Eccles. In that sense it acts as a buffer between the industrial and the rural. To breach this 'neutral' zone would risk destroying the very character of our community.</li> <li>- Allowing this operation on this site would open up the risk of further development along this neutral corridor, again destroying the character of our community. This must surely be taken into account?</li> <li>- What makes matters worse is that the site sits above the village, being on the perimeter of the East Breckland Plateau. This means that the site overlooks the village and any intrusion as a result of the works would be compounded.</li> <li>- The document mentions in passing the existence of the landfill site to the north. However, this has caused enormous anxiety to residents in past years and any ground works close to the landfill are bound to ring alarm bells.</li> </ul> <p>Amenity: Noise and dust are inevitable in an operation such as this.</p> <ul style="list-style-type: none"> <li>- The railway spur which sits close to the site brings in gravel, which is loaded onto trucks near the industrial buildings to the north. These are further away from residents than the proposed sand extraction and yet the vehicles operating on this site are clearly audible. The safety 'bleeps' when the vehicles reverse can carry a considerable distance and no amount of screening will prevent this.</li> </ul>	<p>Objection noted.</p> <p>The land at site MIN 35 is countryside, but it is not designated as a buffer zone between the industrial area and the residential area.</p> <p>NCC's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The site would access Harling Road, which is a designated lorry route, and travel north to the junction with the A11. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements. In accordance with NCC's Local List, a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>Historic Environment/Archaeology: Noted</p> <p>The proposed screening of the site is additional hedge and tree planting along the eastern boundary of the site to screen views from Station Road. Additional hedge and tree planting along the southern boundary of the site to screen views from properties to the south. NCC's Local List would require a Landscape and Visual Impact Assessment to be submitted at the planning application stage to identify any</p>



Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>- The prevailing winds are from the West, which means that any dust will head in the direction of our village. We cannot see how this can be mitigated given the very dry and windy conditions experienced in 2018.</p> <p>Highway access: The work required to improve the site access is considerable, Can this really be viable?</p> <p>Historic environment / Archaeology: The assessment in this regard seems to be reasonable given the historic nature of this region.</p> <p>Landscape: Some additional comments.</p> <p>- Whilst this site cannot be considered a tranquil area of countryside it provides a vital 'buffer' between industrial and rural. Any intrusion into this area would completely destroy any existing amenity/landscape value.</p> <p>- There are no existing buffer zones or advanced planting on this site, which means that screening would rely entirely on some form of bund. Given that the site overlooks the community we fail to see how any bund would be anything other than a major intrusion for those living nearby.</p> <p>Ecology/Water Framework Directive: We note that the extraction site would be worked dry. However, given the location of the adjacent landfill site, we are not convinced that some 'leakage' from this site might occur. We know that substantial amounts of contaminated liquids still exist within the landfill. Although the site is lined, the poor management of the site in past years makes us all understandably sceptical.</p> <p>Restoration: This is perhaps the most worrying aspect of this proposed operation. The assessment paints a quite rosy picture of the restoration and its benefits. However, nothing is guaranteed. After seven years of extraction will this site really be restored or will it become just another extension of the landfill site adjacent? Other uses for the site may also be too tempting to resist. Past experience of the landfill site does not fill us with much confidence.</p> <p>Summary: Quidenham Parish Council has always supported the development of Snetterton Heath, as it recognises the importance of this area to Breckland/Norfolk. Indeed, many of the residents close to this site have been fully supportive of the Council. We ARE NOT therefore a NIMBY community. This proposed operation must be balanced with a desire to</p>	<p>potential impacts and proposed appropriate mitigation measures such as buffers, screening and bunding. However, it has been concluded in the Preferred Options that screening and bunding could be intrusive in its own right, and that therefore the site would be unsuitable for allocation due to unacceptable local landscape impacts as there are more acceptable alternative sites.</p> <p>NCC's Local List would require any future planning application to include a Land Contamination Assessment which would need to assess the potential of contamination as a result of the mineral extraction in proximity to the landfill and identify suitable mitigation measures to address any identified risks.</p> <p>The site is proposed to be restored at a lower level and returned to arable agriculture. Whilst the restoration would involve partial infilling with inert waste, there are no proposals for the site to be used as a landfill.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>maintain the predominantly rural feel of our community. Any intrusion onto this site has the potential for causing irreparable damage to the lives of our residents. This proposed site is just too close to our village and will do far more harm than good.</p>	
<p><b>(Support)</b> Representation ID: 91886  Agent: Stephen M Daw Limited (Mr Stephen Daw) [143] Respondent: <b>Frimstone Limited [3662]</b></p> <p>Whilst the initial conclusion is supported, clarity is required concerning the dimensions of the buffer provided to protect residential amenity. Under the heading 'Amenity' the assessment states, 'the nearest residential property is 42m from the extraction area'. This is incorrect. The buffer area has been designed to ensure the limit of extraction is no closer than 150 metres from the closest residential property positioned close to the southern site boundary.</p>	<p>Noted. The amenity section of the document has been corrected to state that the nearest residential property is 155m from the proposed extraction area. The original error occurred because the 19 units within the Oakwood Industrial Estate are located between 37m and 45m from the proposed extraction area. This has also been clarified in the revised amenity section.</p>
<p><b>RESPONSES FROM INDIVIDUALS</b></p>	
<p><b>(Object)</b> Representation ID: 92540  Respondent: <b>Mrs C Scurll [18006]</b></p> <p>I am writing to register my objection on the following points:  The site in question breaches the 'buffer zone' between the industrial units and Snetterton and Eccles village.  Consequently</p> <ul style="list-style-type: none"> <li>- the noise will be constant and unbearable (I am retired and at home most of the time - I chose to relocate to Eccles because of its quiet environment).</li> <li>- dust and air pollution. The prevailing wind blows from the West - Directly from the proposed site to the village!</li> <li>- property values in Eccles and the immediate environs would be severely effected, no doubt.</li> </ul> <p>And furthermore, what will the resultant pit be used for?  Will it be used for landfill?  If so, this in turn would create further pollution from noise, insects etc.  As a member of our Environmental Services, Ms Jeffery, I ask that this review is considered in far more detail.</p>	<p>Objection noted.</p> <p>The land at site MIN 35 is countryside, but it is not designated as a buffer zone between the industrial area and the residential area.</p> <p>NCC's Local List for the Validation of Planning Applications would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Property values are not a material planning consideration.</p> <p>The site is proposed to be restored at a lower level and returned to arable agriculture. Whilst the restoration would involve partial infilling with inert waste, there are no proposals for the site to be used as a landfill.</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
	<p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 92272 Respondent: <b>Mrs Jill Moses [17666]</b>  <b>(Object)</b> Representation ID: 92032 Respondent: <b>Mr L Moses [17783]</b>  <b>(Object)</b> Representation ID: 92026 Respondent: <b>Mr E Moses [17781]</b></p> <p>Regarding the above referenced planning consultation I would like to raise a number of points of objection.</p> <p>In Eccles we are already subject to a number of industrial operations, doing absolutely nothing to enhance the village quality of where we live, in addition to having to endure an almost daily noise pollution from the racing circuit. Is it really fair that Eccles may be considered as an easy touch and "one more industrial installation won't hurt"?</p> <p>Specifically with regards to the above consultation, is it possible to guarantee 100% that there will be absolutely no noise or dust pollution from the installation planned so close to residential properties, some of which have asthma-sensitive residents? One property's water supply comes from the water table via a well; will this water remain totally unpolluted and potable?</p> <p>Apart from the close proximity of the proposed site to a number of residences, the neutral zone established between the existing industry and the village will be breached and could be viewed as a precedent for future breaches if planning permission is ultimately approved. This neutral zone is used daily by dog walkers and ramblers, and the installation would be visible to all residents.</p> <p>Increased vehicle movements of up to 32 lorries a day put additional strain on our narrow road system, not to mention the increased exhaust pollution and danger to local residents when driving.</p> <p>I really do feel that Eccles is already full up with industrial operations and should on this occasion be given a break. I cannot imagine the value of my property would benefit from any planning application being granted, quite the opposite. Who will pay for this and the inevitable effect of dust pollution?</p>	<p>Objection noted.</p> <p>These existing developments were permitted by Breckland Council. The existing background noise levels would be taken into account in any noise assessment carried out at the planning application stage. NCC's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The proposed extraction site would be worked dry (above the water table) and therefore no effect on water resources is expected.</p> <p>The southern part of the site is not proposed to be extracted and therefore the nearest residential property is 180m from the proposed extraction area and there are 10 residential properties within 250m of the proposed extraction area.</p> <p>The land at site MIN 35 is countryside, but it is not designated as a buffer zone between the industrial area and the residential area.</p> <p>Site MIN 35 is privately owned land and there are no Public Rights of Way across it, or the adjacent field.</p> <p>The proposed screening of the site is additional hedge and tree planting along the eastern boundary of the site to screen views from Station Road. Additional hedge and tree planting along the southern boundary of the site to screen</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>Please consider the above carefully and come to the resident-friendly and socially aware conclusion to down any approval to continue in this matter.</p>	<p>views from properties to the south. NCC's Local List would require a Landscape and Visual Impact Assessment to be submitted at the planning application stage to identify any potential impacts and proposed appropriate mitigation measures such as buffers, screening and bunding. However, it has been concluded in the Preferred Options that screening and bunding could be intrusive in its own right, and that therefore the site would be unsuitable for allocation due to unacceptable local landscape impacts as there are more acceptable alternative sites.</p> <p>The site would access Harling Road, which is a designated lorry route, and travel north to the junction with the A11. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>Property values are not a material planning consideration. However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 92262  Respondent: <b>Mrs J Tyler [17926]</b>  I was surprised given the closeness of the planned development that we did not hear from you directly. I wish to object strongly to the proposal for the following reasons:  a) Dust-I am concerned that there will be increased levels of dust which is worrying from a health perspective.</p>	<p>Objection noted.  a &amp; c) These existing developments were permitted by Breckland Council. The existing background noise levels would be taken into account in any noise assessment carried out at the planning application stage. NCC's 'Local List for the Validation of Planning Applications' would require noise and dust assessments to be submitted at the planning</p>

<b>Representations received about site MIN 35</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>b) Bats- What studies have been undertaken to establish the habitats of the bats that are present in the area.</p> <p>c) Noise- Noise can already be heard from both the track at Snetterton and the industrial area. Whilst this is just at acceptable levels increased noise from the extraction and the removal of the sand would be unacceptable.</p> <p>d) Siting- The area proposed for the extraction can be seen from the village and would both spoil the character and ambiance of the village and I fear the value of the properties would be reduced by this and the noise and dust.</p> <p>e) Village boundary- The siting of such a development prompts concern that Eccles would become an extension of Snetterton industrial area affecting the character of the village and the housing costs.</p>	<p>application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>b) NCC's Local List requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment. Therefore any surveys of potential bat habitats would be carried out by the applicant and submitted as part of a planning application.</p> <p>d) The proposed screening of the site is additional hedge and tree planting along the eastern boundary of the site to screen views from Station Road. Additional hedge and tree planting along the southern boundary of the site to screen views from properties to the south. NCC's Local List would require a Landscape and Visual Impact Assessment to be submitted at the planning application stage to identify any potential impacts and proposed appropriate mitigation measures such as buffers, screening and bunding. However, it has been concluded in the Preferred Options that screening and bunding could be intrusive in its own right, and that therefore the site would be unsuitable for allocation due to unacceptable local landscape impacts as there are more acceptable alternative sites Property values are not a material planning consideration.</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
	<p>e) The land at site MIN 35 is countryside, but it is not designated as a buffer zone between the industrial area and the residential area. Following the seven year extraction period, the site is proposed to be restored back to arable agriculture.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 92193</p> <p>Respondent: <b>Mr Anthony Tyler [17850]</b></p> <p>Firstly I wish to express my deep concern that plans of a development that will have a very considerable impact on the village of Eccles had not received sufficient publicity as to make all residents aware. This is a small village with a few new houses being built and planning permission given for a group of houses that will be directly facing this site. Such a development will spoil the tranquillity of the village and have a considerable affect on house values. I believe the council has completely failed in its duty of care to residents in its failure to inform all affected. I cannot help but question if this was due to the fact that by not doing so it was hoped this development could be passed with few objections?</p> <p>I wish to object to the development of this site for sand extraction on the following grounds –</p> <ol style="list-style-type: none"> <li>1. Development of the site will remove the buffer zone between the industrial activities at Snetterton and the village of Eccles. I believe that it was agreed between villagers and the developers of the industrial zone when it was first built that this would be maintained.</li> <li>2. Despite the plans for the inclusion of shielding features such as trees and bunds this site will still be visible from the village. It is on a small hill that faces the village and unless the trees planted are of a considerable size and maturity and many years elapsed before work starts the extraction period would be during a time when these trees do not provide sufficient screening.</li> <li>3. Noise - We can already hear the sound of reversing warnings from vehicles up at the Snetterton Industrial area and there is obviously intermittent noise from the race track.</li> </ol>	<p>Objection noted.</p> <p>Property values are not a material planning consideration. All addresses within 250m of the proposed site boundary were informed by letter of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls. Quidenham Parish Council was informed of the consultation on 28 June 2018.</p> <ol style="list-style-type: none"> <li>1. The land at site MIN 35 is countryside, but it is not designated as a buffer zone between the industrial area and the residential area.</li> <li>2. The proposed screening of the site is additional hedge and tree planting along the eastern boundary of the site to screen views from Station Road. Additional hedge and tree planting along the southern boundary of the site to screen views from properties to the south. NCC's Local List for the Validation of Planning Applications' would require a Landscape and Visual Impact Assessment to be submitted at the planning application stage to identify any potential impacts and proposed appropriate mitigation measures such as buffers, screening and bunding. However, it has been concluded in the</li> </ol>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>We accept this but the sand quarrying works would involve many vehicles and almost continuous machinery noise with conveyors and plant close to the village. The working hours of the site have also not been determined. This has the potential to affect the quality of life for all that live there.</p> <p>4. Dust - The wind often blows in the direction of the village from the proposed site. Despite dust extraction plans I believe we will see periods where our houses, washing etc are coated in dust. This dust in the air also has the potential to affect the health of residents. The harmful effects of inhaling silicates and sands are now becoming known! Should the health of residents be affected it is highly likely that the council and owners of the site will face the considerable costs of litigation and compensation.</p> <p>5. Conservation issues - I am told there are considerable numbers of bats and other wildlife in the woods to the East of the site. The noise and disturbance created is likely to make these areas no longer suitable habitats.</p>	<p>Preferred Options that screening and bunding could be intrusive in its own right, and that therefore the site would be unsuitable for allocation due to unacceptable local landscape impacts as there are more acceptable alternative sites</p> <p>3. developments were permitted by Breckland Council. The existing background noise levels would be taken into account in any noise assessment carried out at the planning application stage. The working hours of the site would be determined at the planning application stage. However, for information, existing mineral extraction sites in Norfolk have the following permitted operational hours: 7am-6pm Monday to Friday and 7am to 1pm on Saturdays.</p> <p>4. NCC's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>5. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p>

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<p><b>(Object)</b> Representation ID: 92136  Respondent: <b>Ms Jeni Bartlett [17834]</b>  I wish to object to this site within the policy.</p> <p><b>Amenity:</b> the document states that the nearest property is within 42 metres of the proposed site and that the greatest impact would be within the first 100m. Although the text states this would be if it is "uncontrolled", there is no proposal about how the impact on the very local properties would be mitigated. The initial conclusion states the potential for visual buffers, however, there is no statement on how the noise from the operation of the site and the heavy vehicle traffic would be mitigated. Although the site is not far from the racing circuit, the noise from that operation is not constant, and only impacts properties according to the wind direction. The noise from this site would have a negative impact on the residents due to the operational processes.</p> <p>Despite proposing a smaller extraction area, the site is too close to residential properties and will negatively impact their value as well as the lives of the residents.</p> <p><b>Landscape:</b> while the site is on the edge of an industrial area, the statement that it "could not be considered a tranquil, unspoilt area of countryside" is a misrepresentation that the arable site is a buffer for this area of countryside. The houses at the end of Heath Road (not Heath Lane as the document calls it) and on Sandfield Lane are on the edge of countryside. Extracting sand and gravel from the site would compromise this countryside location.</p> <p><b>Industry:</b> although access to the site is through an industrial area, it is not heavy industry. The nearby Oakwood Industrial Estate is comprised of light industry (window supplies, a brewery, mobility centre, artisan kitchen making), and any significant increase in daily lorry movements, increased noise, and visual impacts may affect the viability of these small businesses.</p> <p><b>Summary:</b> The site is too close to residential properties, and will have a significantly negative impact on their lives through increased lorry movements and noise from the site.</p>	<p>Objection noted.</p> <p>NCC's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Property values are not a material planning consideration. The land at site MIN 35 is countryside, but it is not designated as a buffer zone between the industrial area and the residential area. Mineral extraction can only take place where deposits occur, and this is virtually always in countryside locations.</p> <p>The estimated number of HGV movements is 32 per day. The site would access Harling Road, which is a designated lorry route, and travel north to the junction with the A11. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p>



Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>The site is a buffer zone for this area of the countryside, and is accessed through an area of light industry, which lorry movements and noise could negatively impact businesses.</p>	<p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 92112  Respondent: <b>Mrs S Rose [17811]</b>  I am a resident of Station Road, Eccles and have severe concerns regarding the above proposal.</p> <ol style="list-style-type: none"> <li>1. Air Pollution. The prevailing south- westerly wind would carry dust from the site straight across the village possibly causing breathing difficulties for myself and asthma sufferers.</li> <li>2. Noise Pollution. The excavation would mean an increase in noise. We already have the noise from Snetterton Racetrack and the railway to contend with.</li> <li>3. Increase of Traffic. I understand that approximately 32 lorries per day would be used to move the sand. This would inevitably lead to more traffic along Station Road which is already used as a 'rat run' despite the supposed 7.5 tons weight limit.</li> <li>4. Loss of Habitat for Wildlife. This area is used as a nesting site for skylarks and by many other species, their habitat would be destroyed.</li> <li>5. Property Values. The air and noise pollution and the fact that the site would be visible from my property would, I believe, affect the value of the property.</li> <li>6. What would happen once excavation is completed? I am concerned that the site would be used as a landfill, which would result in further air pollution and also fly infestations.</li> <li>7. Designated Buffer Zone. I was of the understanding that the area in question was designated a buffer zone between the industrial area and the residential area and would not be developed.</li> </ol> <p>I would be grateful if you would consider these points before making your final decision.</p>	<p>Objection noted.</p> <ol style="list-style-type: none"> <li>1. NCC's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</li> <li>2. The existing background noise levels would be taken into account in any noise assessment carried out at the planning application stage.</li> <li>3. The estimated number of HGV movements is 32 per day. The site would access Harling Road, which is a designated lorry route, and travel north to the junction with the A11. Using Station Road to access the site would be a significantly longer route for HGV traffic along inappropriate roads. If necessary a routing agreement could be required through planning conditions.</li> <li>4. NCCI's Local List requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</li> </ol>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
	<p>5. Property values are not a material planning consideration</p> <p>6. The site is proposed to be restored at a lower level and returned to arable agriculture. Whilst the restoration would involve partial infilling with inert waste, there are no proposals for the site to be used as a landfill.</p> <p>7. The land at site MIN 35 is countryside, but it is not designated as a buffer zone between the industrial area and the residential area.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 92110</p> <p>Respondent: <b>Mr Derek Rose [17807]</b></p> <p>Comments and objections regarding the above proposed plan.</p> <p>1. I am concerned that a letter was only sent to occupants that live within only 250 m of the plan! Within half-a-mile you have a whole village that will be affected. This smacks of underhandedness!</p> <p>2. As with the previous quarry and then landfill, we will be having all the same issues and will be even nearer.</p> <p>3. As Eccles I live and have done for the last 27 years I have some knowledge of the area.</p> <p>4. The prevailing wind is southwesterly and Eccles lies in direct line of any pollution be it air, noise or any other environmental hazards that go with extraction and the landfill.</p> <p>5. Heavy traffic due to lorries will increase. We are supposed to have a 7.5 tonne weight restriction around the parish but lorries totally flout this and nobody "police's" it.</p> <p>6. Noise pollution will be an issue. Look at how much Mr. Palmer has spent on bunding and other noise reduction elements at Snetterton to see what costs are involved.</p> <p>7. Two other sites in the area would be less environmentally obtrusive. They are on the other side of the A11. MIN102, MIN201.</p>	<p>Objection noted.</p> <p>1. All addresses within 250m of the proposed site boundary were informed by letter of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>Quidenham Parish Council was informed of the consultation on 28 June 2018.</p> <p>2. As detailed below any future application for mineral extraction will need to provide assessment of potential impacts and identify suitable mitigation. There are no proposals for the site to be used as a landfill. The site is proposed to be restored at a lower level and returned to arable agriculture. Any future planning application would be required to contain a restoration scheme which would be controlled by planning conditions on any grant of permission.</p> <p>3. Noted</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>8. Even capped the last landfill on Heath road created noise pollution into Eccles from its methane conversion machinery.</p> <p>9. Light pollution. There will even more, as Snetterton industrial estate lit up like a Christmas tree in once was a reasonable dark sky area.</p>	<p>4. NCC's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust). The site is proposed to be restored at a lower level and returned to arable agriculture. Whilst the restoration would involve partial infilling with inert waste, there are no proposals for the site to be used as a landfill.</p> <p>5. The estimated number of HGV movements is 32 per day. The site would access Harling Road, which is a designated lorry route, and travel north to the junction with the A11. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements.</p> <p>6. See response to point 4.</p> <p>7. Due to both sites MIN 102 and MIN 201 being located adjacent to Swangey Fen SSSI (part of the Norfolk Valley Fens Special Area of Conservation) there is the potential for unacceptable adverse effects on the SSSI and SAC from proposed mineral extraction at these sites. Whilst it may be technically possible to design a site where there would not be any adverse effects, this has not been demonstrated and it is a significant constraint to the development of the sites and therefore there have not been allocated.</p> <p>8. The site is proposed to be restored at a lower level and returned to arable agriculture. Whilst the restoration</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
	<p>would involve partial infilling with inert waste, there are no proposals for the site to be used as a landfill.</p> <p>9. NCC's Local List requires that planning applications include a Lighting assessment to ensure that there are no unacceptable impacts from site lighting.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 91999</p> <p>Respondent: <b>Mr Crispin de Boos [17700]</b></p> <p>I received a copy of Your Council's letter of 26 June 2018, addressed to a select number of households concerning the above.</p> <p>I am rather perturbed about a number of aspects of this proposal. As I understand it, this letter was sent to only six residents of Sandfield Lane/Heath Lane, presumably on the assumption that those who did not receive this information would not be affected. I also understand that the Parish Council was not informed.</p> <p>This assumption is completely wrong. The proposal is to excavate some half a million tonnes of sand over a prolonged period. This will mean noise pollution, air pollution, possibly a prolonged and no doubt noisy building project, a possibly unsightly finished product and overall it will have a detrimental effect on all the residents of this village. Given that we already have to tolerate substantial track noise from Snetterton, a public nuisance in the form of a sometimes intolerable level of Tannoy announcements from the track, and more recently the continual noise of vehicles reversing from the ever increasing industrialisation this is adding insult to injury.</p> <p>The increase in traffic on narrow country lanes will be substantial and there will no doubt be further environmental effects as well.</p> <p>All in all, it is an ill-advised and unnecessary scheme and to presume that only a few residents will be affected is a gross mis-statement.</p>	<p>All addresses within 250m of the proposed site boundary were informed by letter of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>Quidenham Parish Council was informed of the consultation on 28 June 2018.</p> <p>These existing developments were permitted by Breckland Council. The existing background noise levels would be taken into account in any noise assessment carried out at the planning application stage. NCC's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The site is proposed to be restored at a lower level and returned to arable agriculture. Any future planning application would be required to contain a restoration</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>How did you arrive at the conclusion that only residents within 250 yards would be affected? Why, if you did not advise the Parish Council, did you consider it was unnecessary to do so?</p> <p>We strongly object to these scheme and we strongly object to the rather high-handed approach of Norfolk County Council.</p>	<p>scheme which would be controlled by planning conditions on any grant of permission.</p> <p>The site would access Harling Road, which is a designated lorry route, and travel north to the junction with the A11. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 91993 Respondent: <b>Mrs Ann Offer [7980]</b></p> <p>We are very surprised that the letter from yourself only went to a handful of houses when this application will effect everybody living in our small village.</p> <p>Please decline the above application for removal of minerals in our village Eccles. My reason are as follows.</p> <p>I want to keep a buffer between the village and the industrial area and believe a buffer zone has already been agreed so surely these fields are in the buffer zone.</p> <p>We have experienced the noise of a gravel/sand pit previously, it was awful.</p> <p>We already have to put up with the noise from Snetterton race track this is the only track in the UK to hold a 24 hour race, they have up to 31 days a year with cars which are un-silenced, we also hear the tannoy. Plus reverse bleeper noise from forklifts and lorries on the industrial estate both day and night.</p> <p>What happens after the minerals have been removed we suspect you will use it for landfill, once again we have had very bad experiences with that. The smell was horrendous it meant you could not open windows and the back of our house would be covered in flies.</p> <p>Please think of the people of Eccles who have breathing problems the dust from the site will not help them one bit.</p>	<p>The parish council and all addresses within 250m of the proposed site boundary were informed by letter of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls. This site has been submitted as a potential mineral site allocation, it is not a planning application.</p> <p>The land at site MIN 35 is countryside, but it is not designated as a buffer zone between the industrial area and the residential area.</p> <p>These existing developments were permitted by Breckland Council. The existing background noise levels would be taken into account in any noise assessment carried out at the planning application stage. NCC's Local List would require a noise assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>Once again please decline this application, our future is in your hands.</p>	<p>not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The site is proposed to be restored at a lower level and returned to arable agriculture. Whilst the restoration would involve partial infilling with inert waste, there are no proposals for the site to be used as a landfill. The details of the restoration scheme would have to be submitted as part of any future planning application, and the restoration would be controlled by planning conditions on any grant of permission. There would be no odour or flies associated with a mineral extraction operation.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 91990  Respondent: <b>Mr C W Offer [17736]</b>  I would like to lodge my objection to MIN 35.</p> <p>No 1, We suffer from a lot of noise in our village more would be totally unacceptable, we have lived in Eccles for over 30 years during this time Snetterton has got louder and louder in fact tonight they have only just stopped (written at 7.40pm) we have to endure the circuit very nearly everyday and evening, they are the only track to hold a 24 hour race and have up to 31 days a year using un-silenced vehicles. We also have to put up with reverse beepers from lorries and forklifts both day and night from the warehouses in the industrial estate.</p> <p>No 2, I was under the impression we had a buffer between us and industry area this field is in the buffer area. If this mineral pit is allowed what else will be allowed to come in the buffer zone.</p> <p>No 3, I also think we will get lots of dust from this site not good for the health of Eccles people.</p>	<p>Objection noted.</p> <ol style="list-style-type: none"> <li>1. These existing developments were permitted by Breckland Council. The existing background noise levels would be taken into account in any noise assessment carried out at the planning application stage.</li> <li>2. The land at site MIN 35 is countryside, but it is not designated as a buffer zone between the industrial area and the residential area.</li> <li>3. NCC's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</li> </ol>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>No 4, When you no longer extract minerals you will use it to get rid of waste, so we will suffer from smells and flies both of which are not good for the health of Eccles people. Please turn down this application as it will ruin our lives.</p>	<p>4. The site is proposed to be restored at a lower level and returned to arable agriculture. Whilst the restoration would involve partial infilling with inert waste, there are no proposals for the site to be used as a landfill. The details of the restoration scheme would have to be submitted as part of any future planning application, and the restoration would be controlled by planning conditions on any grant of planning permission. There would be no odour or flies associated with a mineral extraction operation or with inert waste. However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 91981 Respondent: <b>Miss A Lentin [4227]</b> <b>(Object)</b> Representation ID: 91980 Respondent: <b>Mr Henry Lentin-Davis [17727]</b></p> <p>This proposed site has been rejected multiple times already due to the close proximity of local residents and habitation. We live here with our 3 children, plus the cottage opposite us has a family so that is an extra 7 people living close to the proposed site. How come this is facing another round of consultations when the local residents are still here, just multiplying!</p> <p>I do not consider the DPD is legally compliant nor sound, in relation to Site Reference MIN 35, for the following reasons:-</p> <p>I note on the OS Map that you are using is originally from 2011, so the current properties down Heath Road aren't represented accurately - the 3 homes appear to be represented as 1 Tetris block! Therefore, looking at the "proposed site" you want to extract sand and gravel from, there is currently 3 homes!!</p> <p>I note the Mineral reserve has been amended and reduced from 650,000 to 525,000 and now is 500,000. Does this mean the depth of the 'pit' is going to be less? More clarification is required please.</p>	<p>Objection noted.</p> <p>The proximity of dwellings to the site boundary has been recognised by the proposer of the site and they have included a reduced extraction area which moves the limit of extraction northwards, such that the closest point of extraction would be 155m from the nearest dwelling.</p> <p>The OS map used in the consultation document does not show each individual house due to the scale of the map used. However, the location of properties was taken into account in the site assessment undertaken by planning officers.</p> <p>The estimated mineral resource in the site has changed over time as the area of extraction has been amended, the estimated maximum depth of the site has not changed significantly.</p> <p>The working hours of the site would be determined at the planning application stage. However, for information, existing mineral extraction sites in Norfolk have the</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>No-where does it state the proposed operational hours and noise limits. Snetterton Racing Circuit have rules to abide by, so these need clarification.</p> <p>Heath Road is a cul-de-sac (the rail crossing was closed 25 years ago on 29/03/1993 and the movement of lorries will mean that the road will be blocked during operational hours. Implications as follows:-</p> <p>The top of the road is a sharp bed - one only has to note the chevron signs on the corner!</p> <p>Mr H Lentin-Davis is a Class 2 lorry driver and work full-time so it's imperative I get to work to provide for my family.</p> <p>Miss A Lentin is a senior co-ordinating midwife which is a reserved occupation and the slightest of incidents would mean I would be unable to leave for work. It is vital that I am at work on time.</p> <p>Emergency Vehicle access would be hampered. In the case of the Wood Yard fire on 25/06/09, we were trapped with no means of vehicular access. [redacted text – personal data] the thought of an ambulance being delayed because of potential lorry movement doesn't bear thinking about. Myself and 2 children [redacted text – personal data] will be affected by the dust from extraction.</p> <p>Down Heath Road we have colonies of bats which are protected under Schedule 2 of the Conservation Natural Habitats Regulations 1994. This proposed site would affect their local distribution or abundance, or affect their ability to survive, breed or rear young - this is an offence to upset their habitat.</p> <p>In my original objection letters, I have written that the site was 7.38ha, however in the most recent document you have published, it states it is 7.5ha. Now [Miss A Lentin] I have lived here since I was 6 hours old and haven't noticed that the field boundary has grown!</p> <p>Our landlords have installed a Bore Hole for us and I fear that this extraction will disturb the land and our water supply - the full effects of extraction haven't been fully investigated.</p> <p>The proposed site is very close to the closed landfill site which was unlined and filled with inert waste. There is regular testing (one site down Heath Rd) to measure any potential</p>	<p>following permitted operational hours: 7am-6pm Monday to Friday and 7am to 1pm on Saturdays. If permitted, the operational hours would be controlled by a planning condition.</p> <p>Noise limits for mineral extraction operations form part of the planning application process. NCC's 'Local List for the Validation of Planning Applications' requires a noise assessment as part of the planning application with mitigation measures identified to ensure no unacceptable adverse impacts. The existing background noise would be taken into account in those assessments.</p> <p>The site would access Harling Road, which is a designated lorry route, and travel north to the junction with the A11. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements. In accordance with NCC's Local List a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>NCC's Local List would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>NCC's Local List requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could</p>



Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>contamination of the land. This extraction has the possibility to speed up the potential contamination of the surrounding land.</p>	<p>provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The site boundary has not changed however, the increased accuracy with which these boundaries can be mapped has resulted in this small change to the measurement of the site area. The reduced extraction area within the wider site would be 4.38ha.</p> <p>The proposed extraction would be above the water table so no effect on water resources would be expected.</p> <p>NCC's Local List would require any future planning application to include a Land Contamination Assessment which would need to assess the potential of contamination as a result of the mineral extraction in proximity to the landfill and identify suitable mitigation measures to address any identified risks.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 91902</p> <p>Respondent: <b>Mr Ian James [17668]</b></p> <p>It is entirely unacceptable for greater emphasis to be given to a collection of beetles living several km away than the impact of local residents. The extraction of minerals from this site would simply encourage the growth of the existing Snetterton light industrial and distribution park towards the nearby villages of Eccles and Quidenham.</p> <p>Whilst I agree that the area is not 'naturally unspoilt' it is wrong to say that it is not tranquil. The developments do not impose significantly on residents. The nearby racetrack causes short periods of loud noise at some weekends; the recycling centre is small and quiet, the light industrial units are very small in scale. well hidden and make little or no</p>	<p>Objection noted.</p> <p>The SSSIs that are discussed in the site assessment have been included because proposed site MIN 35 is located within the 'Impact Risk Zone' (defined by Natural England) for these SSSIs. The SSSI risk zone extends a few kilometres from these sites because they can be affected by changes to hydrogeology. However, the site assessment concludes that there would be no adverse impacts to the SSSIs from mineral extraction at this site. In comparison, the amenity and landscape sections of the site assessment discuss the proximity of local residents and the mitigation measures</p>

<b>Representations received about site MIN 35</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>noise. In contrast, the proposed extraction site would be visible to many local residents and would truly be a blot on the landscape.</p> <p>I do not think any council officer would wish for a gigantic hole to be built 150m from their house for a period of 7 years, yet it is being considered acceptable for local residents. The local residents and the village of Eccles have absolutely nothing to gain from this development.</p> <p>The development at Eccles will cause an awful impact on the amenity of local residents who will 24 metres from the site boundary. This site should be rejected unless the agreement of local residents can be sought.</p>	<p>that would be required to ensure no unacceptable adverse impacts.</p> <p>Following the seven year extraction period, the site is proposed to be restored back to arable agriculture. Therefore, mineral extraction at this location is not expected to encourage the growth of employment area towards the nearby villages.</p> <p>The proposed screening of the site is additional hedge and tree planting along the eastern boundary of the site to screen views from Station Road. Additional hedge and tree planting along the southern boundary of the site to screen views from properties to the south. NCC's 'Local List for the Validation of Planning Applications' would require a Landscape and Visual Impact Assessment to be submitted at the planning application stage to identify any potential impacts and proposed appropriate mitigation measures such as buffers, screening and bunding. However, it has been concluded in the Preferred Options that screening and bunding could be intrusive in its own right, and that therefore the site would be unsuitable for allocation due to unacceptable local landscape impacts as there are more acceptable alternative sites.</p> <p>NCC's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust). Whilst the nearest residential dwelling is 24m from the site boundary, the southern part of the site would not be</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
	<p>extracted and therefore the nearest residential property is 155m from the proposed extraction area.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>
<p><b>(Object)</b> Representation ID: 91884 Respondent: <b>Mrs A Lentin [4226]</b></p> <p>I am writing to object to the mineral extraction,(1) At 29mtrs we are the 2nd closest property to the site. My Husband [redacted text – personal data] the dust would be extremely detrimental to his health. We have lived here for 42 years &amp; hoped to spend our later years in peace, not confined behind closed doors because of the noise &amp; dust from our 'neighbours'.</p> <p>(2) The highway access at the top of Heath Road is NOT suitable, it comes out on to a 45 degree bend, with the Snetterton Recycling Site directly to the right. A commercial wood yard is to the left, Putting an exit road further along would bring it out at a blind bend. Heath Road itself is a narrow (7 Feet wide) no through road. Our only vehicular access is the top of the road. If anything blocks the top of the road, we cannot get out! Heath road is on the national cycling route. We get a lot of cyclists up &amp; down. Also Dog walkers use the road &amp; field</p> <p>3) Heath Road is an Historic site, The cottage at the bottom of the road is built on foundations dating back before the 1600's.</p> <p>(4) Utilities infrastructure: Yes,there are 2x underground electricity cables which run across the top of Heath Road, from the straw burner at Snetterton to the sub-station at Diss, but also running down Heath Road, are 3x 11000v cables, that connect Snetterton industrial estates &amp; Snetterton Circuit. Also the main Fibre Optic cable serving Snetterton. And our Water pipe.</p> <p>(5) Hydrogeology: The South side of the old land fill site is unlined &amp; filled with chicken carcasses. The leachate is monitored regularly down Heath Road, but that wouldn't be good if all that is disturbed.</p>	<p>Objection noted.</p> <p>The proximity of dwellings to the site boundary has been recognised by the proposer of the site and they have included a reduced extraction area which moves the limit of extraction northwards, such that the closest point of extraction would be 155m from the nearest dwelling. Norfolk County Council's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>2. The site would access Harling Road, which is a designated lorry route, and travel north to the junction with the A11. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
<p>Heath Crossing Cottage, at the bottom of Heath Road has only a private water supply. By way of a bore hole, coming from an aquifer into the chalk seam. the cottage is DEPENDENT on this water supply. This Bore Hole Water supplies 3 dwellings, there is no Anglian Water!! I believe that this development would compromise the integrity of our bore hole.</p> <p>My husband &amp; myself are not happy with this proposed site, it would impact hugely on our quality of life, we would see it, hear it, smell it &amp; feel it, all at very close quarters. As Owner &amp; landlady of Heath Crossing Cottage, I am LEGALLY responsible for the quality of the water supply to the cottage. I have to have it tested &amp; certified regularly. The developer of the proposed site must take full responsibility for the quality of the water from our bore-hole.</p> <p>Summary: The site is uncomfortably close to 4 dwellings &amp; 1 business. The respiratory health of the closest residents should be taken into account, we are all down-wind.</p> <p>Re 3 dwellings on bore-hole water, the bore-hole source is less than 60meters from the south boundary of the proposed site????will our bore-hole run dry???</p> <p>Heath Road is a narrow no-through road &amp; access to the proposed site is very limited, without blocking residents &amp; business access.</p> <p>Heath Road has several heavy duty cables including Electric &amp; Telecom underneath the surface.</p> <p>The Public Health danger of leachate from the landfill site.</p>	<p>unacceptable adverse impact on the safety and capacity of the road network.</p> <p>3. There are no listed buildings on Heath Road. NCC's Local List requires a Heritage Statement to be submitted at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p> <p>4. The utilities that run down Heath Road itself should not be affected by the mineral extraction as the site access is proposed onto Harling Road. The utilities within the site boundary are detailed in the site assessment.</p> <p>5. NCC's Local List would require any future planning application to include a Land Contamination Assessment which would need to assess the potential of contamination as a result of the mineral extraction in proximity to the landfill and identify suitable mitigation measures to address any identified risks.</p> <p>The proposed extraction site would be worked dry (above the water table) and therefore no effect on water resources is expected.</p> <p>There would be no odour associated with a mineral extraction operation or inert waste.</p> <p>The proposed screening of the site is additional hedge and tree planting along the eastern boundary of the site to screen views from Station Road. Additional hedge and tree planting along the southern boundary of the site to screen views from properties to the south. NCC's 'Local List for the Validation of Planning Applications' would require a Landscape and Visual Impact Assessment to be submitted at the planning application stage to identify any potential</p>

Representations received about site MIN 35	Norfolk County Council Planning Officer's response
	<p>impacts and proposed appropriate mitigation measures such as buffers, screening and bunding.</p> <p>However, it has been concluded in the Preferred Options that screening and bunding could be intrusive in its own right, and that therefore the site would be unsuitable for allocation due to unacceptable local landscape impacts as there are more acceptable alternative sites.</p>
<p><b>(Object)</b> Representation ID: 91758</p> <p>Respondent: <b>Mr G Stone [17545]</b></p> <p>I am against this being done, as I live in Eccles near the station and can hear the combine when they did the field next to the proposed site, so having mineral extraction going which will cause noise pollution in the area and an excess of dust which could be blown over when there is high winds.</p>	<p>Objection noted.</p> <p>NCC's 'Local List for the Validation of Planning Applications' would require a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to unacceptable local landscape impacts.</p>

**MIN 102**      **land at North Farm, south of the River Thet, Snetterton**

<b>Representations received about site MIN 102</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93125  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to a suitable access onto Hargham Road not North Road.</p>	<p>Noted. However, the site is considered to be unsuitable to allocate.</p>
<p><b>(Comment)</b> Representation ID: 92960  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We would highlight the immediate proximity of MIN 201 to the grade II and scheduled wayside cross and the proximity of both sites to grade II farmhouse. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>The scheduled wayside cross is 550m away from the site boundary and the grade II farmhouse is also 550m away from the site boundary. However, the site is considered to be unsuitable to allocate due to the proximity of the site to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC).</p>
<p><b>(Comment)</b> Representation ID: 92937  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  Sites MIN 40, MIN 19, MIN 205, MIN 201, MIN 35, MIN 51, MIN 13, and MIN 32 propose low level restoration using inert material to restore the site. Whilst these sites do not lie within an SPZ we would expect groundwater to be sufficiently protected. This would involve a robust waste acceptance criteria. We would expect diligence is maintained to ensure non-inert wastes are not accepted at this site. If deposition will be sub-water table, as at sites MIN 200 and MIN 102, the applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water'.</p>	<p>Noted. However, the site is considered to be unsuitable to allocate.</p>
<p><b>(Comment)</b> Representation ID: 92921  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  MIN 102, Land at North Farm, south of the River Thet, Snetterton  As stated on p133, the majority of site MIN 102 is situated within flood zone 1, however there is a small percentage of the site within flood zones 2 and 3 which align the River Thet. There is also a small percentage shown at risk of surface water as shown on the risk of flooding from surface water flood map.  Although the site is currently considered to be unsuitable for allocation, should this change a FRA would be needed to demonstrate the risk of flooding to those working onsite and to ensure that</p>	<p>Noted. This information is contained with the paragraph on Flood Risk for site MIN 102. However, the site is considered to be unsuitable to allocate.</p>

Representations received about site MIN 102	Norfolk County Council Planning Officer's response
flood risk is not increased. The impact of climate change on flood risk will also need to be considered.	
<p><b>(Object)</b> Representation ID: 92566</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>In this section we have provided guidance on the pollution prevention measures that we would expect to be considered at these allocated sites.</p> <p>MIN 102, land at North Farm Snetterton: The site is adjacent to Swangey Fen SSSI and therefore we do not consider it suitable for mineral extraction. A stronger argument is required than that presented in the recommendations, which state that 'this is a significant constraint to the development of the site and therefore the site is considered less deliverable than other sites that have been proposed for extraction'. If it is taken forward as a site it would have to be worked wet because we would not grant a de-watering licence, and we would request with strict planning conditions.</p> <p>As the excavated void is to be utilised for waste disposal or recovery, a robust risk assessment will be required. We would expect waste disposal here to meet all best practice techniques. Due to the sensitivity of groundwater (within an SPZ2) it will not be possible to accept reduced liner thickness or design at this site. The aquifers on site must be adequately protected from potential contamination, and if this site is progressed the Environment Agency will be heavily involved to ensure environmental protection.</p>	<p>Objection noted.</p> <p>The site assessment states that the site would need to be worked above the water table. Therefore the site would be worked dry with no de-watering. The site is considered to be unsuitable to allocate.</p> <p>Noted. No restoration proposals for the site have been submitted. However, due to the expected depth of extraction, it is recognised that restoration to arable is likely to require the use of imported inert material to provide a suitable profile.</p>
<p><b>(Comment)</b> Representation ID: 92407</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>We support the Council's proposed to remove the following sites from further consideration in the plan on the grounds of adverse impacts on wildlife sites, namely MIN 102, MIN 201, MIN 48, MIN 45, MIN 19, MIN 205, MIN 74 and MIN 77.</p>	<p>Noted. One of the reasons that the site is considered to be unsuitable to allocate is the proximity of the site to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC).</p>
<p><b>(Object)</b> Representation ID: 92089</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>Agree this site is unsuitable for the reasons given in relation to the designated sites,</p>	<p>Noted. One of the reasons that the site is considered to be unsuitable to allocate is the proximity of the site to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC).</p>
<p><b>(Object)</b> Representation ID: 92017</p> <p>Respondent: <b>CPRE Norfolk (Mr Michael Rayner) [17775]</b></p>	<p>Noted. One of the reasons that the site is considered to be unsuitable to allocate is the</p>

Representations received about site MIN 102	Norfolk County Council Planning Officer's response
We agree that this site is unsuitable for mineral extraction due to the impact on nearby Swangey Fen SSSI (part of the Norfolk Valley Fens SAC) and County Wildlife Sites.	proximity of the site to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC).

**MIN 201**      **land at Swangey Farm, north of North Road, Snetterton**

Representations received about site MIN 201	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93204  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  The barrow mentioned within MIN 201 has already been partly excavated, levelled by ploughing and has been cultivated, so NCCES believes the impact on it could be mitigated (full excavation) - we would be happy if it was to be removed from the reasons not to allocate. We agree the scheduled cross is a significant constraint.</p>	<p>Noted. The location of the barrow will be removed from the reasons why the site is considered to be unsuitable to allocate.</p>
<p><b>(Comment)</b> Representation ID: 93126  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to a suitable access onto Hargham Road not North Road.</p>	<p>Noted. However, the site is considered to be unsuitable to allocate.</p>
<p><b>(Comment)</b> Representation ID: 92961  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We would highlight the immediate proximity of MIN 201 to the grade II and scheduled wayside cross and the proximity of both sites to grade II farmhouse. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. One of the reasons that the site is considered to be unsuitable to allocate is the immediate proximity of the scheduled wayside cross to the site boundary.</p>
<p><b>(Comment)</b> Representation ID: 92933  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  Sites MIN 40, MIN 19, MIN 205, MIN 201, MIN 35, MIN 51, MIN 13, and MIN 32 propose low level restoration using inert material to restore the site. Whilst these sites do not lie within an SPZ we would expect groundwater to be sufficiently protected. This would involve a robust waste acceptance criteria. We would expect diligence is maintained to ensure non-inert wastes are not</p>	<p>Noted. However, the site is considered to be unsuitable to allocate.</p>



Representations received about site MIN 201	Norfolk County Council Planning Officer's response
<p>accepted at this site. If deposition will be sub-water table, as at sites MIN 200 and MIN 102, the applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water'.</p>	
<p><b>(Object)</b> Representation ID: 92567  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  In this section we have provided guidance on the pollution prevention measures that we would expect to be considered at these allocated sites.  MIN 201, land at Swangey Farm Snetterton  The site is adjacent to Swangey Fen SSSI and therefore we do not consider it suitable for mineral extraction. If it is taken forward as a site it would have to be worked wet because we would not grant a de-watering licence, and we would request with strict planning conditions.</p>	<p>Noted. One of the reasons that the site is considered to be unsuitable to allocate is the proximity of the site to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC).</p>
<p><b>(Comment)</b> Representation ID: 92408  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  We support the Council's proposed to remove the following sites from further consideration in the plan on the grounds of adverse impacts on wildlife sites, namely MIN 102, MIN 201, MIN 48, MIN 45, MIN 19, MIN 205, MIN 74 and MIN 77.</p>	<p>Noted. One of the reasons that the site is considered to be unsuitable to allocate is the proximity of the site to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC).</p>
<p><b>(Object)</b> Representation ID: 92090  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Agree this site is unsuitable for the reasons given in relation to the designated sites,</p>	<p>Noted. One of the reasons that the site is considered to be unsuitable to allocate is the proximity of the site to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC).</p>
<p><b>(Object)</b> Representation ID: 92018  Respondent: <b>CPRE Norfolk (Mr Michael Rayner) [17775]</b>  We agree with the conclusion that this site is unsuitable for mineral extraction due to the impact on nearby Swangey Fen SSSI (part of the Norfolk Valley Fens SAC) and County Wildlife Sites.</p>	<p>Noted. One of the reasons that the site is considered to be unsuitable to allocate is the proximity of the site to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC).</p>

## Broadland sites

MIN 55 land at Keepers Cottage, Attlebridge

Representations received about site MIN 55	Norfolk County Council Planning Officer's response
<p>(<b>Comment</b>) Representation ID: 93128 Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b> The Highway Authority considers the site is acceptable subject to the use of the existing access onto the Reepham Road.</p>	<p>Noted. However, the site is considered to be unsuitable to allocate.</p>
<p>(<b>Comment</b>) Representation ID: 93085 Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b> The deep extraction proposed on this site would make it hard to restore to a suitable landform that could be sinuous with the surrounding landscape. I agree with the conclusion that this would make the site unsuitable for allocation.</p>	<p>Noted. One of the reasons that the site is considered to be unsuitable to allocate is due to the proposed very deep extraction which, due to the small area of the site, is not considered to be practicable and would be very difficult to restore to a suitable landform.</p>
<p>(<b>Comment</b>) Representation ID: 92970 Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b> no comment</p>	<p>Noted. The site is considered to be unsuitable to allocate.</p>

**MIN 202**      **land south of Reepham Road, Attlebridge**

<b>Representations received about site MIN 202</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID:93182  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	Noted
<p><b>(Comment)</b> Representation ID: 93129  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access onto the Reepham Road.</p>	Noted
<p><b>(Comment)</b> Representation ID: 93086  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  The deep extraction proposed on this site would make it hard to restore to a suitable landform that could be sinuous with the surrounding landscape. I agree with the conclusion that the site would be suitable for allocation with a shallower depth of extraction.</p>	Noted
<p><b>(Support)</b> Representation ID: 93078  Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b>  MIN 202: The Company supports the identification of land south of Reepham Road, Attlebridge, as suitable for allocation for sand and gravel extraction.</p>	Noted
<p><b>(Comment)</b> Representation ID: 92971  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  No comment</p>	Noted
<p><b>(Comment)</b> Representation ID: 92560  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  The following section outlines the constraints at certain sites, which will need to be considered at the application stage to ensure that ecology is not adversely affected.  MIN 202 The proximity to ancient woodland and county wildlife sites could cause habitat fragmentation.</p>	The location of Mileplain Plantation PAWS in relation to the proposed site is noted and we have revised the site assessment in relation to the potential impact of mineral extraction on the PAWS. It is recognised that CWS Triumph and Foxburrow Plantations is partly within the site and mineral extraction at the site would lead to a loss of part of the CWS. The draft policy requires an

Representations received about site MIN 202	Norfolk County Council Planning Officer's response
	Arboricultural Impact Assessment to be submitted at the planning application stage. The draft policy also requires a minimum of a 15-metre buffer zone to be left unworked adjacent to the ancient woodland site and for the buffer zone to be planted with native tree species.
<p><b>(Object)</b> Representation ID: 92426</p> <p>Respondent: <b>Woodland Trust (Ms V Bankes Price) [16231]</b></p> <p>The following sites have be found to affect ancient woodland, ancient and veteran trees.</p> <p>MIN 202 - land south of Reephram Road, Attlebridge. Proposed for mineral extraction. Mileplain Plantation, which is a Plantation on Ancient Woodland Site (PAWS) and is adjacent to the site boundary. Size of affected woodland 19.8 Ha. Grid reference TG14163195</p> <p>We welcome the recognition of Mileplain Plantation, which is a Plantation on Ancient Woodland Site (PAWS) adjacent to the site boundary. Planning authorities and inspectors increasingly act to prevent the direct destruction of ancient woodland. However, the damage and impacts posed to ancient woods by nearby development are not so widely appreciated. The Trust opposes MIN 202 in its current form due to the potential impact on ancient woodland. Any future application should be subject to a substantial planted buffer of 50m to ensure the integrity of the ancient woodland.</p>	<p>The location of Mileplain Plantation PAWS in relation to the proposed site is noted and we have revised the site assessment in relation to the potential impact of mineral extraction on the PAWS. The draft policy requires an Arboricultural Impact Assessment to be submitted at the planning application stage. The draft policy also requires a minimum of a 15-metre buffer zone to be left unworked adjacent to the ancient woodland site and for the buffer zone to be planted with native tree species. Standing advice from Natural England and the Forestry Commission states that “for ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage” therefore it is not considered that a buffer of 50m is necessary.</p>
<p><b>(Comment)</b> Representation ID: 92380</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.</p> <p>Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p>	Noted

Representations received about site MIN 202	Norfolk County Council Planning Officer's response
<p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 202 - We are concerned that this proposed site partially overlaps with CWS 1344, 'Triumph and Foxburrow Plantations'. We recommend that either the allocation boundary is redrawn to avoid the CWS, or that the site policy includes a requirement for a stand-off area around the edge that includes that part that overlaps the CWS. In addition, given the proximity to the CWS, we would expect the site to be worked dry to avoid any impacts on hydrogeology and a stand-off area sufficient to avoid any impacts on the CWS from dust. We support the proposed restoration to a mosaic of acid grassland, woodland and wetland, and also support the Council's recommendation that the site could support new heathland when restored.</p>	<p>Noted</p> <p>We can confirm that the site would be worked dry, as it is significantly above the level of the water table in this area. We have revised the site assessment in relation to the impact on CWS 1344 to recognise that mineral extraction within the proposed site boundary would lead to a loss of part of the CWS. The draft policy requires an Arboricultural Impact Assessment to be submitted at the planning application stage. The draft policy also requires a minimum of a 15-metre buffer zone to be left unworked adjacent to the ancient woodland site and for the buffer zone to be planted with native tree species.</p> <p>Support for the proposed restoration is noted. The site is now expected to be restored to heathland.</p>

**MIN 48**                      **land at Swannington Bottom Plantation, Felthorpe**

<b>Representations received about site MIN 48</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93205  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion, but with the following comments:  It is worth including in the reasons why the site is unsuitable that MIN 48 could not be allocated if the scheduled barrow was within its extent - it would not get Scheduled Monument Consent and would be contrary to the requirements of the NPPF.</p>	<p>Noted. The text on the historic environment, within the site assessment, has been amended to state that the scheduled barrow would need to be excluded from the proposed extraction area. However, site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other sites that have been proposed for extraction.</p>
<p><b>(Comment)</b> Representation ID: 93130  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is not acceptable due to concerns with the road network which is sub-standard and narrow.</p>	<p>Noted. The site assessment includes the concerns of the Highway Authority regarding the road network. However, site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other sites that have been proposed for extraction.</p>
<p><b>(Object)</b> Representation ID: 92962  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  MIN 48 includes a scheduled round barrow which was not marked on the map, but is identified on page 146. We find the proposed allocation MIN 48 unsound owing to the failure to avoid impacts to a highly designated heritage asset. If an allocation is to be brought forward in this location it requires a heritage impact assessment to identify the appropriate location for an allocation and outline the mitigation measures required which would be incorporated into policy.</p>	<p>Noted. The scheduled round barrow was marked on the map, however, due to the scale of the map within the printed document it may have not been very clear. However, this heritage designation was also shown on an interactive map on the consultation website which could be viewed at a range of scales. The text on the historic environment, within the site assessment, has been amended to state that the scheduled barrow would need to be excluded from the proposed extraction area. However, site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other sites that have been proposed for extraction.</p>
<p><b>(Comment)</b> Representation ID: 92557  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  The following section outlines the constraints at certain sites, which will need to be considered at the application stage to ensure that ecology is not adversely affected.</p>	<p>Noted. The site assessment includes the potential for impacts on Swannington Upgate Common SSSI from mineral extraction. The site assessment also includes the findings of the Water Framework Directive Assessment in relation to Swannington</p>

Representations received about site MIN 48	Norfolk County Council Planning Officer's response
<p>MIN 48 The proximity of the site to Swannington Ugate Common. Potential impacts on features of interest and Swannington beck, a chalk stream with associated priority habitat and species.</p>	<p>Beck. It concludes that the site would need to be set back from Swannington Beck with screening bunds to mitigate the risk of silt ingress. However, site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other sites that have been proposed for extraction, due to both the lack of a mineral operator promoting the site and the potential for adverse effects on the SSSI.</p>
<p><b>(Comment)</b> Representation ID: 92409  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  We support the Council's proposed to remove the following sites from further consideration in the plan on the grounds of adverse impacts on wildlife sites, namely MIN 102, MIN 201, MIN 48, MIN 45, MIN 19, MIN 205, MIN 74 and MIN 77.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 92129  Respondent: <b>Mr Laurence Elsdon [17826]</b>  The proposal to extract minerals from land at Swannington Bottom Plantation, Felthorpe (MIN 48) is of significant concern to the residents of Felthorpe and surrounding neighbourhoods. The consultation documents provided so far do not include sufficient detail on the method of extraction, duration of extraction, number of heavy goods vehicle or plant vehicle movements, or details of land use after mineral extraction to be able to ascertain the effects on the community.  One of Felthorpe's greatest assets is its large network of footpaths, tracks, and bridleways connecting Ugate Common, Gilham's Heath Plantation, The Lings, Steward's Plantation and of course, central to these is Swannington Bottom Plantation. There has so far been no indication of how these paths used by residents of Felthorpe and visitors from further afield will be protected from the proposed works.  The most significant concern will be the loss of a significant and well established unnamed path to the North of Sandy Lane that runs directly through the middle of the Swannington Bottom Plantation, often used by local walkers, runners, cyclists, dogs and their owners connecting Felthorpe Road to Ugate Common. While not indicated on the Ordnance Survey map provided within the consultation the beginnings of this track are labelled on Google Maps as "Combat St" and OpenStreetMap as Way</p>	<p>Noted. Only limited information has been provided to Norfolk County Council by the proposer of the site.</p> <p>Whilst there is a Public Right of Way (Felthorpe RB7) running along the southern boundary of site MIN 48, there are no PRoW within the site itself. A planning application for mineral extraction would need to demonstrate that there would not be an unacceptable adverse impact on the Public Rights of Way network, for example by setting back the extraction area and including screening and bunding between the extraction area and the PRoW. Therefore no impacts are expected on any PRoW from the proposed mineral extraction.</p>

Representations received about site MIN 48	Norfolk County Council Planning Officer's response
<p>333171535 (<a href="https://www.openstreetmap.org/way/333171535">https://www.openstreetmap.org/way/333171535</a>) and Way 333171537 (<a href="https://www.openstreetmap.org/way/333171537">https://www.openstreetmap.org/way/333171537</a>).</p> <p>Therefore, while it is reassuring to see that the initial conclusion of the consultation document is that the site is unsuitable I note as above, and in addition to other responses from the community and local organisations, that there are many significant reasons the proposed site is unsuitable for allocation.</p>	<p>Site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other sites that have been proposed for extraction, due to both the lack of a mineral operator promoting the site and the potential for adverse effects on the SSSI.</p>
<p><b>(Object)</b> Representation ID: 92128</p> <p>Respondent: <b>Wood Farm Liveries (Mrs Andrea Elsdon) [17825]</b></p> <p>Felthorpe is a quiet country village with a number of horse owners living locally many of whom ride through the village and surrounding areas.</p> <p>There are fifteen owners who keep their horses in livery at Wood Farm. The riders regularly hack out along the public footpaths and bridle ways surrounding Wood Farm. One frequently used footpath, known locally as Sandy Lane, runs along side the proposed site MIN 48. The noise, dust and other activity at the site together with the increased HGV traffic along the C245 Felthorpe Road will cause disruption to both the horses and riders. Horses are easily frightened by sudden loud noises which can result in them bolting and unseating their riders. This can obviously cause a major risk of severe injury to the rider and the horse.</p>	<p>Objection noted. However, Site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other sites that have been proposed for extraction, due to both the lack of a mineral operator promoting the site and the potential for adverse effects on Swannington Ugate Common SSSI.</p>
<p><b>(Object)</b> Representation ID: 92127</p> <p>Respondent: <b>Felthorpe Airfield (Mr Bob Gotts) [17820]</b></p> <p>Background:</p> <p>Since 1964 Felthorpe Airfield has been home to an active aviation community formerly known as the "Felthorpe Flying Group". Approximately 30 single prop aircraft are regularly flown from the airfield, varying from vintage aircraft including a 1940 de Havilland Tiger Moth, a 1936 de Havilland Hornet Moth, and a replica First World War Fokker Dreidecker triplane to modern fixed wing aircraft and gyrocopters.</p> <p>Response:</p> <p>The proposed mineral extraction site Swannington Bottom Plantation, Felthorpe MIN48, lies to the North of Felthorpe Airfield. Norwich Air Traffic Control stipulates for safety reasons that all traffic flying to and from Felthorpe Airfield has to take off and land using the Swannington Lane which is directly overhead of the proposed gravel extraction site. Aircraft are required to transit the</p>	<p>Noted</p> <p>Mineral extraction of itself would not be expected to attract birds. The proposed working is likely to be dry (above the water table) and the proposed restoration is to heathland. There are no proposals for the site to become a landfill site following mineral extraction. All mineral extraction sites have to appropriately control dust emissions to ensure</p>



Representations received about site MIN 48	Norfolk County Council Planning Officer's response
<p>Swannington lane at 600 feet above ground level (AGL). At this height dust created by the proposed gravel extraction works could cause aircraft engine failure due to ingestion of dust and particles which could result in an air accident and loss of life. Potential increased bird activity from the gravel extraction and later landfill could cause bird strikes which are an incredibly serious danger to the safety of all aircraft but particularly light aircraft due to potential penetration of an aircraft windscreen and engine failure all resulting in the aircraft being brought down.</p> <p>Conclusion The proposed mineral extraction at MIN 48 - land at Swannington Bottom Plantation, Felthorpe would create an unacceptable risk to the safe operation of light aircraft from Felthorpe Airfield and therefore should be excluded from the local Plan.</p>	<p>that the development would not have an unacceptable impact on local amenity and health. Therefore dust would not be reaching 600 feet above ground level.</p> <p>However, Site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other sites that have been proposed for extraction, due to both the lack of a mineral operator promoting the site and the potential for adverse effects on Swannington Upgate Common SSSI.</p>
<p><b>(Object)</b> Representation ID: 92094</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>The site is also unsuitable due to potential hydrological and dust deposition impacts on the adjacent Swannington Upgate Common SSSI.</p>	<p>Noted. Site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other mineral sites that have been proposed for extraction, due to both the lack of a mineral operator promoting the site and the potential for adverse effects on Swannington Upgate Common SSSI.</p>
<p><b>(Object)</b> Representation ID: 92019</p> <p>Respondent: <b>CPRE Norfolk (Mr Michael Rayner) [17775]</b></p> <p>We feel that the impact on nearby Swannington Upgate Common should be included in the conclusion which would be an additional reason for deeming this site to be unsuitable. Once/if the plantation is felled it would be welcome to see the land restored to heathland.</p>	<p>Noted. Natural England also consider that potential impacts on Swannington Upgate Common SSSI are a reason that the site is unsuitable to allocate. The proposed restoration is to a heathland habitat. Site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other mineral sites that have been proposed for extraction, due to both the lack of a mineral operator promoting the site and the potential for adverse effects on Swannington Upgate Common SSSI.</p>
<p><b>(Object)</b> Representation ID: 91920</p> <p>Respondent: <b>Felthorpe Parish Council (Ben Bates) [17699]</b></p> <p>Felthorpe Parish Council (FPC) has undertaken a thorough review of the proposed extraction of sand and gravel from the land at Swannington Bottom Plantation, Felthorpe. Our comments and observations are as follows.</p>	<p>Amenity: A planning application for mineral extraction would need to demonstrate that there would not be an unacceptable adverse impact on the Public Rights of Way network, for example by setting back the extraction area and including</p>

<b>Representations received about site MIN 48</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>Amenity:</b> There is a Public Right of Way along the southern boundary of the site (Felthorpe RB7). With its close proximity to the site, it will cease to be a pleasant countryside amenity asset contrary to the ambitions of the Broadland District Council Spatial Planning team.</p> <p><b>Highway Access:</b> Mineral extraction over a 5 year period would add the equivalent of 80 HGV trucks per day to the road network. Highways England and Norfolk County Council are aware of FPC's efforts to reduce traffic particularly that of HGVs using the village as a cut through, something that the new Broadland Northway has failed to remedy. FPC is pursuing an HGV restriction along the C260 The Street from the C245 Reephams Road with Highways England undertaking initial research. Implementation of an HGV 7.5 Ton weight restriction for Felthorpe and Swannington would encompass a far greater area than just the single C260 road and would render this proposed site almost unworkable. A highway routing agreement to prevent HGV quarry traffic from travelling through Felthorpe or Swannington Upgate would be difficult to successfully implement and almost impossible to regulate.</p> <p><b>Pollution:</b> The site is less than 200 metres from the nearest housing and less than 300 metres from the main community. The risks from potential pollution are untenable.</p> <p><b>Air:</b> The predominant winds in the area are south westerly. Smells, dust or other pollutants from the proposed site would be directed towards the village potentially affecting health and quality of life. Thick dust blowing up into the atmosphere could seriously impact the flying of small planes landing and taking off from Felthorpe Airfield.</p> <p><b>Water:</b> A number of properties on Mill Lane are served by private bores, there is a concern that the quantity and quality of the water supply could be adversely affected. The water course that originates from the Felthorpe Hall Lake travels along the boundary of the proposed site, through water lands and marsh through Swannington Upgate Common. This is an SSSI site. Plants and animals that would be put at risk, and could be lost should there be breach during excavations.</p> <p><b>Noise:</b> Operation of the site will not be noise free. Under certain conditions, noise from the Mid Norfolk Shooting Ground in Deighton Hills which is over twice the distance from Felthorpe regularly disturbs the village. The noise from heavy plant and equipment operating continuously would be more intrusive.</p>	<p>screening and bunding between the extraction area and the PRoW..</p> <p><b>Highways:</b> The site assessment includes the concerns of the Highway Authority regarding the road network. Routing agreements for HGV traffic are widely used in planning conditions for mineral extraction sites.</p> <p><b>Pollution and air:</b> Even without mitigation, adverse dust impacts from sand and gravel sites are uncommon beyond 250m from the nearest dust generating activities. The greatest impacts will be within 100 metres of a source, if uncontrolled. Mineral extraction would not lead to smells. Norfolk County Council's Local List for the Validation of Planning Applications' requires a dust assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including air quality and dust). Therefore, dust control measures (such as damping down) would ensure that thick dust would not be blowing up into the atmosphere.</p> <p><b>Water:</b> The proposed working is likely to be dry (above the water table).</p> <p><b>Noise:</b> Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a noise assessment to be submitted with any planning</p>

<b>Representations received about site MIN 48</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Light: Felthorpe is classed as Rural Dark Landscape with no street lighting. Operation of the site during the winter months will regardless of any screening, will impact those living in the area and wildlife.</p> <p>Wildlife / Biodiversity: Swannington bottom plantation is home to a large and varied number of wildlife species, which include birds such as buzzards, nightingales, tree creepers and nuthatches. Also summer roosting colonies of types of bat, There are badger sets to be found there too. There are a number of SSSI areas in the surround region, which although considered in the proposal cannot fail to be impacted in some way or form by the extraction site.</p> <p>Waste Disposal: The Minerals and Waste Local Plan Review does not address the refilling of the site during or upon completion of mineral extraction. It is assumed that the site would be used for waste disposal of some form. Use as a waste disposal site would increase and extend the various sources of pollution imposed on the village of Felthorpe and traffic would increase as a result. The use as waste site would increase the risk of a bird strike for both Norwich Airport and Felthorpe Airfield depending on the type of waste.</p> <p>Restoration: The current proposal indicated that the site will be restored to a heathland habitat. It is understood that the site is private land and that felling of the conifers could take place at any time. However, the loss of one particular type of habitat and replacement with a different type will not necessarily encourage existing wildlife to remain.</p> <p>Conclusion</p> <p>Felthorpe Parish Council understands that there is no particular shortage of readily accessible sand deposits in Norfolk for the medium term future. The infrastructure costs associated with extracting a mineral, that is allegedly not in short supply, should prohibit development of this site during the lifetime of this 2036 plan.</p> <p>Felthorpe Parish Council agrees with the Initial Conclusion that the site unsuitable for allocation as there is still not a mineral operator promoting the proposed site and therefore the site is less deliverable than other sites that have been proposed for extraction. However, in view of our assessment, MIN 48 - Land at Swannington Bottom Plantation, Felthorpe should be excluded in its entirety from the Local Plan.</p>	<p>application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise).</p> <p>Light: Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a lighting assessment to be submitted with any planning application that proposes external lighting to assess the impact of lighting and propose mitigation measures if required. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including light), or on the natural environment. If permitted, the operational hours of the site would be controlled through a planning condition.</p> <p>Wildlife/biodiversity/restoration: Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with any planning application on a site which is likely to be populated by any protected species or affects a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>Waste disposal: There are no proposals for the site to become a landfill site following mineral extraction. Some mineral extraction sites are</p>

Representations received about site MIN 48	Norfolk County Council Planning Officer's response
	<p>restored to a lower level and do not require the import of waste as part of the restoration. Some mineral extraction sites import inert wastes (soil, concrete, rubble etc) as part of the restoration to a suitable landform. The use of inert waste in restoration would not increase the risk of bird strike or sources of pollution, but it would probably lead to increased traffic movements.</p> <p>Conclusion: Noted. Site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other mineral sites that have been proposed for extraction, due to both the lack of a mineral operator promoting the site and the potential for adverse effects on Swannington Upgate Common SSSI.</p>
<p><b>(Object)</b> Representation ID: 91761  Respondent: <b>Swannington with Alderford and Little Witchingham (Mr Tim Prail)</b> [17549]  The Parish Council objects to this proposed site. As the owner and custodian of Upgate Common SSSI which abuts this site we are concerned about the impact any extraction would cause</p>	<p>Noted. The site assessment includes the potential for impacts on Swannington Update Common SSSI from mineral extraction. Site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other mineral sites that have been proposed for extraction, due to both the lack of a mineral operator promoting the site and the potential for adverse effects on Swannington Upgate Common SSSI.</p>
<p><b>(Object)</b> Representation ID: 91698  Respondent: <b>Mr Colin Plunkett</b> [17487]  Please note these are just some of our concerns:  1) Water. Our bungalow has a private bore, we are concerned that the quantity and quality of our water supply could be affected.  2) As the predominant wind is westerly, any noise or smells or other pollutants from the proposed</p>	<p>1. Water: The proposed working is likely to be dry (above the water table).  2. Noise and dust: Norfolk County Council's Local List for the Validation of Planning Applications' requires a noise assessment and a dust assessment to be submitted with any planning application for mineral</p>

<b>Representations received about site MIN 48</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>site would be direct to us affecting our health and quality of life.</p> <p>3) Wildlife. Swannington bottom plantation is home to a large and varied number of wildlife species, which include birds such as buzzards, nightingales, treecreepers and nuthatches. Also summer roosting colonies of types of bat, There are badger sets to be found there too.</p> <p>4) Highways. As is readily accepted by Highways Department, the village of Felthorpe has more than its share of HGV traffic, any increase would be detrimental.</p>	<p>extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on health and local amenity (including noise, air quality and dust). Mineral extraction would not cause any smells.</p> <p>3. Wildlife: Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with any planning application on a site which is likely to be populated by any protected species or affects a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>4. Highways: The site assessment includes the concerns of the Highway Authority regarding the road network.</p> <p>Site MIN 48 is considered to be unsuitable to allocate as it is less deliverable than other mineral sites that have been proposed for extraction, due to both the lack of a mineral operator promoting the site and the potential for adverse effects on Swannington Upgate Common SSSI.</p>

**MIN 37 land at Mayton Wood, Coltishall Road, Buxton**

Representations received about site MIN 37	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93183  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93131  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to a new access onto Coltishall Road.</p>	<p>The proposal includes a new access onto Coltishall Road located close to the existing junction with Sandy Lane.</p>
<p><b>(Comment)</b> Representation ID: 93087  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  Screening should be carefully considered, with native species chosen where possible. The extensive use of conifers should be avoided where possible. Advance planting is required to mitigate views.</p>	<p>This information is included within the landscape section of the site assessment.</p>
<p><b>(Comment)</b> Representation ID: 92969  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  MIN 64 is close to the grade II* St Theobalds church, scheduled Great Hautbois old church, and northwest of a scheduled Roman camp which is on the heritage at risk register. MIN 37 and MIN 64 also need to be seen cumulatively with MIN 65. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>St Theobalds church is 1.63km away, Great Hautbois Old Church is 1.63km away and the Roman camp is 1.71km away from site MIN 37. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p>
<p><b>(Comment)</b> Representation ID: 92381  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.  Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p>	<p>Noted</p>

Representations received about site MIN 37	Norfolk County Council Planning Officer's response
<p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 37 - We support the Council's restoration recommendations for the inclusion of acid grassland/ heathland on this site, which would complement the nearby CWS 1411 'Disused Gravel Pit', which supports similar habitats.</p>	<p>Noted</p> <p>Noted. The draft policy states that restoration should add ecological interest with the creation of acid grassland / heathland.</p>
<p><b>(Comment)</b> Representation ID: 91942</p> <p>Respondent: <b>Lead Local Flood Authority (Norfolk County Council) (Ms E Simpson) [17508]</b></p> <p>MIN 37 - Buxton - We would like to highlight that we are aware of reports of flooding internally and externally adjacent the site boundary (2015 and 2016). Any proposal would need to consider these local flooding issues and if assess potential opportunities to improve existing flooding problems</p>	<p>Noted.</p>
<p><b>(Object)</b> Representation ID: 92291</p> <p>Respondent: <b>Mr &amp; Mrs Woodcock [17946]</b></p> <p>I am writing to object to the digging of land on the Coltishall Road, Buxton, MIN 37, having had to endure 20 plus years of digging and waste filling of adjacent land to this site (Mayton Wood), I strongly object to this extra gravel extraction when this area is grossly over prescribed with quarries, I question the need for another quarry at this site which judging by the outline of the proposed land is only a few metres from my property, with the Mayton Wood quarry, Horstead have two sites Longwater and Tarmac with another in Spixworth, the unending wreckage of the local landscape is in every corner of this area, to be subjected to another quarry on the opposite side of the road from my property is unjustifiable, Being so close as this there would be no way of</p>	<p>Objection noted. The other existing, proposed and historic sand and gravel workings in the vicinity are recognised. The proposed sites would replace existing sites and not be in addition to them. Sand and gravel can only be extracted where it naturally occurs. The Minerals and Waste Local Plan Review process includes forecasting the need for sand and gravel extraction in Norfolk over the plan period to 2036 and allocating sufficient sites to meet that need. Sites were submitted by landowners and mineral operators in response to a 'call for mineral</p>

<b>Representations received about site MIN 37</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>avoiding noise and dust from engulfing my property, I would also highlight inaccuracies in the information provided for MIN 37, it is most probable that the 96 metres minimum distance from the nearest property would be revised upon permission being granted and it will be excavated to the outline of the site as is so often the case. If the people and families opinions who live close to this proposed site have any value at all this site will not be given permission.</p>	<p>sites' and all of the submitted sites have been assessed to determine which are most suitable for allocation in the Minerals and Waste Local Plan. Norfolk County Council's Local List for the Validation of Planning Applications' requires a noise assessment and a dust assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on health and local amenity (including noise, air quality and dust).</p> <p>As stated in the site assessment, the proposed extraction area is set back from Coltishall Road. The proposal includes additional hedge planting along Coltishall Road and the construction of a grassed soil bund, set back from Coltishall Road, to screen views of the extraction area from nearby properties. Norfolk County Council's Local List for the Validation of Planning Applications requires a Landscape and Visual Impact Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the character and quality of the area.</p>



**MIN 64**            **land at Grange Farm, Buxton Road, Horstead**

<b>Representations received about site MIN 64</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93184  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93132  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93088  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  It is important to retain field boundary hedgerows and trees, the removal of these will have a major impact on the landscape. In addition any planting proposed should strengthen the existing with hedgerow and tree belts and form part of the restoration after the site has been worked.</p>	<p>Noted. This information is contained within the site assessment and the draft site policy requires screen planting to be retained as part of the site restoration.</p>
<p><b>(Comment)</b> Representation ID: 92963  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  MIN 64 is close to the grade II* St Theobalds church, scheduled Great Hautbois old church, and northwest of a scheduled Roman camp which is on the heritage at risk register. MIN 37 and MIN 64 also need to be seen cumulatively with MIN 65. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. The Church of St Theobald is 580m away from the proposed site. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p>
<p><b>(Object)</b> Representation ID: 92146  Respondent: <b>Horstead with Stanninghall Parish Council (Ms Suzanne Hall) [17840]</b>  The Parish Council have received concerns from parishioners about the proximity of the site to what is currently a very rural area. The proposed site will change the nature of the area beyond recognition - not only will this impact the mental well-being of residents, it will also have a negative impact on property prices and the ability to sell said properties. There are also traffic issues along the B1354, not just from lorry movement but from those accessing the site to purchase material. There is also concern about land use after the extraction is complete.</p>	<p>Mineral extraction, by its nature is virtually always located in the open countryside. No urban areas have been proposed in response to the 'call for mineral extraction sites' for the Norfolk Minerals and Waste Local Plan Review.  Property values are not a material planning consideration.  The Highway Authority considers that the site is acceptable subject to the use of the existing site access. The number of vehicle movements is</p>

Representations received about site MIN 64	Norfolk County Council Planning Officer's response
	<p>expected to remain the same as existing, but continue for a longer time period. Norfolk County Council's Local List for the Validation of planning applications requires a Transport Statement or Transport Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the highway network, air quality, or unacceptable risks to the safety of road users and pedestrians.</p> <p>The land is proposed to be restored to agricultural use at a lower level. There are no plans to import any waste material to restore the site. Therefore the site would not be used as a landfill.</p>
<p><b>(Support)</b> Representation ID: 92067  Respondent: <b>Longwater Gravel Co. Ltd. (Mr Simon Smith) [9381]</b></p> <p>I write to confirm that Longwater Gravel agree with and support Norfolk County Council's initial conclusion to allocate MIN 64.</p> <p>Longwater Gravel Company is a small scale quarry operator which specialises in small deliveries of sand and gravel to a customer base which includes local builders, groundworkers and the general public. We also supply sand and gravel to a number of small volume readymixed concrete producers.</p> <p>Our quarry at Horstead produces natural shingle, primarily used as a decorative aggregate for driveways, etc. along with a high quality building sand. MIN 64 would form an extension to the quarry and would provide sand and gravel reserves of around 650,000 tonnes. There are no plans to increase production, which is limited by Section 106 agreement to 50,000 tonnes/year. It is anticipated that existing permitted reserves at Horstead Quarry will be exhausted within the next 2-3 years and so following the successful granting of planning permission, extraction could commence in MIN 64 by the end of 2020. It should be noted MIN 64 did originally comprise the</p>	<p>Support noted</p> <p>Noted</p> <p>Noted. The information on the proposed start date and the annual extraction rate is included in the site assessment. The draft site policy requires the annual extraction to be limited to 50,000 tpa.</p>

Representations received about site MIN 64	Norfolk County Council Planning Officer's response
<p>field to the west and having received planning permission, extraction has now been carried out in this area for over two years.</p> <p>It is proposed to plant a small area of mixed native woodland trees in the north east corner of MIN 64, this would be planted in advance of mineral extraction commencing and once established would serve to soften views of the soil storage/screening bunds of the final eastern phase from the properties located at the north east boundary. Views of MIN 64 from the Buxton Road will be screened by the placement of soil storage bunds along the southern boundary with the existing hedgerow strengthened by additional planting of native species hedgerow trees.</p> <p>MIN 64 would be worked in five separate phases working and restoring progressively from west to east. The washing plant, weighbridge and access would be retained in the existing quarry with sand and gravel transported from MIN 64 by dumptruck using an internal haulroad constructed in the northwest corner. Other than mobile plant such as excavator, loader and dumptruck, no other quarry equipment will be located within MIN 64. There are no plans to create an access directly from MIN 64 onto Buxton Road.</p> <p>On completion of sand and gravel extraction, the land would be restored to agricultural use at a lower level with sloping margins around the perimeter of the extraction area which would be constructed using the surplus silt from the gravel washing operation. There are no plans to import any material e.g. household waste or inert waste to restore the site. The overall timescale to complete extraction and restoration of MIN 64 would be around 13 years.</p> <p>We have asked Small Fish Consultants to assess MIN 64 and our proposals against the emerging Minerals and Waste Local Plan and they will comment separately.</p> <p>Summary: Longwater Gravel agrees with Norfolk County Council's initial conclusion to allocate MIN64. This would form an extension to an already established quarry and would enable production to continue for a further 13 years. We are fully committed to submitting an application for planning permission which will meet all of the requirements set out in M&amp;WLP and MIN 64 within the next two years.</p>	<p>This additional detail regarding proposed planting and screening of the site operations is noted and the landscape section of the site assessment has been updated to reflect this information.</p> <p>This additional detail regarding the proposed site operations is noted.</p> <p>The further detail provided on the restoration proposal is noted and the site assessment has been updated to reflect this information.</p> <p>Noted</p> <p>Noted</p>
<p><b>(Support)</b> Representation ID: 92004</p> <p>Agent: Small Fish (Melissa Burgan) [7914] Respondent: <b>Longwater Gravel Co. Ltd. [9380]</b></p> <p>We are writing on behalf of mineral operator Longwater Gravel Co. Ltd. in relation to site MIN 64.</p>	

<b>Representations received about site MIN 64</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>The Council has come to the initial conclusion that the site is considered to be suitable for allocation and Longwater Gravel Co. Ltd. strongly supports the Council's conclusion that site MIN 64 is suitable for development. The site offers a number of benefits in terms of its locational aspects, including:</p> <ul style="list-style-type: none"> <li>* Being extremely well-related to the transport network and able to use the existing quarry access onto the B1354;</li> <li>* Being located close to the major growth area, the Norwich Growth Triangle, as well as the market towns of Aylsham and North Walsham where further housing and employment growth is allocated;</li> <li>* Being remote from any international, national or local biodiversity designations;</li> <li>* Not jeopardising any of the best and most versatile agricultural lands;</li> <li>* Being relatively far from sensitive residential receptors, limiting any amenity impacts;</li> <li>* Being outside of any landscape designations; and</li> <li>* Its location outside of any flood risk zones and able to be worked dry above the water table.</li> </ul> <p>In line with the Council's recommendations resulting from the Site Assessment of MIN 64, the Company can confirm that it will, when submitting a planning application for minerals development on this site, provide:</p> <ul style="list-style-type: none"> <li>* a detailed screening scheme which will include mitigation of views from nearby properties, and surrounding roads;</li> <li>* noise and dust assessments and a programme of mitigation measures to deal appropriately with any amenity impacts;</li> <li>* a Heritage Statement to identify heritage assets and their settings, which will assess the potential for impacts and identify appropriate mitigation measures (if needed);</li> <li>* a proportionate archaeological assessment in consultation with Norfolk County Council, to determine whether any mitigation measures are needed;</li> <li>* a hydrogeological assessment to inform the maximum depth of working above the water table; and</li> <li>* a detailed restoration scheme, which will include any opportunities identified during working for geodiversity assets to be studied and an open face to be included for future scientific study and arable land with margins to allow for long-term screening and biodiversity gains.</li> </ul> <p>Site MIN 64 appears to be fully compliant with national planning policy as well as the policies</p>	<p>Support noted.</p> <p>Highway access is noted in the site assessment Location to growth locations/market towns is noted in the site assessment Distances from biodiversity designations are noted in the site assessment The agricultural land classification is grade 3. Grade 3a is BMV, whilst grade 3b is not. To determine whether land is grade 3a or 3b would require a site soil survey. Therefore, there is the potential that the site is on BMV agricultural land. Whilst there are only five residential properties within 250m of the site boundary, four of these are located within 100m of the site boundary.</p> <p>The lack of local landscape designations is noted in the site assessment Flood Risk Zones and hydrology are noted in the site assessment</p> <p>A requirement for all of the information to be submitted at the planning application stage is included in the draft policy for the site. Longwater Gravel's confirmation that this information will be provided is noted.</p>

Representations received about site MIN 64	Norfolk County Council Planning Officer's response
<p>proposed in the Minerals and Waste Local Plan Review: Initial Consultation, as well as the recently revised National Planning Policy Framework (July 2018). On this basis and with consideration for the above, the Company encourages the Council to allocate the site for minerals development within the Minerals and Waste Local Plan.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 91693  Respondent: <b>MME Niki Oldroyd [17490]</b></p> <p>I understand that no one is going to want a mineral extraction on their doorstep but the proposed site is less than 100m from our house and land which and there will be a significant impact from dust, and noise. With a prevailing wind we already experience noise pollution from the existing site. I can only assume that it is because there are relatively few properties that siting an extraction site so close to a residential area is being considered. With Norfolk being such a big county and so rural there must be other options that will not cause disruption on this scale. My other main concern is what happens to the site when extraction is complete in 13 years if the proposal goes ahead - there needs to be an agreement that the site will not be used for landfill as I believe was the case with the current site 10 years ago.</p> <p>Summary:</p> <ol style="list-style-type: none"> <li>1. Proximity to properties</li> <li>2. Generation of dust and noise pollution</li> <li>3 Possibility of landfill use after extraction has finished</li> </ol>	<p>It is recognised that there are four properties within 100m of the site boundary. However, the site proposal includes soil screening bunds and tree planting in the north east corner, in advance of mineral extraction commencing. Therefore the extraction area will be set back from the properties in the north-east corner and would be 182m from the nearest property.</p> <p>Norfolk County Council's Local List for the Validation of Planning Applications' requires a noise assessment and a dust assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on health and local amenity (including noise, air quality and dust).</p> <p>The process of the Minerals and Waste Local Plan Review included a 'call for mineral extraction sites' for the plan period to 2036. The Initial Consultation document included an assessment of all of the sites proposed and their suitability for future extraction. Norfolk County Council has to plan for a steady and adequate supply of aggregate to be provided. The land is proposed to be restored to agricultural use at a lower level. There are no plans to import any waste material to restore the site. Therefore the site would not be used as a landfill.</p>

**MIN 65 land north of Stanninghall Quarry**

<b>Representations received about site MIN 65</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93133  Respondent: <b>Norfolk County Council Historic Environment Service (Dr J Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92964  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92527  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  MIN 65 is in close proximity to the scheduled Roman camp which is on the heritage at risk register. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p>
<p><b>(Comment)</b> Representation ID:  Agent: SLR Consulting Ltd (Mr G Jenkins) [18001] Respondent: <b>Tarmac Trading Limited [336]</b>  Q54. We are pleased to note the appraisal of Site 'MIN 65: Land north of Stanninghall Quarry' and the initial conclusion that the site is suitable for allocation for sand and gravel extraction. We also note the requirements relating to the issues which a planning application for extraction at the site would need to address, and we are confident that at the detailed planning application / EIA stage each of the issues could be addressed in a way which would satisfactorily mitigate effects on the respective interests.  The one note of concern is the suggestion that the site would need to be phased with other sites in the area so that only one site is worked at any one time. In terms of the Stanninghall development, the northern extension area would be phased as part of a comprehensive working and restoration scheme for the existing quarry and extension area, and the timescale for the operation in the extension area would</p>	<p>Noted</p> <p>The intention of this statement was for the extension to the site to be phased with the existing site as detailed in the consultation response. The draft site policy will state that "the site [MIN 65] will</p>

Representations received about site MIN 65	Norfolk County Council Planning Officer's response
<p>need to reflect the progress of extraction and restoration within the existing quarry and any re-phasing which may be proposed. Any cumulative effects of extraction at Stanninghall with other sites in the locality would be a matter for consideration as part of an EIA (as it was at the time of the original Stanninghall application and inquiry), and this will be an issue which will need to be considered on its merits at the time. The Authority will appreciate that Tarmac has no control over the timing of other developments in the area undertaken by third parties, and there should thus be no planning policy restrictions regarding the timing of the development: this will be a matter for consideration at the application stage. It is also noted that this phasing / timing requirement does not feature in the application requirements for the nearest other potential allocation (MIN 64 Grange Farm Horstead).</p>	<p>need to be phased with the adjacent permitted site so that only one site is worked for extraction at a time.”</p>
<p><b>(Comment)</b> Representation ID: 92401 Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b> Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes. Whilst we hold no specific knowledge on the following sites, we broadly support the restoration proposals proposed for MIN 12, MIN 13, MIN 51, MIN 200 and MIN 65.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 92145 Respondent: <b>Horstead with Stanninghall Parish Council (Ms Suzanne Hall) [17840]</b> Summary: This proposal was turned down in 2006, the concerns raised then are equally valid today. The situation with access to the site along the B1150 have deteriorated further in this time, and the Parish Council cannot back any proposal that is likely to increase the volume of traffic (especially heavy traffic) even further. Full response: Horstead with Stanninghall Parish Council objects to the expansion of this site. When the original site was put forward around 2006, this area was included in those proposals and was scaled back before the current site was approved. Amongst other concerns raised was the impact of such a large site on the surrounding villages and their inhabitants. These concerns are equally valid today.</p>	<p>Objection noted.  Norfolk County Council's Local List for the Validation of Planning Applications' requires a noise assessment and a dust assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on health and local amenity (including noise, air quality and dust). A Landscape and Visual impact Assessment is also required to be submitted with any planning application for mineral extraction and a planning application would need to demonstrate that there would not be an</p>

<b>Representations received about site MIN 65</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>While the Parish Council meets regularly with Tarmac, and Tarmac tries to be a 'good neighbour', Parishioners have been impacted by the current site - for example, lorries frequently use inappropriate country lanes to access the site, the vegetation planted on the bunds is not blocking the visual impact as it should (much of it didn't survive the first year), and there is light pollution when floodlighting is accidentally left on overnight.</p> <p>Another major concern is that the road infrastructure in the area is not adequate to handle either the size/weight of the vehicle or any further increase in traffic. The current site is accessed via Quarry Road which leads directly to the B1150 North Walsham Road. This road has seen a 33% increase in traffic since the Broadland Northway opened earlier this year (as evidenced by data recorded by SAM2 equipment - NCC and Police approved). A 250 metre stretch of this road leading to the 'Recruiting Sergeant' mini roundabout has seen 4 accidents in the last 6 weeks - 2 of which have involved vehicles crossing the footpath which runs alongside the road, these would both have been fatal for anyone walking there. Neither the mini roundabout or the bridge over to Coltishall are designed to cater for the lorries that frequent the quarries.</p> <p>From the above, the Parish Council doesn't believe it would be in the interest of the village for the current site to expand.</p>	<p>unacceptable adverse impact on the character and quality of the area.</p> <p>The current site is monitored by Norfolk County Council officers on a regular basis to ensure compliance with the planning permission. Since the site opened there have been reports on a few occasions, mostly some time ago, where heavy goods vehicles following satellite navigation aids used an incorrect route to access the site. This has been raised with and investigated by the operators and warning given to drivers. Tarmac's own vehicles are fitted with a tracking device and these can be checked against vehicle registration details. At a recent site Liaison meeting a comment was made about a number of HGVs using weight restricted roads - these were white unmarked lorries and therefore thought unlikely to be associated with Stanninghall Quarry. The operator continues to manage HGV's entering and leaving the site.</p> <p>Vegetation planted on the site boundary bunds is in accordance with details of the planning permission. The height of screening bunds have been surveyed and are in accordance with the approved details. A moderate number of plants failed on one occasion and these were replanted by the operator in accordance with the planning condition which requires replacement of dead or diseased plants during a 5 year landscaping maintenance period.</p> <p>At a recent liaison meeting NCC were informed that a light has been left switched on out of hours on the concrete batching plant. The light illuminates an operational area within the site boundary. The operator explained that the light should have gone off on a timer and following an investigation the matter has been addressed.</p> <p>The Highway Authority considers that the site is acceptable subject to the use of the existing site access. The number of vehicle</p>



Representations received about site MIN 65	Norfolk County Council Planning Officer's response
	<p>movements is expected to remain the same as existing, but continue for a longer time period. Norfolk County Council's Local List for the Validation of planning applications requires a Transport Statement or Transport Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the highway network, air quality, or unacceptable risks to the safety of road users and pedestrians.</p>
<p><b>(Support)</b> Representation ID: 92095  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Agree, though please refer to our separate comments regarding the Habitats Regulations Assessment (HRA).</p>	<p>Noted. The comments received regarding the draft Habitats Regulations Assessment have been responded to in the section of the Feedback Report that specifically covers the HRA. Due to the distance (1.43km) of site MIN 65 from Crostwick Marsh SSSI, the SSSI would not be affected by dust deposition and the birds on the designated sites would not be disturbed by noise or lighting from mineral extraction operations. The proposed extraction site is in a different hydrological catchment to Crostwick Marsh SSSI and therefore would not adversely affect the hydrology of the designated site.</p>
<p><b>(Object)</b> Representation ID: 91922  Respondent: <b>Mr Martin Edridge [17701]</b>  I object to the inclusion of this site on the following grounds-</p> <p>1 Property devaluation.  It is inevitable that my property and others nearby will be devalued if a quarry is situated so close.  It is unreasonable and unacceptable to expect property owners to suffer in this manner while the aggregate company and landowner will profit by millions of pounds. If the site goes ahead then compensation should be paid to the property owners.</p> <p>2 Noise pollution  There will undoubtedly be noise pollution created and with the prevailing wind in this area being westerly/south westerly this noise will be carried directly to the</p>	<p>Objection noted.</p> <ol style="list-style-type: none"> <li>1. Property values are not a material planning consideration. Compensation would not be offered and does not form part of the landuse planning process.</li> <li>2. &amp; 3. Noise and Dust</li> </ol> <p>The nearest properties within the settlement of Horstead are located approx. 240m from the site boundary, although there are 4 properties within 100m of the site boundary. Norfolk County Council's Local List for the Validation of Planning Applications' requires a noise assessment and a dust assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on health and local amenity (including noise, air quality and dust).</p>

Representations received about site MIN 65	Norfolk County Council Planning Officer's response
<p>nearby properties. No amount of noise mitigation will mask the noise all of the time.</p> <p>3 Dust pollution For the same reason as mentioned in 2 above there will be dust pollution, particularly in high wind conditions.</p> <p>4 Lorries Problems are currently being seen resulting from lorries exiting the quarry site onto the B1150. They are unable to accelerate away and southbound traffic have to slow down to a crawl for some distance as overtaking is not usually possible. This causes extreme frustration which could lead to dangerous overtaking. While the proposal indicates that lorry movements will remain the same, this could well change if the overall site enlarged. This would clearly create more problems at the quarry exit point.</p>	<p>4. The additional site area would be worked in a phased manner and therefore the extraction rate and associated lorry movements per day are not proposed to increase. The Highway Authority considers that the site is acceptable subject to the use of the existing site access. Norfolk County Council's Local List for the Validation of planning applications requires a Transport Statement or Transport Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the highway network, air quality, or unacceptable risks to the safety of road users and pedestrians.</p>
<p><b>(Comment)</b> Representation ID: 91842 Respondent: <b>Broads Authority (Natalie Beal) [16282]</b> Support submission of Heritage statement</p>	<p>Noted</p>

**MIN 96**            **land at Grange Farm (between Spixworth Road and Coltishall Lane), Spixworth**

<b>Representations received about site MIN 96</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93186  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	Noted
<p><b>(Comment)</b> Representation ID: 93134  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers that the site is acceptable subject to the use of the existing access and continued routing arrangements.</p>	Noted
<p><b>(Comment)</b> Representation ID: 92965  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We would highlight the proximity of grade I St Peters and the grade II barn to MIN 96. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	Noted. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.
<p><b>(Comment)</b> Representation ID: 92558  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  The following section outlines the constraints at certain sites, which will need to be considered at the application stage to ensure that ecology is not adversely affected.  MIN 96 Close proximity to Spixworth Beck, concerns over impacts on the associated habitat including coastal and floodplain grazing marsh.</p>	The site assessment states that the site is expected to be worked dry (above the water table). Therefore impacts on hydrology are not expected. The site assessment summarises the findings of the Water Framework Directive assessment in relation to Spixworth Beck. The WFD assessment concludes that there would not be a pathway for silt ingress.
<p><b>(Comment)</b> Representation ID: 92269  Respondent: <b>Salhouse Parish Council (Mr Martin Nudd) [17663]</b>  A group of Salhouse Parish Councillors have viewed and discussed in depth the Norfolk Minerals and Waste Local Plan documents.  On viewing the documents it was noted the nearest site to our Parish is Spixworth. With this in mind it was decided that this will not have any impact on our Parish and we cannot see that we have any comments to make regarding this.</p>	Noted
<p><b>(Object)</b> Representation ID: 91904  Respondent: <b>Mrs Julie Burgess [17682]</b></p>	

<b>Representations received about site MIN 96</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Concerned with the proximity to residential property and the associated noise and dust issues, together with potential loss of property value. The site is close to SSSI's, has underground water pipes and is in close proximity to the local airport.</p>	<p>The site boundary is adjacent to two residential properties. The draft site policy states that a screening scheme, a noise assessment and a dust assessment will be required at the planning application stage. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health. Property values are not a material planning consideration.</p> <p>The site assessment considers the potential impact on Crostwick Marsh SSSI and concludes that no adverse effects are expected on the SSSI, which is 2.22km away from the proposed site.</p> <p>The site assessment notes that there are Anglian Water foul sewers located within the site and Anglian Water would require the standard protected easement widths for the sewers and any requests for alteration or removal to be conducted in accordance with the Water Industry Act. This requirement is included within the draft site policy.</p> <p>The site assessment notes that the site is within the zone where Norwich Airport must be consulted on all development and a Bird Hazard Assessment would be required at the planning application stage. This requirement is included in the draft site policy.</p>

## Great Yarmouth sites

MIN 203 land north of Welcome Pit, Burgh Castle

Representations Received about site MIN 203	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93206  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  As indicated in the archaeology section of the text, this site has been subject to a trial trenching evaluation with largely negative results and NCCES have advised that no further archaeological work will be required at this site.</p>	<p>Noted. The text on archaeology in the site assessment has been updated to state that no further archaeological work is required.</p>
<p><b>(Comment)</b> Representation ID: 93135  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers that this is not a preferred site due to concerns with the road network which is sub-standard and narrow.</p>	<p>Noted. The site is considered unsuitable to allocate due to the sub-standard and narrow road network.</p>
<p><b>(Comment)</b> Representation ID: 93089  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  The landscape impacts of this extension site would be negligible.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 92966  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  Whilst we note that there are existing quarries, we are concerned about the impact on scheduled Burgh Castle and grade II* St Peter's church. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. However, the site is considered unsuitable to allocate due to the sub-standard and narrow road network.</p>
<p><b>(Support)</b> Representation ID: 91780  Agent: Stephen M Daw Limited (Mr Stephen Daw) [143]  Respondent: <b>Folkes Plant &amp; Aggregates Limited [17581]</b>  I wish to object to the initial conclusion that the site is unsuitable for allocation. This objection is supported by the submission of a separate document entitled 'Proposed Extension to Welcome Pit - Highways Statement'. The document details pre-application contact with the County Highways Authority which led to the conclusion that the CHA 'would not be able to</p>	<p>The content of the Highways Statement from Create Consulting Engineers Ltd is noted, including the pre-application correspondence with Jon Hanner (Engineer – Highways Development Management) at Norfolk County Council. It is also noted that the proposed number of vehicle movements will remain the same but continue over a longer period of time (an additional 14 years). The pre-application advise from</p>

Representations Received about site MIN 203	Norfolk County Council Planning Officer's response
<p>substantiate a highways related objection to the continuation of the quarry (extraction) operations.' The initial conclusion should therefore be altered to be consistent with this pre-application advice, especially as the site is acceptable in all other respects.</p>	<p>the Highway Authority considers the site on its own merits and does not consider whether better sites may be available elsewhere. For allocation within the Minerals and Waste Local Plan, a site is compared for suitability against all other sites submitted. This means that we only allocate the best sites sufficient to meet the minerals requirements of Norfolk. Therefore, the site is considered unsuitable to allocate in the Minerals and Waste Local Plan due to the continued use of a sub-standard and narrow road network and that there are more acceptable alternative sites for sand and gravel extraction proposed in the Plan.</p>
<p><b>(Object)</b> Representation ID: 91747  Respondent: <b>Burgh Castle parish council (Ms K Palmer) [1518]</b>  Burgh Castle Parish Council would like to submit the following comments concerning the Norfolk County Council Minerals and Waste Local Plan Review (Initial Consultation) MIN 203- land north of Welcome Pit, Burgh Castle  The Parish Council object as it is felt the site is unsuitable for allocation because the Highway access is considered unsuitable, and due to properties either side of the road there is no opportunity for suitable improvements.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 91721  Respondent: <b>Great Yarmouth Borough Council (Mr Andrew Parnell) [17514]</b>  Thank you for consulting Great Yarmouth Borough Council on the Norfolk Minerals and Waste Local Plan Review. Please accept this response on behalf of the Borough Council.  The Borough welcomes the opportunity to comment on the review and has the following comments on the sites which lie within the Borough. In respect of question 56, proposed Site MIN 203 'land north of Welcome Pit, Burgh Castle' The Borough Council agrees with the initial conclusion that this site is unsuitable for allocation, supported by the evidence from the Highway authority.</p>	<p>Noted</p>

MIN 38

land at Waveney Forest, Fritton

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93187 Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b> We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93157 Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b> The Highway Authority considers the site is not acceptable with the proposed priority junction; a suitable right hand turn lane onto the A143 will be required.</p>	<p>Noted. The requirement for a right-hand turn lane to allow traffic turning into the access road from Great Yarmouth to wait without stopping west bound traffic is included within the highway assessment of the site.</p>
<p><b>(Comment)</b> Representation ID: 93090 Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b> Although screening trees would be retained, there are large areas of woodland within the site which, although not characteristic of the area, form an identifiable part of the landscape. Although loss of woodland in this area would not cause a large impact on the wider landscape the immediate effects from within the woodland would be noticeable.</p>	<p>Noted. However, Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation, and there would be screening trees retained in proximity to the public rights of way.</p>
<p><b>(Object)</b> Representation ID: 92967 Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b> We are concerned about the size and location of this allocation and its proximity to St Olave's Priory which did not appear to be marked on the map, although is referenced in the Sustainability Appraisal Annex B. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>The St Olave's Priory scheduled monument was shown on the map, but due to the scale of the map within the printed document it may not have been very clear. However, this heritage designation was also shown on an interactive map on the consultation website which could be viewed at a range of scales. The remains of the St Olave's Priory are separated from the extraction areas within MIN 38 by approximately 400m, this includes a significant tree screen which would be retained as part of the proposal. There are also more modern buildings including agricultural buildings, and the Priory Farm restaurant and its associated carpark</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
	which are located immediately to the northeast of the Priory remains between it and MIN 38, which would limit intervisibility and impacts to the setting of the Priory remains.
<p><b>(Object)</b> Representation ID: 92916</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>With regards to ecology at MIN 38, our main concern about a mineral extraction site at this location would be the impact of poor water quality, as a result of runoff and dust from the site, entering the adjacent wetland habitat. The coastal grazing marsh between the River Waveney and the boundary of the site contains habitat for protected species such as water vole, Norfolk Hawker and the narrow-mouthed whorl snail. The narrow-mouthed snail is a NERC species of principle importance with specific habitat requirements, often limited to fringing coastal marsh habitat as found at the at MIN38. We would have concerns about issuing a permit for a development which may have the potential to impact a NERC species or their habitat. Due to the close proximity to priority habitat and species records, dust mitigation measures may be insufficient to prevent loss.</p> <p>As such the suitability of this site for mineral extraction is still of concern.</p>	<p>Objection noted:</p> <p>The information submitted by the site proposer states that no dewatering would take place, and that once the extraction reached the water table, working would be carried out 'wet'. The groundwater level is several metres below ground level, so it is not expected that drain down or runoff would take place.</p> <p>Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p>
<p><b>(Object)</b> Representation ID: 91972</p> <p>Respondent: <b>Fritton with St Olaves Parish Council (Mr A Mendum) [17724]</b></p> <p>These are the main objections that we cited last year and still apply:</p> <ul style="list-style-type: none"> <li>* Loss of the only woodland amenity for Great Yarmouth and Lowestoft.</li> <li>* Biodiversity loss throughout the forest.</li> </ul>	<p>Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p> <p>The County Wildlife Site within the forest will be retained and does not form part of the two extraction areas, which were formerly commercial coniferous plantation which have relatively low</p>



Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>* Unique Archaeology loss of the newly discovered resistance hides.</p> <p>* Water: Effect of development on Fritton Lake municipal water supply.</p> <p>* Regular flooding of a large area of site.</p> <p>* Desecration of the Broads Authority National Park.</p>	<p>biodiversity. Restoration including wet woodland, heathland, and water bodies would provide biodiversity gains in comparison to the existing plantation.</p> <p>The military archaeology on the site is recognised as being of importance and this is one of the reasons the site is concluded to be unsuitable for allocation.</p> <p>It is proposed that no dewatering would take place as part of the mineral extraction. It is dewatering that would pose the most significant risk to water supply; normal mitigation measures which would be conditioned as part of a permission for mineral extraction would ensure no unacceptable adverse impacts to water supply from the extraction.</p> <p>The vast majority of the site is in Flood Zone 1 and is considered to be at low risk of flooding, while Fritton Marshes are at high risk of flooding these are not included in MIN 38. Sand and Gravel extraction is also considered to be water compatible development within national guidance.</p> <p>The Landscape character assessment carried out by the Broads Authority recognised that while part of Waveney Forest was within the Broads Authority Executive Area, it did not contribute to the character of the Broads and is not included with the 'St Olaves and Burgh Castle' Landscape Character Area. However, in the Preferred Options document an additional reason has been added regarding why site MIN 38 is unsuitable to allocate, which is that there</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>* Effect on European protected species.</p> <p>* Roads: No access available and A 143 already overloaded.</p> <p>* Noise and dust producing property blight</p> <p>* Loss of forest and carbon footprint unbalance</p>	<p>are not exceptional circumstances for mineral extraction within the Broads.</p> <p>Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>A new access to the A143 would be formed as part of the proposal. As an A road, the A143 is the preferred highway route for HGVs. HGV transport from existing mineral sites to the west of the site currently travel on the A143 to reach Great Yarmouth.</p> <p>Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years. 'Blighted land' is a planning term specifically defined in legislation (Schedule 13 of the Town and Country Planning Act 1990) and commercial mineral extraction is not one of the land uses or functions contained in definition of 'blighted land' in the legislation.</p> <p>The Waveney Forest is a commercial coniferous plantation and the felling of trees forms part of the operation of the plantation, so the carbon capture of the site is time limited. The restoration of the site after extraction would include coniferous and</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>* 20,000 signed our petition, last time We have not petitioned this time but hundreds of people have supported us on media this time around.</p> <p>* There was no technical or financial aid for a tiny village to compete with the might of a determined national mineral company.</p> <p>These are the areas we are expecting to raise in addition to all of the above in respect of the new proposal.</p> <p>The close proximity of the residential area with the inconvenience of:</p> <p>* The dreadful dust effects on property and health 175 metres from New Road is nothing short of criminal. The tree screen there is bare, no leaves at all (see photos).</p> <p>* Ionisation of dust particles buy the high tension cables that cross the entire area these bypass defences and stick in your lungs and would affect horses at Redwings.</p>	<p>broadleaf woodland, heathland and grassland together with water bodies; this would provide improved biodiversity.</p> <p>The planning assessment of sites is based on the issues not on the number of respondents. The Mineral Planning Authority is required to prepare a minerals plan, this does not include providing support for any group, organisation or company.</p> <p>A dust assessment would be required to be submitted with any future planning application. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>It is considered that dust mitigation measures would ensure that unacceptable adverse impacts would be avoided in the future. Sand and gravel extraction is not a significant generator of PM2.5 particles. In 2007 The World Health Organisation's <u>Environmental Health Criteria (2007)</u> stated that "High-voltage power lines produce clouds of electrically charged ions as a consequence of corona discharge. It is suggested that they could increase the deposition of airborne pollutants on the skin and on airways inside the body, possibly adversely affecting health. However, it seems unlikely that corona ions will have more than a small effect, if any, on long-term health risks, even in the</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>Since the last application a new horse sanctuary has moved in to the land just below the site to the southwest Hillside Animal Sanctuary expects horse numbers to reach 1000 shortly with old and horses with special needs. These horses will drink from the lower dykes and be susceptible to run off from above. A mineral quarry is hardly a quiet sanctuary.</p> <p>The lower marsh dykes have recently been cleared out at great expense to facilitate migration of eels from the river 'Waveney to Fritton Lake again there must be a run off concern</p> <p>* Access route is upwind and adjoining the busy children's New Road playground.</p> <p>* The depot and access is adjacent residential properties and near the busy New Road children's playground.</p> <p>* In five years' it will be mandatory to adhere to the European limits for dust PM2.5s this will effectively close the mineral activities here. Bretts have no chance of having 22 years of extraction.</p> <p>* Noise: 100 metres is insufficient to be a noise barrier. No mention of the noisy grading activities at all.</p> <p>* Security lights for the compound will ruin our night sky in the area.</p> <p>* Threat of diggers breaking through the artesian well cap with effects on local wells and Fritton Lake.</p>	<p>individuals who are most exposed."</p> <p>The groundwater level in the area is several metres below ground level. Run off from the site is not expected because the extraction will take place several metres below the surrounding ground level and therefore overland flows are not expected.</p> <p>The access route travels directly south from the site to the A143 and does not use New Road or adjoin the play area.</p> <p>There is no indication that the mineral industry will not be able to meet any new limits on dust emissions.</p> <p>Modern aggregate processing plants generate relatively low levels of noise and it is considered that noise could be controlled to acceptable levels, the proposed processing plant location would be approximately 350m from the nearest dwelling.</p> <p>Lighting details and lighting assessments are required as part of the planning application process if external lighting is proposed, together with mitigation measures to ensure that unacceptable adverse impacts do not occur, which would be conditioned as part of any planning permission.</p> <p>There is no evidence that this would occur and neither the Environment Agency or Essex and Suffolk water have not raised this as a potential problem. Fritton Lake is surface water fed, not groundwater fed. A Hydrogeological Impact Assessment would be</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>* The tree screens will not work due to turbulence and eddies over the forest. (See K. Nunn paper).</p> <p>* Fire: The forest has always been a fire hazard; sparks from vehicles or machinery would be a danger in a tinder dry period. Four fires in four days recently. Average over 30 per year.</p> <p>* The Broads Authority has spoken up to protect their National Park a mineral pit plus draglines and commercial machinery would affect tourism for the Broads and Fritton Lake Estate and Caldecott Hall both trying to promote their new holiday lodges.</p> <p>* The number of HGVs on the A 143 would increase by up to 50 more per day it is at present jammed up constantly.</p> <p>* The access road junction would destroy a lovely overhead tree canopy and due to the slope sand would collect and be a danger to motorcycles.</p> <p>* The congestion and dangers on the A 143 where not all accidents are recorded. Local opinion disagreeing with Highway's stated position. This is from real people living adjacent to the road.</p> <p>* Great Yarmouth Council agree this will not alter until we get a third river crossing.</p> <p>* Our Parish Council has resisted noise and light pollution for 30 years separating us from Great Yarmouth, this would destroy our villages as we know them.</p>	<p>required to be submitted with any future planning application.</p> <p>The Institute of Air Quality Management has guidance which states that trees and woodland can reduce the levels of airborne dust.</p> <p>Mineral extraction sites do not represent a fire hazard, as the topsoil is normally stripped as each extraction phase progresses. Pine needle litter and unauthorised public access are risks in the current plantation areas.</p> <p>In the Preferred Options document an additional reason has been added regarding why site MIN 38 is unsuitable to allocate, which is that there are not exceptional circumstances for mineral extraction within the Broads.</p> <p>The Highway Authority states that the proposed highway access is suitable subject to the provision of a right hand turn lane on the A143.</p> <p>A small number of trees would need to be removed as part of the formation of the proposed access. An Arboricultural Impact Assessment would be required to be submitted with any future planning application that has the potential to affect any trees or hedges over a specified size. It is a standard planning requirement for an access road to be hard surfaced and for the site to have a wheel wash to stop any sand from being deposited on the highway.</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>* The area floods more readily than Brett Suggested and the Staithe area has no embankment protection.</p> <p>* Article 8 of the Human Rights Act should ensure that we have the right for quiet enjoyment of our home.</p> <p>* Planning blight house values down. Several houses blighted now.</p>	<p>The Highway Authority states that the proposed highway access is suitable subject to the provision of a right hand turn lane on the A143.</p> <p>The majority of the site is in Flood Zone 1 (96%) which is lowest risk for flooding and the western boundary of the site which is at higher flood risk is not within the proposed mineral extraction area.</p> <p>Article 8 of the ECHR – the right to respect for private and family life, home and correspondence</p> <p>Article 8 rights are a material planning consideration and should be respected but are not guaranteed;</p> <p>The rights have to be balanced against all other material considerations and this will be a planning judgment.</p> <p>The purpose of the Minerals Local Plan Review is to consider whether specific sites are suitable for allocation (MIN 38, Waveney Forest has been considered to be unsuitable for allocation). The revised Minerals Local Plan will be tested at examination for soundness and legal compliance by an independent Planning Inspector on behalf of the Secretary of State for Housing, Communities, and Local Government.</p> <p>Property values are not a material planning consideration. Blight is a legal term referring to when the value of a property is reduced because of large scale public works (such as a highway scheme) and the owners are unable to sell it at market value. The proposed mineral extraction is a private development, proposed by Brett Aggregates. Norfolk County Council or any other government</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>* We already have had poor water pressure and sewage trouble for the last five years. They admit to expecting to add to this.</p> <p>* Suggested wetlands will go stagnant breed mosquitoes and encourage flooding.</p> <p>* Forestry Commission is asking for more trees to sequestrate carbon not less.</p> <p>* Suggested action area covers the resistance hides and would destroy them.</p> <p>* A number of asthma sufferers in the villages (13 in New Road area alone).</p>	<p>body would not be the developer and therefore blight is not relevant in this case.</p> <p>We are not aware of any statement from the proposer of the site regarding an adverse impact on water pressure or sewage. Mineral extraction sites require an abstraction licence from the Environment Agency for any consumptive use of water in the extraction or mineral processing operations.</p> <p>Wetland areas would not encourage flooding. This area would just be a low lying area within the forest and would be wetland because of the level of the existing watertable. The proposed wetland area would be no more or less likely to go stagnant and breed mosquitos than any other area of open water in the local area (such as existing ponds, lakes or ditches).</p> <p>Waveney Forest is a commercial conifer plantation. The southern part of the site is proposed to be restored back to commercial conifer plantation. The northern part is proposed to be restored to wetland, acid grassland and some broadleaf woodland.</p> <p>The reason why Site MIN 38 was considered to be unsuitable to allocate in the Initial Consultation document was because the harm to the significance of Waveney Forest as an example of a WW2 training area could not be appropriately mitigated.</p> <p>Noted. A dust assessment would be required to be submitted as part of any planning application and would be assessed by the Environmental Health</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>* It was stated previously that Norfolk had now sufficient minerals without the unacceptable areas.</p> <p>* New government policy should protect the National Park and take green local opinion more into consideration. We have plenty of that</p>	<p>Officer as part of deciding the suitability of the proposed extraction.</p> <p>There is a forecast need for an additional 20.313 million tonnes of landwon sand and gravel in Norfolk in the period to 2036, which is the reason the Minerals Local Plan review is being carried out.</p> <p>In the Preferred Options document an additional reason has been included regarding why site MIN 38 is unsuitable to allocate, which is that there are not exceptional circumstances for mineral extraction within the Broads.</p>
<p><b>(Comment)</b> Representation ID: 91722</p> <p>Respondent: <b>Great Yarmouth Borough Council (Mr A Parnell) [17514]</b></p> <p>Thank you for consulting Great Yarmouth Borough Council on the Norfolk Minerals and Waste Local Plan Review. Please accept this response on behalf of the Borough Council.</p> <p>The Borough welcomes the opportunity to comment on the review and has the following comments on the sites which lie within the Borough. In respect of question 57, proposed site MIN 38 'land at Waveney Forest, Fritton'. Again the Borough Council agrees with the site should be considered unsuitable for allocation.</p>	<p>Noted.</p>
<p><b>(Object)</b> Representation ID: 91852</p> <p>Respondent: <b>GYB Services (Mr Graeme Watson) [17623]</b></p> <p>In reference to the proposed scheme to include areas of Fritton in NCC's gravel and aggregate proposals; I feel that it is important to point out the grave implications for the wildlife and bio-diversity of this area. The removal of significant amounts of tree canopy covering this area would have a drastic negative environmental consequences for plants, birds, mammals and invertebrates. It would lead to a loss of wildlife habitat and also the amenity value of the woodland would be lost.</p>	<p>Noted.</p> <p>The Waveney Forest is a commercial coniferous plantation and the felling of trees forms part of the operation of the plantation, so the carbon capture of the site is time limited. The restoration of the site after extraction would include coniferous and broadleaf woodland, heathland and grassland together with water bodies; this would provide improved biodiversity. A significant proportion of the standing trees within the plantation have been</p>



Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>Local pollution levels will also increase with less carbon scrubbing capacity due to the removal of trees. This will also effect the water retention/interception capacity of the surrounding area, possibly leading to higher soil erosion.</p> <p>The development of the site for economic reasons would have a negative impact on the biodiversity of the wider area and with many different habitats and eco systems being lost or detrimentally effected.</p> <p>I feel this area provides a very important amenity and landscape value to the surrounding area and the Yarmouth borough as a whole. Enjoyed by the public and is visible within the surrounding landscape.</p> <p>Great Yarmouth Borough has very little woodland and any remaining 'pockets' need to be protected and retained as best they can, not only for wildlife but for the benefit of us all.</p> <p>I am happy to discuss this further in my capacity of Tree Officer for GY Borough.</p>	<p>felled within the last few years as part of the ongoing cropping of Waveney Forest.</p> <p>Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p> <p>Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years. The proposal for extraction at MIN 38 would retain a screen belt of trees, with extraction taking place within two areas within the site on a phased basis. The County Wildlife Site has also been excluded from the extraction areas.</p>
<p><b>(Object)</b> Representation ID: 91843</p> <p>Respondent: <b>Broads Authority (Natalie Beal) [16282]</b></p> <p>The Authority supports the conclusion that this should not be allocated for the reasons as set out in the assessment. Page 169 - the landscape character assessment is also relevant: <a href="http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-character-assessments">http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-character-assessments</a>. Broads Landscape Character Assessment 2016; Land considered as heathland Landscape Character Type (LCT) within the St Olaves to Burgh Castle Landscape Character Area (LCA). Land to the north and west considered to be estuarine marshland LCT within the same LCA. Haddiscoe Island LCA beyond river. The Authority strongly requests that Norfolk County Council liaise with us regarding this site and any future policy prior to the next version of the Local Plan. Strongly support this conclusion and the reasons for it. The current commercial forest operation, whilst not ideal in terms of the HE features within it, offers a degree of continued protection to those features. Page 169</p>	<p>Noted. With regards to LCA Area 9, St Olaves to Burgh Castle of The Broads Landscape Character Assessment - the Waveney Forest borders the LCA, but is not included within it, although it is recognised that the plantation edge is a landscape feature. The proposal for extraction at MIN 38 would retain a screen belt of trees at this point.</p> <p>In the Preferred Options document an additional reason has been included regarding why site MIN 38 is unsuitable to allocate, which is that there are not exceptional circumstances for mineral extraction within the Broads.</p> <p>The Mineral Planning Authority attends regular meetings with the Broads Authority where the Mineral and Waste Local Plan are discussed.</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>Typographical error: "although food practice for tree felling" presumably should read good practice.</p>	<p>Typographical error has been corrected.</p>
<p><b>(Object)</b> Representation ID: 91833  Respondent: <b>The Broads Society (Ms S Vergette) [17616]</b></p> <p>The Broads Society is extremely concerned regarding the proposals by Bretts to commence gravel extraction within Waveney Forest. This application flies in the face of national concerns over denuding National Parks of their increasing loss of trees and natural cover. Waveney Forest is in an area of outstanding natural beauty lying as it does in the heart of the island of Lothingland between Great Yarmouth and Lowestoft, and not far from Fritton Lake which is the site of one of the last of the working Duck Decoys.</p> <p>The proposed extraction is very close to important residential areas and the resulting dust, disturbance to wildlife and difficulty of access will impact on the local community and landscape lying, as it does, close to the River Waveney. If it were to proceed the risk of pollution in the River Waveney is a risk that must not be ignored.</p> <p>The A143 is already overused and dangerous and the resulting increase in heavy traffic would be totally unacceptable.</p> <p>We live in a fragile landscape, currently one of the finest wetland areas in Europe, and The Broads Society feels most strongly that Norfolk County Council must resist all pressure to allow</p>	<p>Noted.</p> <p>The proposal by Brett Aggregates is not a planning application; it is a potential site allocation with the Minerals Plan Review. The conclusions of the initial consultation document were that the site was unsuitable for allocation. The Waveney Forest is a commercial coniferous plantation which is subject to cropping as part of its management. The Waveney Forest is not designated as an 'Area of Outstanding Natural Beauty'.</p> <p>A dust assessment would be required to be submitted with any future planning application. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years. Sand and gravel extraction does not produce harmful contaminants, both as a result of mitigation measures, and because the mineral being extracted is non-toxic and similar to the surrounding soils.</p> <p>A new access to the A143 would be formed as part of the proposal. As an A road, the A143 is the preferred highway route for HGVs. HGV transport from existing mineral sites to the west of the site currently travel on the A143 to reach Great Yarmouth.</p> <p>Noted, as stated above the site was concluded to be unsuitable for allocation in the consultation document.</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>this proposed devastation within one of our precious National Parks to proceed. We are, therefore, strongly opposed to this application.</p>	
<p><b>(Object)</b> Representation ID: 92556  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  In this section we have provided bespoke guidance relating to ecology, groundwater protection and flood risk at certain sites. MIN 38, Land at Waveney Forest, Fritton is of considerable concern.  We have significant concerns regarding the allocation of this site from both a Groundwater Protection and an Ecology perspective.  Groundwater Protection at Waveney Forest  Protection of groundwater quality and potable drinking supplies are of paramount concern to us. It is highly likely that the quarry operators at this site would need to excavate below the water table, which is very shallow at this location. As such, significant dewatering would most likely result in groundwater level drawdown outside the boundary of the quarry and would affect/derogate nearby abstractions. We are aware of some local, licenced and unlicensed, abstractions which would most likely be affected.  For additional reference there is a public water supply (Northumbrian Water/Essex &amp; Suffolk) abstraction from Fritton Lake. This is technically classed as a surface water abstraction because it is taken from the lake, but the lake is virtually a groundwater fed body, and so it is in hydraulic continuity with the same geological strata that the quarry wishes to excavate, as are the surrounding marshes. Unfortunately, our system will not assign a source protection zone to the abstraction because it only recognises the abstraction as being from surface water. While it is probably unlikely that the Lake would be impacted to the extent that it affects the public water supply abstraction, there remains the concern of contamination from air borne and groundwater pollutant resulting from quarry activities. This would otherwise have been more rigorously assessed should a Source Protection Zone have been assigned to this abstraction.  As of January this year dewatering is now a licensable activity as a New Authorisation. If we were consulted over this application, we would take a hard line, requesting detailed risk assessments and environmental impact assessments, including implications for impact to features assessed under the Water Framework Directive. We would expect detailed calculations of impact to Fritton Marshes, flow to the Waveney, Fritton Warren South County Wildlife Site, Fritton Lake,</p>	<p>Noted.</p> <p>The information submitted by the site proposer states that no dewatering would take place, and that once the extraction reached the water table, working would be carried out 'wet'.</p> <p>Normal planning conditions for mineral extraction require mitigation measures for dust, and control of substances such as fuel which could be a potential contaminant if spilled. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>An initial Water Framework Directive compliance assessment has been carried out as part of the Initial Consultation document, which indicated a low risk of runoff as the mineral extraction will be several metres below ground level, and low risk to flow and</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>effects to local abstractors (including an updated search for domestic sources) and the Public Water Supply.</p> <p>Ecology at Waveney Forest</p> <p>This site has been raised in previous plans and we remain concerned that the size of the removal of aggregate could cause negative impacts on visual amenity, character and wildlife.</p> <p>Numerous protected species in the area linked to fringing wetland habitat such as water vole, otter, Norfolk hawk, grass snake. Others linked to heathland and mire habitat to be lost include adder, lizard, slow-worm, nightjar and turtle dove. The narrow-mouthed whorl snail has also been recorded in habitats fringing the Waveney.</p> <p>Impacts on the quality of water from run-off and draining down of surrounding wetland habitats (marshes, Fritton Lake) are likely to be severe. There is potential to compromise projects and eel passage improvements on nearby Blocka Run.</p> <p>Several County Wildlife Sites (mainly heathland) will be lost to development, and it is unclear how impacts will be offset and even whether it is possible.</p>	<p>surrounding water levels as no dewatering would take place.</p> <p>A screen of woodland would be retained on the western side of the site linked to fringing wetland habitat. The County Wildlife site which contains the remnant heathland is excluded from the extraction areas.</p> <p>As no dewatering will take place, and the groundwater level is several metres below ground level, it is not expected that drain down or runoff would take place.</p> <p>The County Wildlife Sites are excluded from the potential extraction areas and would be retained.</p>
<p><b>(Object)</b> Representation ID: 92427</p> <p>Respondent: <b>Woodland Trust (Ms V Bankes Price) [16231]</b></p> <p>The following sites have been found to affect ancient woodland, ancient and veteran trees.</p> <p>MIN 38 – land East of Fritton marshes. Proposed for mineral extraction. Contain veteran beech.</p> <p>Grid reference: TG46390076</p> <p>Again the Trust supports the Council's position not to allocate the site but would like to add the presence of a veteran beech tree (as noted on the Ancient Tree Inventory) as a further reason not to take this site forward.</p>	<p>Noted. The grid reference given (64639,30076) while within the site boundary, is not within either of the extraction areas. Therefore, the veteran beech tree would remain.</p>
<p><b>(Comment)</b> Representation ID: 92340</p> <p>Respondent: <b>Essex and Suffolk Water plc (Ms S Newbury) [7918]</b></p> <p>Essex &amp; Suffolk Water (southern operating area of Northumbrian Water Group) would like to make the following comments in relation to the Norfolk Minerals and Waste Local Plan Review Initial Consultation document (May 2018) and the proposed sand and gravel extraction area at Waveney Forest, Fritton:</p> <p>Fritton Lake is predominantly a groundwater fed lake from which Essex &amp; Suffolk Water abstracts for public water supply to Belton, North Lowestoft and the surrounding villages.</p> <p>The Norfolk Minerals and Waste Local Plan Review Initial Consultation document (May 2018) has</p>	<p>Noted.</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>stated that the proposed Fritton Waveney Forest sand and gravel extraction area is located within the catchment and 400 metres from Fritton Lake. If dewatering was required, this would lower local groundwater levels, could change the groundwater catchment boundary and therefore could affect groundwater flow into Fritton Lake, thus potentially compromising Essex &amp; Suffolk Water's abstraction.</p> <p>We trust that the hydrological and hydrogeological effects of operations associated with gravel extraction at all the proposed sites and particularly at Waveney Forest, Fritton will be considered as part of your detailed options appraisal.</p> <p>We would object to any dewatering or activities that would reduce base flow to or affect the water quality of Fritton Lake.</p>	<p>The information submitted by the site proposer states that no dewatering would take place, and that once the extraction reached the water table, working would be carried out 'wet'.</p>
<p><b>(Object)</b> Representation ID: 92020 Respondent: <b>CPRE Norfolk (Mr M Rayner) [17775]</b></p> <p>We agree that this site is unsuitable. In addition to the reason given it is an area much used by residents as an area of woodland amenity – this would be good to maintain, particularly when there are other suitable sites for extraction which do not have such public access.</p>	<p>Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p>
<p><b>(Support)</b> Representation ID: 93016 Agent: Heaton Planning Ltd (Mr S Warren) Respondent: <b>Brett Group [7915]</b></p> <p>PROMOTION OF MIN 38 - WAVENEY FOREST, FRITTON</p> <p>In a response to Norfolk County Council's 'Call for Sites' a comprehensive submission was made on behalf of the Brett Group promoting land at Waveney Forest, Fritton. The submission included a detailed assessment of the potential environmental and amenity impacts that may arise from the development of a new sand and gravel quarry at Fritton.</p> <p>Part 2 of the Consultation Document undertaken by the County Council concurs with the findings of the Call for Sites report submitted by Brett in August 2017, with exception of Heritage interests.</p> <p>The final few sentences of the paragraph on archaeology, contained within the Initial Consultation document, clearly contradict one another: "The site is currently a commercial forestry plantation within which felling operations take place, which involve the use of heavy vehicles and earth moving operations. These operations may have degraded the undesignated</p>	<p>The view of the Norfolk Historic Environment Service is that grouping of the known and unknown military archaeology on the site is a significant factor in its heritage significance. Good practice in felling operations is that archaeology should be protected from felling operations involving heavy machinery. Therefore, felling should not result in any future degradation of archaeology and it should be preserved in situ.</p>

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<p>heritage assets, although good practice for tree felling operations states that archaeological features should be protected. Therefore, an assessment of the significance of archaeological deposits will be required at the planning application stage, in order to protect and mitigate the impact of mineral extraction in this site. However, the Norfolk Historic Environment Service have stated that they consider that no appropriate mitigation or modification of the site would be able to prevent harm to the undesignated heritage assets which as a whole make up the significance of the WW2 training area, of which few examples remain."</p> <p>We believe that the site is able to be developed for quarrying purposes. Within the submission by Brett for the Call for Sites a detailed heritage appraisal was undertaken - a summary of the report is provided below:</p> <p>"Direct Impacts on Heritage Assets - The site is known to contain military structures dating from WWI and predominantly WWII. Some of these are solidly engineered in concrete, whilst the majority are understood to be of more flimsy construction making use of wood, chicken wire and corrugated iron.</p> <p>The PAA may also retain earlier archaeology, in particular from the later prehistoric period. In the past 5 years tree felling has occurred across approximately 60% of the proposed extraction areas. This has involved heavy machinery, including evidence of some ground reduction caused by the windrowing of the wastage. The damage caused to archaeology, both military and earlier, could not be quantified on the site visit, but it is considered that it could be significant. Should this site be allocated, a thorough survey should be carried out using GPS and photography to create a catalogue of archaeology. Some archaeological evaluation may be required. This would allow an assessment of the distribution, form, condition and significance of all archaeology within the PAA.</p> <p>Opportunities - Any future planning application would require a mitigation strategy to manage the archaeological resource. This would involve a combination of preservation in situ, excavation and recording.</p> <p>The majority of the military structures identified in the 2009 survey by Warner and Wilby lie outside or on the periphery of the proposed extraction areas and preservation in situ of these outliers should be the objective.</p>	

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<p>These were only temporary structures and in time they will inevitably decay and collapse through natural processes. Excavation and recording of a selection of structure types within the extraction areas would be an important contribution to our understanding of how they were constructed and operated.</p> <p>Consideration should be given to the consolidation of some of the military remains to ensure their preservation for the future. There is also potential to create an educational resource, based around any consolidated structures should the restoration concept permit, that would be an important public benefit.</p> <p>This approach has been adopted elsewhere, for example at Binnegar Quarry, Dorset where an auxiliary bunker has been archaeologically excavated and the results will form the focus of a display in an on-site education centre recounting the history of the Auxiliary Units in Dorset</p> <p>The Heritage Appraisal reaches the following conclusion:</p> <p>"On current evidence, there are no overriding constraints to the allocation of this site and, from an archaeological and heritage perspective and subject to appropriate mitigation, the proposals provide opportunities for educational benefit and conform to national planning policy and guidance."</p> <p>The current Consultation Documents produced by the County Council acknowledge that:</p> <ul style="list-style-type: none"> <li>* no local listed feature falls within the proposed extraction area;</li> <li>* the site is commercial forestry plantation within which felling operations take place, which involve the use of heavy vehicles and earth moving operations;</li> <li>* commercial forestry operation may have degraded the undesignated heritage assets;</li> <li>* further archaeological assessment work will be required.</li> </ul> <p>No recognition has been given, by the County Council, to the potential opportunity that could arise from a quarry development to allow for proper archaeological assessment whilst providing opportunities through a considered restoration.</p> <p>We have some concerns with the Sustainability Appraisal scoring for land at Waveney Forest, Fritton:</p>	<p>SA1: Sites within 5km of an urban area/main town have a score of ++, sites between 5-10km have a +,</p>

Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>SA1 - It is unclear why some sites score more positively than others when they are similar distances to main towns. Why has a score of '+' rather than '++' been given? The site is in close proximity to two urban areas / main towns, Great Yarmouth and Gorleston on Sea.</p> <p>SA5 - We have concerns that the evaluation within the SA is not taken forward to the assessment within Part 2 of the Consultation Document. Sites with known heritage interests in close proximity are proposed for allocation with no clear indication on mitigation. Further to our comments above, the proposals for Waveney Forest do not have any impact on any designated asset. There is no justification for a score of '-' post extraction on the site. Brett have offered a restoration scheme that would build on the heritage interest in the area and provide beneficial opportunities. This has not been recognised in any of the assessment documents produced by the County Council to date.</p> <p>SA8 - why has a '-' score been applied when it is acknowledged that there will be no impact upon any designated landscape and the existing woodland will screen the proposed development.</p> <p>SA11 - a score of '++' should be applied due to the proximity of Great Yarmouth and Gorleston on Sea and the lack of other allocated sites in closer proximity.</p> <p>The site is located approximately 9km from Great Yarmouth, the adopted Core Strategy identifies that this is one of three 'major built up areas' in Norfolk. The Core Strategy sets out a 'locational preference' to potential site allocations which are 'close and/ or well related' to the Great Yarmouth Urban Area. This is such a site and it is understood by the promoter to be the closest land-won aggregate site to Great Yarmouth with reserves throughout the Plan period. Furthermore, there are no other extraction operations within the immediate vicinity which would lead to consideration of cumulative effects.</p> <p>The main impact of the proposals relates to heritage interest and potential for structures from WW1 and WW2. These were predominantly temporary structures (for example constructed of timber, chicken wire, corrugated iron and sandbags) and that the cycle of forestry planting and felling will likely destroy or significantly affect these remains. Mineral extraction offers an</p>	<p>Waveney forest is 6.5km distant from Gorleston-on-sea, and therefore a score of + is correct.</p> <p>SA5: MIN 38 is the only site with such significant amounts of archaeological features within the site, and where extraction would adverse impact on the significance of the group asset by removal of parts of the asset. National policy states that plan making authorities need to consider both undesignated and designated heritage assets, including the potential for unknown archaeology. Consultation with the Norfolk Historic Environment Service has indicated that preservation in-situ is likely to be the most appropriate form of preservation.</p> <p>SA8: The development of the site will require the removal of some trees from public viewpoints, specifically in relation to the formation of the access route and junction, therefore, a '-' score has been applied, the retention of tree screens around the site has been taken into account, SA8 does not only refer to designated landscapes.</p> <p>SA11: A site does not automatically achieve a higher score merely because of a lack of other sites, the sustainability appraisal looks at all sites across Norfolk, there is no sub-division of aggregate targets for individual urban areas.</p>



Representations Received about site MIN 38	Norfolk County Council Planning Officer's response
<p>opportunity to survey, excavate archaeologically and record, as well as consolidating and preserving some in situ for future generations.</p> <p>By adopting the approach preferred by Brett and the landowner, the site will be able to offer opportunities for creating ecological habitats that are more in keeping with the local environment including woodland, wetland / wet woodland on restoration. In addition to long term habitat creation and protection, the wider benefits will be derived from the development through comprehensive restoration includes opportunities for public access and interpretation of heritage assets.</p> <p>The public benefit derived from these proposals outweigh the potential damage, as set out in NPPF.</p> <p>It is therefore submitted that the site represents an ideal opportunity for allocation for sand and gravel extraction as part of the Norfolk Minerals and Waste Local Plan Review.</p>	

**Responses were received about site MIN 38 from the following individuals and groups**

Representation ID: 93059 Respondent: **Mr R Warner [17479]**  
 Representation ID: 93032 Respondent: **Mr P Miles [18337]**  
 Representation ID: 93002 Respondent: **Fritton Owl Sanctuary (Mr M Weston) [18331]**  
 Representation ID: 92998 Respondent: **Mr K Nunn [5704]**  
 Representation ID: 92997 Respondent: **Mr I McIntyre [7821]**  
 Representation ID: 92910 Respondent: **Mrs C Butcher [17482]**  
 Representation ID: 92909 Respondent: **Mr T Booth [18128]**  
 Representation ID: 92908 Respondent: **Mr S G & Mrs L M Bowman [10169]**  
 Representation ID: 92907 Respondent: **Ms M Johnson [17939]**  
 Representation ID: 92906 Respondent: **Mr G & Mrs S Leggett [7816]**  
 Representation ID: 92905 Respondent: **Mr J Williams [18134]**  
 Representation ID: 92904 Respondent: **Ms I North [18137]**  
 Representation ID: 92903 Respondent: **Mr R & Mrs K Murray [15399]**  
 Representation ID: 92902 Respondent: **Mr J & Mrs V Jeffries [17759]**  
 Representation ID: 92901 Respondent: **Ms C Carter [18326]**  
 Representation ID: 92893 Respondent: **Mr R C Coe [7826]**  
 Representation ID: 928895 Respondent: **Mr K Lynch [18316]**  
 Representation ID: 92890 Respondent: **Ms S Malkovich [18315]**  
 Representation ID: 92889 Respondent: **Mr D C Mallett [18318]**  
 Representation ID: 92888 Respondent: **Mr N Chaling [18319]**  
 Representation ID: 92887 Respondent: **A Minister [18322]**  
 Representation ID: 92886 Respondent: **Mr B Brown [18321]**  
 Representation ID: 92885 Respondent: **Ms S Hughes [18320]**  
 Representation ID: 92884 Respondent: **R Foster [15713]**  
 Representation ID: 92883 Respondent: **Mr A J Roberts [9728]**  
 Representation ID: 92882 Respondent: **Ms C Buss [18312]**  
 Representation ID: 92881 Respondent: **Mr B Roberts [18313]**  
 Representation ID: 92880 Respondent: **M Bradford [18311]**  
 Representation ID: 92879 Respondent: **Ms L Thorpe [18310]**  
 Representation ID: 92878 Respondent: **P Sharpe [18301]**  
 Representation ID: 92877 Respondent: **B J Buckoke [18314]**

Representation ID: 91950 Respondent: **Ms L Hughes [17565]**  
 Representation ID: 91949 Respondent: **Ms E Learner [17719]**  
 Representation ID: 91945 Respondent: **Mr R Dunn [4362]**  
 Representation ID: 91936 Respondent: **Ms L M Clark [17712]**  
 Representation ID: 91932 Respondent: **Ms I Radford [8193]**  
 Representation ID: 91930 Respondent: **Mr R Ceiley [17707]**  
 Representation ID: 91929 Respondent: **Mrs S Redstone [17706]**  
 Representation ID: 91918 Respondent: **Mr J Kent [17696]**  
 Representation ID: 91914 Respondent: **Ms V Wild Smith [17692]**  
 Representation ID: 91913 Respondent: **Priory Farm Restaurant (Mrs J Teasdale) [17660]**  
 Representation ID: 91911 Respondent: **Mrs C Tate [17690]**  
 Representation ID: 91910 Respondent: **Redwings (Ms L Cutress) [17688]**  
 Representation ID: 91909 Respondent: **Ms A Bermundez [17686]**  
 Representation ID: 91908 Respondent: **Ms M Fleming [17684]**  
 Representation ID: 91907 Respondent: **Mr J Wadeson [17689]**  
 Representation ID: 91906 Respondent: **Mr A Matherne [17685]**  
 Representation ID: 91899 Respondent: **Mr G Power [17676]**  
 Representation ID: 91898 Respondent: **Mr M Dodd [17675]**  
 Representation ID: 91894 Respondent: **Mr P Barwell [17674]**  
 Representation ID: 91893 Respondent: **Ms T Brownlow [17673]**  
 Representation ID: 91891 Respondent: **Mrs C Beard [17671]**  
 Representation ID: 91889 Respondent: **Mr A J Postle [17669]**  
 Representation ID: 91888 Respondent: **Ms J Kinkaid [17670]**  
 Representation ID: 91887 Respondent: **Mrs C Hurren [9740]**  
 Representation ID: 91883 Respondent: **Mrs C Chaplin [17651]**  
 Representation ID: 91882 Respondent: **Mr J Radford [17655]**  
 Representation ID: 91881 Respondent: **S Oosthuysen [17658]**  
 Representation ID: 91880 Respondent: **Mr R Casey [17657]**  
 Representation ID: 91879 Respondent: **Mrs L Radford [176556]**  
 Representation ID: 91878 Respondent: **D Biswell [17654]**  
 Representation ID: 91877 Respondent: **Ms S Lamb [17653]**

Representation ID: 92876 Respondent: <b>Mr S Shand [15777]</b>	Representation ID: 91876 Respondent: <b>Mr T Summons [17652]</b>
Representation ID: 92875 Respondent: <b>A Hale [18309]</b>	Representation ID: 91875 Respondent: <b>Mr R Chaplin [17650]</b>
Representation ID: 92874 Respondent: <b>Ms S Secher-Parkman [18308]</b>	Representation ID: 91874 Respondent: <b>Mr S Wood [17649]</b>
Representation ID: 92873 Respondent: <b>Mr S Stollworthy [18307]</b>	Representation ID: 91873 Respondent: <b>Mr A Salter [17648]</b>
Representation ID: 92872 Respondent: <b>Ms P Vincent [18306]</b>	Representation ID: 91872 Respondent: <b>Mrs C Wood [17647]</b>
Representation ID: 92871 Respondent: <b>Mr N Driscoll &amp; Mrs L Jackson [18305]</b>	Representation ID: 91871 Respondent: <b>Mr P Johnson [17645]</b>
Representation ID: 92870 Respondent: <b>Mr B Ryall [18304]</b>	Representation ID: 91870 Respondent: <b>C Leigh [17644]</b>
Representation ID: 92869 Respondent: <b>Ms S L Moore [15911]</b>	Representation ID: 91869 Respondent: <b>Ms S Luxon [17643]</b>
Representation ID: 92868 Respondent: <b>Mrs L P Moore [15912]</b>	Representation ID: 91868 Respondent: <b>Dr B Kelly [17641]</b>
Representation ID: 92867 Respondent: <b>Ms P King [18303]</b>	Representation ID: 91866 Respondent: <b>Dog go! (Mr J Figiel) [17637]</b>
Representation ID: 92866 Respondent: <b>Ms K A King [16043]</b>	Representation ID: 91865 Respondent: <b>Ms J Ray [8185]</b>
Representation ID: 92865 Respondent: <b>R Hubbard [18302]</b>	Representation ID: 91864 Respondent: <b>Hillside Animal Sanctuary (Ms W Valentine) [17635]</b>
Representation ID: 92864 Respondent: <b>Ms T Duffield [18300]</b>	Representation ID: 91863 Respondent: <b>Aldeby Liaison Group (Mr K Brown) [1747]</b>
Representation ID: 92863 Respondent: <b>Ms L Johnson [18299]</b>	Representation ID: 91862 Respondent: <b>Mr I Pittman [17633]</b>
Representation ID: 92862 Respondent: <b>Mrs J M Newman [18298]</b>	Representation ID: 91861 Respondent: <b>Mr N K Lovejoy [17632]</b>
Representation ID: 92861 Respondent: <b>W Mallet [18297]</b>	Representation ID: 91860 Respondent: <b>Ms J Lovejoy [17631]</b>
Representation ID: 92860 Respondent: <b>Mrs S Pearson [18296]</b>	Representation ID: 91859 Respondent: <b>Mr R J Smith [17630]</b>
Representation ID: 92859 Respondent: <b>Mrs R Flat [18295]</b>	Representation ID: 91858 Respondent: <b>Ms L Green [17629]</b>
Representation ID: 92858 Respondent: <b>Mr L Smith [18294]</b>	Representation ID: 91857 Respondent: <b>Mr I Kinge [17628]</b>
Representation ID: 92857 Respondent: <b>Ms M Robinson [18293]</b>	Representation ID: 91856 Respondent: <b>Mr G Smith [17625]</b>
Representation ID: 92856 Respondent: <b>Ms A Light [18292]</b>	Representation ID: 91855 Respondent: <b>Mr &amp; Mrs Hall [17627]</b>
Representation ID: 92855 Respondent: <b>Mr D Farman [18160]</b>	Representation ID: 91854 Respondent: <b>Mr &amp; Mrs Webb [17626]</b>
Representation ID: 92854 Respondent: <b>Ms A Young [18159]</b>	Representation ID: 91853 Respondent: <b>Ms J Kent [17624]</b>
Representation ID: 92853 Respondent: <b>Mr B Mallet [18158]</b>	Representation ID: 91831 Respondent: <b>Mr B &amp; Mrs D Everitt [17543]</b>
Representation ID: 92852 Respondent: <b>Mr D Robinson [18157]</b>	Representation ID: 91830 Respondent: <b>Mr I &amp; F Mrs McIntyre [17614]</b>
Representation ID: 92851 Respondent: <b>Mr M Farman [18317]</b>	Representation ID: 91829 Respondent: <b>Mrs F McIntyre [9420]</b>
Representation ID: 92850 Respondent: <b>Ms L Willert [18156]</b>	Representation ID: 91828 Respondent: <b>Mr N &amp; Mrs M Lake [9707]</b>
Representation ID: 92849 Respondent: <b>Mr G Johnson [18155]</b>	Representation ID: 91827 Respondent: <b>Mr G Hardy [7932]</b>
Representation ID: 92848 Respondent: <b>Mrs V Johnson [18154]</b>	Representation ID: 91824 Respondent: <b>Miss M Smith [7818]</b>
Representation ID: 92847 Respondent: <b>Ms T Sweeney [18153]</b>	Representation ID: 91823 Respondent: <b>Ms F Orga [17611]</b>
Representation ID: 92846 Respondent: <b>W A Sutton [18152]</b>	Representation ID: 91822 Respondent: <b>Mr &amp; Mrs J Wakefield [17587]</b>
Representation ID: 92845 Respondent: <b>Ms C White [18151]</b>	

Representation ID: 92844 Respondent: <b>Ms Macleod [18150]</b>	Representation ID: 91821 Respondent: <b>S Johnson [17610]</b>
Representation ID: 92843 Respondent: <b>Mr J Kettless [18149]</b>	Representation ID: 91817 Respondent: <b>Mr N &amp; Mrs M Lake [9707]</b>
Representation ID: 92842 Respondent: <b>Mr D Alcock [18148]</b>	Representation ID: 91816 Respondent: <b>Mrs K M Riches [17606]</b>
Representation ID: 92841 Respondent: <b>Ms A Alcock [18147]</b>	Representation ID: 91815 Respondent: <b>Mr C &amp; Mrs M Chilvers [17605]</b>
Representation ID: 92840 Respondent: <b>Mr J Binding [18146]</b>	Representation ID: 91814 Respondent: <b>Mr H Storzaker [17604]</b>
Representation ID: 92839 Respondent: <b>D Youngs [18145]</b>	Representation ID: 91813 Respondent: <b>Ms M Broom [17603]</b>
Representation ID: 92838 Respondent: <b>Mr P Mansfield [18144]</b>	Representation ID: 91812 Respondent: <b>Mr K &amp; Mrs P Gillings [7817]</b>
Representation ID: 92837 Respondent: <b>Ms L Johnson [18143]</b>	Representation ID: 91811 Respondent: <b>A J Scott [17602]</b>
Representation ID: 92836 Respondent: <b>Ms S Buckenham [18142]</b>	Representation ID: 91810 Respondent: <b>Mrs H M Beach [17601]</b>
Representation ID: 92835 Respondent: <b>Ms R Buckenham [18141]</b>	Representation ID: 91809 Respondent: <b>Mr D Fisher [17600]</b>
Representation ID: 92834 Respondent: <b>Mr L Buckenham [18140]</b>	Representation ID: 91808 Respondent: <b>Miss L E Perry [17599]</b>
Representation ID: 92833 Respondent: <b>Mr R &amp; Mrs J Smith [18139]</b>	Representation ID: 91807 Respondent: <b>Mr L J Meecham [17598]</b>
Representation ID: 92832 Respondent: <b>Mr K &amp; Mrs M Chesneau [18138]</b>	Representation ID: 91806 Respondent: <b>Mr T Eagle [17597]</b>
Representation ID: 92831 Respondent: <b>Mr T Johnson [18136]</b>	Representation ID: 91805 Respondent: <b>Ms E Ratty [17596]</b>
Representation ID: 92830 Respondent: <b>Mrs J Bosworth [17963]</b>	Representation ID: 91804 Respondent: <b>Ms J Baines-Burton [17595]</b>
Representation ID: 92694 Respondent: <b>Mr P Bosworth [18135]</b>	Representation ID: 91803 Respondent: <b>Miss R M green [7882]</b>
Representation ID: 92693 Respondent: <b>Mr S Shafiei [18133]</b>	Representation ID: 91802 Respondent: <b>Mr C Jurak [17593]</b>
Representation ID: 92692 Respondent: <b>P Mounser [18132]</b>	Representation ID: 91801 Respondent: <b>Ms J Norris [17592]</b>
Representation ID: 92691 Respondent: <b>Ms A Hutchinson [18131]</b>	Representation ID: 91798 Respondent: <b>Ms J Steward [17586]</b>
Representation ID: 92690 Respondent: <b>Mrs E A Noble [18130]</b>	Representation ID: 91797 Respondent: <b>Mr B Hurren [17585]</b>
Representation ID: 92689 Respondent: <b>Mr J Honeywood [9900]</b>	Representation ID: 91796 Respondent: <b>Ms R De Jean [17984]</b>
Representation ID: 92688 Respondent: <b>Mr N &amp; Mrs M Lake [9707]</b>	Representation ID: 91795 Respondent: <b>J Baldry [17583]</b>
Representation ID: 92687 Respondent: <b>Mr M Buckenham [18129]</b>	Representation ID: 91794 Respondent: <b>L Trindall [17582]</b>
Representation ID: 92686 Respondent: <b>Mrs J King [18127]</b>	Representation ID: 91793 Respondent: <b>Ms L Hurren [17580]</b>
Representation ID: 92685 Respondent: <b>Ms S Lake [18126]</b>	Representation ID: 91792 Respondent: <b>Ms J Lewis [17579]</b>
Representation ID: 92684 Respondent: <b>Ms M Allen [18125]</b>	Representation ID: 91791 Respondent: <b>Ms A Willis [17578]</b>
Representation ID: 92683 Respondent: <b>Ms H Secker [18124]</b>	Representation ID: 91790 Respondent: <b>Ms A Johnson [17577]</b>
Representation ID: 92682 Respondent: <b>Ms V Ong [18123]</b>	Representation ID: 91789 Respondent: <b>Ms B Gislam [17575]</b>
Representation ID: 92681 Respondent: <b>Mr P Clark [18122]</b>	Representation ID: 91788 Respondent: <b>Ms A Petersen [17574]</b>
Representation ID: 92680 Respondent: <b>Ms T Waite [18121]</b>	Representation ID: 91787 Respondent: <b>K Pryce [17573]</b>
Representation ID: 92679 Respondent: <b>Mr D West [18120]</b>	Representation ID: 91786 Respondent: <b>Ms J Nicholl [17572]</b>
Representation ID: 92678 Respondent: <b>Mrs P West [6107]</b>	Representation ID: 91785 Respondent: <b>Mr D Peacock [17571]</b>
Representation ID: 92677 Respondent: <b>Ms Z Chambers [18119]</b>	Representation ID: 91784 Respondent: <b>Ms A Lawrence [17570]</b>

Representation ID: 92676 Respondent: **Mr T Fisher [18118]**  
Representation ID: 92675 Respondent: **Mr P Reed [18117]**  
Representation ID: 92674 Respondent: **Ms K Harvey [18116]**  
Representation ID: 92673 Respondent: **Ms J Harvey [18115]**  
Representation ID: 92534 Respondent: **Mr K Nunn [5704]**  
Representation ID: 92533 Respondent: **Mr K Nunn [5704]**  
Representation ID: 92509 Respondent: **Rt Hon B Lewis MP [17996]**  
Representation ID: 92469 Respondent: **D P Smith [17993]**  
Representation ID: 92468 Respondent: **Mr D N Smith [17992]**  
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Representation ID: 92459 Respondent: **Ms T Parrott [17985]**  
Representation ID: 92458 Respondent: **M J Brett [15398]**  
Representation ID: 92457 Respondent: **Mr R & Mrs B Ceiley [15435]**  
Representation ID: 92456 Respondent: **E P Smith [15683]**  
Representation ID: 92455 Respondent: **Mr M Musciano [17984]**  
Representation ID: 92454 Respondent: **Mr B Vasey [17770]**  
Representation ID: 92453 Respondent: **Ms C Harvey [17769]**  
Representation ID: 92452 Respondent: **Ms S Harvey [17768]**  
Representation ID: 92451 Respondent: **Ms I Martin [17766]**  
Representation ID: 92450 Respondent: **Mr I Parrott [17765]**  
Representation ID: 92448 Respondent: **Ms J Waite [17764]**  
Representation ID: 92448 Respondent: **Ms H Linkhorn [17763]**  
Representation ID: 92447 Respondent: **Ms J Arnold [17762]**  
Representation ID: 92446 Respondent: **Ms N Vasey [17761]**  
Representation ID: 92445 Respondent: **Mrs M Cooper [17760]**  
Representation ID: 92444 Respondent: **Mr J & Mrs V Jeffries [17759]**

Representation ID: 91783 Respondent: **Ms S Tupper-Carey [17569]**  
Representation ID: 91782 Respondent: **Ms J Burgoyne [17567]**  
Representation ID: 91781 Respondent: **Mr I McKean [17562]**  
Representation ID: 91779 Respondent: **Mr C Bacon [17576]**  
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Representation ID: 91777 Respondent: **S Hills [17566]**  
Representation ID: 91776 Respondent: **Mr G Wheadon [17564]**  
Representation ID: 91775 Respondent: **S Turner [17563]**  
Representation ID: 91774 Respondent: **Dr C Winter [17561]**  
Representation ID: 91773 Respondent: **Mr K Quinn [17560]**  
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Representation ID: 91769 Respondent: **Mrs K Murphy [17556]**  
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Representation ID: 91766 Respondent: **Mr D Wadson [9713]**  
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Representation ID: 91764 Respondent: **Mr S Barlow [17552]**  
Representation ID: 91763 Respondent: **Ms D Dalgetty [17551]**  
Representation ID: 91762 Respondent: **Ms M Moore [17550]**  
Representation ID: 91760 Respondent: **Mr C Dearmun [17547]**  
Representation ID: 19759 Respondent: **Mr J Wedon [17546]**  
Representation ID: 91757 Respondent: **Mr J & Mrs J Mills [17540]**  
Representation ID: 91756 Respondent: **Mrs V Mansfield [17541]**  
Representation ID: 91755 Respondent: **Mr T & Mrs J Beales [17542]**  
Representation ID: 91754 Respondent: **J Swainson [17544]**  
Representation ID: 91753 Respondent: **Ms A Wilby [15397]**  
Representation ID: 917752 Respondent: **Mr K Leggett [17536]**  
Representation ID: 91751 Respondent: **Mrs J V Child [9677]**  
Representation ID: 91750 Respondent: **Mr J & Mrs C Collins [17534]**  
Representation ID: 91749 Respondent: **Mr H & Mrs K Smith [17535]**

Representation ID: 92443 Respondent: **Ms A Gage [17758]**  
Representation ID: 92442 Respondent: **Ms J Coleman [17757]**  
Representation ID: 92441 Respondent: **Mrs S Dack [17756]**  
Representation ID: 92440 Respondent: **Ms E Goodwin [17755]**  
Representation ID: 92439 Respondent: **Ms S Chapman [17754]**  
Representation ID: 92438 Respondent: **Mrs V Fox [7933]**  
Representation ID: 92437 Respondent: **Mr L Stocks [17753]**  
Representation ID: 92436 Respondent: **Mr J Blyth [17752]**  
Representation ID: 92435 Respondent: **Mrs J Blyth [17751]**  
Representation ID: 92434 Respondent: **Ms H Fausto [17750]**  
Representation ID: 92433 Respondent: **Ms P Howell [17749]**  
Representation ID: 92432 Respondent: **Mr W Howell [6108]**  
Representation ID: 92431 Respondent: **Ms Z Fausto [17748]**  
Representation ID: 92430 Respondent: **Mr R Fausto [17747]**  
Representation ID: 92338 Respondent: **Mr T Bryant [17969]**  
Representation ID: 92332 Respondent: **Mr S Wells [17967]**  
Representation ID: 92327 Respondent: **Ms E Reed [17964]**  
Representation ID: 92326 Respondent: **Mr J Burton [6857]**  
Representation ID: 92325 Respondent: **Mrs J Bosworth [17963]**  
Representation ID: 92323 Respondent: **Mrs C Steels [17961]**  
Representation ID: 92322 Respondent: **Mr R Steels [17960]**  
Representation ID: 92317 Respondent: **C Burton [17958]**  
Representation ID: 92289 Respondent: **Mr K Nunn [5704]**  
Representation ID: 92278 Respondent: **Ms M Johnson [17939]**  
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Representation ID: 92131 Respondent: **Mr V Hills [17830]**  
Representation ID: 92088 Respondent: **Mr P Belden [17808]**  
Representation ID: 92087 Respondent: **Dr C Richards [17806]**  
Representation ID: 92082 Respondent: **Mr B Boyle [17805]**  
Representation ID: 92055 Respondent: **Mr B & Mrs A Humphrey [17799]**  
Representation ID: 92039 Respondent: **Ms A Yelland [17787]**  
Representation ID: 92025 Respondent: **Ms L Bensley [17780]**  
Representation ID: 92002 Respondent: **Mrs V Wadson [17555]**

Representation ID: 91748 Respondent: **Mr P McRuvie & Ms P Saywell [17537]**  
Representation ID: 91746 Respondent: **Mr J Thompson [17532]**  
Representation ID: 91745 Respondent: **Ms T Oldham [17531]**  
Representation ID: 91744 Respondent: **Ms V Arger [17530]**  
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Representation ID: 91741 Respondent: **Ms F Cowan [17528]**  
Representation ID: 91740 Respondent: **Mr A Flynn [17527]**  
Representation ID: 91739 Respondent: **Mr P & Mrs D Adams [9717]**  
Representation ID: 91738 Respondent: **Mrs H Carruthers [17526]**  
Representation ID: 91737 Respondent: **Mr C & Mrs C Palmer [17525]**  
Representation ID: 91736 Respondent: **Mr C Julian [17524]**  
Representation ID: 91735 Respondent: **Mr P Douch [17523]**  
Representation ID: 91734 Respondent: **J M Willimot [15404]**  
Representation ID: 91733 Respondent: **Mr R Curruthers [17522]**  
Representation ID: 91730 Respondent: **Mr J Stephens & Ms S McQueen [17500]**  
Representation ID: 91729 Respondent: **Mr D Dunnett & Mrs S Feebery [17520]**  
Representation ID: 91727 Respondent: **Ms A Creasey [17519]**  
Representation ID: 91726 Respondent: **S Saunders [17517]**  
Representation ID: 91725 Respondent: **Mrs C Thrower [17516]**  
Representation ID: 91724 Respondent: **Ms A Stacey [17515]**  
Representation ID: 91720 Respondent: **Mr D J Tate [15401]**  
Representation ID: 91719 Respondent: **Mr A Mendum [15438]**  
Representation ID: 91718 Respondent: **Ms S Peart [17512]**  
Representation ID: 91717 Respondent: **Ms S Sayers**  
Representation ID: 91716 Respondent: **Ms S Kingston [17511]**  
Representation ID: 91715 Respondent: **Ms E Cleveland [17510]**  
Representation ID: 91714 Respondent: **Mr C Powell [17509]**  
Representation ID: 91712 Respondent: **Ms A Wilby [15397]**  
Representation ID: 91711 Respondent: **Mr S Wadson [17506]**  
Representation ID: 91710 Respondent: **Mr K Moore [17505]**

Representation ID: 91995 Respondent: <b>Mrs H Carruthers [17526]</b> Representation ID: 91973 Respondent: <b>Mrs L A Nicholls [17725]</b> Representation ID: 91971 Respondent: <b>Ms C Bell</b> Representation ID: 91969 Respondent: <b>The Somerleyton Estate [7926]</b> Agent: <b>Evolution Town Planning (Mr S Bainbridge) [17539]</b>	Representation ID: 91709 Respondent: <b>Mr J Wright [17504]</b> Representation ID: 91708 Respondent: <b>Ms C Horne [17503]</b> Representation ID: 91707 Respondent: <b>Ms E Mckay [17502]</b> Representation ID: 91706 Respondent: <b>Mr J Woodhouse [17501]</b> Representation ID: 91701 Respondent: <b>Mrs C Butcher [17482]</b> Representation ID: 91700 Respondent: <b>Miss J Harris [17495]</b> Representation ID: 91697 Respondent: <b>Mrs L Sedgewick [17493]</b> Representation ID: 91695 Respondent: <b>Mrs S Salt [17492]</b> Representation ID: 91694 Respondent: <b>Ms S Kitchen [17491]</b>
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<b>Representations received about site MIN 38</b>	<b>Norfolk County Council Planning Officer's response</b>
<b>AMENITY /RECREATION USE</b>	
<p>The site is possibly the largest, most secluded, quiet and peaceful recreational amenity that Great Yarmouth and its surrounding villages have. Don't deprive the general public of their right of enjoyment of such places.</p> <p>An important local amenity would be lost.</p> <p>The woods are used for family walks / cycling / horse riding / picnics / exercise/ jogging /running / meeting other people / bird watching / place to relax / recreation area / teaching children about nature and wildlife</p> <p>Waveney Forest is Important for the mental and physical health of people who use it (lowered blood pressure and stress hormones and improved immune system).</p> <p>Great Yarmouth does not have any similar area for its population to visit for these purposes. Horse Riders will have no other alternative but to ride along Great Yarmouth Beaches and Gorleston Beach</p>	<p>Waveney Forest is in private ownership and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p>
<p>Restoration and public access: You say that the site could also be subject to very good restoration scheme, offering significant ecological gains of wet woodland and lowland heath land were both included. But people love the forest as it is now, and would no doubt use a restored woodland -- that doesn't need to be mineral extraction for the woodland to be restored. Part of the site is heathland and reed beds, but part of the restoration</p>	<p>Waveney Forest is in private ownership and currently public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p>

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<p>would need to be woodland for people to enjoy and for wildlife. Would there be continued public access during extraction and even greater public access on restoration? If so, what sort of access will there be to a gravel pit, and what kind of pleasure can anyone take in such a visit? Losing a large area of beautiful forest which is enjoyable to walk through, and replacing it with a walk along the edge of a working gravel pits with enormous machinery, noise, dust and pollution -- I don't think that's much of a substitute. And increased access after restoration is a poor substitute -- what are people going to do in the meantime? Retaining an existing tree belt as suggested in the conclusion would not be enough.</p>	<p>The two extraction areas do not include the heathland or and reed beds. The restoration concept includes one wetland habitat in the western extraction area. The southern extraction area would be restored to back to commercial woodland.</p>
<p>Lovely place to walk dogs / have been walking dogs there for years / nowhere else local to walk dogs / would have to drive to walk the dog elsewhere off the lead. Dog walkers will have no other alternative but to take their dogs along Great Yarmouth Beaches and Gorleston Beach</p>	<p>Waveney Forest is in private ownership and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p>
<p>The surrounding areas - particularly Great Yarmouth, Lowestoft, and Gorleston have significant areas of deprivation, and endangering the use a free local facility in which to encourage physical activity, would be very ill advised, particularly in light of media interest into preserving free access to places that encourage people to be less sedentary. Mental and Physical Health problems (particularly Cardiac Disease and Type 2 Diabetes) are high in the local area, and residents need to be encouraged to use the natural environment to become active, which will help to raise mood and improve their physical health. A beautiful, and free to use facility, is something of immense value and we should not be allowing it to come under threat.</p>	<p>Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p>
<p>The forested area is open access and this would be off-limits due to mineral extraction.</p>	<p>This is incorrect. Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way.</p>
<p>For forty years the forest was maintained as a working and amenity forest by central government funding via the Forestry Commission before being sold into private hands. The private owners have now confined access to the pre-existing rights of way.</p>	<p>Noted. Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way.</p>



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<p>I find it very hard to understand why a popular wood, used by local people and visitors such as myself, and people from Lowestoft and Great Yarmouth, is seen as dispensable. Woodlands are extremely important for recreation, particularly in an area where there isn't much choice -- agricultural land is not usually open apart from a few foot paths, and the seaside though lovely is a little way away and very busy especially in summer. There are no other local woodlands to visit.</p>	<p>Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p>
<p><b>LOSS OF WOODLAND</b>  Destruction of the forest /woodlands. Need more trees not less. Some areas of young trees have been planted to provide the next crop for building and would be dug up by the quarry. The trees have already had a major chop several years ago which they are only now recovering from. Global warming is taking hold of this planet, through increasing Carbon dioxide levels causing rising temperatures. Carbon dioxide is absorbed by plants, specially growing trees. Waveney Forest has very many young trees which are absorbing Carbon Dioxide, we need as many trees, woods and forests as possible due to global warming / climate change.</p> <p>Woodland will not be replaced once it is destroyed.  We only have 10% woodland in England the average in EU is 35% yet more woodland is being destroyed across the country.</p> <p>Loss of green spaces  Loss of former common land</p>	<p>The Waveney Forest is a commercial coniferous plantation and the felling of trees forms part of the operation of the plantation, so the carbon capture of the site is time limited. The restoration of the site after extraction would include coniferous and broadleaf woodland (together with heathland, grassland and waterbodies).</p> <p>The restoration of the site after extraction would include coniferous and broadleaf woodland, heathland and grassland together with water bodies; this would provide improved biodiversity.</p> <p>Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way.</p>
<p><b>IMPACT ON ECOLOGY</b>  Loss of wildlife habitat, loss of biodiversity, flora and fauna (wildflowers, animals, reptiles, moths, butterflies, insects, adders and slowworms in the forest, deer, rabbits, shelducks nesting, Snipe, Wrens, Green Woodpeckers, Jackdaws, Wood Pigeons, Sparrow Hawks, Deer, Dragonflies, Grass Snakes, Toads, frogs. Would displace and kill wildlife. Would increase deer crossing the A143 to leave wood. Foxes would move to residential areas. Norfolk Biodiversity Information Service has a data set for Waveney Forest showing</p>	<p>The restoration of the site after extraction would include coniferous and broadleaf woodland, heathland and grassland together with water bodies; this would provide improved biodiversity. Just over half of the existing Waveney Forest site would not be included within any proposed extraction area.</p>

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<p>the huge biodiversity of this forest, and most notably the very, very rare Vertigo Angustior snail, which is protected under European Law. We have high numbers of bees, dragon flies, newts, butterflies in addition to many other types of mammals and birds. More recently we have seen buzzards flying over the woods and believe that the woods are essential to ensure that the biodiversity of the area is maintained. We also have bats that circle the house in the evening. It is well known that the numbers of insects including bees are in decline and the destruction of the woods would make this worse. We have also seen rare dragonflies in our garden including the Norfolk Hawker which is rare and protected. Fritton Woods is a prime hunting ground for birds of prey, especially owls which form an integral part of the biodiversity structure and play a vital part in vermin control. Also, not all species of owl that we have in our area are totally nocturnal. The lighting, noise, dust, air and water pollution, along with woodland devastation and disruption will destroy their hunting ability, food supply, shelter and habitat. More and more land is being development and this area should be protected. The fields of Bradwell and Belton are being built on for houses and surely this warrants more areas of nature. Potential negative impacts on County Wildlife Sites adjoining the proposed site - Fritton Warren South CWS 1426 and heathland in Waveney Forest CWS 1427.</p> <p>The development will adversely affect the outlook from the river, as well as polluting the River Waveney and killing the wildlife and its habitat.</p> <p>The area being originally part of heath land and a last part of the Sandlings that extended from Ipswich to Gt Yarmouth, should be maintained as part woodland and managed back to its origin.</p> <p>4. NCC need to refer to and act on the advices by T. Gardiner author of The Natural History of the Waveney Forest, publ in 2013.</p>	<p>The two extraction areas do not include the area covered by the Waveney Forest County Wildlife Site, which is an area of acid grassland and heath, with small wet areas. The restoration concept includes one wetland habitat in the western extraction area, with grassland surrounding it. The southern extraction area would be restored to commercial broadleaf woodland.</p> <p>Currently, most of the proposed extraction areas are given over to single species commercial coniferous plantation, which are being felled as they reach maturity. Such plantations are generally considered to be relatively poor in terms of biodiversity. The County Wildlife Site Fritton Warren South is outside the boundary of the site.</p> <p>The Norfolk Biodiversity Information Service holds records of species sightings. The preliminary ecological assessment provided by the site proposer (Brett Southern Ltd) examined these records. Any future planning application would be required to produce detailed surveys for protected and notable species and habitats, together with recommendations for mitigation and compensatory habitats if required. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The proposal for extraction at MIN 38 would retain a screen belt of trees, with extraction taking place within two areas within the site on a phased basis. The extraction would not be visible from the River Waveney, or the Angles Way. Sand and gravel extraction does not produce harmful contaminants, both as a result of mitigation measures, and because the mineral being extracted is non-toxic and similar to the surrounding soils. Normal planning conditions for mineral extraction require mitigation measures for noise and dust emissions. These have operated effectively at mineral sites across Norfolk for many years.</p>

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<p>Mineral extraction site next to Breydon Water SSSI, Ramsar would be an environmental disaster.</p>	<p>Dewatering would not be undertaken as part of the proposal and silt ingress as a result of runoff is considered unlikely as the water table would be several metres below ground level.</p> <p>MIN 38 Waveney Forest is just over 2km from Breydon Water SSSI, it is considered that due to this distance the operation of the site would not impact on the SSSI, as detailed in the ecology part of the site assessment.</p>
<p><b>TRAFFIC/HIGHWAYS IMPACTS</b></p> <p>There are several stretches of the A.143 road between Great Yarmouth and Beccles where it is questionable that 2 heavy lorries could pass safely going in opposite directions because the road is not wide enough.</p> <p>The 'Trunk' roads around the area will not be able to handle the increased heavy duty traffic.</p> <p>Road network cannot cope with increased traffic and accidents. Traffic disruption. Existing traffic congestion on A143 will be made worse by HGV movements. Dangerous for pedestrians crossing the road. Dangerous bend on Beccles Road next to the Jolly Angler which is virtually impassable if you get two large vehicles meet going in opposite directions. A143 is unsuitable for HGVs. Dangerous access points to the A143. Fritton bends at Decoy public house is dangerous to traffic and pedestrians. A143 exit to A47 at Decoy public house has increased traffic flow.</p> <p>Traffic on the A146 often can't access the A143 without considerable delay. The Fritton corner is already hazardous if two HGVs have to pass on opposite sides. HGVs drive on pavements to avoid each other. Another 50 lorries a day would result in a fatality. Dangerous junction.</p> <p>Pollution from additional lorry movements and from gravel extraction. The amount of traffic coming through the A143 seems to have doubled. The hundreds of new properties on the Bluebell Meadow development have made an impact, with many more to come. The amount of extra traffic using the new road from the A47 joining the A143 is making a huge difference. This is already a very dangerous road. The Haddiscoe bends</p>	<p>The road hierarchy states that A roads are the roads preferred for HGV transport to use. The A143 would currently be used by HGV traffic accessing Great Yarmouth from the direction of Beccles; this would include existing aggregate vehicles from sand and gravel workings such as at Norton Subcourse. The Department for Transport has traffic data which indicates that an average of around 9,500 daily vehicle movements occur on the A143 between St. Olaves and Fritton. It is not expected that the volume of between 40 and 120 additional HGV movements (4 to 12 per hour) related to any potential working at Waveney Forest would have a significant impact on traffic congestion, as it represents an increase of 1.26%. The surrounding road network is subject to a 40mph speed limit at the proposed access point and 30mph limits through both St Olaves and Fritton. The type of HGV normally used by mineral operators (8 wheel rigid body vehicles) do not have difficulty travelling along roads such as the A143.</p> <p>A Transport Statement or Assessment would be required to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p>

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<p>must be one of the most dangerous roads in Norfolk, now we have long queues forming both ways to get over the bridge at St. Olaves. We cannot have more large lorries coming onto this road.</p> <p>If you walk through our village, where there are pavements, they are very narrow and this makes the walker feel unsafe especially when larger vehicles go past. These extra lorries would have to either come through Fritton which has a sharp bend on a hill, go over the little single track bridge at St Olaves or go up Herringfleet Road and through Somerleyton which also has some very sharp bends; none of these roads are suitable for this extra traffic. I live in a cottage very close to the A143 and lorries driving through the village make our cottage shake so this extra volume of heavy vehicles could damage our cottages and who would be responsible if any damage were to occur?</p> <p>There are several schools on &amp;/or near the A.143 which would be vulnerable.</p> <p>Debris from the site which would be deposited on the A.143 initially by the lorries would be dangerous to other road users.</p> <p>More sand and silt being washed onto the road in wet weather.</p> <p>What do they propose to do about the mud and debris from the lorries on the A.143 / A.12 / A.47 e.t.c..</p> <p>The additional H.G.V., traffic would result in increased erosion of the road and the verges</p> <p>The small villages will not be able to handle the traffic when there is an accident on the A.12 / A.47 / A.143 and A.146 as frequently happens</p> <p>It is alleged that the integrity of Haddiscoe Bridge is in question [ if not the bridge itself then the approaches onto it ] . This will accelerate considerably, with the increased H.G.V., traffic should the pit go ahead. St Olaves Bridge is also a single lane historical bridge and this would risk damage due to the weight and frequency of the equipment and lorries.</p>	<p>The road hierarchy states that A roads are the roads preferred for HGV transport to use. The Highway Authority stated that the proposed highway access is suitable subject to the provision of a right hand turn lane on the A143. The full response in the paragraph above is also relevant to this representation.</p> <p>Mitigation measures such as wheel washing, and hard surfacing of access routes ensure that unacceptable levels of silt ingress onto the highway does not occur; these can be conditioned as part of any planning permission. The proposer of the site has stated that the access route would be hard surfaced. The Air Quality Assessment supporting the proposal has recommended a wheel wash installed at the northern end of the access road, and that a road sweeper should be used as and when required.</p> <p>The response by the Highway Authority has not indicated any problems which would prevent HGV traffic using the Haddiscoe Bridge.</p> <p>Excavators and processing plant equipment are normally on a mineral extraction site for the duration of the working.</p>

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<p>Traffic on the A146 often can't access the A143 without considerable delay. I work in Beccles and sometimes the traffic stretches all the way from the St Olaves bridge to Caldecott Hall, with extra lorries this is only going to get worse. A 20 minute drive home can take an hour due to congestion.</p> <p>* Obvious increase of traffic flow through St Olaves by HGVs, staff and visitors. There is currently a daily back up of vehicles due to the current volume of traffic travelling through the village over the bridge.</p> <p>Being so close to the James Paget Hospital the additional traffic could have a serious influence on the already under pressure Ambulance service and add to the stress level of the hard working employee's</p> <p>Since the new road from Bradwell to Gorleston was opened (B1534), the A143 through Fritton and St Olaves is now the main route for ambulances to and from James Paget Hospital. Ambulances already being held up due to tail back of traffic. This would be worse with HGVs from a quarry. Already enough traffic with new housing estates and holiday traffic. The quarry will lead to additional traffic on the B1534.</p> <p>Emergency service access is also likely to be adversely affected putting the lives of locals and tourists at risk due to delays.</p> <p>New Road is the only access into the Forest and it is not suitable for HGV traffic. In several spots it is only suitable for one car and is therefore totally unsuitable for two HGV's going in opposite directions.</p> <p>Access from a new entrance on the A.143 from a field next to The Warren would be unsuitable and dangerous because it would be on a hill and the entry and exit sightline is not sufficient. A suggested right turn only from said entrance would cause no end of traffic problems and delays.</p> <p>Should the proposal go ahead I am in a quandary as to which route the estimated 50 heavily laden aggregates lorries will take towards Gr. Yarmouth? Highways have said that there would have to be a designated right hand turn at the proposed new junction onto the A143 from the haul</p>	<p>The Department for Transport has traffic data which indicates that an average of around 9,500 daily vehicle movements occur on the A143 between St. Olaves and Fritton. It is not expected that the volume of between 40 and 120 additional HGV movements (4 to 12 per hour) related to any potential working at Waveney Forest would have a significant impact on traffic congestion, as it represents an increase of 1.26% in overall traffic.</p> <p>The surrounding road network is subject to a 40mph speed limit at the proposed access point and 30mph limits through both St Olaves and Fritton. The type of HGV normally used by mineral operators (8 wheel rigid body vehicles) do not have difficulty travelling along roads such as the A143.</p> <p>A Transport Statement or Assessment would be required to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The proposed access route travels directly south from the site to the A143 and does not use New Road.</p> <p>A preliminary design for the proposed access point has examined sightlines, and the Highway Authority confirmed that these would be sufficient.</p> <p>The reference to a right turn lane does not refer to the access route but refers to a right turn lane which would be incorporated into the improvements to the A143 allowing vehicles to wait to turn right into the access road from the direction of Great Yarmouth without stopping following traffic. Traffic leaving the site would be able to turn left or right.</p>

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<p>road. This is in the direction of St. Olaves, Somerleyton and Beccles with no possible turning point. The proposed new road means that all of up to 50 lorries per day will have to turn right. This will not only destroy a beautiful canopy of yet more trees, but also negates the main reason for considering the site, namely its proximity to Gt Yarmouth and Gorleston building sites. Where will these lorries go to.?</p> <p>There will be a massive increase in slow moving heavy goods vehicles on an already slow road into Great Yarmouth. This road already has massive congestion at the bridge at St Olaves at peek time.</p> <p>Traffic levels are already high on the Beccles Road particularly with people going to Norwich for work. I am often delayed at the bridge at St Olaves trying to cross and this would be exacerbated by lorries and other machinery if the extraction goes ahead. Turning right out of New Road on to the Beccles Road is very challenging and traffic is often speeding which has led to near misses and accidents. The introduction of large gravel lorries would increase traffic and the potential for serious accident. If the lorries and equipment are brought into Fritton from the Bradwell direction there is a house very close to the turn in to the village which risks being hit already by large vehicles.</p> <p>Our main worry is the vibration our house may suffer, due to the large number of extra heavy lorries that will be using our road. The A143 was recently resurfaced which has helped a lot. Prior to this we did suffer a lot of vibration, and if these extra heavy lorries, up to 50 a day are to be allowed, we are concerned the problem will return as the new road surface will degrade more quickly.</p> <p>There is little to no regard to the speed limit by heavy commercial vehicles</p>	<p>A small number of trees would need to be removed as part of the formation of the proposed access. An Arboricultural Impact Assessment would be required to be submitted with any future planning application that has the potential to affect any trees or hedges over a specified size. It would be for the determination of any future planning application to consider the impacts and any proposed mitigation measures, although it is not considered that the junction location would be unacceptable in principle.</p> <p>Information supplied as part of the proposal indicate that HGV movements would be between 40 and 120 additional HGV movements per day. This would not a massive increase for an A road. Due to the hours of operation of aggregate workings, there is not a concentration of HGVs from these sites through the am and pm peaks.</p> <p>It is not expected that the volume of HGV movements related to any potential working at Waveney Forest would have a significant impact on traffic congestion. The surrounding road network is subject to a 40mph speed limit at the proposed access point and 30mph limits through both St Olaves and Fritton. The type of HGV normally used by mineral operators (8-wheel rigid body vehicles) do not have difficulty travelling along roads such as the A143.</p> <p>The road hierarchy states that A roads are the roads preferred for HGV transport to use. The Department for Transport has traffic data which indicates that an average of around 9,500 daily vehicle movements occur on the A143 between St. Olaves and Fritton. The volume of between 40 and 120 additional HGV movements (4 to 12 per hour) related to any potential mineral working at Waveney Forest would represent an increase of 1.26% in overall traffic.</p>

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<p>now, particularly early morning/late evening. I have no confidence that these quarry lorries will not also ignore the speed limit.</p> <p>The proposed access route is expected to be go over the track that leads to our property. Underneath this track, all major service cables are currently in use; electricity, water and telephone. It is extremely likely that these services may be damaged or cut off which is very concerning to us. Access to our property would also be negatively affected as the proposed access route goes over our track and would make it difficult for us to go out. There is no other access to our property rendering us potentially trapped at different times of the day when lorries would be in transit.</p>	<p>Speeding is a law enforcement matter and as such is not a material consideration in planning.</p> <p>The construction of any access track would need to consider services lying underneath. Access routes for mineral extraction often have to take existing services and access points into account and ensure appropriate construction practices are undertaken to safeguard these. Based on the estimated number of HGV movements, for a normal working day, a HGV would travel along the access route approximately every 11 minutes which should not unduly restrict access.</p>
<p><b>FLOOD RISK</b></p> <p>The lower area to the west floods more readily than is suggested. The Staith area has no embankment protection. Suggested restoration to wetlands will encourage flooding. The area has easily flooded in recent years.</p> <p>There is a potential for increased risk of flooding to some properties.</p>	<p>The lower area to the west including Staith Road is not included within the extraction areas. The proposed extraction areas are within Flood Zone 1 (lowest risk of flooding). Restoration of part of the site to a wetland habitat will not encourage flooding, the water level would be several metres below ground level. A site specific flood risk assessment would need to be submitted at the planning application stage to demonstrate that the development would not have an unacceptable impact on flood risk on site or lead to an increase in flood risk elsewhere.</p>
<p><b>WATER POLLUTION/SUPPLY</b></p> <p>Possible effect on local wells. For some this is the only supply of fresh water. This proposed quarry combined with other areas of current development in the locality and the granted planning of 64 homes on New Road, Belton could further disrupt the supply and water quality of wells/reservoirs.</p> <p>Somerleyton Estate has applied for and been granted planning permission to clear some dykes so that eels and elvers can migrate from the river to Fritton Lake, this very positive action would be severely compromised by run down, disturbance and pollution.</p>	<p>It is proposed that no dewatering would take place as part of the mineral extraction. It is dewatering that would pose the most significant risk to water supply; normal mitigation measures, which would be conditioned as part of a permission for mineral extraction would ensure no unacceptable adverse impacts to water supply from the extraction.</p>

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<p>This project would be at risk due to contamination from the close by work and dust that would pollute the water in the newly formed stream</p> <p>Pollution to drinking water from dust and particulates. There are 4 homes at the foot of the farm that rely on an Artesian aquifer for all their water needs including drinking water. Their water supply will be contaminated.</p> <p>Hydrology suggests it will not affect Fritton Lake however, reverse flows are possible and brackish water contamination too from the tidal reaches of the WAVENEY, the nearby marshes and salty water in BREYDON WATER.</p> <p>The water table locally to the site is permeable so the whole of the surrounding area will be affected by the pollution caused by the machinery extracting the aggregates.</p> <p>The small tributary running over our farm will be polluted, by way of the water table and the polluted water will then be pumped directly into the River Waveney by a large and dedicated pump run by the Somerleyton estate that serves to drain the surrounding area including the woods.</p> <p>I believe that the quarry workings would have an adverse affect on navigation with rundown to the river Waveney and so polluting it even further.</p>	<p>Sand and gravel extraction does not produce harmful contaminants, both as a result of mitigation measures, and because the mineral being extracted is non-toxic and similar to the surrounding soils. Normal planning conditions for mineral extraction require mitigation measures for dust, and control of substances such as fuel which could be a potential contaminant if spilled. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>As no dewatering will take place, and the groundwater level is several metres below ground level, it is not expected that drain down or runoff would take place.</p>
<p><b>AMENITY IMPACTS – NOISE / DUST / LIGHTING</b></p> <p>Noise and dust from mineral extraction would affect local amenity – especially residents in New Road. Tree screens may not be sufficient to stop significant deposition of dust on properties in new Road and children's play area. The applicants have yet to provide the required independent quantitative determination of their expected noise emissions. Taking account of the proximity of the pit and the extremely low background sound level the perceived sound level at Forest Lodge will be several times that equating with the threshold of the highest (of five) noise impact categories (10dB above background- termed major noise impact).</p>	<p>Modern aggregate processing plants generate relatively low levels of noise and it is considered that noise could be controlled to acceptable levels, the processing plant location would be approximately 350m from the nearest dwelling. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>A noise assessment and a dust assessment would be required to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an</p>



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<p>Applicants have in the past made reference to 'mitigation measures' claimed to reduce the impact of their activities. There is a seeming lack however of independent quantitative scientific evidence of their level of effectiveness.</p> <p>There is enough dust pollution from farming. The human respiratory system is greatly affected by particulates in the air but not as much as it affects horses and cattle. The Haddiscoe marshes and pastures just adjacent to the proposed Min 38 site are now home to hundreds of retired, abused, sick and old horses looked after by a local sanctuary. These horses, together with grazing cattle, should not endure the effects of dust particulates which will make the remainder of their already numbered days miserable and this would come with very costly Vets bills for the Sanctuary. These marshes and pastures are on long term leases. The knock on effect would be that the landowners would no longer be able to lease these marshes or pastures for grazing therefore creating loss of livelihood too.</p> <p>The government has a new clean air strategy and this aims to reduce the amount of people living near sources of PM2.5 particulates because of the damage they do to the health of the population. It recognises WHO limits on PM2,5 and includes their production by industry, agriculture and other sources. Quarrying will produce PM2.5 particles only a few metres from residential properties and ionisation of these particles by high tension wires could increase their ability to damage the health of the community. How can an organisation that works closely with government Public Health departments from one side say it is alright to risk the health of a whole community by allowing production of PM2.5. Where will the responsibility lie when the health of the community deteriorates due to COPD or worse?</p>	<p>unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Farming is not subject to the same requirement for mitigation measures as mineral extraction. Normal planning conditions for mineral extraction require mitigation measures for dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>With regards to the issue of adverse impacts on local businesses, this is not a material planning consideration given that the planning system is not in place to protect private business interests. The assessment considers whether the proposal would result in unacceptable amenity impacts (such as noise, dust etc.) and whether any existing use of land ought to be protected in the public interest.</p> <p>It is considered that dust mitigation measures would ensure that unacceptable adverse impacts would be avoided in the future. Sand and gravel extraction is not a significant generator of PM2.5 particles.</p>

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<p>HEALTH &amp; SAFETY: The pollution from the machinery has been proven to cause harm to both cattle and humans alike. It has been proven to cause many health problems and in Europe and many other countries globally has already been banned, this point is escalated given that the site is littered with high tension power lines, which have been proven by the Bristol University to ionize the dust which makes it more likely to stick to the walls of the lungs.</p> <p>This in itself opens up the potential of legal action against the council from any individuals whose health might be affected over the next 20 years; especially now that the council has been made aware of the health risks in advance of granting permission.</p> <p>Health impact of dust – additional cost to NHS due to health impacts. There are 30 dwellings in Fritton which will be within 250m of this proposed sand &amp; gravel pit, one of which will be a mere 44m away. Within this range, dust from quarrying is likely to exceed 50µg/m<sup>3</sup>, which is the NAQS and European Directive limit. No useful work has been done in this country on dust levels near to sand &amp; gravel quarries. Nevertheless a Californian University study was used for the above figures. 12 Villagers have lung disease, which will be obviously exacerbated with this dust. The Institute of Air Quality Management has issued a publication entitled 'Guidance on the Assessment of Mineral Dust Impacts for Planning', which states on page 9: "ensure, in granting planning permission for mineral development, that there are no unacceptable adverse impacts on the natural and historic environment, human health...". It also states on page 12: "PM10 needs to be assessed if there are sensitive receptors within 1km (to be consistent with the nPPG)".</p> <p>It poses a health risk to me and my family. I also have family members with asthma and chronic breathing problems. If this extraction goes ahead, they would not be able to visit severely affecting my family life.</p>	<p>The types of machinery used for mineral extraction have been subject to European emission requirements since 1999. These requirements have been revised several times over the intervening years. The latest emissions standards are approximately equivalent to the latest Euro 6 emissions standards for road going HGVs. Therefore, the excavation equipment is unlikely to produce any greater emissions than a road-going vehicle.</p> <p>In 2007 The World Health Organisation <u>Environmental Health Criteria</u> (2007) stated that "High-voltage power lines produce clouds of electrically charged ions as a consequence of corona discharge. It is suggested that they could increase the deposition of airborne pollutants on the skin and on airways inside the body, possibly adversely affecting health. However, it seems unlikely that corona ions will have more than a small effect, if any, on long-term health risks, even in the individuals who are most exposed."</p> <p>There are considerable differences in climatic and regulatory regimes between the area covered by the California study and the UK. The area covered by the California study has a climate described as semi-desert. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>Mitigation measures to ensure no unacceptable adverse impacts are conditioned as a normal part of a planning permission process, following appropriate assessment as part of the planning application. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>The information on page 12 of the IAQM publication relates to whether there is the need for detailed dust assessment at the planning application stage. To be consistent with the nPPG, such an assessment would need to include PM10s; although the information on page 36 of the guidance indicates that sand and gravel quarries are not significant generators of</p>

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<p>To gain some physical insight into how stringent requirements for air quality are now becoming please see attached figure. It begs the question what if they spilled two handfuls or more?</p> <p>Try as you might to contain it a little stray dust goes a very long way. A handful of dust (about 200 grams) is all it takes to impart a hazardous illegal level of contamination* to the volume of air contained in over seven R101 airship sheds.</p> <p>Under more stringent air quality regulations soon to be introduced the volume will equate with twelve R101 airship sheds (about a quarter of the air contained within the whole Waveney Forest between ground level and tree top height).</p> <p>*National air quality objectives and European Directive limit and target values for the protection of human health. - no more than forty millionths of a gram of dust to each cubic metre of air.</p> <p>It is commonly observed that when the finer siliceous minerals are tipped into a container from a bucket the air displaced upwards lofts the fine particulates to many times the original drop height from which should the wind blow they are apt to overtop any practicable 'screening'</p> <p>Noise from heavy plant machinery working all hours is unacceptable for a small village. Will ruin current tranquillity and clean air.</p> <p>we do hear a significant amount of traffic noise from the Beccles Road, the train at Haddiscoe and the Bell Public House events. These are at considerable distance from the house and therefore, machinery within 250 metres will be extremely noisy and will adversely affect our quality of life due to noise pollution.</p> <p>Noise from HGV traffic.</p> <p>There will be substantial noise pollution and on top of this there will be air pollution from the heavy machinery used to extract the sand and gravel. The trees that surround this site do NOT act to block dust and partial contamination created by the many heavy industrial vehicles used in mineral extraction, they in fact cause the particles to be pushed up into the</p>	<p>PM10s, and that in relation to larger particles that make up disamenity dust, the guidance notes on page 12 that impacts from dust at sand and gravel workings are uncommon beyond 250m measured from the nearest dust generating activities.</p> <p>Furthermore, on page 19 of the IAQM guidance, "Sand and gravel deposits may possess an inherently high moisture content which can cause particles to adhere and thereby affords a high degree of natural mitigation." This would be the case for the deposits at Waveney Forest.</p> <p>The Institute of Air Quality Management has guidance which states that trees and woodland can reduce the levels of airborne dust.</p> <p>Modern aggregate processing plants generate relatively low levels of noise and it is considered that noise could be controlled to acceptable levels, the processing plant location would be approximately 350m from the nearest dwelling.</p> <p>Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years. Planning conditions restrict hours of operation at mineral extraction sites.</p> <p>Normally mineral extraction within Norfolk does not involve large amounts of heavy machinery. Typically, a 360 excavator, and a small number of articulated dump trucks, this machinery would be similar in scale to that</p>

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<p>atmosphere. This alone is damaging to the overall health of people living nearby as well as animals and livestock.</p> <p>livestock will be subject to increased contaminates from both the air and grazing, which will go on to be present in the food chain. Very many rescued (hundreds) ,with more to come, of old horses are housed next to the proposed boundary. As with the people living near by these would be very severely affected by both air pollution and also the run down of water into the dykes' that they drink from.</p> <p>Restrictions on working hours must be enforced. 8am-5pm Monday to Friday and no weekends or public holidays.</p> <p>Environment and health issue with infilling the hole.</p> <p>* Light pollution - the villages actively discourage lighting; as evidenced by no street lighting.</p> <p>The river between St. Olaves and Burgh Castle runs between Haddiscoe Island and Fritton and Belton marshes and is a quiet and peaceful stretch with a delightful view of the forest. These assets would be totally lost by the noise and light pollution of a quarry.</p>	<p>seen on most construction sites and are not considered to produce unacceptable levels of pollution. The Institute of Air Quality Management has guidance which states that trees and woodland can reduce the levels of airborne dust.</p> <p>Sand and gravel extraction does not produce harmful contaminants, both as a result of mitigation measures, and because the mineral being extracted is non-toxic and similar to the surrounding soils. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years. Dewatering would not be undertaken as part of the proposal and silt ingress as a result of runoff is considered unlikely as the water table would be several metres below ground level.</p> <p>Planning conditions to restrict operational hours form part of a planning permission for mineral extraction. The exact hours would be a matter for the detail of any future application; however, Monday to Friday 7am-6pm and Saturday 7am-1pm have been found to be appropriate operational hours in a number of cases.</p> <p>The restoration concept does not involve the infilling of the extraction area with waste.</p> <p>If external lighting is proposed, then lighting details and lighting assessments are required as part of the planning application process, together with mitigation measures to ensure that unacceptable adverse impacts do not occur, which would be conditioned as part of any planning permission.</p>
<p><b>HUMAN RIGHTS</b></p> <p>Spoiling residents' rights to a peaceful life.</p> <p>Will our human rights not be violated if you allow this quarry to go ahead?</p>	<p>Protocol 1 Article 1 (the substantive right of peaceful enjoyment of one's possessions)</p> <p>This is a 'qualified right', where the planning authority must consider the public interest of a proposal, in terms of providing for society as a whole, and potential effects, and the rights of individual property owners, including</p>

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	<p>neighbours and the landowner/proposer. The question is if in coming to a decision, the planning authority has struck a fair balance between these rights, and the public interest. In making that balance it may also be taken into account that the amenity of local residents could be adequately safeguarded by conditions, for example, planning conditions for mineral extraction operations normally require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>Article 8 of the ECHR – the right to respect for private and family life, home and correspondence Justice Hickinbottom (2016) set out the relevant principles established from previous cases: Article 8 does not give a right to a home, Where someone has a home in a particular dwelling, it may interfere with the Article 8 rights to require that person to move; Article 8 rights are a material planning consideration and should be respected but are not guaranteed; The rights have to be balanced against all other material considerations and this will be a planning judgment. The purpose of the Minerals Local Plan Review is to consider whether specific sites are suitable for allocation (MIN 38, Waveney Forest has been considered to be unsuitable for allocation). The revised Minerals Local Plan will be tested at examination for soundness and legal compliance by an independent Planning Inspector on behalf of the Secretary of State for Housing, Communities, and Local Government.</p>
<p><b>IMPACT ON THE HISTORIC ENVIRONMENT</b> There are two Heritage Assets within the proposed site. These are listed with the Broads Authority and are recognised as contributing to the special character of the area. There are also several WW2 underground hides within Gt. Yarmouth Borough part of the site which are considered to be of special importance. Military archaeology – military sites scattered through the whole forest remainders of WWI and WWII training grounds. Weapons pits, zig-zag</p>	<p>The two locally listed Heritage Assets (the railway bridge and the practice firing range) are both outside of the proposed extraction areas. The undesignated heritage assets related to the military training area are important as a group and are the reason the site was considered unsuitable for allocation in the Initial Consultation document.</p>

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<p>trenches, underground hides, a rifle range, concrete bases, sewerage systems, possible caches of hidden or unexploded ammunition. This area of historical importance should be left intact and untouched as a mark of respect and protected for future generations.</p> <p>During World War Two, Waveney Forest was used as a military training ground, in conjunction with military activities at Fritton Lake. At least 41 sites have been found in the Forest from gun pits to a group of 8 and a group of 10 mysterious underground chambers, probably built by the British Secret Army (Churchill's Underground) - only one other similar site has been found in the country (ref: J.C.Thomas of English Heritage). The Shooting Range goes back to World War One, as evidenced by 1917 cartridge cases. Unfortunately there has been deliberate destruction to some of these sites during forestry operations, and this may well continue till there is proper protection by scheduling.</p> <p>Heritage of old train line.</p> <p>The County Council historic officer has stated that the military archives in the woods are many and varied and are so hidden and widely scattered as to leave little space for development if they are to be sustained. The owners have already destroyed some of the hides that we told them about, as they went about their everyday forestry activities. My own uncle was in the auxiliaries building these Fritton hides in the second world war, and there is so much more to be preserved as this type of archive is very hard to find nationally, these days and should be protected. Indeed I know English Heritage is looking into this.</p> <p>I agree with the initial conclusion because my own uncle Russell Leech built the hides in the forest during the WW2. He is now deceased but told us of his activities in charge of the resistance in the woods and of the many adventures they had in practicing with the main army guarding the bridges. His men were the secret army and briefed to hide and come out to attack the invading German troops from behind. These hides and some, yet to be found, should be protected and eventually restored for future generations. There can be very few such precious archives left now in the country.</p>	

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<p><b>IMPACT ON PROPERTY VALUES</b>  A quarry will lead to devaluation of homes / homes will be unsellable.  Local residents should get compensation if the quarry goes ahead.</p> <p>Will ruin a residential area.</p> <p>The development would blight local properties.</p>	<p>Property values are not a material planning consideration. Compensation would not be offered and does not form part of the landuse planning process. Brett Aggregates is a private company and has submitted this site for consideration into the Minerals and Waste Local Plan Review process. Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan and to determine planning applications for mineral extraction.</p> <p>Blight is a legal term referring to when the value of a property is reduced because of large scale public works (such as a highway scheme) and the owners are unable to sell it at market value. The proposed mineral extraction is a private development, proposed by Brett Aggregates. Norfolk County Council or any other government body would not be the developer and therefore blight is not relevant in this case.</p>
<p><b>IMPACT ON LANDSCAPE</b>  Local beauty spot would be destroyed.  Blot on the landscape within the Broads area  Natural beauty of the Waveney Valley and Broads area should be protected.</p>	<p>Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p> <p>The Landscape character assessment carried out by the Broads Authority recognised that while part of Waveney Forest was within the Broads Authority Executive Area, it did not contribute to the character of the Broads and is not included with the 'St Olaves and Burgh Castle' Landscape Character Area. The proposal for extraction at MIN 38 would retain a screen belt of trees, with extraction taking place within two areas within the site on a phased basis. The extraction would not be visible from the River Waveney, or the Angles Way.</p> <p>The site assessment recognised that part of the site is within the Broads Authority Executive Area and this is one of the reasons why the site is concluded to be unsuitable for allocation within the Preferred Options document (in accordance with paragraph 2.5 (a) and 172 of the National Planning Policy Framework).</p>
<p><b>IMPACT ON PRIVATE BUSINESSES AND TOURISM</b></p>	<p>With regards to the issue of adverse impacts on local businesses, this is not a material planning consideration given that the planning system is not in</p>

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<p>Businesses and tourism in the area would suffer. It would have an adverse effect on tourism that The Somerleyton Estate is trying to promote to sell its Lodges.</p> <p>Fritton Plant Centre (Myhills Nurseries Ltd) is on a ten-acre site fronting the main A143 at Fritton. We employ staff some local as well as the family. In addition we have a registered charity owl sanctuary and a pet centre on site. We also have planning permission for a seven-day flea and antique/collectors market with anything from twenty to thirty stall holders in situ at any one time. We strongly object to Brett's application on Min 38 for the following reasons: noise, pollution and dust affecting the health of our employees, ourselves, our workers and the devaluation of our business and property.</p> <p>People visit Fritton and St Olaves because of the varied relaxing facilities, Fritton/Waveney Forest, Fritton Lake, Fritton House Hotel, Lodges, Decoy Bed and Breakfast, Caldecott Hall Golf Club, Cabins, Redwings horse sanctuary, Garden Centres, Public houses, restaurants. Concerns about the impact the quarry will have on the customers of these businesses.</p> <p>The Woods are used by many Belton residents and holiday makers from the local Haven Holiday Park, as it can be walked easily from Belton in less than 15 min down a lovely sandy lane, very picturesque and beautiful, through Caldecott Golf Course and straight into the woods.</p> <p>Waveney Forest is an amenity for tourists. A quarry in Waveney Forest would deter tourists from visiting the area and lead to a loss of income at local shops, restaurants and camp sites and affect local employment in tourism.</p> <p>Our local economy is highly dependent on jobs and activity related to tourism. If this quarry goes ahead it will have a negative impact on the River Waveney, the trade for local pubs, guest houses, the Boat Hire at Haddiscoe, Fritton Lake and the wider area. The Broads is a beautiful area</p>	<p>place to protect private business interests. The site assessment considers whether the proposal would result in unacceptable amenity impacts (such as noise, dust etc.) on an existing use of land which ought to be protected in the public interest.</p> <p>Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years. The nearest point of the proposed extraction areas is just over 500m from the Fritton Plant Centre. At this distance, this machinery used for mineral extraction (typically, a 360 excavator, and a small number of articulated dump trucks) would be similar in scale to that seen on the majority of construction sites and are not considered to produce unacceptable levels of pollution. Property values are not a material planning consideration.</p> <p>Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation. The proposal for extraction at MIN 38 would retain a screen belt of trees, with extraction taking place within two areas within the site on a phased basis. With regards to the issue of adverse impacts on local businesses, this is not a material planning consideration given that the planning system is not in place to protect private business interests.</p> <p>The proposal for extraction at MIN 38 would retain a screen belt of trees, with extraction taking place within two areas within the site on a phased basis. The extraction would not be visible from the River Waveney. With regards to the issue of adverse impacts on local businesses, this is not a material planning consideration given that the planning system is not in place to protect private business interests. The site assessment considers whether the proposal would result in unacceptable amenity impacts (such</p>



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<p>that needs to be protected and this quarry would be within the park or certainly very close.</p> <p>Commercial: We run a dog walking business (Dog go!) in the area and the forest is unique locally in providing a large area to exercise bigger energetic dogs. Any restrictions to using this public amenity would have a large impact on our ability to run our business.</p> <p>The River Waveney (Norfolk Broads) runs alongside the proposed site, leading to potential water contamination and also an eyesore for the many Broads cruisers. "Angles Way" using this riverbank, an historic long-distance walk, voted the best riverside walk in Britain!</p> <p>The development is in a rural area that is considered a national park by many and is just metres away from the Norfolk Broads, one of our region's biggest assets and one that has a massive contribution to our region financially</p> <p>Hillside animal sanctuary are resident on the farm land at St Olaves and also on the grazing paddocks to the rear of the existing woods. Redwings Houses sanctuary is present on the land to the north of the woods. Fitton woods are almost surrounded by Animal sanctuaries and indeed grazing animals. There are hundreds of previously sick animals that are homed within meters of the woods whilst they recover. The noise, pollution and dust will be nothing short of torture for they already distressed animals. Both of these animal sanctuaries are open to the public and have invested heavily in the area. Their presence has become a valuable local asset, creating employment and tourism income. Anything that jeopardises these newly located attractions would adversely affect our area.</p>	<p>as noise, dust etc.) on an existing use of land which ought to be protected in the public interest.</p> <p>Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation. Any commercial use of the private woodland would be a matter for the landowner.</p> <p>The proposal for extraction at MIN 38 would retain a screen belt of trees, with extraction taking place within two areas within the site on a phased basis. The extraction would not be visible from the River Waveney, or the Angles Way.</p> <p>Mineral extraction by its nature takes place in rural areas. It is recognised that part of the site is within the Broads Authority Area and in the Preferred Options consultation document an additional reason has been added regarding why site MIN 28 is unsuitable for allocation, which is that there are not exceptional circumstances for a mineral extraction site to be located within the Broads.</p> <p>Sand and gravel extraction does not produce harmful contaminants, both as a result of mitigation measures, and because the mineral being extracted is non-toxic and similar to the surrounding soils. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years. Dewatering would not be undertaken as part of the proposal and silt ingress as a result of runoff is considered unlikely as the water table would be several metres below ground level.</p>

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<p>Forests have a remarkable capacity to swallow up visitors -- there can be a lot of visitors but as the people are dispersed the forest remains peaceful.</p>	<p>Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p>
<p><b>UNEXPLODED ORDNANCE</b></p> <p>The forest site was used by the army for 'live firing' exercises during both world wars. Any descending 'dud' shells or mortar bombs would penetrate some distance into the sandy ground and in time get buried even deeper by the accumulation of compacted pine needles. The lost ordnance items could well have, by now, become sensitised by 'sweating' of the explosive charges. Some two years ago one came to light near Staith Road track. After a police guard overnight, and residents having been warned, the bomb was detonated in situ by Army Bomb Disposal.</p> <p>We advise, on health and safety grounds, that prior to any extraction a comprehensive 'mine clearance' of the site be carried out.</p>	<p>Investigations for Unexploded Ordnance (UXO) form a normal part of planning applications in areas where they may be present. The proposer of the site is aware of the history of the site, and still considers it to be viable.</p>
<p><b>ALTERNATIVES</b></p> <p>Cutting down acres of mature trees and then digging up minerals that we have an excess of locally and that are surplus to requirements; especially considering that the local council have just signed a contract to purchase such aggregates from sea bed extraction and they tell me they have no need for sand.</p> <p>it is clear that there is plentiful supply of suitable minerals in current and potential quarry sites and the sea that do not impinge on people and wildlife without reconsidering such as Waveney Forest now or in the future.</p> <p>Norfolk must have more places for a quarry that will not ruin all these villages in such a lovely part of the Broads.</p> <p>There must be many other places in Norfolk and Suffolk where gravel could be extracted without causing such destruction of a local amenity / people's recreational activities / destruction of valuable woodland.</p>	<p>Waveney forest is a commercial coniferous plantation, and the cropping of the trees is part of the normal management of the site. There is a forecast need for an additional 20.313 million tonnes of landwon sand and gravel in Norfolk in the period to 2036, which is the reason the Minerals Local Plan review is being carried out. Great Yarmouth Borough Council are not a significant user of aggregates, the majority being used by private companies. The contract may relate to beach recharge, rather than construction.</p> <p>Proposals for mineral extraction require a willing landowner and mineral operator to be deliverable. Norfolk County Council conducted a 'call for sites' as part of the Minerals Local Plan, where landowners and mineral operators were invited to propose land to be considered. 41 sites were proposed, of which 25 were considered suitable to allocate in the Initial Consultation document. MIN 38, Waveney Forest was considered unsuitable for allocation in both the Initial Consultation and the Preferred</p>

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<p>Would you want a quarry to start this close to your property. There must be other places to quarry which are further away from residential properties and that are not going to spoil such a beautiful area. Have you visited our woods and looked out across the broads or are we just a few lines on a map?</p> <p>We should be recycling aggregates not quarrying/mining new.</p>	<p>Options documents. There are very few locations where mineral extraction would not be in proximity to some sensitive receptors / residential dwellings. Planning Officers have visited Waveney Forest as part of the site assessment work.</p> <p>The need for new mineral extraction sites takes into account the amount of recycled aggregates that is available, and the anticipated production in the future based on government guidance and information from the recycled aggregates industry. Recycled aggregates are not suitable for all products.</p>
<p><b>THE PROPOSAL SHOULD NOT BE CONSIDERED</b></p> <p>Norfolk County Council should not even consider a planning application at this site. Norfolk County Council should not even consider a proposal for mineral extraction within a forest. Owners and developers should be told not to apply again.</p> <p>If permission is granted in the face of the sizeable objections, there will be an application for judicial review and if needs be, a demand for a planning enquiry.</p>	<p>MIN 38 Waveney Forest is not a planning application, it is a proposal for allocation of a specific site in a Local Plan. The conclusion on the site in the Initial Consultation document was that the site was unsuitable for allocation.</p> <p>However, Norfolk County Council cannot legally refuse to consider a planning application for mineral extraction at Waveney Forest if one was submitted. Anyone has the opportunity to submit a planning application, and even if an application is refused, another application can be submitted which seeks to address the reasons for refusal.</p> <p>Judicial review and an application for the Secretary of State to recover an application for determination are options open if someone is aggrieved by a planning decision.</p>
<p><b>PHYSICAL CONSTRAINTS</b></p> <p>There are currently numerous Electricity Pylons [16 / 18 let alone the ones at either end which will have to be diverted ] running through the middle of the forest which will cost several million pounds to move:</p> <p>No plant, machinery, scaffolding, or personnel should encroach within the safety zone of the overhead conductor lines.</p> <p>Take care when moving ladders, elevators, irrigation pipes or other long objects. They should be moved only when horizontal or in their lowest position.</p> <p>Never reduce the clearance under overhead electricity lines by dumping or</p>	<p>The two proposed extraction areas are not within the area where the pylons are. Mineral operators are experienced at working with site constraints including pylons. There is guidance from UK Power Networks for working around pylons.</p>

<b>Representations received about site MIN 38</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>tipping waste material; erecting structures, buildings or hay stacks; or creating storage areas under lines.</p>	
<p><b>CONSISTENCY WITH NATIONAL POLICY</b>  Additionally, I have always been concerned that the policies and considerations set out in the document issued by the Office of the Deputy Prime Minister that the Government expects Mineral Planning Authorities (MPAs) to follow in preparing mineral and waste development schemes, have been followed in the case of MIN38.  The following are specific references from the said document, MPS2, which we believe are at odds with the selection of MIN38 :-</p> <p>Para 4) "MPAs should.....ensure that.....the transport of materials are kept to an absolute minimum". Given the Burgh Castle pit's much nearer proximity to Great Yarmouth, and it's ability to satisfy GY's requirements for the foreseeable future (as stated by GYC), this surely precludes the opening of another pit further away.  "MPAs should.....protect areas of nationally-designated or archaeological value, cultural heritage or nature conservation from mineral development, other than exceptional circumstances where it can be demonstrated that the proposed development is in the public interest". We would question what "exceptional circumstance" exist in relation to MIN38, and how it has been "demonstrated that the proposed development is in the public interest", when exactly the opposite would appear to be the case.</p> <p>Para 5) "MPAs should liaise appropriately with.....English Nature, the Countryside Agency.....voluntary conservation and environmental groups". The developer's application had not even been referred to the Broads Authority let alone any of the others. At a meeting that took place between a group from the village and the Planners, it was stated by them that they were not obliged to do so, but this is directly contradicted by MPS2.</p> <p>Para 8) "mineral working applications.....in or affecting the following</p>	<p>Noted.  Mineral Planning Statement 2 was cancelled by national Government in 2012 and replaced by the National Planning Policy Framework and Planning Practice Guidance.</p> <p>Great Yarmouth Borough Council are not a significant user of aggregates, the majority being used by private companies. The current mineral extraction at Burgh Castle is required to be restored by December 2025 and has less than 150,000 tonnes of permitted mineral reserve remaining. The proposed site MIN 203 at Burgh Castle only has an estimated mineral resource of 280,000 tonnes and is considered unsuitable to allocate because the Highway Authority state that the highway access is unsuitable because the local road network is sub-standard and narrow.</p> <p>In the Initial Consultation document site MIN 38 was considered to be unsuitable to allocate for mineral extraction because of the harm to the significance of Waveney Forest as an example of a WW2 training area. In the Preferred Options consultation document an additional reason has been added, which is that there are not exceptional circumstances for a mineral extraction site to be located within the Broads.</p> <p>The Broads Authority and Natural England were consulted on the Initial Consultation in 2018 (the Countryside Agency no longer exists).</p> <p>In the Initial Consultation document site MIN 38 was considered to be unsuitable to allocate for mineral extraction because of the harm to the</p>

<b>Representations received about site MIN 38</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>designations (National Parks, the Broads).....should be subject to the most rigorous examination, normally including an Environmental Statement, regardless of the size of the site". This consideration was taken into account in the site being found "Not Acceptable".</p> <p>Para 11) "Development plan policies and proposals for mineral extraction and associated development should take into account: the impacts of mineral working, such as visual intrusion, dewatering, water pollution, noise, dust and fine particulates, blasting and traffic". These are surely key to the planner's recommendation not to allocate this site. Likewise "the impacts on landscape, agricultural land, soil resources, ecology and wildlife, including severance of landscape and habitat loss, and impacts on sites of nature conservation, archaeological and cultural heritage value". "</p> <p>Para 12) "MPAs should also have regard where relevant to cumulative impacts of simultaneous and/or successive working of a number of sites in a wider area of commercially viable deposits. These may effect communities and localities over an extended period, the nature, age and size of the site". Burgh Castle pit is already and has at least 10 years more supply at current estimates. MIN38 would blight the village of Fritton for 22 years.</p> <p>Para18) "Any.....loss of amenity must be kept to an acceptable minimum.....Where effective mitigation of unacceptable impact is not possible, permission should be refused". The Planners have correctly taken the view that the "mitigations" in the developer's proposal would do little to mitigate the loss of amenity for walkers, dog exercising, birdwatching etc. or the destruction of the WWII sites dotted around the site.</p>	<p>significance of Waveney Forest as an example of a WW2 training area. In the Preferred Options consultation document an additional reason has been added, which is that there are not exceptional circumstances for a mineral extraction site to be located within the Broads.</p> <p>The potential impacts on all of these planning considerations were included in the assessment of the proposed site in the Initial Consultation document. If a planning application was submitted in the future for mineral extraction at Waveney Forest, it would be assessed against relevant planning policies and legislation, which would include the assessment of potential impacts on all of these planning considerations.</p> <p>It is not considered that there would be cumulative impacts associated with mineral extraction at the proposed site at Waveney Forest because there are no other existing mineral extraction sites in close proximity. The existing site at Burgh Castle would not lead to cumulative impacts with mineral extraction at Waveney Forest. The current mineral extraction at Burgh Castle is required to be restored by December 2025 and has less than 150,000 tonnes of permitted mineral reserve remaining. The proposed site MIN 203 at Burgh Castle only has an estimated mineral resource of 280,000 tonnes and is considered unsuitable to allocate because the Highway Authority state that the highway access is unsuitable because the local road network is sub-standard and narrow.</p> <p>In the Initial Consultation document site MIN 38 was considered to be unsuitable to allocate for mineral extraction because of the harm to the significance of Waveney Forest as an example of a WW2 training area. Waveney Forest has been in private ownership for a number of years and public access is only along the public rights of way. Use of the public rights of way would not be affected by the proposed mineral extraction operation.</p>

## King's Lynn and West Norfolk sites

MIN 6 land off East Winch Road, Mill Drove, Middleton

Representations received about site MIN 06	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93188  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	Noted
<p><b>(Comment)</b> Representation ID: 93151  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and continued routing arrangements.</p>	Noted
<p><b>(Comment)</b> Representation ID: 92968  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  No comment</p>	Noted
<p><b>(Comment)</b> Representation ID: 92924  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  At sites MIN 6, MIN 204, MIN 23 and MIN 116 it is not stipulated if these sites are to be utilised for waste disposal or recovery. If either of the options are progressed a robust risk assessment will be required. We would expect waste disposal here to meet all best practice techniques. Whilst the site does not lie within an SPZ we would expect groundwater to be sufficiently protected.</p>	Noted. The site is proposed to be restored to a lower level with inert material.
<p><b>(Comment)</b> Representation ID: 92568  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  In this section we have provided guidance on the pollution prevention measures that we would expect to be considered at these allocated sites.  MIN 6, land off East Winch Road Middleton  We agree that a hydrogeological impact/risk assessment is needed for working beneath the water table. It may be necessary to apply constraints such as a limiting or precluding de-watering at the site, which will be dependent on the results of the hydrogeological risk assessment. The assessment should include impacts on protected rights (water features and other lawful users) and</p>	The hydrogeology section of the site assessment was incorrect with regards to the depth of groundwater in the area. The adjacent carstone site is worked dry above the water table and therefore site MIN 06 would also be a dry working above the water table and this requirement will be included in the draft site policy. Therefore, dewatering would not be required and there would not be an issue of

Representations received about site MIN 06	Norfolk County Council Planning Officer's response
<p>the risk of pulling in contaminated groundwater due to the proximity of Blackborough End Landfill. The issue of contaminated groundwater being mobilised from Blackborough End landfill is not addressed in the current assessment report.</p>	<p>contaminated groundwater being mobilised from Blackborough End landfill site.</p>
<p><b>(Comment)</b> Representation ID: 92349</p> <p>Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b></p> <p>DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.</p> <p>The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.</p> <p>On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham. The following sites MIN 6; MIN 204; MIN 74; MIN 206 and MIN 32 the restoration is dry using inert waste or imported inert materials. If this were to change to wet restoration or there was potential for wet working as part of the extraction scheme, DIO Safeguarding would need to be consulted.</p>	<p>Noted. The site is proposed to be restored to a lower level with inert material to a heathland habitat. There is no proposal for a wet restoration or a wet working.</p>

**MIN 45**                      **land north of Coxford Abbey Quarry, East Rudham**

<b>Representations received about site MIN 45</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93136  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access.</p>	<p>Noted.</p>
<p><b>(Comment)</b> Representation ID: 93118  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms A Crotty) [18343]</b>  The initial conclusion recommends that that the site is unsuitable for allocation in accordance with Section 15 of the NPPF. I am in agreement with this conclusion.</p>	<p>Noted. Site MIN 45 is concluded to be unsuitable to allocate because MIN 45 is largely on an ancient woodland site and it is unlikely that sand and gravel extraction would meet the benefit/loss test set out in the NPPF.</p>
<p><b>(Comment)</b> Representation ID: 93106  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms C Keightley) [18344]</b>  We are in agreement with the conclusion that the site is unsuitable for allocation in accordance with Section 15 of the NPPF.</p>	<p>Noted. Site MIN 45 is concluded to be unsuitable to allocate because MIN 45 is largely on an ancient woodland site and it is unlikely that sand and gravel extraction would meet the benefit/loss test set out in the NPPF.</p>
<p><b>(Comment)</b> Representation ID: 93091  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  In support of my Arboriculture colleagues comments, I am in agreement that this site is unsuitable for allocation.</p>	<p>Noted. Site MIN 45 is concluded to be unsuitable to allocate because MIN 45 is largely on an ancient woodland site and it is unlikely that sand and gravel extraction would meet the benefit/loss test set out in the NPPF.</p>
<p><b>(Comment)</b> Representation ID: 92972  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  No comment</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92930  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  At sites MIN 12, MIN 08 and MIN 45, the excavated void is to be utilised for waste disposal or recovery, so a robust risk assessment will be required. We would expect waste disposal here to meet all best practice techniques. Due to the sensitivity of groundwater (within an SPZ3) it will not be possible to accept reduced liner thickness or design at this site. The aquifers on site must be</p>	<p>Noted. Site MIN 45 is concluded to be unsuitable to allocate because MIN 45 it largely on an ancient woodland site and it is unlikely that sand and gravel extraction would meet the benefit/loss test set out in the NPPF.</p>



Representations received about site MIN 45	Norfolk County Council Planning Officer's response
adequately protected from potential contamination, and if this site is progressed we will be heavily involved to ensure environmental protection.	
<p><b>(Comment)</b> Representation ID: 92559</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>The following section outlines the constraints at certain sites, which will need to be considered at the application stage to ensure that ecology is not adversely affected.</p> <p>MIN 45 Potential impacts to ancient woodland, and county wildlife sites, particularly the hydrology and ecology of Syderstone Common SSSI which supports a population of protected natterjack toad.</p>	<p>Noted. Site MIN 45 is concluded to be unsuitable to allocate because MIN 45 it largely on an ancient woodland site and it is unlikely that sand and gravel extraction would meet the benefit/loss test set out in the NPPF.</p>
<p><b>(Object)</b> Representation ID: 92425</p> <p>Respondent: <b>Woodland Trust (Ms V Bankes Price) [16231]</b></p> <p>The following sites have be found to affect ancient woodland, ancient and veteran trees.</p> <p>MIN 45 - land north of Coxford Abbey Quarry (south of Fakenham Road), East Rudham. Proposed for mineral extraction. Contains Coxford Wood which is a Plantation on Ancient Woodland Site (PAWS). Size of affected woodland 23.73 ha. Grid reference TF82315566.</p> <p>We strongly support the Council's initial conclusion that the site should not be taken forward due to the presence of ancient woodland.</p>	<p>Noted. Site MIN 45 is concluded to be unsuitable to allocate because MIN 45 it largely on an ancient woodland site and it is unlikely that sand and gravel extraction would meet the benefit/loss test set out in the NPPF.</p>
<p><b>(Comment)</b> Representation ID: 92411</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>We support the Council's proposed to remove the following sites from further consideration in the plan on the grounds of adverse impacts on wildlife sites, namely MIN 102, MIN 201, MIN 48, MIN 45, MIN 19, MIN 205, MIN 74 and MIN 77.</p>	<p>Noted. Site MIN 45 is concluded to be unsuitable to allocate because MIN 45 it largely on an ancient woodland site and it is unlikely that sand and gravel extraction would meet the benefit/loss test set out in the NPPF.</p>
<p><b>(Comment)</b> Representation ID: 92535</p> <p>Agent: SLR Consulting (Ms J Colebrook) [18004] Respondent: <b>Longwater Gravel Co. Ltd. (Mr Simon Smith) [9381]</b></p> <p>DESCRIPTION OF PAWS AT COXFORD ABBEY QUARRY</p> <p>A block of 20.6ha of woodland identified<sup>1</sup> as Plantation on Ancient Woodland Site (PAWS) occurs at the north of the quarry, and is known as Coxford Wood.</p> <p>The term Ancient Woodland is applied to sites in England and Wales whose documented history</p>	<p>Noted</p>

Representations received about site MIN 45	Norfolk County Council Planning Officer's response
<p>shows them to have been continuously wooded since approximately 1600, and which are by extension considered likely to have been continuously wooded since the last Ice Age. Research on the Coxford Wood site history includes Faden's map of Norfolk published in 1797 and 19th century tithe and enclosure maps which show woodland boundaries that correspond closely to the area designated as PAWS. The First series OS Plan dated around 1880 shows the PAWS area with new plantation to the east north east and south. It is interesting to note that the detailed cartography of the time shows the PAWS area with a significant proportion of conifers. These cannot be the trees currently in place as these date from the late 1960's to the early 70s, so it seems the PAWS area has seen at least two conifer rotations.</p>	<p>Noted</p>
<p>The majority of Coxford Wood is now plantation woodland dominated by Scot's pine <i>Pinus sylvestris</i> with Douglas fir <i>Pseudotsuga menziesii</i>, oak <i>Quercus robur</i>, beech <i>Fagus sylvatica</i>, silver birch <i>Betula pendula</i>, sweet chestnut <i>Castanea sativa</i> and rowan <i>Sorbus aucuparia</i> recorded. The proportion of conifers in the canopy is high throughout the woodland and typically exceeds 90%. Woodland understory is typically sparse throughout the wood and species lists from all field surveys conducted in Coxford Wood have been reviewed for records of Ancient Woodland Indicator (AWI) species in East England (Rose, 2006; as cited by Rotherham, 2011) for flora associated with ancient woodland sites.</p>	<p>Noted</p>
<p>Only three AWI species have been recorded from the site: climbing corydalis <i>Ceratocarpus claviculata</i>; holly <i>Ilex aquilifolium</i> and rowan <i>Sorbus aucuparia</i>. This is a very low number of AWI species for an ancient woodland site and indicates that the woodland's past management, anecdotally reported to have included two rotations of conifers, has clearly had an adverse effect upon the biodiversity value of the woodland habitat present.</p>	<p>Noted. However, Coxford Wood is in the ancient woodland inventory and therefore the NPPF paragraph 175.c) applies which states that "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists". The woodland is therefore of value at a national level because ancient woodland soils and their seed bank are an irreplaceable habitat.</p>
<p>Coxford Wood, including PAWS, is considered to be of Parish Value. It is unlikely to meet CWS guidelines for woodland habitats as it is currently in poor condition due to dominance by coniferous species and as a result of two conifer rotations reducing ground flora richness.</p>	<p>The NPPG states that both types of ancient woodland (PAWS and ASNW) should be treated equally in terms of the protect afforded to ancient woodland in the NPPF.</p>
<p>POTENTIAL IMPACTS OF QUARRY EXTENSION INTO PAWS Do nothing scenario: Commercial forestry is typically managed on a 30-60 year rotation, and therefore it is highly likely</p>	

Representations received about site MIN 45	Norfolk County Council Planning Officer's response
<p>that the current tree crop including the PAWS, would be felled and replanted at some point in next 20-30 years. The felling and replanting of forest, would further disrupt the soils in ancient woodland areas, but may be an opportunity to replace mixed and coniferous stands with native broadleaves.</p> <p>However, the landowner is likely to wish to maximise commercial land values and therefore another conifer rotation is more likely than a switch to lower yielding broadleaves in the absence of other drivers.</p> <p>Habitat Loss, Fragmentation and Isolation due to land take</p> <p>Due to its management in the last century, the biodiversity value of PAWS in Coxford Wood is considered to rest within its soils. Field surveys of the PAWS woodland have not identified any specific features indicative of ancient woodland, such as ancient or veteran trees or a diverse flora of AWI species. In the absence of any mitigation, it is predicted that the permanent loss of soil resource from the majority of the PAWS as a result of quarry extension would be considered an adverse impact significant at a Parish level.</p> <p>It is proposed that top-soils from the PAWS would be stripped in a phased manner and direct placed onto pre-prepared restored areas in advance of replanting with broadleaved trees which would be managed to recreate Coford Wood, in accordance with an agreed Woodland Management Plan.</p> <p>This approach to phased development, restoration and long-term management would give the best opportunity to maintain any seed bank and functional soil micro-organisms within the translocated soils and for the restored woodland habitats to maximise their biodiversity potential. A review of literature and guidance on the translocation of ancient woodlands and their soils was undertaken by SLR in 2013 (Unpublished report, refer to Appendix 1 of this report for a full list of key sources) provides evidence that this approach to compensation for the loss of the PAWS habitat has a high chance of successfully maintaining the residual value of the soils and restoring a native woodland to replace the non-native plantation currently present.</p>	<p>Noted. The felling and replanting of the woodland would not be a matter for the Mineral Planning Authority, as a felling licence would be required from the Forestry Commission.</p> <p>It is agreed that the biodiversity value of the PAWS at Coford Wood is within the ancient woodland soils. The permanent loss of soil resources from the PAWS as a result of quarry restoration would not be in accordance with the NPPF which states that “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptions reasons and a suitable compensation strategy exists”. The NPPG states that both types of ancient woodland (PAWS and ASNW) should be treated equally in terms of the protect afforded to ancient woodland in the NPPF.</p> <p>Noted.</p> <p>The Natural England and Forestry Commission standing advice on ancient woodland states that proposed compensation measures should not be considered as part of the assessment of the merits of the development proposal because ancient woodland is irreplaceable. It also states that whilst new native woodland could be planted on soil that has been moved from the destroyed area of ancient</p>

Representations received about site MIN 45	Norfolk County Council Planning Officer's response
<p>With these measures in place and the implementation of a woodland management plan, the residual effects upon woodland habitats, including PAWS, are not considered significant.</p> <p>Restoration Scheme</p> <p>Proposed mineral extraction on the site would provide a catalyst for the transformation of a commercial, mainly conifer woodland to native broadleaved woodland over the restoration period.</p> <p>The process of PAWS soil translocation and the commitment to the long-term management of woodland habitats would produce substantial gains in terms of biodiversity value in the long-term and is considered to provide a net positive impact for biodiversity that is significant at a Parish level.</p> <p>Residual Impact</p> <p>In this instance, the PAWS at Coxford Abbey Quarry is considered to be of low biodiversity value and its loss to quarrying and the restoration of the site to a native woodland is not considered to be significant in biodiversity terms when compared to the predicted baseline and "do nothing" scenario.</p> <p>CONCLUSION</p> <p>The proposed development would lead to the predicted loss of Plantation on Ancient Woodland Site as identified on the Ancient Woodland Inventory. In biodiversity terms, PAWS at Coxford Abbey Quarry is considered to be of low biodiversity value and its loss to quarrying and the restoration of the site to a native woodland is considered not significant when compared to the "do nothing" scenario.</p> <p>The ecological assessment has identified no residual impacts of habitat loss and fragmentation upon woodland or other habitats of ecological value. Long-term management commitments and restoration of woodland areas would ensure that adverse effects upon important receptors are minimised. The proposed restoration and 20-year management plan is considered to generate net biodiversity gains at a local level in comparison to the predicted baseline.</p>	<p>woodland, you cannot move an ancient woodland ecosystem.</p> <p>As stated above, Coxford Wood is in the ancient woodland inventory and therefore the NPPF paragraph 175.c) applies which states that "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists". The woodland is therefore of value at a national level because ancient woodland soils and their seed bank are an irreplaceable habitat. The NPPG states that both types of ancient woodland (PAWS and ASNW) should be treated equally in terms of the protect afforded to ancient woodland in the NPPF.</p> <p>The Natural England and Forestry Commission standing advice on ancient woodland states that proposed compensation measures should not be considered as part of the assessment of the merits of the development proposal because ancient woodland is irreplaceable. It also states that whilst new native woodland could be planted on soil that has been moved from the destroyed area of ancient woodland, you cannot move an ancient woodland ecosystem.</p>
<p><b>(Support)</b> Representation ID: 92027</p>	

Representations received about site MIN 45	Norfolk County Council Planning Officer's response
<p>Respondent: <b>Longwater Gravel Co. Ltd. (Mr Simon Smith) [9381]</b></p> <p>We write to inform you that Longwater Gravel disagrees with the initial conclusion in respect of MIN 45 and would urge Norfolk County Council to reconsider its proposal not to allocate the north extension at Coxford Abbey Quarry. Norfolk County Council's adopted Minerals Site Specific Allocations Development Plan Document (Minerals SSA DPD), currently allocates the remaining minerals in the central area of Coxford Abbey Quarry, along with two extension areas to the east and south along with the north extension which is proposed to be removed. Longwater Gravel remains committed to extraction from the north extension with restoration to native woodland as it was understood that Norfolk County Council, by virtue of the allocation in the adopted Minerals SSA DPD and from informal discussion with planning officers in April 2015, that when the timing was right, i.e. when the permitted reserves at Coxford Abbey Quarry were almost exhausted, a planning application could then be submitted.</p> <p>You will remember that during the Minerals SSA DPD consultation period (2008-2012), Longwater Gravel was preparing a planning application for the same area as that which is currently allocated along with an additional extension area to the west. Initial consultation drafts of the Minerals SSA DPD published in October 2009, May 2011 and February 2012 indicated that the plantation on ancient woodland site in the north extension would be included in the allocation, however in late 2012 and following advice from Norfolk County Council's ecological and landscape officers, changes were made to policy MIN 45 which ostensibly removed the north extension from the allocation. Fearing that the inclusion of the north extension in the planning application would result in a refusal of planning permission, Longwater Gravel took the decision to delete the north extension and submitted a planning application which only included the central area, along with extensions to the east, west and south.</p> <p>You will also remember that during the independent examination of the Minerals SSA DPD held in March 2013, the Planning Inspector, Mr Andrew Freeman BSc (Hons) DipTP DipEM FRTPI FIHT MIEnvSc, directed Norfolk County Council to include the north extension within policy MIN 45. Unfortunately by this time the planning application for Coxford Abbey Quarry had already been submitted and it was now too late to withdraw and revise it to include the north extension. Shortly after planning permission was granted in March 2014, discussion with Norfolk County</p>	<p>We note that the site is currently allocated in the adopted Minerals SSA DPD as part of the wider Coxford Quarry site. However, all of the currently allocated sites are being reviewed in the Minerals and Waste Local Plan Review, taking into account additional sites proposed in response to the 2017 'call for mineral extraction sites'. There is no assumption that currently allocated sites will continue to be allocated in the M&amp;WLPR. Whilst Norfolk County Council Planning Officers provide pre-application advice, it is the decision of the applicant as to whether to submit a planning application and when to do so.</p> <p>The Submission version of the Minerals SSA DPD (May 2012) stated that "The northern part of the allocation is currently a PAWS. The soils of ancient woodlands are important in their own right and if these remain on parts of the site they are likely to require protection/mitigation, therefore a soil assessment should form part of any survey to identify any ancient woodland features." This was consistent with the Minerals SSA DPD consultation in June 2011 which stated that a survey to identify any features that remain of the ancient woodland and appropriate mitigation would be required at the planning application stage. The further amendment referred to was proposed as a modification to the Submission document when it was submitted to the Planning Inspectorate in December 2012. The proposed modification provided further information in line with paragraph 118 of the NPPF (2012). It</p>

Representations received about site MIN 45	Norfolk County Council Planning Officer's response
<p>Council development control officers about the situation led to the formal submission of a request for a screening/scoping opinion for mineral extraction from the north extension, the aim being to resolve the situation by applying for planning permission for the area which had been deleted. The screening/scoping opinion was received in July 2014, NCC reference PP/C/2/2014/2007, and Longwater Gravel commenced work on the development of the application, closely following the requirements of the now adopted Policy MIN 45. At a meeting in April 2015, Longwater Gravel was advised by Norfolk County Council planning officers not to submit the application for planning permission for the north extension as it would likely result in a refusal, due to the fact that sufficient minerals were now permitted at Coxford Abbey Quarry and other sites in Norfolk and also because it was considered unlikely that the north extension could be worked within the adopted Minerals SSA DPD period (2010-2026). Longwater Gravel duly accepted and followed this advice and the planning application for the north extension was not submitted. It has therefore come as an unwelcome surprise that having reached an understanding with planning officers about the timing of an application, Norfolk County Council are now proposing to remove MIN 45 from the Minerals and Waste Sites Development Plan.</p> <p>Whilst the presence of the PAWS is acknowledged, Longwater Gravel would not insist that Norfolk County Council allocate MIN 45 if the woodland was deemed to be of significant ecological or historic importance or indeed if it was an established native broadleaved woodland. It should be noted that a substantial proven sand and gravel reserve actually lies immediately to the north of the proposed MIN 45 extraction area, the majority of which is outside of the area designated as a PAWS, but as this already contains a number of mature broadleaved trees, Longwater Gravel's development proposals for MIN 45 do not include this area for mineral extraction, but do include the progressive restoration of this area by the thinning/selective felling of the conifers and additional replanting of native broadleaved woodland species trees in an effort to restore Coxford Wood.</p> <p>As part of developing the application for planning permission for the north extension, a number of habitat studies have already been undertaken, all in accordance with the requirements of bullet point 1 of the adopted Policy MIN 45, i.e. 'a survey to identify any features, including soils, that remain of the ancient woodland and protection/mitigation for any features identified'. These include studies to identify the presence of flora and fauna associated with ancient woodland, e.g. bluebells, fungi, remnant tree stumps, veteran trees, etc. along with soil sampling, testing and soil</p>	<p>was Longwater Gravel's decision regarding which areas of land to include in a planning application.</p> <p>All of the currently allocated sites are being reassessed in the Minerals and Waste Local Plan Review, taking into account additional sites proposed in response to the 2017 'call for mineral extraction sites' and the forecast need for sand and gravel extraction in the period up to 2036.</p> <p>Noted. However, it is the woodland soils and their seed bank that are the irreplaceable habitat in a Plantation on Ancient Woodland. It would be technically very difficult to restore, recreate or replace the ancient woodland soils and therefore these soils form an irreplaceable habitat.</p> <p>Noted. However, these studies have not been submitted as part of the consultation response and therefore limited weight can be afforded to them. The information provided about the proposed phased restoration and restoration of MIN 45 is noted. However, the Natural England and Forestry Commission standing advice on ancient woodland</p>

Representations received about site MIN 45	Norfolk County Council Planning Officer's response
<p>germination trials. Sadly, all of these habitat studies noted a complete absence of any definitive ancient woodland indicators in the PAWS at MIN 45. Accepting that the only remaining feature of the ancient woodland is the soil, protection and mitigation, in the form of careful translocation will be proposed. The phased extraction and restoration of MIN 45 can be designed so that soils from the woodland areas can be directly placed without the need for the soil to be stored in bunds. The open arable field in the west (phase 1) would be worked and restored first with the soil from this area being placed into a soil storage bund in the main quarry. As this phase is completed, the block of woodland in the southwest, i.e. phase 2, would be felled and the soils carefully translocated onto the restored surface in phase 1. As extraction progresses, the process would be repeated until the final phase where the soils stored in the main quarry would be used to complete the restoration. Longwater Gravel plans to trial turve cutting/lifting equipment, similar to that used in heathland translocation, in order to minimise soil disturbance. Consultant ecologists will be employed to evaluate and monitor the recovery of the translocated soils, the findings from which will inform and recommend any changes in translocation technique which may be necessary. New planting will be sourced from local stock to maintain provenance and a maintenance scheme to regularly remove invasive weeds will also be implemented.</p> <p>As the sand and gravel landbank for Norfolk remains well above 7 years and there are sufficient permitted reserves at Coxford Abbey Quarry to meet demand for the foreseeable future, clearly the timing for submitting a planning application for the north extension remains some way off. However, at some point before 2036, the landbank will reduce as Coxford Abbey Quarry and other sites exhaust their reserves, therefore, the proposal for an extension at an already established quarry which delivers a significant quantity of minerals for the county's needs along with a commitment to restoring Coxford Wood to a native broadleaved woodland might then be acceptable. If MIN 45 is removed from the Mineral and Waste Local Plan, then proposals for the north extension cannot even be submitted for consideration.</p> <p>Longwater Gravel fully accepts that the NPPF 2018 does indeed preclude developments which lead to the loss of ancient woodland 'unless there are wholly exceptional reasons and a suitable compensation strategy exists'. However, the NPPF 2018 does give 'great weight' to minerals, recognising that they can only be worked where they are found and that they are necessary to provide the infrastructure that society needs. We would also argue that that mineral extraction is not a development which leads to the loss of irreplaceable habitats. In most if not all cases,</p>	<p>states that proposed compensation measures should not be considered as part of the assessment of the merits of the development proposal because ancient woodland is irreplaceable. It also states that whilst new native woodland could be planted on soil that has been moved from the destroyed area of ancient woodland, you cannot move an ancient woodland ecosystem.</p> <p>The Minerals and Waste Local Plan Review will allocate sufficient sites to meet the forecast need for mineral extraction in the period up to 2036. The M&amp;WLPR process is determining which are the most appropriate sites, of all the sites submitted for consideration, to allocate for future sand and gravel extraction. Not allocating site MIN 45 within the NM&amp;WLP would mean that any planning application for mineral extraction within site MIN 45 after adoption of the M&amp;WLP would be a departure from the Development Plan. Norfolk County Council would still be legally required to determine the application in accordance with the Development Plan, unless material considerations indicate otherwise.</p> <p>We do not consider that there are wholly exceptional reasons for sand and gravel extraction to take place on the ancient woodland site. We do not</p>

Representations received about site MIN 45	Norfolk County Council Planning Officer's response
<p>restored mineral extraction sites create multiple benefits to biodiversity and there are numerous precedents where mineral extraction has been granted planning permission which leads to the loss of a PAWS. Hermitage Quarry in Kent and Brickworth Quarry in Wiltshire are two notable examples. In both cases, the operator has proposed large scale replanting of woodland to restore the quarry, which will create irreplaceable habitat in the long term. It is therefore not unique for Norfolk County Council to allocate and consider an application for mineral extraction from a PAWS.</p> <p>Finally, I have asked both Small Fish Consulting and SLR Consulting, both of which have been involved with the development of the planning application for the north extension to submit additional responses arguing in support of the allocation of MIN 45.</p> <p>We hope that Norfolk County Council will reverse its proposal not to allocate MIN 45.</p> <p>Summary: Longwater Gravel should be allowed to submit a planning application for MIN 45 as we believe that we can develop a planning application which would be acceptable to Norfolk County Council (NCC). The only reason an application has not been submitted is because NCC have advised us to delay submission until the existing permitted reserves at Coxford Abbey Quarry are almost exhausted. The removal of MIN 45 would mean that the north extension would be a departure</p>	<p>consider that the public benefit would outweigh the loss. We note the contents of para 205 of the NPPF, regarding the benefits of mineral extraction, but do not consider that this provides 'wholly exceptional reasons' for the development as there are other locations available and deliverable in Norfolk for the extraction of sand and gravel.</p> <p>With regards to permission granted by Wiltshire County Council for Brickworth Quarry (16/09386/WCM) in 2017, WCC decided that the proposals met a clear and urgent need to supply demand and bolster the landbank which is below minimum requirements and that it had been demonstrated that the site could be worked for minerals in a way that robustly protects and retains the soils which contain the potential ancient woodland seedbank.</p> <p>With regards to the permission granted for the extraction of 16 million tonnes of ragstone and hassock at Hermitage Quarry in Kent in 2013 (Application TM/10/2158341 Appeal ref. APP/W2275/V/11/2158341), the Inspector's report concluded that the benefits of the proposals outweighed the loss of the ancient woodland. The NPPF policy on ancient woodland has been strengthened since these applications were granted.</p> <p>Whilst Norfolk County Council Planning Officers provide pre-application advice, it is the decision of the applicant as to whether to submit a planning application and when to do so. Not allocating site MIN 45 within the NM&amp;WLP would mean that any</p>



Representations received about site MIN 45	Norfolk County Council Planning Officer's response
<p>from the M&amp;WLP and therefore a application to extract mineral and completely restore Coxford Wood could not be considered by NCC.</p>	<p>planning application for mineral extraction within site MIN 45 after adoption of the M&amp;WLP would be a departure from the Development Plan. Norfolk County Council would still be legally required to determine the application in accordance with the Development Plan, unless material considerations indicate otherwise.</p>
<p><b>(Support)</b> Representation ID: 92005  Agent: Small Fish (Melissa Burgan) [7914] Respondent: <b>Longwater Gravel Co. Ltd. [9380]</b>  We are writing on behalf of mineral operator Longwater Gravel Company Ltd. in relation to site MIN 45 and in response to the consultation on the Norfolk Minerals and Waste Local Plan Review "Initial Consultation" in summer 2018.  As you will be aware, the Council has come to the initial conclusion that the site is considered to be unsuitable for allocation because:  * It is considered unlikely that a proposal largely on an ancient woodland site, for the extraction of sand and gravel, would meet the benefit/loss test set out in the NPPF.  * It has not been proved that soil translocation would have no detrimental effects to the quality of the PAWS, or that this would aid the proposal in meeting the benefit/loss test. Natural England in 2012 stated that "ancient woodland as a system cannot be moved", and the Joint Nature Conservation Committee states that the uncertainty of habitat translocation means that it should be viewed only as a measure of last resort in partial compensation for damaging developments."  Proposed Policy MW 2 states that:  "Proposals for minerals development and/or waste management development will be permitted where it can be demonstrated that the development would not have an unacceptable impact (including cumulative impact in combination with other existing or permitted development) on:  ... k. The natural and geological environment (including internationally, nationally or locally designated sites and irreplaceable habitats);  ... Where appropriate, enhancement of the environment would be sought, including, but not exclusively, the enhancement of the Public Rights of Way Network, creation of recreation</p>	<p>Noted</p> <p>This is the Initial Conclusion contained in the Initial Consultation document.</p> <p>This is the text of Proposed Policy MW2 contained in the Initial Consultation document</p>

Representations received about site MIN 45	Norfolk County Council Planning Officer's response
<p>opportunities and enhancement of the natural, historic and built environment and surrounding landscapes."</p> <p>The supporting text to Policy MW 2 states further that:  "Minerals or waste management development which impacts on Sites of Special Scientific Interest, National Nature Reserves and irreplaceable priority habitats such as ancient woodland and aged or veteran trees will only be permitted where the impact does not conflict with the wildlife or geological conservation interests of that asset."</p> <p>The proposal for MIN 45 is compliant with this proposed policy. Although the site encompasses an area of a planted ancient woodland site (PAWS), in accordance with Policy MW 2 the proposal will not conflict with the wildlife or geological conservation interest of the ancient woodland asset. Furthermore, the proposed minerals development will lead to an overall environmental enhancement. These aspects of compliance of the proposal to extract sand and gravel from site MIN 45 are explained in more detail throughout this representation.</p> <p>Since the publication of the consultation document, the NPPF has been revised and the Council will be aware that it continues to provide protection to ancient woodland and veteran trees as an "irreplaceable habitat" unless there are wholly exceptional reasons and a suitable compensation strategy can be agreed (Paragraph 175c). We believe 'wholly exceptional circumstances' exist in this particular case and that a suitable compensation strategy can be agreed. Paragraph 205 of the revised NPPF supports this and requires that "great weight" is given to the benefits of minerals extraction.</p> <p>Firstly, as the Council will be aware, MIN 45 consists predominantly of a conifer plantation planted in the late 1960s/early 1970s, which has likely undergone at least two conifer rotations. This is significant in terms of the ecological value of the area. A survey of flora completed by Norfolk Wildlife Services shows very little flora associated with ancient woodland and it is thought that over 100 years of coniferous cover on the site is the reason for this. MIN 45 currently exists solely for providing lumber on a commercial basis, not for providing biodiversity value. Most, if not all, of the existing trees within MIN 45 will eventually be cut down, regardless of any proposals for minerals extraction, and will likely be replaced with more conifers, thus limiting the long-term habitat potential of this site.</p>	<p>Noted</p> <p>We consider that the proposed mineral extraction would conflict with the biodiversity conservation interest of the ancient woodland asset as it has not been proved at this stage that the translocation of the ancient woodland soil as part of the site restoration following extraction would have no detrimental effects to the quality of the ancient woodland site.</p> <p>We disagree. We do not consider that there are wholly exceptional reasons for sand and gravel extraction to take place on the ancient woodland site. We do not consider that the public benefit would outweigh the loss. We note the contents of para 205 of the NPPF, but do not consider that this provides 'wholly exceptional reasons' for the development because there are other suitable locations in Norfolk for sand and gravel extraction.</p> <p>It is recognised that the trees are a commercial conifer plantation. However, it is the woodland soils and their seed bank that are the irreplaceable habitat in a Plantation on Ancient Woodland.</p>

<b>Representations received about site MIN 45</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>It is worth noting that site MIN 115 shares the same characteristics as MIN 45 in that they are both conifer plantations, although MIN 115 has not been designated as a plantation on ancient woodland site. MIN 115 has been found suitable for allocation, despite providing the same habitat as MIN 45.</p> <p>It is also worth pointing out that the revised National Planning Policy Framework (July 2018) definition of "irreplaceable habitat" is:</p> <p>"Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen."</p> <p>Ancient woodland designations are based on historic mapping which indicates whether the site has been continuously wooded, not on the quality of the habitat at the time of designation. In this respect, it is not a biodiversity designation.</p> <p>The relatively young commercial plantation woodland at MIN 45 should not be considered an irreplaceable habitat in the context of Paragraph 175c of the NPPF, as all of the trees lost during the minerals extraction process (the vast majority of which are conifers) will be replaced with native species broadleaved trees. As the site measures around 22 hectares, this will result in a massive gain in terms of biodiversity and landscape. Therefore, with reference to the definition of irreplaceable habitat, the site would not "be technically very difficult to restore, recreate or replace" and therefore should not be considered an irreplaceable habitat.</p> <p>Mineral extraction is temporary and cannot be compared to other developments which would lead to the permanent loss of ancient woodland such as buildings, roads, etc. constructed on ancient woodland sites. If the final stage of a mineral extraction development is to replant the woodland, using the same soils in exactly the same location, then arguably there is no loss. The restoration of MIN 45, which will be to replant the woodland with native broadleaved trees will provide a significantly improved habitat for local biodiversity. Whilst there may be some adverse</p>	<p>This is a key difference between the two sites; MIN 115 is not designated as an ancient woodland, whilst the majority of MIN 45 is an ancient woodland site.</p> <p>NPPF definition is noted</p> <p>We agree that ancient woodland designations are based on historic mapping. However, the NPPF states that ancient woodland is an 'irreplaceable habitat'.</p> <p>The trees of the commercial plantation woodland are not considered an irreplaceable habitat in the context paragraph 175c of the NPPF, it is the woodland soils and their seed bank that are the irreplaceable habitat in a Plantation on Ancient Woodland. It would be technically very difficult to restore, recreate or replace the ancient woodland soils and therefore these soils form an irreplaceable habitat.</p> <p>It is recognised that mineral extraction is a temporary use of land and that the site will be restored following extraction. However, it has not been proved at this stage that the translocation of the ancient woodland soil as part of the site restoration following extraction would have no detrimental effects to the quality of the ancient</p>

<b>Representations received about site MIN 45</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>effects in the short-term in terms of habitat loss during the extraction of the minerals, the proposal and its restoration plan will provide a long-term benefit to biodiversity.</p> <p>In this particular case, the circumstances of the proposal are wholly exceptional and the restoration of the site to a native, high-quality broadleaved woodland habitat should be considered a long-term public benefit when coupled with the economic benefits of the minerals extraction, which would more than adequately replace and compensate for the loss of a low-quality conifer woodland habitat.</p> <p>In addition to the biodiversity benefit, MIN 45 also offers the following environmental, social and economic benefits:</p> <ul style="list-style-type: none"> <li>* Existing minerals site extension, operated by a reputable local minerals operator</li> <li>* Suitable existing highways access</li> <li>* Retention of jobs at this facility for an additional 7 years</li> <li>* Well-located to facilitate growth in Fakenham, an area designed for significant growth in the West Norfolk Local Plan</li> <li>* Remote from settlements and housing, limiting amenity impacts such as noise, dust and vibration</li> <li>* Not in an area of flood risk</li> <li>* No impact on water resources</li> <li>* No impact on landscape designations, such as AONB, Heritage Coast, National Parks or Core River Valleys</li> <li>* No impacts likely on any international, national or locally designated nature conservation sites, such as Ramsar, SPA, SAC, SSSI, NNR, LNR, CGS or CWS</li> <li>* No impacts likely on any designated or known non-designated heritage assets, including Listed Buildings, Scheduled Monuments, Historic Parks or Conservation Areas</li> </ul>	<p>woodland site. In addition, the Natural England and Forestry Commission standing advice on ancient woodland states that proposed compensation measures should not be considered as part of the assessment of the merits of the development proposal because ancient woodland is irreplaceable. It also states that whilst new native woodland could be planted on soil that has been moved from the destroyed area of ancient woodland, you cannot move an ancient woodland ecosystem.</p> <p>Extension to existing site and existing operator is noted and stated in consultation documents  Suitable existing highway access is noted and stated in the consultation documents  Retention of jobs is noted and stated in sustainability appraisal  Proximity to Fakenham is noted and stated in the consultation documents  Distance from residential properties and settlements is noted and stated in the consultation documents  No impact on water resources is noted and stated in consultation documents  Low flood risk is noted and stated in consultation documents  No impact on landscape designations is noted and stated in consultation documents.  No impacts likely on SPA, SAC Ramsar, NNR, LNR, CGS or CWS is noted and stated in consultation documents. There is potential for impacts on Syderstone Common SSSI.</p>

<b>Representations received about site MIN 45</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>* This site is not within or near to an AQMA</p> <p>* Restoration proposal would act as a carbon sink, absorbing CO2 emissions</p> <p>Therefore, we urge you to reconsider the Council's initial conclusion that MIN 45 is unsuitable for allocation, as the single short-term impact of the loss of a relatively poor-quality habitat needs to be sensibly balanced against (and will be outweighed by) the numerous benefits the site would provide in environmental, social and economic terms.</p> <p>Summary: We strongly object to the conclusion that site MIN 45 is not suitable for allocation. The existing conifer plantation is not a high quality or irreplaceable habitat and the proposed restoration scheme will result in a significant habitat improvement and environmental gain. The circumstances surrounding this site and the proposed development are wholly exceptional and the site should be considered suitable for sand and gravel extraction and allocated.</p>	<p>No impacts likely on designated heritage assets is noted and details of heritage assets stated in consultation documents.</p> <p>No impact on AQMA is noted and stated in consultation documents</p> <p>Proposed restoration is noted and stated in consultation documents.</p>

**MIN 204 land north of Lodge Road, Feltwell**

<b>Representations received about site MIN 204</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93215</p> <p>Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b></p> <p>We agree with the initial conclusion for this site, but with the following comments:            There is no mention made of the find of Palaeolithic handaxe on adjacent land. We would like to see the text on archaeology updated as a result of new information. The old Lodge Pit (aka Frimstone's Quarry) located c.500 m north of MIN 204 has yielded significant assemblages of quartzite as well as flint palaeoliths and has been subject to recent study for evidence of a Middle Pleistocene Stage 6 glaciation. Interpretation of the lithic assemblages and geology at Feltwell are relevant to current archaeological debate relating to pre-Anglian human occupation of Britain. It is highly likely that similar deposits will be present at MIN 204, which means that archaeological assessments must consider the impact of any planning application on Palaeolithic/Pleistocene exposures. If planning permission were to be granted mitigation would likely include monitoring of spoil heaps for artefacts in addition to any pre-application archaeological surveys and trial trenching.</p>	<p>Noted. The site assessment refers to 'a wider landscape with a significant number of finds and features from multiple period, but especially the Neolithic and Bronze Age'. Specific finds have not been referred to in the site assessment. The archaeology site assessment has been amended as requested. However, the site is concluded to be unsuitable to allocate because of its proximity to the Breckland Forest SSSI (part of the Breckland SPA).</p>
<p><b>(Comment)</b> Representation ID: 93137</p> <p>Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b></p> <p>The Highway Authority considers the site is acceptable subject to the use of the existing access.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93117</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms A Crotty) [18343]</b></p> <p>This site is surrounded by coniferous woodland and hedgerows and would require an AIA to ensure sufficient standoff from the adjacent trees to ensure their roots are protected for their safe long term retention.</p>	<p>Noted. The site assessment has been amended to state that an AIA would be required at the planning application stage. However, the site is concluded to be unsuitable to allocate because of its proximity to the Breckland Forest SSSI (part of the Breckland SPA).</p>
<p><b>(Comment)</b> Representation ID: 93092</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b></p> <p>I support the requirement for a detailed landscaping scheme to mitigate impacts on Feltwell Gate Lodge and surrounding landscape.</p>	<p>Noted. However, the site is concluded to be unsuitable to allocate because of its proximity to the Breckland Forest SSSI (part of the Breckland SPA).</p>

Representations received about site MIN 204	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92973  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  Whilst there is an existing quarry and landfill site nearby, this proposed site allocation brings the quarrying in closer proximity to grade II Denton Lodge. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. The site assessment states that a Heritage Statement would be required at the planning application stage, to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. However, the site is concluded to be unsuitable to allocate because of its proximity to the Breckland Forest SSSI (part of the Breckland SPA).</p>
<p><b>(Comment)</b> Representation ID: 92917  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  At sites MIN 6, MIN 204, MIN 23 and MIN 116 it is not stipulated if these sites are to be utilised for waste disposal or recovery. If either of the options are progressed a robust risk assessment will be required. We would expect waste disposal here to meet all best practice techniques. Whilst the site does not lie within an SPZ we would expect groundwater to be sufficiently protected.</p>	<p>Noted. No information has been provided on whether inert waste would be required for the restoration of the site to grass heathland but is a possibility. However, the site is concluded to be unsuitable to allocate because of its proximity to the Breckland Forest SSSI (part of the Breckland SPA).</p>
<p><b>(Comment)</b> Representation ID: 92917  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  In this section we have provided guidance on the pollution prevention measures that we would expect to be considered at these allocated sites.  MIN 204, land off Lodge Road Feltwell  It is not clear whether de-watering is proposed. Planning requirements in the initial conclusion should include the need for 'an appropriate hydrogeological risk assessment'.</p>	<p>Noted. The site would be worked dry, above the water table, and dewatering would not be required. The site assessment has been amended to clarify this. However, the site is concluded to be unsuitable to allocate because of its proximity to the Breckland Forest SSSI (part of the Breckland SPA).</p>
<p><b>(Comment)</b> Representation ID: 92350  Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b>  DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.  The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.  On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham. The following sites MIN 6; MIN 204; MIN 74; MIN 206 and MIN 32 the restoration is dry using inert waste or imported inert materials. If this were to change</p>	<p>Noted. The site is proposed to be restored to grass heathland. There is no proposal for a wet restoration or a wet working.</p>

Representations received about site MIN 204	Norfolk County Council Planning Officer's response
<p>to wet restoration or there was potential for wet working as part of the extraction scheme, DIO Safeguarding would need to be consulted.</p>	
<p><b>(Comment)</b> Representation ID: 92334  Respondent: <b>Borough Council of King's Lynn and West Norfolk (Ms F Pollard) [17968]</b>  MIN204 - north of Lodge Rd Feltwell: The report notes that 'The nearest residential property is 21m from the site boundary. There are six sensitive receptors within 250m of the site boundary. We agree that any planning application for mineral extraction at this site would need to include a dust assessment and mitigation measures to deal appropriately with any amenity or health impacts. This is likely to include a buffer zone due to the proximity of the nearest sensitive receptors.</p>	<p>Noted. In the absence of site specific noise and dust assessments at the site allocation stage, it is considered that the operational area would need to be set back approximately 100 metres from the nearby residential property. However, the site is concluded to be unsuitable to allocate because of its proximity to the Breckland Forest SSSI (part of the Breckland SPA).</p>
<p><b>(Object)</b> Representation ID: 92099  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Please refer to our separate comments regarding the Habitats Regulations Assessment (HRA), and why we do not agree that this site can be screened in as suitable at present.   Annex 1: Natural England's comments on the Draft Habitats Regulations Assessment of the M&amp;WLPR, dated May 2018   A recent judgment from the Court of Justice of the European Union (Case C-323/17 People Over Wind v Coillte Teoranta) has provided authoritative interpretation relating to the use of mitigation measures at the screening stage of a Habitats Regulations Assessment (HRA). The judgment concluded that it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site. However, when determining whether the plan or project will have an adverse effect on the integrity of the European site at appropriate assessment, a competent authority may take account of those avoidance and mitigation measures.  The Local Planning Authority, as competent authority for the Minerals and Waste Local Plan, should consider this judgment when undertaking the HRA screening under the Conservation of Habitats and Species Regulations 2017 and may wish to take its own legal advice on the implications of the judgment.  This means that for any sites where avoidance and mitigation measures have been identified to</p>	<p>Objection noted. The site is now concluded to be unsuitable to allocate because of its proximity to the Breckland Forest SSSI (part of the Breckland SPA).</p> <p>Noted.</p> <p>Noted.</p>



Representations received about site MIN 204	Norfolk County Council Planning Officer's response
<p>protect designated Natura 2000 sites such as Special Areas of Conservation (SACs), Special Areas of Protection (SPAs) or Ramsar sites, the sites should not be screened out for likely significant effect but carried forward to Appropriate Assessment, at which point any mitigation measures, eg not de-watering, conditions to control dust or lighting etc, can be assessed in detail and taken into account.</p> <p>Our specific comments on various individual allocations included in the initial consultation are intended to reflect this ruling. That is, where measures have been identified specifically to protect a Natura 2000 site, then these allocations should be screened in to Appropriate Assessment. At this stage the effectiveness of any proposed avoidance and mitigation measures and all the evidence should be examined to reach a conclusion of likely significant effect, either alone or in combination with other plans or projects, and to ascertain whether an adverse effect on the integrity of the site can be ruled out.</p> <p>Note that any proposal which may affect a Natura 2000 designated site must go through a project level HRA in addition to this strategic plan-level HRA. This should be identified for each relevant allocation and reflected in the policy wording, including what avoidance and mitigation measures would be necessary. This can be at a 'high' level, e.g. work would take place outside the bird breeding season to avoid disturbance to nesting birds. However, more detail would be expected in the HRA at planning application stage.</p> <p>The future conclusions and recommendations of the HRA will need to be incorporated into later revisions of the Sustainability Appraisal (SA) report, and be reflected in the allocations and policies of the M&amp;WLPR.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
<p><b>(Comment)</b> Representation ID: 92028</p> <p>Respondent: <b>Borough Council of King's Lynn and West Norfolk (Mr Geoff Hall) [9627]</b></p> <p>o Feltwell (Site 204 - Lodge Road). This is an extension of existing works. If better quality geological information is supplied which proves the estimated mineral resource, the two southern parcels of land are potentially acceptable subject to the requirements in the policy.</p>	<p>Noted. This comment repeats the conclusion contained in the Initial Consultation document. However, the site is now concluded to be unsuitable to allocate because of its proximity to the Breckland Forest SSSI (part of the Breckland SPA).</p>
<p><b>(Comment)</b> Representation ID: 91934</p> <p>Respondent: <b>Norfolk Geodiversity Partnership (Mr Timothy Holt-Wilson) [17710]</b></p> <p>The texts regarding potential impact on Geodiversity and Archaeology need modifying to make clear about the potential impact on Palaeolithic resources. The old Lodge Pit (aka Frimstone's</p>	<p>Noted. The site assessment has been amended as requested in the archaeology and geodiversity sections. However, the site is concluded to be unsuitable to allocate because of its proximity to the Breckland Forest SSSI (part of the Breckland SPA).</p>

<b>Representations received about site MIN 204</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Quarry) located c.500 m north of MIN 204 has yielded significant assemblages of quartzite as well as flint palaeoliths (see Wessex Archaeology 1996; Macrae 1999; Hardaker &amp; Macrae 2000), and has been subject to recent study for evidence of Middle Pleistocene Stage 6 glaciation (see Gibbard et al 2011). Interpretation of the lithic assemblages and geology at Feltwell are relevant to current archaeological debate relating to pre-Anglian human occupation of Britain. It is highly likely that similar deposits will be present at MIN 204, which means that watching briefs and permissive access for geological and archaeological monitoring of exposures and spoil heaps should be requested as a planning condition.</p>	

**MIN 19 & MIN 205 land north of the River Nar, Pentney**

<b>Representations received about site MIN 19 &amp; MIN 205</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93216  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We do not consider that the proximity of the Scheduled Monument makes this site unsuitable for allocation. We are aware that Historic England previously objected to the allocation of this site on the grounds of harm to the setting of the Scheduled Monument. NCCES recommend that a desk-based assessment and field survey should take place to inform any planning application.</p>	<p>Noted. Historic England have stated that a heritage impact assessment would be required to ascertain the extent of land suitable to be allocated in this area. The proposer of the site submitted a Heritage Assessment of the site, which is discussed in relation to the consultation response from Historic England below. However, the site is concluded to be unsuitable to allocate because the sites are within a Core River Valley and the restoration would not result in enhancement sufficient to justify mineral extraction.</p>
<p><b>(Comment)</b> Representation ID: 93138  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to improvements along the route to the A47 and further detail will be required with regard to the proposed highway improvements.</p>	<p>Noted.</p>
<p><b>(Comment)</b> Representation ID: 93093  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  Whilst the removal of the plant is now not a consideration in the issue of landscape gain, with the right restoration these sites could provide other landscape gain.</p>	<p>Noted. Approximately one-third of site MIN 19 is required to be restored by the end of 2024, whilst approximately two-thirds of MIN 19 is required to be restored by the end of 2019. The current planning permission for MIN 19 is for the majority of the site to be restored to woodland, which is considered to be in keeping with the existing woodland in areas to the north and south of the site. Site MIN 205 is currently arable agricultural fields. Whilst it is recognised that with the right restoration the site could provide a landscape gain, the site is within a Core River Valley and the proposed restoration would not result in enhancement to the landscape sufficient to justify</p>

Representations received about site MIN 19 & MIN 205	Norfolk County Council Planning Officer's response
	mineral extraction. Therefore, the site is concluded to be unsuitable to allocate.
<p><b>(Object)</b> Representation ID: 92974</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>The Sustainability Appraisal Annex B identifies that the potential exists for the mineral extraction to substantially harm the setting of the highly designated heritage assets at Pentney Priory. Whilst there is existing quarrying adjacent to these two proposed allocations and there potentially is scope to allocate land in this area, a heritage impact assessment on grade I Pentney Priory gatehouse, grade II Abbey farmhouse, and the scheduled remains of Pentney Priory should be undertaken to ascertain the extent for an allocation in this area. Mitigation and restoration measures also should be included in policy supporting any allocation.</p>	<p>Noted. The proposer of the site submitted a Heritage Assessment of the site. The Heritage Appraisal stated that "The setting of the proposed allocation area, approximately 0.5km west of the scheduled remains of Pentney Priory has been considered. At that distance, the adverse effects caused by visual impact, noise and dust during operation are considered minor or negligible. The overall setting may in fact be enhanced through restoration of the quarry to water and fen-edge, which is more akin to the landscape of the priory in the medieval period and before the wholesale reorganisation of its surrounds in the early 19<sup>th</sup> century." An assessment of the historic setting of Pentney Priory, submitted by the site proposer concluded "The principal issues likely to be faced with any application in terms of the priory ruins would be to do with setting, and the proximity of the operational works to the designated remains." Therefore, the two parts of the Heritage Assessment are contradictory with regards the potential impacts on the setting of Pentney Priory during mineral extraction.</p> <p>Norfolk County Council's Historic Environment Service have advised that they do not consider that the proximity of the Scheduled Monument makes this site unsuitable for allocation and recommended that a desk-based assessment and field survey should take place to inform any planning application. However, the site is concluded to be unsuitable to allocate because the sites are within a Core River</p>

Representations received about site MIN 19 & MIN 205	Norfolk County Council Planning Officer's response
	Valley and the restoration would not result in enhancement sufficient to justify mineral extraction.
<p><b>(Comment)</b> Representation ID: 92931</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>Sites MIN 40, MIN 19, MIN 205, MIN 201, MIN 35, MIN 51, MIN 13, and MIN 32 propose low level restoration using inert material to restore the site. Whilst these sites do not lie within an SPZ we would expect groundwater to be sufficiently protected. This would involve a robust waste acceptance criteria. We would expect diligence is maintained to ensure non-inert wastes are not accepted at this site. If deposition will be sub-water table, as at sites MIN 200 and MIN 102, the applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water'.</p>	<p>Noted, although it is not proposed for inert materials to be used to restore sites MIN 19 and MIN 205. The proposed restoration scheme is to areas of open water with reed fringes, wet grassland and wet woodland. However, the site is concluded to be unsuitable to allocate because the sites are within a Core River Valley and the restoration would not result in enhancement sufficient to justify mineral extraction.</p>
<p><b>(Comment)</b> Representation ID: 92410</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>We support the Council's proposed to remove the following sites from further consideration in the plan on the grounds of adverse impacts on wildlife sites, namely MIN 102, MIN 201, MIN 48, MIN 45, MIN 19, MIN 205, MIN 74 and MIN 77.</p>	<p>The site assessment notes that the site is adjacent to the River Nar SSSI and that the potential exists for impacts from mineral extraction at this site (from dust deposition and hydrogeology), if uncontrolled. However, this is not a reason why the site is concluded to be unsuitable to allocate. The site is concluded to be unsuitable to allocate because the sites are within a Core River Valley and the restoration would not result in enhancement sufficient to justify mineral extraction.</p>
<p><b>(Comment)</b> Representation ID: 92341</p> <p>Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b></p> <p>DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.</p> <p>The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.</p> <p>On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham: MIN 19 &amp; 205;76;77;40; SIL01 SIL02; AOS E &amp; J.</p> <p>Therefore, DIO Safeguarding is concerned with the development of open water bodies, the</p>	<p>Noted. The proposed restoration scheme for site MIN 19 and MIN 205 includes areas of open water with wet woodland, wet grassland and reeds. The proposed restoration scheme was provided to MOD DIO and the MOD DIO follow-up response in December 2018 is included in the representations</p>

Representations received about site MIN 19 & MIN 205	Norfolk County Council Planning Officer's response
<p>creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety. Therefore, we would recommend dry restoration and dry phased working.</p> <p>Follow up response (December 2018): "The site is approximately 6km north west of RAF Marham. The restoration plan for this site shows a series of lakes, which are deep and steep sided surrounded by wet woodland with reed fringes. The design also includes 2 proposed walkways consisting of grassy glades which lie above water level.</p> <p>Therefore, the MOD would have no safeguarding concerns subject to open water being kept to a minimum; the lakes are designed to be less than 200m X 200m with steep bank sides as per restoration plan. A robust Bird Hazard Management Plan (BHMP) to be approved by the MOD should be applied to manage the hazardous birds i.e. waterfowl, gulls, heron etc. and applied to the adjacent site if owned by the same company."</p>	<p>received. The MOD stated that they would have no safeguarding concerns subject to open water being kept to a minimum with steep bank sides and the approval of a robust Bird Hazard Management Plan.</p> <p>Noted.</p>
<p><b>(Comment)</b> Representation ID: 92141</p> <p>Agent: Stephen M Daw Limited (Mr Stephen Daw) [143] Respondent: <b>Middleton Aggregates Ltd [1861]</b></p> <p>The Site (MIN 19 &amp; MIN 205) is suitable for Allocation for the following reasons:</p> <p>(i) Historic Environment -</p> <p>The fenlands along this section of the River Nar were enclosed, allotted, drained and improved following a series of Acts passed in the 25 years after 1790. The present landscape, a grid-like network of fields now largely under arable cultivation, was created at that time. The boundaries of the proposed allocation area are formed by die-straight boundaries. They were almost certainly laid out when the parish was enclosed in 1809. This new landscape was still under construction when mapped in 1813 by the Ordnance Survey Clearly, between 1796 and c.1815, this was a landscape which saw radical transformation.</p> <p>Aerial photographs clearly show that the Priory ruins stand within a roughly oval land unit defined by tracks and hedge boundaries extending north-east from the River Nar for c.1 km. The southern half is scheduled. These curving boundaries are very different from those of the late, straight-edged fields, which surround it and which would, of course, not have existed at the time of the Priory's occupation. The simple reason is that beyond the oval land unit - in essence the Priory's outer precinct - the land was wet and seasonally under water. This would have formed</p>	<p>Noted.</p> <p>Noted. However, the oval land unit does not define the setting of the Scheduled Monument and Listed Buildings at the Priory.</p>

Representations received about site MIN 19 & MIN 205	Norfolk County Council Planning Officer's response
<p>an important resource for the Priory, for fish and water fowl, and the River Nar, now embanked, could have provided access and opportunities for trade.</p> <p>Visually, and as appreciated on a recent site visit with Norfolk CC Officers, the proposed allocation area is sufficiently distant in a flat landscape to avoid harm to the setting of the scheduled monument and listed gatehouse.</p> <p>In conclusion, a water-based restoration would represent a return to a more authentic monastic landscape than the current, early 19th-century, fieldscape. This would be of benefit to the historic setting of the monastic complex. Visual setting would not be affected.</p> <p>(ii) Landscape - Supporting text gives the impression that the Allocation of MIN 19 was allowed, in no small part, to bring the asphalt plant under planning control. This is misleading as the plant has only ever operated under a time-limited planning consent and so planning control has always been in place. Indeed it is understood the plant is to be dismantled and removed next year (2019). Notwithstanding removal of the asphalt plant, the MIN 19 Allocation contains sand and gravel processing plant/stockpiles and so it is therefore incorrect to say that the whole of the MIN 19 area could be restored at the time of the asphalt plants removal.</p>	<p>Norfolk County Council's Historic Environment Service have advised that they do not consider that the proximity of the Scheduled Monument and Listed Buildings makes this site unsuitable for allocation and recommended that a desk-based assessment and field survey should take place to inform any planning application.</p> <p>Whilst it is recognised that with the right restoration the site could provide a landscape gain, the site is within a Core River Valley, and previous mineral workings in the area have already resulted in areas of water nearby. Additional smaller areas of water closer to the Pentney Priory would not result in enhancement of the landscape sufficient to justify mineral extraction.</p> <p>It is noted that the asphalt plant was operated under a time-limited permission and that the asphalt plant has now been removed (February 2019). The site assessment has been amended to take this into account.</p> <p>It is noted that approximately one-third of MIN 19 has planning permission until the end of 2024, whilst approximately two-thirds of MIN 19 is required to be restored by the end of 2019. The site assessment text has been amended to take this into account.</p>

Representations received about site MIN 19 & MIN 205	Norfolk County Council Planning Officer's response
<p>The approved afteruse of the MIN 19 plant site is woodland. The proposed mosaic of pools and wet woodland will be more appropriate to the Fenland landscape that might once have occurred in the area.</p> <p>The MIN 205 area is not grazing marsh as stated but has been in an arable use for several decades, this year growing sugar beet.</p> <p>Supporting text suggests that the proposals are to restore the site to open water. This is not the case, the proposals are to restore the site to a mosaic of wetland/fenland habitats. Areas of open water will not be visible within this landscape as the water bodies will be on a much smaller scale than the majority of the open water lakes in the area (to which supporting text refers). The proposed mosaic will consequently offer a considerable landscape and ecological enhancement over the open arable field that currently exists and so is entirely consistent with the aims of Core River Valley Policy.</p>	<p>It is noted that the approved restoration scheme for MIN 19 is woodland and this is considered to be in keeping with the woodland in areas to the north and south of the site, although it is recognised that these woodland areas are relatively modern plantations.</p> <p>Noted. The site assessment text has been amended to state that MIN 205 is arable agricultural fields.</p> <p>The proposed restoration includes areas of open water. Whilst the water bodies will be on a smaller scale than the majority of the open water lakes in the area resulting from mineral extraction and the areas of water are proposed to be mainly screened by wet woodland this would not result in enhancement to the landscape sufficient to justify mineral extraction within a Core River Valley.</p>
<p><b>(Support)</b> Representation ID: 92109 Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b> Agree that there would need to be detailed investigations regarding potential impacts on the River Nar SSSI.</p>	<p>Noted. However, the site is concluded to be unsuitable to allocate because the sites are within a Core River Valley and the restoration would not result in enhancement sufficient to justify mineral extraction.</p>
<p><b>(Object)</b> Representation ID: 92021 Respondent: <b>CPRE Norfolk (Mr Michael Rayner) [17775]</b> We agree that these sites are unsuitable due to their substantially harmful impacts on the River Nar and the Abbey Gatehouse and its setting.</p>	<p>Noted. The site is concluded to be unsuitable to allocate because the sites are within a Core River Valley and the restoration would not result in enhancement sufficient to justify mineral extraction.</p>
<p><b>(Comment)</b> Representation ID: 91943 Respondent: <b>Norfolk Geodiversity Partnership (Mr Timothy Holt-Wilson) [17710]</b> We wish to make additional comments, to modify the existing paragraph on Geodiversity. "The site consists of peat and valley fill deposits, overlying Leziate Member bedrock. It is listed as</p>	<p>The text has been amended as requested.</p>



<b>Representations received about site MIN 19 &amp; MIN 205</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>KLW64 in the Norfolk Geodiversity Audit. It is highly likely that complex sequences of valley fill sediments (glacial and interglacial) containing fossil material and evidence of Middle Pleistocene sea-level changes are present, as recorded at other sites nearby. MINs 19 and 205 are therefore likely to contain geodiversity priority features. Potential impacts to geodiversity would need to be assessed and appropriate mitigation identified as part of any future application."</p>	

**MIN 74 land at Turf Field, Watlington Road, Tottenhill**

Representations received about site MIN 74	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93141  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site.</p>	<p>Noted.</p>
<p><b>(Comment)</b> Representation ID: 92978  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We would highlight the proximity to designated heritage assets including the Tottenhill Row conservation area which didn't appear to be marked and the grade I Church of St Peter and Paul. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Both the Conservation Area and the Grade I church were marked on the map, however, due to the scale of the map within the printed document they may have not been very clear. However, these heritage designations were also shown on an interactive map on the consultation website which could be viewed at a range of scales. Site MIN 74 is concluded to be unsuitable to allocate because any mineral working on this site would have unacceptable impacts on the landscape and the historic environment.</p>
<p><b>(Comment)</b> Representation ID: 92412  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  We support the Council's proposed to remove the following sites from further consideration in the plan on the grounds of adverse impacts on wildlife sites, namely MIN 102, MIN 201, MIN 48, MIN 45, MIN 19, MIN 205, MIN 74 and MIN 77.</p>	<p>Noted. Site MIN 74 is concluded to be unsuitable to allocate because any mineral working on this site would have unacceptable impacts on the landscape and the historic environment.</p>
<p><b>(Comment)</b> Representation ID: 92351  Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b>  DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme. The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.  On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham. The following sites MIN 6; MIN 204; MIN 74; MIN 206 and MIN 32 the restoration is dry using inert waste or imported inert materials. If this were to change</p>	<p>Noted. Site MIN 74 is concluded to be unsuitable to allocate because any mineral working on this site would have unacceptable impacts on the landscape and the historic environment.</p>

Representations received about site MIN 74	Norfolk County Council Planning Officer's response
<p>to wet restoration or there was potential for wet working as part of the extraction scheme, DIO Safeguarding would need to be consulted.</p>	
<p><b>(Object)</b> Representation ID: 92271  Respondent: <b>Mr J Marriott [17935]</b>  I am writing in response to proposed site, MIN 74, Land at Turf Field, Watlington Road.  I find the proposed site unsuitable for the following reasons.  1; Dust. As winds blow predominantly from West to East, I get the dust from this field whenever there's a tractor, or combine doing its job, This, I accept, as it's farming, but Quarrying daily would mean constant dust throughout the day, even with the slightest of breezes.  2; Noise, As the wind travels East, so does sound, I always hear any activity in this field before I can see it, and once again, Quarrying daily would mean constant machine noise throughout the day.  3; The site is about 80 metres from my property, being within the 100 metres that the council say would receive the greatest impact.  I appreciate these 3 reasons could be said about anything, anywhere, but this field seems to have its own wind stream, or perhaps I get the consequences more, as my ground is some 2 metres higher than the field in question, but whatever the theory, I have pictures and video's, to support my comments.  I would like to think I'm being fair by saying, the Quarry and its access were there before I moved here, however, there was no Quarrying to the West of me, and taking into account the 3 reasons above, is why I oppose the application for MIN 74.</p>	<p>Site MIN 74 is concluded to be unsuitable to allocate because any mineral working on this site would have unacceptable impacts on the landscape and the historic environment.</p>
<p><b>(Object)</b> Representation ID: 92270  Respondent: <b>Mrs S Denniss [17934]</b>  I oppose the above application as I live 77 metres from this site, and have concerns about the dust and noise which I don't get at present.</p>	<p>Noted. Site MIN 74 is concluded to be unsuitable to allocate because any mineral working on this site would have unacceptable impacts on the landscape and the historic environment.</p>
<p><b>(Object)</b> Representation ID: 91982  Respondent: <b>Ms. Ailsa Beattie [17730]</b>  Agree with all points made</p>	<p>Noted. Site MIN 74 is concluded to be unsuitable to allocate because any mineral working on this site would have unacceptable impacts on the landscape and the historic environment.</p>

**MIN 76**            **land at West Field, Watlington Road, Tottenhill**

<b>Representations received about site MIN 76</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93189  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site and we confirm that the statement that no further archaeological work is needed is correct.</p>	<p>Noted. Planning permission was granted for 285,000 tonnes of sand and gravel extraction at this site on 18/04/2019. Therefore, the site will now be removed from the M&amp;WLP.</p>
<p><b>(Comment)</b> Representation ID: 93139  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site.</p>	<p>Noted. Planning permission was granted for 285,000 tonnes of sand and gravel extraction at this site on 18/04/2019. Therefore, the site will now be removed from the M&amp;WLP.</p>
<p><b>(Comment)</b> Representation ID: 92979  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We would highlight the proximity to designated heritage assets including the Tottenhill Row conservation area which didn't appear to be marked and the grade I Church of St Peter and Paul. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>The Conservation Area is marked on the map but may not have been easily visible due to the scale of the hard copy map and the location of the County Wildlife Site. The maps are also available on an interactive map on Norfolk County Council's website and therefore can be enlarged for easier viewing.  Planning permission was granted for 285,000 tonnes of sand and gravel extraction at this site on 18/04/2019. Therefore, the site will now be removed from the M&amp;WLP.</p>
<p><b>(Comment)</b> Representation ID: 92922  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  MIN 76, land at West Field, Watlington Road  The plan incorrectly states that MIN 76 is situated in Flood Zone 1. The North West corner of the site is situated in Flood Zones 2 and 3, as shown on our Flood Map for Planning. This should be updated to ensure flood risk is addressed and mitigation measures considered.</p>	<p>We have double checked site MIN 76 against the Environment Agency's flood map for planning and the site is entirely situated in Flood Zone 1. Therefore, no changes are required. Planning permission was granted for 285,000 tonnes of sand and gravel extraction at this site on 18/04/2019. Therefore, the site will now be removed from the M&amp;WLP.</p>
<p><b>(Comment)</b> Representation ID: 92382  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p>	

Representations received about site MIN 76	Norfolk County Council Planning Officer's response
<p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.</p> <p>Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p> <p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 76: We support the Council's proposals for conservation led restoration at MIN 76 and the inclusion of wide field margins and hedgerow planting at MIN 206. Given the proximity of these proposals to several CWS, we recommend that co-ordinated restoration to enhance landscape connectivity between all the nearby CWS should be supported in the site policy.</p>	<p>Noted</p> <p>Noted</p> <p>Noted. Planning permission was granted for 285,000 tonnes of sand and gravel extraction at this site on 18/04/2019. Therefore, the site will now be removed from the M&amp;WLP.</p>
<p><b>(Comment)</b> Representation ID: 92343</p> <p>Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b></p> <p>DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.</p> <p>The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.</p> <p>On reviewing the proposed mineral sites the following occupy statutory birdstrike</p>	<p>At the same time as the Minerals and Waste Local Plan process is taking place, a planning application was submitted by Frimstone Ltd for mineral extraction at site MIN 76 (reference C/2/2018/2001). Therefore, the planning application process was ongoing at the same time as the Minerals and Waste Local Plan consultation. The proposed restoration includes reed marsh and open water. The DIO response to this application (21 May</p>

Representations received about site MIN 76	Norfolk County Council Planning Officer's response
<p>safeguarding consultation zones for RAF Marham: MIN 19 &amp; 205; 76; 77; 40; SIL01 SIL02; AOS E &amp;J.</p> <p>Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety. Therefore, we would recommend dry restoration and dry phased working.</p> <p>Follow up response (December 2018): "The MOD have recently reviewed this planning consultation and submitted conditional response citing subject to a BHMP being implemented we have no safeguarding concerns as part of planning consent."</p>	<p>2018) was: "On reviewing the revised restoration drawings and Bird Hazard Management Plan, I can confirm the MOD has no safeguarding concerns and is content with the contents of the management plan. However, a condition will still need to be included in any planning permission granted which obligates the applicant to comply with the requirements of the Bird Hazard Management Plan. To maintain air traffic safety at RAF Marham the development shall comply with the birdstrike safeguarding commitments as outlined in the supporting document entitled '<i>Bird Hazard Management Plan for the Watlington Quarry, West Field</i>' dated 23/04/18."</p> <p>Norfolk County Council's Planning (Regulatory) Committee resolved to grant planning permission at their meeting on 13 July 2018. Due to the need for a s106 legal agreement to be signed regarding ecology provisions, the planning permission was granted on 18 April 2019. Therefore, the site will now be removed from the M&amp;WLP.</p>
<p><b>(Object)</b> Representation ID: 91983</p> <p>Respondent: <b>Ms. Ailsa Beattie [17730]</b></p> <p>Permission was granted on 13th July despite under consultation until 13th August???</p> <p>Our property is approximately 100 metres from this site. Despite the Department of Environment recommending 250-500 metre buffer zone.</p> <p>A quiet Conservation Area already disrupted by the Conveyor Belt the extraction of this site will cause extreme noise nuisance, pollution and distress not only to residents but the wildlife on the common.</p>	<p>At the same time as the Minerals and Waste Local Plan process is taking place, a planning application was submitted by Frimstone Ltd for mineral extraction at site MIN 76 (reference C/2/2018/2001). Therefore, the planning application process was ongoing at the same time as the Minerals and Waste Local Plan consultation. Norfolk County Council's Planning (Regulatory) Committee resolved to grant planning permission at their meeting on 13 July 2018. The Committee report assessed the effect of the proposed development on the Conservation Area, potential amenity impacts from noise and the potential for pollution. Due to the need for a</p>

<b>Representations received about site MIN 76</b>	<b>Norfolk County Council Planning Officer's response</b>
	Section 106 legal agreement to be signed regarding ecological provisions the planning permission was granted on 18 April 2019. Therefore, the site will now be removed from the M&WLP.

**MIN 77**            **land at Runs Wood, south of Whin Common Road, Tottenhill**

<b>Representations received about site MIN 77</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93142  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site.</p>	<p>Noted. However, the site is concluded to be unsuitable to allocate because mineral extraction on this site would cause unacceptable landscape and ecological impacts due to the loss of a significant area of mature mixed deciduous woodland.</p>
<p><b>(Comment)</b> Representation ID: 93119  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms A Crotty) [18343]</b>  For MIN 77 Runs Wood Tottenhill, the initial conclusion recommends that that the site is unsuitable for allocation in accordance with Section 15 of the NPPF. I am in agreement with this conclusion, particularly as Runs Wood is not ancient woodland but is still considered important due to its high biodiversity value.</p>	<p>Noted. The site is concluded to be unsuitable to allocate because mineral extraction on this site would cause unacceptable landscape and ecological impacts due to the loss of a significant area of mature mixed deciduous woodland.</p>
<p><b>(Comment)</b> Representation ID: 93107  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms C Keightley) [18344]</b>  We are in agreement with the conclusion that the site is unsuitable for allocation in accordance with Section 15 of the NPPF.</p>	<p>Noted. The site is concluded to be unsuitable to allocate because mineral extraction on this site would cause unacceptable landscape and ecological impacts due to the loss of a significant area of mature mixed deciduous woodland.</p>
<p><b>(Comment)</b> Representation ID: 93094  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  In support of my Arboriculture colleague's comments, I am in agreement that this site is unsuitable for allocation due to the importance of Runs Wood.</p>	<p>Noted. The site is concluded to be unsuitable to allocate because mineral extraction on this site would cause unacceptable landscape and ecological impacts due to the loss of a significant area of mature mixed deciduous woodland.</p>
<p><b>Comment)</b> Representation ID: 92980  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We would highlight the proximity to designated heritage assets including the Tottenhill Row conservation area which didn't appear to be marked and the grade I Church of St Peter and Paul. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted; however, the site is concluded to be unsuitable to allocate because mineral extraction on this site would cause unacceptable landscape and ecological impacts due to the loss of a significant area of mature mixed deciduous woodland.</p>
<p><b>(Comment)</b> Representation ID: 92413  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p>	<p>Noted. The site is concluded to be unsuitable to allocate because mineral extraction on this site would cause unacceptable landscape and ecological</p>



Representations received about site MIN 77	Norfolk County Council Planning Officer's response
<p>We support the Council's proposed to remove the following sites from further consideration in the plan on the grounds of adverse impacts on wildlife sites, namely MIN 102, MIN 201, MIN 48, MIN 45, MIN 19, MIN 205, MIN 74 and MIN 77.</p>	<p>impacts due to the loss of a significant area of mature mixed deciduous woodland.</p>
<p><b>(Comment)</b> Representation ID: 92343</p> <p>Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b></p> <p>DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.</p> <p>The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.</p> <p>On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham: MIN 19 &amp; 205;76;77;40; SIL01 SIL02; AOS E &amp;J.</p> <p>Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety. Therefore, we would recommend dry restoration and dry phased working.</p>	<p>Noted. The site is proposed to be restored to a lower level comprising a mixture of ponds, wet woodland and wet grassland; however, the site is concluded to be unsuitable to allocate because mineral extraction on this site would cause unacceptable landscape and ecological impacts due to the loss of a significant area of mature mixed deciduous woodland.</p>
<p><b>(Object)</b> Representation ID: 91984</p> <p>Respondent: <b>Ms. Ailsa Beattie [17730]</b></p> <p>Woodland is already being damaged.</p>	<p>The site is concluded to be unsuitable to allocate because mineral extraction on this site would cause unacceptable landscape and ecological impacts due to the loss of a significant area of mature mixed deciduous woodland.</p>

**MIN 206 land at Oak Field, west of Lynn Road, Tottenhill**

Representations received about site MIN 206	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93190  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	Noted
<p><b>(Comment)</b> Representation ID: 93140  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site.</p>	Noted
<p><b>(Comment)</b> Representation ID: 92981  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We would highlight the proximity to designated heritage assets including the Tottenhill Row conservation area which didn't appear to be marked and the grade I Church of St Peter and Paul. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>The Conservation Area is marked on the map but may not have been easily visible due to the scale of the hard copy map and the location of the County Wildlife Site. The maps are also available on an interactive map on Norfolk County Council's website and therefore can be enlarged for easier viewing. The draft site policy contains a requirement for a Heritage Statement to be submitted at the planning application stage.</p>
<p><b>(Comment)</b> Representation ID: 92383  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes .  Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.  Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that</p>	<p>Noted</p> <p>Noted</p>

Representations received about site MIN 206	Norfolk County Council Planning Officer's response
<p>any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 206: We support the Council's proposals for the inclusion of wide field margins and hedgerow planting at MIN 206. Given the proximity of proposals MIN 76 and MIN 206 to several CWS, we recommend that co-ordinated restoration to enhance landscape connectivity between all the nearby CWS should be supported in the site policy.</p>	<p>Noted. The CWSs are not adjacent to the proposed site and there are a number mineral workings that have been restored to open water in the vicinity. Site MIN 76 was granted planning permission in 2019. The draft policy for site MIN 206 states that the restoration scheme should include wide field margins and hedgerow planting to provide landscape and biodiversity gains.</p>
<p><b>(Comment)</b> Representation ID: 92352</p> <p>Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b></p> <p>DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.</p> <p>The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.</p> <p>On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham. The following sites MIN 6; MIN 204; MIN 74; MIN 206 and MIN 32 the restoration is dry using inert waste or imported inert materials. If this were to change to wet restoration or there was potential for wet working as part of the extraction scheme, DIO Safeguarding would need to be consulted.</p>	<p>Noted. The site is proposed to be restored to be restored to an agricultural afteruse at original ground levels. There is no proposal for a wet restoration or a wet working. Restoration is proposed to use inert materials.</p>
<p><b>(Comment)</b> Representation ID: 92333</p> <p>Respondent: <b>Borough Council of King's Lynn and West Norfolk (Ms F Pollard) [17968]</b></p> <p>MIN206 - Oak Field, Tottenhill: The report notes that 'The only residential dwelling within 250m of the site boundary is 243m away. The settlement of Tottenhill is 243m away. We agree that any planning application for mineral extraction at this site would need to include a dust assessment and mitigation measures to deal appropriately with any amenity or health impacts.</p>	<p>Noted. The draft site policy requires a dust assessment to be submitted at the planning application stage.</p>

Representations received about site MIN 206	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92029</p> <p>Respondent: <b>Borough Council of King's Lynn and West Norfolk (Mr Geoff Hall) [9627]</b></p> <p>o Tottenhill (Site 206 - West of Lynn Road) This is an extension of existing works. The Tottenhill sites would be worked sequentially to mitigate any cumulative impacts. Potentially acceptable subject to the requirements in the policy.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 91985</p> <p>Respondent: <b>Ms. Ailsa Beattie [17730]</b></p> <p>Overall over extraction in the area of Tottenhill Row so close to a Conservation Area and residential properties.</p>	<p>There is a significant area of woodland between proposed site MIN 206 and the Tottenhill Row Conservation Area. The proposed site is over 400m from residential properties at Tottenhill Row. The draft site policy requires a Heritage Statement to be submitted at the planning application stage and also requires the proposed sites to be worked sequentially so that only one site is worked for extraction at a time.</p>
<p><b>(Support)</b> Representation ID: 91921</p> <p>Agent: Stephen M Daw Limited (Mr Stephen Daw) [143] Respondent: <b>Frimstone Limited [3662]</b></p> <p>Since submitting this extension site for inclusion, my client has carried out further geological investigations on both the original site and adjoining land. These investigations have proven a more extensive deposit of Sand and Gravel than originally envisaged. Given this, the Company would wish to enlarge the size of the original extension site to 13.9ha and increase the estimated mineral reserve figure to 780,000 tonnes. A Revised Location Plan and Revised Mineral Reserve Report are being submitted under separate cover. I would ask for these revisions to be carried forward to adoption in the review of the Local Plan.</p>	<p>Noted. The revised enlarged site area and increased mineral resource estimate have been taken into account in the assessment of site MIN 206 for the Preferred Options consultation document of the Norfolk Minerals and Waste Local Plan Review.</p>

**MIN 32**                      **land west of Lime Kiln Road, West Dereham**

<b>Representations received about site MIN 32</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93207  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  The archaeology text needs amending: A number of Anglo-Saxon buildings and remains of burial mounds were found during excavations on adjacent land (not one significant building as described).</p>	<p>The text has been amended as requested.</p>
<p><b>(Comment)</b> Representation ID: 93143  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and continued routing arrangements.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 92975  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  This proposed allocation is in relatively open and flat farmland and directly opposite the scheduled remains of a monastic grange and moated site. A heritage impact assessment should be undertaken for this site to assess its suitability and, if so, appropriate mitigation and restoration measures. These should be incorporated into policy. We also note that grade I Church of St Andrew is within 500m - 1km of the site boundary.</p>	<p>Noted. However, the site is considered to be unsuitable to allocate due to landscape impacts. It is considered that screen bunding and hedge planting would be intrusive in its own right in the open landscape.</p>
<p><b>(Comment)</b> Representation ID: 92936  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  Sites MIN 40, MIN 19, MIN 205, MIN 201, MIN 35, MIN 51, MIN 13, and MIN 32 propose low level restoration using inert material to restore the site. Whilst these sites do not lie within an SPZ we would expect groundwater to be sufficiently protected. This would involve a robust waste acceptance criteria. We would expect diligence is maintained to ensure non-inert wastes are not accepted at this site. If deposition will be sub-water table, as at sites MIN 200 and MIN 102, the applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water'.</p>	<p>Noted.</p>
<p><b>(Comment)</b> Representation ID: 92353  Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b></p>	<p>Noted. The site is proposed to be restored to agriculture with some woodland. There is no proposal for a wet restoration or a wet working.</p>

Representations received about site MIN 32	Norfolk County Council Planning Officer's response
<p>DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.</p> <p>The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.</p> <p>On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham. The following sites MIN 6; MIN 204; MIN 74; MIN 206 and MIN 32 the restoration is dry using inert waste or imported inert materials. If this were to change to wet restoration or there was potential for wet working as part of the extraction scheme, DIO Safeguarding would need to be consulted.</p>	
<p><b>(Object)</b> Representation ID: 91799</p> <p>Agent: Stephen M Daw Limited (Mr Stephen Daw) [143] Respondent: <b>Frimstone Limited [3662]</b></p> <p>In order to address the Initial Conclusion, the area of land proposed for extraction has been reduced and a detailed specification for screen bunding and landscaping arrangements has been prepared. The scheme has been designed so that future workings will be screened whilst ensuring that screen bunding will not in itself be intrusive in the landscape. A revised mineral reserve estimate has been prepared.</p> <p>On behalf of Frimstone Limited, I would contend that the information submitted adequately addresses the sole reason why this site has not been considered suitable for allocation and that the site should now be allocated.</p>	<p>The additional information submitted is noted. However, whilst the hedge planting and screen bunding would screen views of the extraction site, it is still considered that the proposed hedge planting and screen bunding would be intrusive in its own right. The surrounding landscape is very open in nature with long distance views only punctuated by individual trees and small copses. The introduction of hedgerows and bunds would appear incongruous in the landscape. Therefore, the site is still considered to be unsuitable to allocate.</p>

## Silica Sand

MIN 40 land east of Grandcourt Farm, East Winch

Representations Received about site MIN 40	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93191            Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>            We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93113            Respondent: <b>Norfolk County Council - Natural Environment Team (Ms A Crotty) [18343]</b>            There appear to be trees within the proposed site at the NW corner which would have to be removed unless the site boundaries are amended. Bearing in mind that there were requirements regarding retaining veteran trees on land at Grandcourt Farm previously, I feel that an AIA would be required for this site to determine the categorisation of the trees in this area to determine if they are worthy of retention.</p>	<p>Noted. A planning application is currently (June 2019) being determined for silica sand extraction at this site. The north west corner of the site is proposed as a soil storage area and not for mineral extraction. There are no trees recorded as veteran trees within the boundary of site MIN 40 on the ancient tree inventory. As requested, the draft site policy requires an Arboricultural Impact Assessment to be submitted at the planning application stage.</p>
<p><b>(Comment)</b> Representation ID: 93108            Respondent: <b>Norfolk County Council - Natural Environment Team (Ms C Keightley) [18344]</b>            We agree with the Arboricultural officers comments for land east of Grandcourt Farm. It should also be noted that if avoidance measures are not possible and these veteran trees are removed, an assessment of the value of these trees for wildlife in particular bats and nesting birds must be undertaken prior to any works on these trees.</p>	<p>Noted. A planning application is currently (June 2019) being determined for silica sand extraction at this site. An ecological impact assessment was submitted as part of the Environmental Statement accompanying the planning application. The ecological impact assessment included bat surveys, breeding bird surveys and tree surveys. There are no trees recorded as veteran trees within the boundary of site MIN 40 on the ancient tree inventory. Norfolk County Council's Local List for the Validation of Planning Applications requires a Biodiversity Survey and Report to be submitted at the planning application stage for any development which affects a feature which provides or could provide a habitat for wildlife, or where it is likely</p>

Representations Received about site MIN 40	Norfolk County Council Planning Officer's response
	that the application site is populated by a protected species.
<p><b>(Object)</b> Representation ID: 92976</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>This large allocation is directly opposite the grade II* Church of All Saints which, as an edge of settlement church, overlooks the surrounding flat farmland. A heritage impact assessment should be undertaken for this site to assess its suitability and, if so, location, and appropriate mitigation and restoration measures.</p>	<p>Noted. In between the proposed site and the Church of All Saints is the A47. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p> <p>A planning application is currently (June 2019) being determined for silica sand extraction at this site. The Environmental Statement accompanying the application included a section on cultural heritage. The proposed restoration of the site is to mainly open water in the west and an agricultural field in the east – immediately opposite the Church of All Saints. Historic England's response to the planning application was that they did not have any comments to make.</p>
<p><b>(Comment)</b> Representation ID: 92932</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>Sites MIN 40, MIN 19, MIN 205, MIN 201, MIN 35, MIN 51, MIN 13, and MIN 32 propose low level restoration using inert material to restore the site. Whilst these sites do not lie within an SPZ we would expect groundwater to be sufficiently protected. This would involve a robust waste acceptance criteria. We would expect diligence is maintained to ensure non-inert wastes are not accepted at this site. If deposition will be sub-water table, as at sites MIN 200 and MIN 102, the applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water'.</p>	<p>Noted. However the restoration at site MIN 40 will not include the import of any waste material and will use the overburden (carstone, clay and soil) from the site to create the final landform.</p>
<p><b>(Comment)</b> Representation ID: 92918</p> <p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p>	<p>Noted.</p> <p>The draft policy states that a Hydrogeological Risk Assessment will be required at the planning</p>



Representations Received about site MIN 40	Norfolk County Council Planning Officer's response
<p>In this section we have provided guidance on the pollution prevention measures that we would expect to be considered at these allocated sites.</p> <p>MIN 40, land east of Grandcourt Farm East Winch</p> <p>We agree with the need for an appropriate hydrogeological risk assessment as set out in the initial conclusions. This should also consider the proposed restoration scheme as well as the de-watering phase. Restoration and de-watering phases should consider the possibility of a perched aquifer in the Carstone Formation. We would not accept any passive de-watering of this aquifer.</p>	<p>application stage to identify any potential impacts on groundwater during both the extraction and restoration of the site, including the potential for a perched water table to occur in the carstone aquifer, and propose appropriate mitigation to address any of these impacts.</p>
<p><b>(Comment)</b> Representation ID: 92482</p> <p>Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b></p> <p>The site is allocated as a specific site for silica sand extraction in the Adopted in the Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010-2026 (adopted September 2011) and identified in the Minerals Site Specific Allocations Development Plan Document (DPD) (adopted October 2013, amendments adopted December 2017).</p> <p>The Initial conclusion on the MIN40 site in the May 2018 consultation document notes that "the site is considered suitable for allocation for silica sand extraction, subject to any planning application addressing the requirements below: [requirements are detailed in the Initial Consultation document]</p> <p>Sibelco has submitted a planning application for an extension of Grandcourt Quarry into the MIN40 site and has the following comments on some of the "requirements" noted in the Initial Consultation document.</p> <p>* Opportunities during working for any geodiversity assets to be studied, and if compatible with the landscape and ecology objectives, an open face to be retained as part of the restoration scheme</p> <p>Sibelco will examine working faces during operation and can take photographic records of any features of note observed, if any. Following extraction being completed in each phase, Carstone material will be used to cover and stabilise the Leziat Sand faces to create safe long term slopes as described in Appendix 9 to the submitted Planning Statement (Geotechnical Design</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted. The draft site policy has been amended to remove the requirement for an open geological face to</p>

Representations Received about site MIN 40	Norfolk County Council Planning Officer's response
<p>and Assessment).</p> <p>Opportunities could be afforded during working to geology students to inspect and study open faces and overburden areas under supervision where consistent with health and safety of the site. Bearing in mind the proposed open water restoration with peripheral broadleaved woodland and shrub/grassland it is not been possible to incorporate any open face in the restoration, which would in addition be difficult to maintain safely due to the nature of the geology, which makes it vulnerable to erosion and a potential safety hazard.</p> <p>* A restoration scheme incorporating heathland or a heathland/arable mix with blocks of woodland which provides biodiversity gains and does not result in permanent dewatering of a perched water table in the carstone aquifer if one is identified in a hydrogeological risk assessment</p> <p>The lodged planning application proposes a combination of restored areas of open water (51.4%), native broadleaved woodland (8.8%), hedgerows (increase of 920 linear metres), scrub &amp; species rich grassland (20.7%), agricultural land (15.2%) and public rights of way for the restored site with biodiversity gains. The hydrogeological assessment of the site showed there were no significant impacts on the perched water table in the Carstone as a result of working and restoration.</p> <p>The proposed restoration is primarily to water since the excavation will be several metres below the natural groundwater level in order to release the proven mineral. It will not be possible to deliver a dry restoration using on-site overburden materials. For the same reason it will not be possible to deliver a requirement of MIN40, which is to incorporate heathland into the restoration. The proposed site for the former Site Specific Allocations DPD was considerably reduced in area at examination which removed land which may have been suitable for heathland restoration. The much reduced currently allocated area reflects very closely the area of excavation. Once the restored margin areas are accounted for, the remaining area of land restoration is at the lake margins on mostly slopes to the water's edge, which is not suitable for heathland. Significant heathland restoration has been delivered by the Applicant on former mineral sites to the north of Middleton Stop Drain.</p> <p>The proposed restoration scheme is shown on the submitted restoration drawings. This scheme has been designed with due regard for the precise setting of the site; the local geology; local</p>	<p>be incorporated into the restoration of the site as it is recognised that this is not practicable.</p> <p>Noted</p> <p>Noted</p> <p>It is recognised that due to the depth of the mineral extraction part of the restored site area will be to open water. It is noted that since the Initial Consultation in 2018 the proposed restoration scheme has changed to incorporate an agricultural field into the restoration scheme opposite the listed Church of All Saints. Therefore, it is recognised that, whilst restoration to heathland would preferable be in terms of biodiversity, it would not be practicable on the western part of the site due to the depth of extraction, or in accordance with Historic England's advice for the eastern part of the site. Therefore, the draft site policy has been amended to remove the requirement for restoration to heathland.</p>

Representations Received about site MIN 40	Norfolk County Council Planning Officer's response
<p>topography; position of the natural groundwater table and the volumes of different overburden materials identified within the site by drilling programmes.</p>	Noted
<p>Policy Min 40 states that a restoration scheme for the site should seek to incorporate heathland or a heathland/arable mix with blocks of woodland which provides biodiversity gains. Given the volumes of sand and overburden materials present and the position of the local groundwater table this is not possible in its entirety in this case.</p>	Noted
<p>Sibelco has restored former mineral extraction area locally to heathland (for example Wicken North and Wicken South), however, these areas have very different physical parameters which allowed such restoration to be designed and implemented. Wicken North and Wicken South are located on lower ground and had relatively low sand to overburden ratios which allowed significant areas to be restored to generally level ground above the local groundwater level. Grandcourt Quarry extension is located on higher ground, has a different ratio of sand to overburden (higher ratio) and a different relationship of ground levels to groundwater level. Final restored slopes must be stable in the long term and at the same time utilise only suitable overburden materials from the site (there are no proposals to import any materials from elsewhere to effect the restoration). Tailings materials from the mineral washing (silts and clays) are unsuitable for restoration in this area due to high water content of the tailings and distance from the processing plant. The company has sufficient permitted tailings space elsewhere on the wider site.</p>	Noted
<p>The restoration scheme proposed for the extension area in the lodged planning application does include agricultural land, woodland blocks and scrub with a lake of some 9.2 hectares representing the natural groundwater level. The proposed restoration of the MIN40 site reflects the permitted restoration of the existing Grandcourt Quarry site and has been designed to complement and fit in with this overall restoration which is dictated by the geotechnical assessment and local geological circumstances.</p>	Noted
<p>The overburden volumes in the Grandcourt extension area and volumes required to restore the site as per the submitted proposed restoration scheme are as follows:</p>	
<p>Overburden materials identified by drilling programmes: Soils 78,000m<sup>3</sup></p>	Noted

Representations Received about site MIN 40	Norfolk County Council Planning Officer's response
<p>Carstone 1,300,000 m3  Clay 420,000 m3  Material required to create the proposed landform in the MIN40 site:  Material required to create 1:4 slopes on final sand and overburden faces 1,020,000 m3  Material required to create embankment for bridleway and farm access 736,000 m3</p> <p>Given the material balance for the site as shown above and with no proposal to import any material for restoration or other purposes, the final landform and restoration scheme proposed is the only one which can reasonably be implemented. The MIN40 site is not suitable for heathland restoration.</p> <p>The submitted Environmental Statement contains a hydrogeological risk assessment which identifies potential impacts on groundwater including the perched water table in the Carstone. The proposed eastern extension will have little or no additional significant impacts to the north, south and west. The area over which drawdown in groundwater levels will occur will increase to the east, but no water sensitive receptors have been identified within the predicted area of influence in this direction. It is proposed that the potential additional impacts to surface and groundwater are monitored and controlled via a minor revision of the existing Water Management Plan.</p> <p>There is electricity infrastructure within MIN40 site.</p> <p>Subject to the above comments Sibelco supports the inclusion of MIN40 as a Specific Site.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92384  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.  Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.  Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly</p>	<p>Noted</p>

Representations Received about site MIN 40	Norfolk County Council Planning Officer's response
<p>recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 40 - Given the location within a kilometre of East Winch Common SSSI, restoration of this site to heathland has the potential to enhance the connections of the SSSI with the wider landscape. Therefore we support the Council's recommendation that the restoration proposals for this site should include heathland. Additionally, given the proximity to King's Lynn, the site has the potential to support the provision of new green infrastructure.</p>	<p>Noted</p> <p>The majority of the western part of the site is now proposed to be restored to open water due to the depth of the mineral working, whilst the eastern part of the site is proposed to be restored to arable agriculture due to its location opposite the Church of All Saints. Whilst the incorporation of heathland within the restoration scheme would have been preferable in terms of biodiversity, restoration of the eastern field to agriculture is required to reduce the harm to the rural setting of the Church of All Saints on the opposite side of the A47, as advised by Historic England.</p>
<p><b>(Comment)</b> Representation ID: 92344</p> <p>Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b></p> <p>DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.</p> <p>The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.</p> <p>On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham: MIN 19 &amp; 205;76;77;40; SIL01 SIL02; AOS E &amp; J.</p> <p>Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the</p>	<p>Noted. The draft site policy requires the submission of a Bird Hazard Assessment at the planning application stage. The Bird Hazard Assessment report would identify the risk of bird hazard to the safe operation of aerodromes and aircraft, identify proposed mitigation of any identified risk, and include a Bird Hazard Management Plan if necessary. The proposed restoration of the site includes an area of open water. The open water is proposed to be steep sided with low fencing, grassland, scrub and trees to discourage waterbirds.</p>

Representations Received about site MIN 40	Norfolk County Council Planning Officer's response
<p>potential to attract large flocking bird species hazardous to aviation safety. Therefore, we would recommend dry restoration and dry phased working.</p> <p>Follow up response (December 2018): "The MOD commented on this application and the proposed extension to Grandcourt Farm at planning stages. There is an existing Bird Management Plan in place which includes the extension site. Therefore, the MOD stated no objection subject to the BMP being implemented as part of planning consent."</p>	<p>A planning application is currently (June 2019) being determined for silica sand extraction at this site. The MOD responded to the planning application with a no objection response subject to a robust Bird Hazard Management Plan being applied to any planning permission granted.</p>
<p><b>(Comment)</b> Representation ID: 92111</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>In the text it states: "The potential exists for impacts from mineral extraction at MIN 40, if uncontrolled. An assessment of potential hydrogeological impacts from dewatering, together with appropriate mitigation would be required as part of any planning application." Yet in the Habitats Regulations Assessment (HRA) the site has been screened out (Task 1 Table p30). Please refer to our comments in general about the HRA.</p> <p>Annex 1: Natural England's comments on the Draft Habitats Regulations Assessment of the M&amp;WLPR, dated May 2018</p> <p>A recent judgment from the Court of Justice of the European Union (Case C-323/17 People Over Wind v Coillte Teoranta) has provided authoritative interpretation relating to the use of mitigation measures at the screening stage of a Habitats Regulations Assessment (HRA). The judgment concluded that it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site. However, when determining whether the plan or project will have an adverse effect on the integrity of the European site at appropriate assessment, a competent authority may take account of those avoidance and mitigation measures.</p> <p>The Local Planning Authority, as competent authority for the Minerals and Waste Local Plan, should consider this judgment when undertaking the HRA screening under the Conservation of Habitats and Species Regulations 2017 and may wish to take its own legal advice on the implications of the judgment.</p> <p>This means that for any sites where avoidance and mitigation measures have been identified to protect designated Natura 2000 sites such as Special Areas of Conservation (SACs), Special Areas of Protection (SPAs) or Ramsar sites, the sites should not be screened out for likely</p>	<p>We consider that the HRA Task 1 correctly screened out MIN 40 as it is located outside the 3km Impact Risk Zone for East Walton and Adcock's Common SSSI (part of the Norfolk Valley Fens SAC). The supporting text in the consultation document had not taken this into account and has now been corrected to state that the site is located outside the Impact Risk Zone and therefore there would be no adverse effects on the SSSI or SAC.</p> <p>A planning application is currently (June 2019) being determined for silica sand extraction at this site. Natural England response to the planning application was "Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development". Therefore, Norfolk County Council Planning Officers consider that the site does not require an Appropriate Assessment and can be screened out.</p>

Representations Received about site MIN 40	Norfolk County Council Planning Officer's response
<p>significant effect but carried forward to Appropriate Assessment, at which point any mitigation measures, eg not de-watering, conditions to control dust or lighting etc, can be assessed in detail and taken into account.</p> <p>Our specific comments on various individual allocations included in the initial consultation are intended to reflect this ruling. That is, where measures have been identified specifically to protect a Natura 2000 site, then these allocations should be screened in to Appropriate Assessment. At this stage the effectiveness of any proposed avoidance and mitigation measures and all the evidence should be examined to reach a conclusion of likely significant effect, either alone or in combination with other plans or projects, and to ascertain whether an adverse effect on the integrity of the site can be ruled out.</p> <p>Note that any proposal which may affect a Natura 2000 designated site must go through a project level HRA in addition to this strategic plan-level HRA. This should be identified for each relevant allocation and reflected in the policy wording, including what avoidance and mitigation measures would be necessary. This can be at a 'high' level, e.g. work would take place outside the bird breeding season to avoid disturbance to nesting birds. However, more detail would be expected in the HRA at planning application stage.</p> <p>The future conclusions and recommendations of the HRA will need to be incorporated into later revisions of the Sustainability Appraisal (SA) report, and be reflected in the allocations and policies of the M&amp;WLPR.</p>	
<p><b>(Object)</b> Representation ID: 92281</p> <p>Respondent: <b>Mr D Franklin [3273]</b></p> <p>We do not agree with the conclusion that the whole area identified as being suitable for extraction. There should be greater distances from the edge of residential boundaries to proposed extraction limits, a very minimum of 500 metres. It should also be accepted that a garden area should have the same values as a residential building to be enjoyed quietly and free of dust.</p>	<p>The site assessment recognises that there are 88 residential properties within 250m of the site boundary and 25 of these are within 100m of the site boundary. Part of the site nearest to East Winch village is not proposed to be extracted and therefore there are 54 residential properties within 250m of the proposed extraction area and 3 of these are within 100m of the extraction area. A screening bund would be required around the boundary of the extraction area to mitigate noise and dust impacts.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning</p>

<b>Representations Received about site MIN 40</b>	<b>Norfolk County Council Planning Officer's response</b>
	<p>application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health. A planning application is currently (June 2019) being determined for silica sand extraction at this site. The Environmental Impact Assessment submitted with the planning application contains sections on noise and air quality.</p>



**SIL01 land at Mintlyn South, Bawsey**

Representations Received about site SIL 01	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93192  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92977  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  We would highlight the proximity to the grade II* Church of St Michael and the grade II font at Whitehouse Farmhouse. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. The location of the site in relation to the Ruins of the Church of St Michael has been assessed in the consultation document. The draft site policy requires a Heritage Statement to be submitted at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p>
<p><b>(Comment)</b> Representation ID: 92919  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  In this section we have provided guidance on the pollution prevention measures that we would expect to be considered at these allocated sites.  SIL 01: This is potentially a high risk site with a County Wildlife site situated within it. However we agree with the recommendation to allocate it provided an appropriate hydrogeological risk assessment is included.</p>	<p>Whilst the proposed site SIL01 contains a County Wildlife Site, silica sand is recognised as a nationally important industrial mineral, whilst county wildlife sites are of county ecological importance. The NPPF recognises that minerals can only be worked where they are found. There is a shortfall in permitted and allocated sites for silica sand in Norfolk in relation to the forecast need. Therefore, it is not considered appropriate to exclude the CWS from the allocated specific site for silica sand extraction.</p>
<p><b>(Support)</b> Representation ID: 92483  Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b>  Sibelco supports the inclusion of SIL01 as a Specific Site</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92385  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p>	

Representations Received about site SIL 01	Norfolk County Council Planning Officer's response
<p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes. Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p> <p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale co</p> <p>SIL 01 - We are concerned at the proposal to include part of CWS 416 '70 &amp; 100 Plantations' in this allocation and recommend that as part of any mitigation that these areas are not excavated and are safeguarded as part of any restoration proposals. Provided that suitable mitigation can be provided to ensure the CWS are safeguarded, we support the restoration of the site to habitat types similar to the surroundings to provide connectivity and note the potential for the site to provide green infrastructure with links to the nearby country park. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p>	<p>Noted</p> <p>Noted</p> <p>Whilst the proposed site SIL01 contains a County Wildlife Site, silica sand is recognised as a nationally important industrial mineral, whilst county wildlife sites are of county ecological importance. The NPPF recognises that minerals can only be worked where they are found. There is a shortfall in permitted and allocated sites for silica sand in Norfolk in relation to the forecast need. Therefore, it is not considered appropriate to exclude the CWS from the allocated specific site for silica sand extraction.</p>
<p><b>(Comment)</b> Representation ID: 92345</p> <p>Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b></p> <p>DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.</p> <p>The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.</p> <p>On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding</p>	<p>Noted. The site draft policy includes a requirement for a Bird Hazard Assessment to be submitted at the planning application stage. The Bird Hazard Assessment report would identify the risk of bird hazard to the safe operation of aerodromes and aircraft, identify proposed mitigation of any</p>

Representations Received about site SIL 01	Norfolk County Council Planning Officer's response
<p>consultation zones for RAF Marham: MIN 19 &amp; 205;76;77;40; SIL01 SIL02; AOS E &amp;J. Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety. Therefore, we would recommend dry restoration and dry phased working.</p> <p>Follow up response (December 2018): "This site is approximately 12.4km north by north west for RAF Marham, any proposed water bodies would need to be designed to the following principles:</p> <ul style="list-style-type: none"> <li>• No island – as the provide safe predator free environment for roosting and nesting birds</li> <li>• The bank margins are planted with dense goose proof barrier of emergent vegetation (common reed), or fenced to prevent easy access between open water and nearby short grass areas</li> <li>• A BHMP to remove or treat any feral goose nests and eggs to prevent feral geese successfully breeding on site</li> </ul> <p>The above is based on the information available at present."</p>	<p>identified risk, and include a Bird Hazard Management Plan if necessary.</p>
<p><b>(Support)</b> Representation ID: 92113 Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b> We welcome the specific policy for this site which seeks to safeguard designated sites.</p>	<p>Noted</p>

**AOS E land to the north of Shouldham**

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93220</p> <p>Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b></p> <p>We agree with the conclusion to allocate the area of search, but with the following comments: E.5 should state that the archaeological assessment should include a desk-based assessment and field evaluation. It should also refer to archaeological remains rather than 'deposits'</p>	<p>Noted. The wording of paragraph E.5 has been amended as requested.</p>
<p><b>(Comment)</b> Representation ID: 93114</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms A Crotty) [18343]</b></p> <p>AOS E land to the North of Shouldham - this area encompasses a large amount of woodland centred on Shouldham Warren that when viewed from a satellite image shows that this is a large block of woodland within a largely arable landscape that forms a connecting feature with the woodland centred on West Bilney Wood to the NE. As such, although the woodland is undesignated in any way, it is a vital connecting feature within the landscape and where possible should be retained. If any of the woodland area is removed, appropriate planting of a similar size of broadleaved woodland should be included as part of the restoration scheme.</p>	<p>Noted. The Areas of Search are areas of the silica sand resource within which planning permission for silica sand extraction may be granted on a smaller area of land, particularly if there is a shortfall in supply. Whilst ancient woodland has been excluded from the areas of search, coniferous plantations, such as Shouldham Warren, have not been excluded. The draft Area of Search Policy MP13 includes the following requirements which will need to be met for a planning application for mineral extraction within an area of search:</p> <ul style="list-style-type: none"> <li>• Submission of a Landscape and Visual Impact Assessment to identify potential landscape impacts, together with suitable mitigation measures to address the impacts and manage change in ways that will best sustain heritage values;</li> <li>• Submission of a Biodiversity Survey and Report, including a protected species assessment. If protected species are found on the proposed extraction site, then appropriate mitigation will be required;</li> <li>• Submission of an Arboricultural Impact Assessment to identify the impact of the</li> </ul>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
	<p>development on existing trees and identify appropriate mitigation measures if required;</p> <ul style="list-style-type: none"> <li>• Submission of a comprehensive phased working and restoration scheme, incorporating opportunities on restoration for ecological enhancement, the improvement of public access and geological exposures for future study;</li> </ul>
<p><b>(Comment)</b> Representation ID: 93110</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms C Keightley) [18344]</b></p> <p>Woodland is located within the area of search. These woodland areas are of ecological value and likely support protected species and other wildlife. We would like to see woodland areas retained where possible. Where woodland areas are proposed for removal then an ecological assessment needs to be undertaken and any further surveys need to be carried out or mitigation proposed, if necessary.</p>	<p>Noted. The Areas of Search are areas of the silica sand resource within which planning permission for silica sand extraction may be granted on a smaller area of land, particularly if there is a shortfall in supply. Whilst ancient woodland has been excluded from the areas of search, coniferous plantations, such as Shouldham Warren, have not been excluded. The draft Area of Search Policy MP13 includes the following requirements which will need to be met for a planning application for mineral extraction within an area of search:</p> <ul style="list-style-type: none"> <li>• Submission of a Biodiversity Survey and Report, including a protected species assessment. If protected species are found on the proposed extraction site, then appropriate mitigation will be required;</li> <li>• Submission of an Arboricultural Impact Assessment to identify the impact of the development on existing trees and identify appropriate mitigation measures if required;</li> <li>• Submission of a comprehensive phased working and restoration scheme, incorporating opportunities on restoration for ecological</li> </ul>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
	enhancement, the improvement of public access and geological exposures for future study;
<p><b>(Comment)</b> Representation ID: 93095</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b></p> <p>This area contains a large amount of woodland, which is intrinsic within the overall landscape, providing important visual and biodiversity connections. Where possible woodland should be retained, but where loss is unavoidable suitable mitigation should be provided during the working of any site within the area of search, and the planting of woodland should be considered as part of any restoration.</p>	<p>Noted. The Areas of Search are areas of the silica sand resource within which planning permission for silica sand extraction may be granted on a smaller area of land, particularly if there is a shortfall in supply. Whilst ancient woodland has been excluded from the areas of search, coniferous plantations, such as Shouldham Warren, have not been excluded. The draft Area of Search Policy MP13 includes the following requirements which will need to be met for a planning application for mineral extraction within an area of search:</p> <ul style="list-style-type: none"> <li>• Submission of a Landscape and Visual Impact Assessment to identify potential landscape impacts, together with suitable mitigation measures to address the impacts and manage change in ways that will best sustain heritage values;</li> <li>• Submission of a Biodiversity Survey and Report, including a protected species assessment. If protected species are found on the proposed extraction site, then appropriate mitigation will be required;</li> <li>• Submission of an Arboricultural Impact Assessment to identify the impact of the development on existing trees and identify appropriate mitigation measures if required;</li> <li>• Submission of a comprehensive phased working and restoration scheme, incorporating</li> </ul>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
	<p>opportunities on restoration for ecological enhancement, the improvement of public access and geological exposures for future study;</p>
<p><b>(Object)</b> Representation ID: 93004  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>Whilst we note that this area of search forms part of the recently adopted Silica Sand Review, however, it has to be reviewed cumulatively alongside the new preferred area of SIL 02 and MIN 19 and MIN 205. We have significant concerns for the historic environment in this area, which were detailed in our submissions to the Silica Sand Review process, and the relevant extract of our hearing statement to the Silica Sand Examination in Public is copied below. Given the high number of designated heritage assets in the area and the significant areas set aside as allocations, preferred areas and areas of search, we would expect a heritage impact assessment to be undertaken as part of the evidence base for the plan rather than use the arbitrary 250m buffer to define the Area of Search. This would provide more certainty for both the designated heritage assets and for prospective minerals developers looking in the Area of Search and the preferred area. As this evidence is currently not part of the plan, we have to object to this area of search.</p> <p>Annex 1: Extract from Norfolk Minerals Site Allocations DPD: Single Issue Silica Sand Review - Hearing Statement on AOS E  AOS E is an area centred on Shouldham Warren. This area is significant with regard to the historic environment for two reasons:  *A well-preserved monastic Medieval landscape with high evidential, social and historic value  * An area of high archaeological potential</p> <p>Medieval landscape  The wider area supported an unusually high number of medieval religious communities including several sites of female religious orders. Whilst broadly following the Nar valley and its tributary streams, these various religious houses can be seen to be geographically grouped around the natural island of Shouldam Warren.</p>	<p>The Planning Inspector who carried out the Examination in Public of the Single issue Silica Sand Review considered the submissions which have been attached, and concluded that the Area of Search Policy (now MP13) provided sufficient safeguards for heritage assets of all types, and was sound and legally compliant. Submissions at the Single Issue Review highlighted that Areas of Search are not extraction areas, and that it is expected that any potential future planning application would be for a smaller area within an Area of Search.</p> <p>As part of the evidence base for the Preferred Options stage of the Minerals and Waste Local Plan Review a Heritage Impact Assessment on SIL 02 and AOS E has been carried out by Norfolk County Council's Historic Environment Service. The HIA recommended that the northern parts of AOS E nearest to Wormegay and Pentney Priory should not be allocated due to the potentially severe impact of mineral extraction in these areas on the setting of the heritage assets at Wormegay and of Pentney Priory. The findings of the HIA will be incorporated into the Preferred Options stage of the Local Plan.</p> <p>It should be noted that it has been concluded in the Initial Consultation document that MIN 19 and MIN</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>Shouldham Warren itself is a feature of Medieval origin, capitalising on the natural island formed between streams. The area is criss-crossed by paths which link the priories and is read as part of the wider Medieval landscape. The warren would have generated income for one or more of the religious communities, providing revenue from meat and fur. it is an important part of the Medieval farmed landscape.</p> <p>As noted in the EIP, this wider landscape does not benefit from any direct designation but contributes value to the historic environmental and should be considered an undesignated heritage asset. Where further assessment reviews the interrelationships between the Medieval sites within and around this landscape, a clearer understanding of the level of significance of Shouldham Warren and the wider landscape of AOS E may be made.</p> <p>The landscape is also acknowledged to be of historic significance indirectly within the listing of individual designated assets as demonstrated in the extracts from the list descriptions of the following heritage assets:</p> <p>*Scheduled Monument and Grade II listed Blackborough Priory - A Medieval Nunnery - Blackborough Priory is of interest as one of a group of seven monastic foundations of different orders and varying size located in or immediately adjacent to the Nar Valley, the two nearest being Augustinian priories at Wormegay, some 2.5km to the south west, and at Pentney, 3.5km to the south west.</p> <p>*Scheduled Monument and Grade II* Listed Marham Abbey - A Cistercian Nunnery - The abbey has additional importance as one of a group of seven monastic foundations of different orders and varying size located in and immediately adjacent to the Nar valley, the two nearest being a Gilbertian double house for both monks and nuns at Shouldham, about 2.5km to the west and an Augustinian priory at Pentney, a similar distance to the north west.</p> <p>*Scheduled Monument and Grade I Listed remains of Pentney Priory - An Augustinian Monastery - The priory has additional interest as one of at least seven monastic foundations situated in or adjacent to the Nar Valley, of which two others, including the associated Wormegay Priory, were of the Augustinian Order.</p> <p>*Scheduled Monument - Wormegay Priory - An Augustinian Priory - Wormegay Priory is the westernmost of six religious houses, including three foundations of the Augustinian order,</p>	<p>205 are unsuitable for allocation for future mineral extraction.</p>



Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>located on either side of the River Nar, and is unique among them in being on an island in the fen. One of the other two Augustinian houses is the priory at Pentney, 4.75km to the east, with which it was eventually united. It is given additional interest by its proximity to the motte and bailey castle at Wormegay (1km south east), held by the Bardolph family, who were patrons of the priory.</p> <p>As demonstrated by the last extract, the religious houses did not occupy the landscape in isolation with many contemporaneous villages, churches, field systems, warrens and great houses, examples of which survive as some of the 35 listed buildings in close proximity to AOS E, eight of which are Grade I or Grade II* listed (show on the accompanying map appendix 1) together with eight Scheduled Monuments.</p> <p>The collective experience of this dense concentration of heritage assets makes the area of high sensitivity and as noted, the landscape itself is a valuable and contributing part of the historic environment.</p> <p><b>Archaeological Potential</b></p> <p>Norfolk is internationally important in terms of surviving evidence of early human activity. The quality of land in the Nar valley is such that there always is very high potential for settlement from the earliest periods. Archaeological remains from the Palaeolithic, Mesolithic and Neolithic periods are often concentrated along riverine environments and their associated sands and gravels. As such, these archaeological remains are vulnerable to substantial harm or complete destruction by minerals extraction.</p> <p>This part of Norfolk is of special historic interest in that it has been continuously occupied from the earliest period of human activity to the present day with settled communities from the Iron Age, Roman and Romano-British, Saxon, Danish, Norman and post-Medieval periods. For many of these early periods, activity was also often concentrated around riverine environments.</p> <p>When reviewing flood maps of AOS E, provided within the draft DPD it is noted that Shouldham Warren forms a natural island, a fact which would also likely have been exploited by early communities. As such, Shouldham Warren and the areas within the AOS to the immediate north and south, are likely to be of high archaeological potential. The small river valleys within the area</p>	

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>are of value as part of the archaeological record and the setting informing the understanding of surviving remains.</p> <p>Whilst archaeological potential does not necessarily conflict with the allocation of an AOS, it is important factor when considering the significance and likely historic value of locations within the AOS.</p>	
<p><b>(Support)</b> Representation ID: 92484</p> <p>Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b></p> <p>Sibelco supports the inclusion of Area E as an Area of Search for silica sand</p>	Noted
<p><b>(Comment)</b> Representation ID: 92406</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Areas of Search E, F, I, J: We note that in previous iterations of the Minerals plan, it has been considered acceptable to modify Areas of Search to exclude CWS and their immediate surroundings. In order to safeguard multiple CWS from both direct and indirect impacts of minerals extraction, we recommend that similar provisions are made and the Areas of Search are modified to provide sufficient stand off from these CWS to safeguard them from adverse impacts. In particular we note CWS 425 'Mow Fen' which is within AoS E, CWS 424 'Westbrigg's Wood' and CWS 373 'Adj. Adams Plantation' which are both adjacent to AoS E and CWS 365 'Broad Meadow Plantation' which is adjacent to AoS F.</p>	Silica sand is recognised as a nationally important industrial mineral, whilst county wildlife sites are of county ecological importance. The NPPF recognises that minerals can only be worked where they are found. There is a shortfall in permitted and allocated sites for silica sand in Norfolk in relation to the forecast need. Therefore, it is not considered appropriate to exclude the CWS from the allocated area of search for silica sand extraction.
<p><b>(Comment)</b> Representation ID: 92347</p> <p>Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b></p> <p>DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.</p> <p>The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.</p> <p>On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham: MIN 19 &amp; 205;76;77;40; SIL01 SIL02; AOS E &amp; J.</p> <p>Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the</p>	Noted. As an area of search for future silica sand extraction there are no proposals available for the method of working of restoration if a site was to be proposed within the area of search in the future. The Areas of Search Policy (MP13) will be amended to state that a Bird Hazard Assessment will be required at the planning application stage. The Bird Hazard Assessment report would identify the risk of bird hazard to the safe operation of aerodromes and aircraft, identify proposed mitigation of any

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>potential to attract large flocking bird species hazardous to aviation safety. Therefore, we would recommend dry restoration and dry phased working.</p> <p>Follow up response (December 2018): "It is difficult to determine the risk of wet restoration in this location without any plans illustrating the extent and design of open water bodies. The MOD have safeguarding concerns to the wet working and restoration of this site due its potential to attract and support hazardous waterfowl closer within critical airspace. Therefore, further information would be required before a definitive response can be made."</p>	<p>identified risk, and include a Bird Hazard Management Plan if necessary.</p>
<p><b>(Comment)</b> Representation ID: 92114</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>Agree with the conclusions regarding the designated sites.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 91946</p> <p>Respondent: <b>Marham Parish Council (Mrs Sara Porter) [17714]</b></p> <p>Loss of landscape &amp; amenity would be obtrusive &amp; detrimental to the visual amenity of the area.</p> <p>Desirability of the adjacent properties, or locality, may affect potential property values.</p>	<p>The potential landscape impact would depend on the specific location of any mineral extraction proposed within one of the areas of search. Mineral extraction is usually phased so as to minimise the working area. At the beginning of each working phase, soils would be stripped and stored in bunds around the area to be extracted, these would form screening. As the extraction would be taking place below ground level, and the plant would be relatively low level, screening would not need to be excessively high. Other mineral extraction sites typically have bunds of 2.5-3.5m, if these were constructed with a shallow outer gradient and grassed, at distance they would not be easily distinguishable as separate features. The Areas of Search Policy (MP13) states that a Landscape and Visual Impact Assessment would need to be submitted at the planning application stage.</p> <p>Property values are not a material planning consideration.</p>

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<p>Quarry sites will be used as landfill which is a concern due to the regulations of the Landfill Directive.</p> <p>Each quarry site must be reinstated prior to moving onto the next throughout the development.</p> <p>That a corridor of trees is supplied in Spring Lane, the adjacent landholding.</p> <p>That the current PROW from the village to the river &amp; Shouldham Warren, is retained as it would be detrimental if this were lost.</p>	<p>It is not proposed for any potential extraction sites within Areas of Search to be used for landfill after mineral extraction. Silica sand extraction sites in Norfolk that have recently been restored and those that are currently being restored have either used the overburden from the site to create a suitable landform, or have been restored to water, or have used the tailing material from the mineral washing process to restore the site.</p> <p>It is normal practice for sites to be worked in phases and to progressively restore each phase. Draft Policy MP7 details the progressive restoration requirements for mineral extraction sites. Planning conditions are used to specify the date by which a permitted site must be completed and restored.</p> <p>The details of any screening required would be a matter for any future planning application, once the details of a working scheme are known.</p> <p>There is only one Public Right of Way (PROW) which allows access from Marham to AOS E via the river (Nar Valley Way), Marham FP9. There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the temporary diversion or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would need to address the footpath location. Alternatively, a phased extraction may allow for the existing footpath to be retained, this would be a matter for a future planning application. There have been multiple examples of mineral extraction sites in</p>

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	Norfolk, where similar issues regarding PROWs have been successfully addressed.
<b>REPRESENTATIONS RECEIVED FROM INDIVIDUALS</b>	
<p><b>(Object)</b> Representation ID: 93221  Respondent: <b>Mrs LDT Gallagher [17797]</b>  Please accept this email as an objection to the above proposal.  I reside in the village of Marham I object to this planned development for the following reasons;</p> <p>1. Environmental issues  If approved, the project will strip all vegetation, soil and clay from the fields to allow quarrying equipment access to the sand below. This will involve heavy duty equipment brought to the site - congestion and damage to already badly repaired/maintained roads, plus the noise, pollution and disruption to the villages affected by this project.  This large plot of land will be 'mined' for over 20 years, this WILL totally destroy the flora and fauna of this area and the landscape changed forever.  Nearly 400 hectares of good quality agricultural farmland will be destroyed. With an ever increasing population we as a nation, need to consider this land for agricultural rather than industrial uses.  Any screening or bunding of the site to mitigate noise and light pollution will ruin this beautiful landscape.  What will happen to the removed soil from the land stripping process?</p> <p>2. Health and safety  The sand/silica/dust created has health and safety concerns. Sand and dust will easily reach properties in Marham and Shouldham, significantly affecting the health of the elderly, our children and those with pre-existing breathing difficulties.</p>	<p>1. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. Mineral extraction is usually phased so as to minimise the working area. At the beginning of each working phase, soils would be stripped and stored in bunds around the area to be extracted, these would form screening. The existing silica sand extraction sites in West Norfolk use normal construction equipment of a type seen on many development sites. This equipment is normally on the site for the duration of working.</p> <p>2. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Noise Assessment and a Dust Assessment to be submitted with planning applications for mineral extraction.</p> <p>A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The HSE states that "Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust". "No cases of silicosis have been documented among</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>3. Noise, dust and light pollution The area is flat and this site will be visible to the majority of the residents of Marham, Marham being on higher ground than the proposed site. Screening will, therefore, be ineffective or so tall as to block all views across the Fen from both Marham and Shouldham. There is no bunding large enough to provide a barrier against the noise and light pollution this work will cause. The noise, dust and light pollution from the estimated 11 hour day land stripping and 24 hour a day 7 days a week dredging is totally unacceptable</p> <p>4. The Water Table / Flood plain The land is currently part of a HIGH RISK flood plain. The plan by Sibelco is to flood this area in order to dredge the sand. This will only increase the chance of future flooding in the area. Any bunding and piles of surface soil and clay will only reduce the natural flow of water and increase the risk of flooding further.</p> <p>5. Local community. What is the value of the proposal to the local community and Britain? Sibelco is not a British company, its head offices are based in Belgium. The value of this type of sand is extremely profitable. There will be no job benefits to the local community as the manpower required to run the planned dredging operations is less than the current services of those working the land. There will therefore be a reduction in jobs and absolutely no value or benefit of such a scheme to the local community.</p> <p>6. Property Value This site will significantly reduce the value of properties in and around Marham and Shouldham for at least the next 28 years.</p>	<p>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>3. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>4. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>5. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>6. Property values are not a material planning consideration.</p>

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<p>7. Other</p> <p>The proximity to RAF Marham and the danger to aircraft from increased bird activity due to the excavation and subsequent flooding of the site. This would be a catastrophic event for the aircrew, the aircraft and the community if there is a crash and a total waste of taxpayers money to replace or repair the aircraft.</p> <p>In conclusion; the destruction of this rural setting, reduced appeal to visitors and residents in the future and quality of life for residents of both villages now, will be impacted severely with little to gain for the local population/area who will bear the brunt of this project. This project will make the area poorer but considerable profit for SIBELCO.</p> <p>Please accept the above points as a formal objection to the proposed silica sand extraction site SIL 02 proposed by Sibelco UK Ltd and AOS E.</p>	<p>7. Noted. As an area of search for future silica sand extraction there are no proposals available for the method of working or restoration if a site was to be proposed within the area of search in the future. The area of search policy will be amended to state that a Bird Hazard Assessment will be required at the planning application stage. The Bird Hazard Assessment report would identify the risk of bird hazard to the safe operation of aerodromes and aircraft, identify proposed mitigation of any identified risk, and include a Bird Hazard Management Plan if necessary.</p>
<p><b>(Object)</b> Representation ID: 93220</p> <p>Respondent: <b>Mr J Clarke [17917]</b></p> <p>The residents of Marham and Shouldham live in a quiet rural community that has provided a peaceful home for the RAF and their families for 100 years. For the community this is an area of natural beauty that is highly valued.</p> <p>A proposed development of this scale and impact must be put to a democratic vote via a local referendum. The proposals will blight the community, ruin the environment, and reduce the community amenity. The financial beneficiaries of this development have no long term interest in the local community or the condition of the environment.</p> <p>There are many specific reasons why this this development proposal should be rejected, I anticipate these will be covered in detail by others. In addition to this the current consultation documentation is unacceptable, it is vague, not legally binding and therefore subject to variation. The reality is once this kind of development begins the terms of reference change and developments expanded both in scale and duration. It is also very concerning that there is no agreed restoration plan for this site. I would have thought that this a fundamental issue that underpins the sustainability and suitability of any development of this kind.</p> <p>Whilst I recognise this is a consultation document the reality is that it will be used as the basis for</p>	<p>The consultation process is set out in both the adopted Norfolk County Council Statement of Community Involvement and also in Chapters 2, 3 and 4 of the Initial Consultation document which set out the consultation process, the Local Plan process so far and what happens next.</p> <p>The Local Plan process includes two public consultation stages (the Initial Consultation and the Preferred Options) and one legally required formal representations stage on the proposed Submission version of the Plan.</p> <p>The Local Plan process must be carried out in accordance with the relevant legislation and National planning policy and guidance, which does not allow for a referendum to be used to determine the contents of the Minerals and Waste Local Plan, or to</p>

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<p>going forward and as such the suggestion that the local community has been fully consulted will be inferred. I therefore oppose the proposals in principle as the primary stakeholder (the community) has not been fully informed or consulted. The consultation process has not been set out in detail. Guidance on the rights of the community to determine how they can shape decision making has not been provided.</p> <p>Once a consultation process has been properly completed and due process seen to be done the County Council must undertake and fund a local referendum on this matter. The reason why the United Kingdom voted to leave the European Union can be expressed in three words: 'To Take Back Control'. Local people must have control over the decisions that impact and shape their communities and environment. Elected representatives, Borough Councillors, County Councillors and Members of Parliament, must support and respect the democratic will of local people.</p>	<p>determine whether the final version of the Local Plan should be adopted.</p> <p>Following the formal representations period on the proposed Submission version of the Local Plan, the Plan will be subject to an examination in public carried out by an independent Planning Inspector on behalf of the Secretary of State. The Planning Inspector will consider whether the Plan meets the legal and procedural requirements and if it meets the 'tests of soundness' set out in the National Planning Policy Framework. Following receipt of the Inspector's report, the County Council will then decide whether to adopt the Plan. Local Plans and planning applications are not determined based on a local referendum. This does not form part of the legal process.</p>
<p><b>(Object)</b> Representation ID: 93014</p> <p>Respondent: <b>Mr S Gray [18335]</b></p> <p>I am a keen ornithologist and bird ringer for the British trust of ornithology. I have monitor, reported on and watched birds all over the world and ring birds at Marham little fen. it is with total horror that i see there are plans in place to extract sand and gravel from this area. The area around Button fen and around the back of the warren has had breeding Lapwing, Yellowhammer, Linnet and Grey partridge on this year. All these birds are on the RED list of the RSPB birds of concern. They are struggling enough with yet more land being turn into a dust bowl of quarries.</p> <p>Reed Bunting, Mute Swan, Little Grebe, Black headed Gull all nest around here to and are on the amber list of British birds of concern.</p> <p>I was born in Marham in 1963 and have watched the destruction of the little fen over the years as they drained it and lost a fantastic habitat for Marsh Harrier, Reed warbler and other species.</p>	<p>Objection noted.</p> <p>Marham Little (or Small) Fen is not within AOS E.</p> <p>The Small Fen is just over 600m from the nearest point of potential extraction. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years. A Biodiversity Survey and Report is required to be submitted with any future planning application for mineral extraction within AOS E.</p>



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<p>The amount of noise dust and disturbance is intolerable and the proposed plans as to what they replace it with is utterly useless for birds. Deep sided lakes no good for swans or waders they do this to prevent encouraging birds down because of the bird strike threat to RAF Marham. So you dig up a fantastic habitat and replace with something utterly useless for the species that use to use it.</p> <p>I now live in leziate near to the silica quarry. I cannot imaging the traffic using these small roads to ferry sand back to leziate its bad enough on the A roads.</p> <p>THIS PROPOSED PLAN HAS TO BE STOPPED.</p>	<p>A Transport Assessment is required to be submitted with any future planning application for mineral extraction within AOS E. In the Preferred Options document, the Areas of Search Policy (MP13) will also state that there is a preference for the existing processing plant to be accessed via conveyor, pipeline or off-public highway routes. Any future proposal within AOS E may incorporate alternative methods for transporting the silica sand such as use of a pipeline to reduce HGV movements.</p>
<p><b>(Object)</b> Representation ID: 93012</p> <p>Respondent: <b>Mr Robert Thompson [17779]</b></p> <p>The appraisal in the Initial Consultation Area of Search E (Land north of Shouldham) document is thorough in its consideration of the physical impact silica sand extraction will have on historical geographical features. It gives scant regard to the impact on the residents of the disruption arising from a huge amount of excavation that is likely to involve significant noise pollution including the use of explosives and heavy machinery. The light at the end of a very long tunnel will be the promise of recreational resource rich in natural biodiversity including I would expect significantly increased numbers of wading birds and wildfowl. There is no mention of RAF Marham in the Area of Search but hopefully the RAF has been invited to comment on the increased risk of bird strike that will accrue for aircraft landing and taking off at the air station, in addition to the risk for low flying aircraft negotiating routes over and around this proposed site. I would be grateful if you could take my comments into consideration.</p>	<p>Silica sand extraction would not use explosives.</p> <p>The boundaries of the area of search are at least 250m from the nearest residential property. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls. Policy MP13, which applies to all areas of search states that any planning application within an area of search would need to include a programme of mitigation measures (e.g. standoff areas, screening and/or bunding) to deal appropriately with any potential amenity impacts, including noise and dust.</p> <p>Mineral extraction in Norfolk <b>does not use</b> explosives, it is unnecessary for the types of minerals occurring in the county.</p> <p>The existing silica sand extraction sites in West Norfolk use normal construction equipment of a type</p>

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	<p>seen on many development sites. This equipment is normally on the site for the duration of working.</p> <p>The 'Preferred Options' version of the Minerals and Waste Local Plan Review has been amended to include a paragraph stating that AOS E is within the zone for RAF Marham where the MOD DIO must be consulted on developments with the potential to increase the number of birds and the 'bird strike' risk to aircraft. Therefore a Bird Hazard Assessment would be required for any planning application submitted for mineral extraction within AOS E. The MOD Defence Infrastructure Organisation has responded to the Initial Consultation regarding AOS E (see representation 92347).</p>
<p><b>(Object)</b> Representation ID: 92302</p> <p>Respondent: <b>Mr &amp; Mrs S &amp; M Beardmore [17951]</b></p> <p>I am writing to formally object to the proposed Silica Sand Extraction proposal as detailed under SIL 02 and AOS-E (located between Shouldham and Marham villages).</p> <p>I was unaware of this significant planning proposal and feel uneasy with a rushed approach to gather assurances and information before permission is considered. This major industrial site, so close to my residence and leisure space, will clearly have impact to my family.</p> <p>Areas of Objection in no particular order are:</p> <p>Scenic Views. The proposed area sits next to the river Nar and Shouldham Warren, surrounded by prime agriculture land. The introduction of an industrial site in this area will devastate this beautiful views, both during operations and when decommissioned in the future.</p>	<p>Area of Search E is not a planning application, it is an Area of Search within the Local Plan Review. The Local Plan process includes two public consultation stages (the Initial Consultation and the Preferred Options) and one legally required formal representations stage on the proposed Submission version of the Plan. This will be followed by an Examination of the Plan by an independent Planning Inspector. A planning application would also be required before any future extraction could take place.</p> <p>AOS E is an Area of Search, no proposal has been submitted for any specific area of extraction within this area (apart from the overlap with SIL 02 which is dealt with separately in the Local Plan and in this</p>

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<p>The area is used by not only villagers by a significant number of people for both walking and our pursuits such a mountain biking. Impact on footpaths and entry and exit to the Warren is unknown.</p> <p>Environment Pollution. There are no guarantees or assurances of the impact to the village of Shouldham on the pollution this site will generate. This industrial complex will generated dust, noise and light population which has not been quantified accurately. The village's idyllic rural setting will likely be heavily tarnished by the presence of a pollution generating site within such close proximity.</p> <p>The impact to the beautiful river Nar, the wildlife is all undetermined and at least requires a significate survey to understand the impact.</p>	<p>feedback report). If such a proposal was submitted in the future, any planning application would need to comply with the requirements of Areas of Search Policy MP13, including assessment and mitigation of landscape impacts.</p> <p>Any future planning application for mineral extraction would need to address the footpath locations and public access. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PROWs have been successfully addressed.</p> <p>Noise and dust assessments, including mitigation measures where necessary, will also be required at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity. These assessments are considered by an Environmental Health Officer. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years. Mineral sites may have lighting in and around the processing plant; however, extraction areas are normally unlit and worked during daylight. Stockpiles in processing areas allow for this. A lighting assessment would be required to support any future planning application if lighting is required.</p> <p>Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>Financial/ Monetary. The value of property and land in the area is now in freefall, based on the uncertainty of this proposal and its potential impact. Villagers of both Shouldham and Marham have purchased premium property under the indeed justified assumption it's tranquil and non-industrial surroundings remain intact. The proposed threat to this will certainly affect property values in the foreseeable future.</p> <p>Vehicle Impact to Shouldham. Access to this site, both during construction and during operations, is unknown. Shouldham village access is extremely limited with narrow roads, a large elderly population and a well-established and increasingly popular primary school. We already suffer from large buses and speeding agriculture vehicles just about navigating their way safely through the village. Apart from the clear logistical and safety issues for the site vehicles, the village and surrounding warren are a popular destination for walkers, cyclists, horse-riders and others wishing to enjoy the countryside. This community would almost certainly be affected by increased traffic.</p> <p>Unknown Future/ Decommission. The site has a limited period of effective use, the future is unknown and this unsettles the local residences. Although there may be promises of restoring</p>	<p>applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. This would identify potential impacts and appropriate mitigation measures to ensure that there were no unacceptable adverse impacts.</p> <p>Property values are not a material planning consideration.</p> <p>AOS E is an Area of Search, no proposal has been submitted for any specific area of extraction within this area (apart from the overlap with SIL 02 which is dealt with separately in the Local Plan and in this feedback report). A Transport Assessment is required to be submitted with any future planning application for mineral extraction within AOS E. In the Preferred Options document, the Areas of Search Policy (MP13) will also state that there is a preference for the existing processing plant to be accessed via conveyor, pipeline or off-public highway routes. Any future proposal within AOS E may incorporate alternative methods for transporting the silica sand such as use of a pipeline to reduce HGV movements.</p> <p>As an area of search, there is no further information currently available on any future proposals for mineral extraction within AOS E, including restoration. Land at SIL02 has been submitted by</p>

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<p>the site back to farm land, this can never be guaranteed. The fear is the area will be turned into a Land Fill site which would have a clearly devastating impact on all.</p> <p>Heath Concerns. Silica Sand and the particle's in dust are reported to have health concerns. These concerns need quantifying and local residents require credible independent assurances that they will not be effected.</p> <p>Admittedly, I am not a professional on any of the areas listed above, however through research into your project and others I feel it necessary to raise these issues. As a resident of Shouldham for over 15 years, I would be devastated if your proposal lead to the eventual diminishing of</p>	<p>Sibelco UK Ltd as a proposed silica sand extraction site, which is partly located within AOS E. SIL02 is assessed separately to AOS E and representations regarding SIL02 are covered in the section of the Feedback Report which specifically deals with SIL02. It is not proposed for any potential extraction sites within Areas of Search to be used for landfill after mineral extraction. Silica sand extraction sites in Norfolk that have recently been restored and those that are currently being restored have either used the overburden from the site to create a suitable landform, or have been restored to water, or have used the tailing material from the mineral washing process to restore the site.</p> <p>A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust). The HSE states that "Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust". "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>As an area of search, there is no further information currently available on any future proposals for mineral extraction within AOS E. Land at SIL02 has been submitted by Sibelco UK Ltd as a proposed silica sand extraction site, which is partly located within AOS E. SIL02 is assessed separately to AOS E and</p>

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<p>vibrant village. Transparency is primarily what us, as residents, require in order to make our individual assessments on what you are proposing. Without the facts, we cannot begin to do so.</p>	<p>representations regarding SIL02 are covered in the section of the Feedback Report which specifically deals with SIL02.</p>
<p><b>(Object)</b> Representation ID: 92297  Respondent: <b>Mrs Shayne Canham [17949]</b>  I wish to lodge my objection to the proposed site AOS E.  I believe the 'best case scenario' does nothing to counteract the negative impact on the residents wellbeing, the community, and the environment.  Health and safety-  Noise, dust and light pollution which is in violation of the right to life human rights.  Health concerns to respiratory diseases and silicosis which, at least could inflict the elderly and young.</p> <p>Impact on local water supply.</p> <p>24 hours working.</p>	<p>A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust). A noise assessment, lighting assessment and dust assessment would be submitted at the planning application stage and would be considered by an Environmental Health Officer.</p> <p>The HSE states that “Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust”. “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>Anglian Water have been consulted and have not raised objections to the area of search. The area of search does not include the Source Protection Zone surrounding the Anglian Water facility. A hydrogeological risk assessment would be required as part of any future planning application.</p> <p>As an area of search, there is no further information currently available on any future proposals for mineral extraction within AOS E, such as potential working hours.</p>

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<p>Flood risk area and removal of drains could put the villages at risk and increase insurance.</p> <p>The economic benefits only favour the company which is detrimental to villages with no job value, house price decreased, reduction in tourism.</p> <p>No infrastructure able to accommodate this. The A47 and A10 both being very busy roads.</p> <p>Destruction of habitat. Priority red list birds, endangered wildlife and the important river Nar. The damage to these areas could be irreversible and certainly not on the agenda from sibelco. All views for local residents will be destroyed. Heritage assets, ancient footpaths and rights of way would be destroyed.</p> <p>The Warren wildlife would be in serious danger of decline.</p> <p>I feel this would create wasteland with no ecological or leisure benefits.</p>	<p>AOS E does include land at high risk of flooding. Sand extraction is a 'water compatible' land use. A site specific flood risk assessment would be required at the planning application stage.</p> <p>Property values are not a material planning consideration.</p> <p>A Transport Assessment would be required to be submitted at the planning application stage. In the Preferred Options document, the Areas of Search Policy MP13 will state that there is a preference for the existing processing plant to be accessed via conveyer, pipeline or off-public highway haul route.</p> <p>As an area of search, there is no further information currently available on any future proposals for mineral extraction within AOS E. Land at SIL02 has been submitted by Sibelco UK Ltd as a proposed silica sand extraction site, which is partly located within AOS E. SIL02 is assessed separately to AOS E and representations regarding SIL02 are covered in the section of the Feedback Report which specifically deals with SIL02.</p> <p>In the Preferred Options document Areas of Search Policy MP13 will require a biodiversity survey and report, a heritage statement and an archaeological assessment to be submitted at the planning application stage. The Policy will also require submission of a suitable scheme for the temporary diversion and reinstatement of any Public Rights of Way located within the site. To be granted planning permission, a mineral development should not have</p>

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	an unacceptable impact on the natural environment, the historic environment or the PRow network.
<p><b>(Object)</b> Representation ID: 92294</p> <p>Respondent: <b>Mr JJ Gallagher [17796]</b></p> <p>Proposed Site SIL 02 As A Preferred Area for Silica Sand Extraction by SIBELCO UK Ltd Behind Spring Lane and Mere Plot Near Marham and Shouldham, Kings Lynn, NORFOLK. AOS E</p> <p>Please accept this letter as a formal objection to the above.</p> <p>As a resident of Marham living in close proximity to this planned development I, like most other residents, was totally unaware or advised of such a scheme until a neighbour informed me of it a few days ago. Apparently only 10 letters were sent out to properties closest to the site. It also appears that this plan has been discussed by the County Council for over three years. The consultation period for this development ends in the next few days giving the residents of Marham and Shouldham minimal time to review and comment on such a scheme. Considering the size and nature of this planned development this is totally unacceptable and unprofessional. Why have we not been made aware of this plan earlier?</p> <p>Fortunately a meeting was held by Shouldham Parish Council 06 August 2018 and the following key points identified;</p> <ul style="list-style-type: none"> <li>* If approved, the first phase of the project will involve the stripping of all vegetation, soil and clay from the fields to allow quarrying equipment access to the sand below. This will involve the use of heavy duty earth moving equipment.</li> <li>* The second phase will involve the flooding of the land and dredging on the sand, operating 24 hours a day, 7 days a week. No restriction on working hours has been planned. There are also concerns as this type of dredging has not been carried out by Sibelco in the UK before.</li> <li>* Planned start date 2026 for a period in excess of 20 years.</li> </ul> <p>The reasons for my objection to the above are as follows;</p> <ol style="list-style-type: none"> <li>1. Environmental issues <ol style="list-style-type: none"> <li>a. Stripping such a large plot of land for over 20 years will totally destroy the wildlife in this area. The Fen in Marham and the woods in Shouldham Warren will become isolated.</li> <li>b. Mow Fen, a country Wildlife site, is located within this area.</li> <li>c. The Carbon Footprint of the area will be greatly affected by the removal of such a large area of crops. Nearly 400 hectares of good quality agricultural farmland will be lost forever at a time</li> </ol> </li> </ol>	<p>All parish councils in Norfolk and all addresses within 250m of the proposed AOS boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>The Single Issue Review of Silica Sand (2014-2016) was a previous Plan document; and this was subject to multiple rounds of public consultation and Examination in Public. A number of Parish Councils engaged in the review process; Marham and Shouldham Parish Councils were informed.</p> <p>This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. SIL 02 is assessed separately in the Local Plan.</p> <p>1. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. SIL 02 is assessed separately in the Local Plan.</p> <p>A future planning application would need to consider</p>



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<p>where, as a nation, we need to be considering growing more crops.</p> <p>d. Any screening or binding of the site to reduce noise and light pollution will ruin this beautiful landscape and the views currently seen across the fen. Where will all the removed soil be stored from the land stripping process?</p> <p>2. Health and safety</p> <p>The dust created by such a development will cause health and safety issues.</p> <p>Smaller particles of sand and dust will travel long distances and easily reach properties in Marham and Shouldham. This area of land is extremely flat with no natural barriers to slow or prevent the movement of dust and fine particles from the site to the adjacent properties. The effects of this on the health of the elderly, asthma sufferers and those with breathing issues will be significant.</p> <p>The government website states the following;</p> <p><a href="http://www.hse.gov.uk/construction/healthrisks/cancer-and-construction/silica-dust.htm">www.hse.gov.uk/construction/healthrisks/cancer-and-construction/silica-dust.htm</a></p> <p>Silica is the biggest risk to construction workers after asbestos. Heavy and prolonged exposure to RCS can cause lung cancer and other serious respiratory diseases. HSE commissioned estimates it was responsible for the death of over 500 construction workers in 2005. In addition to the risks from lung cancer, silica is also linked to other serious lung diseases:</p> <ul style="list-style-type: none"> <li>* Silicosis can cause severe breathing problems and increases the risk of lung infections. Silicosis usually follows exposure to RCS over many years, but extremely high exposures can cause acute silicosis more quickly.</li> <li>* Chronic obstructive pulmonary disease is a group of lung diseases including bronchitis and emphysema. It results in severe breathlessness, prolonged coughing and chronic disability. It can be very disabling and is a leading cause of death.</li> </ul> <p>The NHS website also states; <a href="http://www.nhs.uk/conditions/silicosis/">www.nhs.uk/conditions/silicosis/</a></p> <p>Silicosis</p>	<p>the loss of any agricultural land, compared with the need for silica sand for glass making; which is recognised as an important and nationally scarce industrial mineral.</p> <p>2. The HSE states that “Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust”. “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>Areas of Search Policy MP13 and Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Noise Assessment and a Dust Assessment to be submitted with planning applications for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust). These assessments would be considered by an Environmental Health Officer.</p>

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<p>Silicosis is a long-term lung disease caused by inhaling large amounts of crystalline silica dust, usually over many years.</p> <p>Silica is a substance naturally found in certain types of stone, rock, sand and clay. Working with these materials can create a very fine dust that can be easily inhaled. Once inside the lungs, the dust particles are attacked by the immune system.</p> <p>This causes swelling (inflammation) and gradually leads to areas of hardened and scarred lung tissue (fibrosis). Lung tissue that's scarred in this way doesn't function properly.</p> <p>People who work in the following industries are particularly at risk:</p> <ul style="list-style-type: none"> <li>* stone masonry and stone cutting - especially with sandstone</li> <li>* construction and demolition - as a result of exposure to concrete and paving materials</li> <li>* pottery, ceramics and glass manufacturing</li> <li>* MINING AND QUARRYING</li> <li>* sand blasting</li> </ul> <p>3. Noise, dust and light pollution</p> <p>The area under consideration is extremely flat with no natural noise, light or dust barriers. The entire site will be visible to the majority of the residents of Marham due to Marham being on higher ground than the proposed site. Screening will, therefore, be ineffective or so tall as to block all views across the Fen from both Marham and Shouldham. There is no Bunding large enough to provide a barrier against the noise and light pollution this work will cause. The noise, dust and light pollution from the estimated 11 hour day land stripping and 24 hour a day 7 days a week dredging is totally unacceptable.</p> <p>4. Access to site</p> <p>The local road network is poor and insufficient for such a project. I believe there is a possibility of installing an overland pipeline from this site to transport the sand for processing after wet dredging but no allowance has been made for the heavy duty equipment necessary for land</p>	<p>An Equality Impact Assessment (EQIA) will be carried out as part of the Pre-submission publication stage. This will assess whether particular sections of the community would be unduly affected by the proposals. An EQIA was carried out for the previous Silica Sand Review which found that Marham Parish had one of the lower percentages of people aged over 65 compared with other parishes containing silica sand resources.</p> <p>3. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. SIL 02 has been assessed separately in the Local Plan.</p> <p>4. As an area of search, there is no further information currently available on any future proposals for mineral extraction within AOS E. Land at SIL02 has been submitted by Sibelco UK Ltd as a proposed silica sand extraction site, which is partly located within AOS E. SIL02 is assessed separately to AOS E and representations regarding SIL02 are</p>

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<p>stripping to prepare the site for each new dredge. Neither has consideration been given to the lack of appropriate roads for the necessary plant and HGV that would be required to transport the raw material to the Leziate processing plant should it be decided to dry dredge the site instead.</p> <p>5. The Water Table / Flood plain</p> <p>a. The majority of the land under review is currently part of a HIGH RISK flood plain. The plan by Sibelco is to flood this area in order to dredge the sand. This will only increase the chance of future flooding in the area in the absence of the flood plain. Any Bunding and piles of surface soil and clay will only reduce the natural flow of water and increase the risk of flooding further.</p> <p>b. Anglian Water have a sewage pumping station in close proximity to the site. They also have a number of bore holes across Marham Fen for the extraction of clean water. How will these be affected by the plan?</p> <p>c. Concerns have already been expressed and documented by the Council on a restoration plan after the 20 year period involving the creation of a lake and wetlands. The concern is the increase in birds and wild fowl resulting in potential bird strikes on aircraft in close proximity to RAF Marham, with the risk of a major catastrophe from an aircraft crashing into a local built up area. The initial flooding of the land for the dredging will also cause this issue.</p>	<p>covered in the section of the Feedback Report which specifically deals with SIL02. A Transport Assessment would be required to be submitted at the planning application stage. In the Preferred Options document, the Areas of Search Policy MP13 will state that there is a preference for the existing processing plant to be accessed via conveyer, pipeline or off-public highway haul route.</p> <p>5. a) This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. AOS E does include land at high risk of flooding. A site specific flood risk assessment would be required at the planning application stage.</p> <p>b) Anglian Water have been consulted and have not raised objections to the area of search. The area of search does not include the Source Protection Zone surrounding the Anglian Water facility. A hydrogeological risk assessment would be required as part of any future planning application.</p> <p>c) Noted. As an area of search for future silica sand extraction there are no proposals available for the method of working or restoration if a site was to be proposed within the area of search in the future. The area of search policy will be amended to state that a Bird Hazard Assessment will be required at the planning application stage. The Bird Hazard Assessment report would identify the risk of bird</p>

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<p>6. Value to the community.</p> <p>a. What is the value of such a project to the local community and Britain? Sibelco is not a British company, its head offices are based in Belgium. The value of this type of sand is extremely high and profits made from the sale of this material will be of great value to BELGIUM and not the UK.</p> <p>b. There will also be no job benefits to the local community as the manpower required to run the planned dredging operations is less than the current services of those working the land. There will therefore be a reduction in jobs and absolutely no value or benefit of such a scheme to the local community.</p> <p>7. Property Value</p>	<p>hazard to the safe operation of aerodromes and aircraft, identify proposed mitigation of any identified risk, and include a Bird Hazard Management Plan if necessary.</p> <p>6. a. Noted. The proposed mineral extraction within Shouldham and Marham does not have proposed economic benefits for those parishes, although there may be workers at the Leziat processing plant who reside in the parishes. Sibelco UK is subject to business rates, to the Borough Council, for the Leziat processing plant. Residents of the parishes benefit from the use of finished goods manufactured from silica sand extracted within Norfolk. The National Planning Policy Framework states that it is essential that there is a sufficient supply of mineral to provide the infrastructure, buildings, energy and goods that the country needs. Silica sand from Norfolk is used in the manufacture of glass in the north of England, and supplies a number of downstream industries including the construction, automotive, and food and drink sectors. The potential operator of the site and their background is not a material planning consideration.</p> <p>b. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>7. Property values are not a material planning consideration.</p>

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<p>This site will significantly reduce the value of properties in and around Marham and Shouldham for at least 28 years. Who wants to live near and look at a Silica sand extraction plant that will be in opened from 2026 and in operation for at least 20 years, possibly longer?</p> <p>Please accept the above points as a formal objection to the proposed silica sand extraction site SIL 02 proposed by Sibelco UK Ltd</p>	
<p><b>(Object)</b></p> <p>Representation ID: 92256 Respondent: <b>Mrs N Bressani [17921]</b></p> <p>Representation ID: 92254 Respondent: <b>Mr M Bressani [17920]</b></p> <p>I wish to lodge my objection to the proposed site SIL 02 and AOS E as a preferred areas for silica sand extraction in the vicinity of the villages of Shouldham and Marham.</p> <p>I understand the need to provide a future source of silica sand, however, I feel that this development will have a disproportionate and devastating impact on our rural community.</p> <p>I would also like to note that the proposal put forward by Sibelco is an optimistic 'best case scenario' which downplays the negative impact on the residents' wellbeing, our community, and the environment, especially considering the massive size of these proposed sites and time scales involved in the development.</p> <p>I would also like to point out that the process has not adhered to the principles laid out in Norfolk County Council's own 'Statement of Community Involvement'. Residents were completely unaware of these plans, they were not notified of the consultation and had only a few days to prepare a response ahead of the deadline.</p> <p>In particular, my objection is based on the following grounds:</p> <p>Health/Safety &amp; Environment</p> <p>* A potentially unacceptable increase in Noise, Dust and Light pollution as a direct result of the proposed extraction is in violation of local residents' rights as per European Convention on Human Rights, specifically Article 2 (right to life), given health concerns about silica dust and links to silicosis and respiratory diseases, Article 8 (respect for one's private and family life, home and correspondence), and Protocol 1 (right to peaceful enjoyment of your property), considering the</p>	<p>This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>All parish councils in Norfolk and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>The Health and Safety Executive states that "Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust". "No cases of silicosis have been documented among members of the general public in Great Britain, indicating that environmental</p>

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<p>'excessive burden' placed on thousands of individual residents.</p> <p>* Prolonged exposure to silica dust present significant risk to vulnerable members of the community, particularly the elderly and young, given the village demographics.</p>	<p>exposures to silica dust are not sufficiently high to cause this occupational disease.”</p> <p>Protocol 1 Article 1 (the substantive right of peaceful enjoyment of one's possessions)</p> <p>This is a 'qualified right', where the planning authority must consider the public interest of a proposal, in terms of providing for society as a whole, and potential effects, and the rights of individual property owners, including neighbours and the landowner/proposer. The question is if coming to a decision, the authority has struck a fair balance between these rights, and the public interest.</p> <p>e.g. Dust, noise and lighting assessments are required to be submitted as part of a planning application and are assessed by an Environmental Health Officer.</p> <p>Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>Article 8 of the ECHR – the right to respect for private and family life, home and correspondence</p> <p>Justice Hickinbottom (2016) set out the relevant principles established from previous cases. Article 8 rights are a material planning consideration and should be respected but are not guaranteed;</p> <p>The rights have to be balanced against all other material considerations and this will be a planning judgment.</p> <p>The purpose of the Minerals Local Plan Review is to consider whether specific sites are suitable for allocation, and areas of search can be designated. The revised Minerals Local Plan will be tested at</p>

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<p>* No information has been provided regarding the impact of mineral extraction on local water supply/quality.</p> <p>* No restriction on site working hours is proposed.</p> <p>* This is the only proposal within Norfolk M&amp;WLP that is in a high-risk flood area. Flood risks are further exacerbated by the removal of ancient drainage ditches.</p> <p>Economic</p> <ul style="list-style-type: none"> <li>* No proposed economic benefit for the villages of Marham or Shouldham.</li> <li>* No additional job creation.</li> <li>* Reduction in house values.</li> <li>* Potential impact on home insurance due to increased flood risk.</li> <li>* Reduction in tourism and visitors to the Nar Valley Way.</li> <li>* Creation of 'trapped' residents unable to move due to the inevitable slowing of the housing market.</li> </ul>	<p>examination for soundness and legal compliance by an independent Planning Inspector on behalf of the Secretary of State for Housing, Communities, and Local Government.</p> <p>Anglian Water have been consulted and have not raised objections to the area of search. The area of search does not include the Source Protection Zone surrounding the Anglian Water facility. A hydrogeological risk assessment would be required as part of any future planning application.</p> <p>As an area of search, there is no further information currently available on any future proposals for mineral extraction within AOS E, such as potential working hours.</p> <p>AOS E does include land at high risk of flooding. Sand extraction is a 'water compatible' land use. A site specific flood risk assessment would be required at the planning application stage.</p> <p>The proposed mineral extraction within Shouldham and Marham does not have proposed economic benefits for those parishes, although there may be workers at the Leziat processing plant who reside in the parishes. Sibelco UK is subject to business rates, to the Borough Council, for the Leziat processing plant. Residents of the parishes benefit from the use of finished goods manufactured from silica sand extracted within Norfolk. The National Planning Policy Framework states that it is essential that there is a sufficient supply of mineral to provide the infrastructure, buildings, energy and goods that the</p>

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<p>Local Infrastructure</p> <ul style="list-style-type: none"> <li>* Existing road infrastructure is unsuitable for HGV and plant access. Precedence has been established by RAF Marham who are prohibited from using village roads for access purposes.</li> <li>* Local trunk roads will be negatively affected by increased traffic (A47 &amp; A10).</li> <li>* No proposal for Sibelco's preferred option for above ground pipeline between proposed site and their current site at Leziate taking into account natural and transport barriers.</li> </ul> <p>Ecology</p> <ul style="list-style-type: none"> <li>* Destruction of habitat of endangered wildlife species including:</li> <li>* Voles, Newts, scarce Emerald Damselfly, Moths including the Grizzled Skipper, Dingy Skipper.</li> <li>* Birds - conservation priority red list: Skylark, Lapwing, House Sparrow, Linnet, Yellowhammer, Song Thrush, Grey Wagtail, Tree Pipit, Nightjar, Woodlark, Grey Partridge.</li> <li>* Dust deposition relating to the River Nar - a designated SSSI and a Core River valley.</li> <li>* No proposal as to how the Core River Valley will be enhanced following mineral extraction.</li> </ul>	<p>country needs. Silica sand from Norfolk is used in the manufacture of glass in the north of England, and supplies a number of downstream industries including the construction, automotive, and food and drink sectors.</p> <p>Property values are not a material planning consideration.</p> <p>There is no restriction on the surrounding highway for HGV traffic, the agreement with RAF Marham is not the result of a Traffic Regulation Order. A transport assessment would form part of any future planning application which would consider potential transport impacts as a result of the proposed development, and suggest appropriate mitigation if required. The Highway Authority would be consulted on any future planning application for mineral extraction. The pipeline proposed by Sibelco is regarding site SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues.</p> <p>Natural England, and a number of other statutory and non-statutory nature conservation bodies were consulted on the initial document, and no 'in principle' objections were received. Any future planning application would be required to carry out habitat and species surveys to identify the ecological baseline, and suggest appropriate mitigation for any potential impacts identified.</p> <p>AOS E is an area of search and therefore there is currently no restoration scheme for future mineral</p>



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<p>* Detrimental impacts on ecology and biodiversity on nearby Country Wildlife Sites.</p> <p>* No restoration plan proposed for the entire site, which suggests there is no intention to remedy the harm caused, fears exacerbated by the very poor and dangerous condition of other Sibelco sites, such as Bawsey and Leziate.</p> <p>Landscape</p> <p>* Marham village enjoys an elevated position relative to the proposed site, with beautiful longreaching views across the fen landscape:</p> <p>* Bunds or screening will be ineffective and intrusive in their own right.</p> <p>* Proposed works will be visually detrimental and out of character with the local landscape.</p> <p>* Prevailing North and North West winds will aggravate noise and dust pollution concerns and impact on health.</p> <p>* Irreplaceable loss of agricultural land.</p>	<p>extraction within AOS E. Areas of Search Policy MP13 requires a comprehensive working and restoration scheme to be submitted at the planning application stage. Historic permissions such as Bawsey and Pentney did not have detailed restoration schemes agreed as part of the application process, unlike the present situation.</p> <p>This landscape comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. Areas of Search Policy MP13 requires a Landscape and Visual Impact Assessment to be submitted at the planning application stage.</p> <p>Analysis of the windrose information for RAF Marham shows that the general prevailing wind is south westerly. A noise assessment and dust assessment will be required at the planning application stage. These documents are considered by an Environmental Health Officer. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>A future planning application would need to consider the loss of any agricultural land, compared with the need for silica sand for glass making; which is recognised as an important and nationally scarce industrial mineral.</p> <p>There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the temporary diversion</p>

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<p>* Destruction of ancient footpaths and relocation of rights of way (further than the stipulated 100m permitted) contained both within and adjacent to the proposed site, which are extensively used by local residents, schools and tourists.</p> <p>* Detrimental impact on the open nature of the landscape and to the setting of the scheduled monument Pentney Priory Gatehouse and other heritage assets.</p> <p>* No assurances have been received regarding the possibility of the site being used for Landfill in the future.</p>	<p>or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would need to address the footpath locations. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PRowS have been successfully addressed.</p> <p>As part of the evidence base for the Preferred Options stage of the Minerals and Waste Local Plan Review a Heritage Impact Assessment on SIL 02 and AOS E has been carried out by Norfolk County Council's Historic Environment Service. The HIA recommended that the northern parts of AOS E nearest to Wormegay and Pentney Priory should not be allocated due to the potentially severe impact of mineral extraction in these areas on the setting of the heritage assets at Wormegay and of Pentney Priory. The findings of the HIA will be incorporated into the Preferred Options stage of the Local Plan.</p> <p>It is not proposed for any potential extraction sites within Areas of Search to be used for landfill after mineral extraction. Silica sand extraction sites in Norfolk that have recently been restored and those that are currently being restored have either used the overburden from the site to create a suitable landform, or have been restored to water, or have used the tailing material from the mineral washing process to restore the site.</p> <p>Areas of Search Policy MP13 requires a Heritage Statement and an archaeological assessment to be</p>

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<p>Archaeology</p> <p>* This area is potentially very rich in archaeological finds, from Pre-Historic to Roman to Medieval and any undiscovered sites would be destroyed permanently by the project.</p> <p>* Close proximity to Pentney Priory Gatehouse and the unexplored Cistercian Nunnery in Marham.</p> <p>In conclusion, nothing in this proposal addresses residents' concerns about the devastating impact the development will have on our community, quality of life, health and wellbeing for decades to come.</p> <p>No assurances have been given that the site will not be abandoned as industrial wasteland with zero potential for either leisure or ecological benefit.</p> <p>Whilst I am sure that many of the concerns raised here may be easily answered, there are some which will have a huge impact on our villages and feel the manner in which the proposal has thus far been dealt with has not allowed any concerns of the local residents to be involved in the process. I remain committed to be involved in this process such that the concerns can be addressed. If you require any clarification of the points raised, I would be happy to discuss the matter further.</p>	<p>submitted at the planning application stage. An archaeology assessment may initially be desk-based but may need to be followed up with field surveys and trial trenching.</p> <p>The response to the landscape issues raised above in relation to Pentney Priory Gatehouse also applies to this issue.</p> <p>The response to the restoration issues raised above also apply to this statement. AOS E is an area of search and therefore there is currently no restoration scheme for future mineral extraction within AOS E. Areas of Search Policy MP13 requires a comprehensive working and restoration scheme to be submitted at the planning application stage. Phased working and progressive restoration are a normal part of modern mineral extraction applications and are controlled by planning conditions.</p>
<p><b>(Object)</b></p> <p>Representation ID: 92251 Respondent: <b>Mr J Clarke [17917]</b></p> <p>Representation ID: 92258 Respondent: <b>Miss S French [17916]</b></p> <p>Representation ID: 92245 Respondent: <b>Ms S Swanson [17914]</b></p> <p>Representation ID: 92243 Respondent: <b>Mrs J Hallett [17912]</b></p> <p>Representation ID: 92240 Respondent: <b>Mr A Archibald [17910]</b></p> <p>Representation ID: 92238 Respondent: <b>Ms B Archibald [17909]</b></p> <p>Representation ID: 92207 Respondent: <b>Ms Sandra Wilson-Low [17884]</b></p>	

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<p>Representation ID:92205 Respondent: <b>Ms Christine Wilson-Low [17816]</b></p> <p>Representation ID: 92175 Respondent: <b>Mr K Walton [17862]</b></p> <p>Representation ID: 92172 Respondent: <b>Mrs Angela Walton [17821]</b></p> <p>Representation ID: 93222 Respondent: <b>Miss J Fowler [18244]</b></p> <p>Representation ID: 93223 Respondent: <b>Ms S Hughes [18221]</b></p> <p>Representation ID: 93224 Respondent: <b>Ms S Winstone [18222]</b></p> <p>Representation ID: 93225 Respondent: <b>Ms H Hooper [18223]</b></p> <p>I wish to lodge my objection to proposed sites SIL 02 and AOS-E as preferred areas for silica sand extraction.</p> <p>I understand the need to provide a future source of silica sand, however, I feel that this development will have a disproportionate and devastating impact on a rural community already affected by a rapidly expanding RAF base of strategic national importance.</p> <p>I would also like to note that the proposal put forward by Sibelco is an optimistic 'best case scenario' which downplays the negative impact on the residents' wellbeing, our community and the environment, especially considering the massive size of this site and timescales involved in the development.</p> <p>I would also like to point out that the process has not adhered to the principals laid out in Norfolk County Council's own 'Statement of Community Involvement'. Residents were completely unaware of these plans, they were not notified of the consultation and had only a few days to prepare a response ahead of the deadline.</p> <p>In particular, my objection is based on the following grounds:</p> <p>Health/Safety and Environment</p> <p>* Unacceptable increase in noise, dust and light pollution as a direct result of the proposed extraction is in violation of local residents rights as per the European Convention on Human Rights, specifically Article 2 (right to life), given health concerns about silica dust and links to silicosis and respiratory diseases, Article 8 (respect for one's private and family life, home and</p>	<p>This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>All parish councils in Norfolk and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>The Health and Safety Executive states that “Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust”. “No cases of silicosis have been documented among members of the general public in Great Britain, indicating that environmental</p>

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<p>correspondence), and Protocol 1 (right to peaceful enjoyment of your property), considering the 'excessive burden' placed on thousands of individual residents</p> <p>* Prolonged exposure to silica dust presents significant risk to vulnerable members of the community, particularly the elderly and young, given the village demographics</p>	<p>exposures to silica dust are not sufficiently high to cause this occupational disease.”</p> <p>Protocol 1 Article 1 (the substantive right of peaceful enjoyment of one's possessions)</p> <p>This is a 'qualified right', where the planning authority must consider the public interest of a proposal, in terms of providing for society as a whole, and potential effects, and the rights of individual property owners, including neighbours and the landowner/proposer. The question is if coming to a decision, the authority has struck a fair balance between these rights, and the public interest.</p> <p>e.g. Dust, noise and lighting assessments are required to be submitted as part of a planning application and are assessed by an Environmental Health Officer. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>Article 8 of the ECHR – the right to respect for private and family life, home and correspondence</p> <p>Justice Hickinbottom (2016) set out the relevant principles established from previous cases. Article 8 rights are a material planning consideration and should be respected but are not guaranteed;</p> <p>The rights have to be balanced against all other material considerations and this will be a planning judgment.</p> <p>The purpose of the Minerals Local Plan Review is to consider whether specific sites are suitable for allocation, and areas of search can be designated. The revised Minerals Local Plan will be tested at</p>

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<p>* No information has been provided regarding the impact of mineral extraction on local water supply/quality</p> <p>* No restriction on site working hours is proposed</p> <p>* This is the only proposal within Norfolk M &amp; WLP that is in a high-risk flood area. Flood risks are further exacerbated by the removal of ancient drainage ditches</p> <p>Economic</p> <ul style="list-style-type: none"> <li>* No proposed economic benefit for the village of Marham or Shouldham</li> <li>* No additional job creation</li> <li>* Reduction in house values</li> <li>* Potential impact on home insurance due to increased flood risk</li> <li>* Reduction in tourism and visitors to the Nar Valley Way</li> <li>* Creation of 'trapped' residents unable to move due to the inevitable slowing of the housing market</li> </ul>	<p>examination for soundness and legal compliance by an independent Planning Inspector on behalf of the Secretary of State for Housing, Communities, and Local Government.</p> <p>Anglian Water have been consulted and have not raised objections to the area of search. The area of search does not include the Source Protection Zone surrounding the Anglian Water facility. A hydrogeological risk assessment would be required as part of any future planning application.</p> <p>As an area of search, there is no further information currently available on any future proposals for mineral extraction within AOS E, such as potential working hours.</p> <p>AOS E does include land at high risk of flooding. Sand extraction is a 'water compatible' land use. A site specific flood risk assessment would be required at the planning application stage.</p> <p>The proposed mineral extraction within Shouldham and Marham does not have proposed economic benefits for those parishes, although there may be workers at the Leziat processing plant who reside in the parishes. Sibelco UK is subject to business rates, to the Borough Council, for the Leziat processing plant. Residents of the parishes benefit from the use of finished goods manufactured from silica sand extracted within Norfolk. The National Planning Policy Framework states that it is essential that there is a sufficient supply of mineral to provide the infrastructure, buildings, energy and goods that the</p>

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<p>Local Infrastructure</p> <ul style="list-style-type: none"> <li>* Existing road infrastructure is unsuitable for HGV and plant access. Precedence has been established by RAF Marham who are prohibited from using village roads for access purposes.</li> <li>* Local trunk roads will be negatively affected by increased traffic (A47 and A10)</li> <li>* No proposal for Sibelco's preferred option for above ground pipeline between proposed sites and their current site at Leziate taking into account natural and transport barriers</li> </ul> <p>Ecology</p> <ul style="list-style-type: none"> <li>* Destruction of habitat of endangered wildlife species including: Voles, Newts, scarce Emerald Damselfly, Moths including the Grizzled Skipper, Dingy Skipper</li> <li>Birds on conservation priority list: Skylark, Lapwing, House Sparrow, Linnet, Yellowhammer, Song Thrush, Grey Wagtail, Tree Pipit, Nightjar, Woodlark, Grey Partridge</li> <li>* Dust deposition relating to the River Nar - a designated SSSI and a Core River valley</li> <li>* No proposal as to how the Core River Valley will be enhanced following mineral extraction</li> </ul>	<p>country needs. Silica sand from Norfolk is used in the manufacture of glass in the north of England, and supplies a number of downstream industries including the construction, automotive, and food and drink sectors. The potential operator of the site and their background is not a material planning consideration.</p> <p>Property values are not a material planning consideration.</p> <p>There is no restriction on the surrounding highway for HGV traffic, the agreement with RAF Marham is not the result of a Traffic Regulation Order. A transport assessment would form part of any future planning application which would consider potential transport impacts as a result of the proposed development, and suggest appropriate mitigation if required. The Highway Authority would be consulted on any future planning application for mineral extraction. The pipeline proposed by Sibelco is regarding site SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues.</p> <p>Natural England, and a number of other statutory and non-statutory nature conservation bodies were consulted on the initial document, and no 'in principle' objections were received. Any future planning application would be required to carry out habitat and species surveys to identify the ecological baseline, and suggest appropriate mitigation for any potential impacts identified.</p>

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<p>* Detrimental impacts on ecology and biodiversity on nearby County Wildlife Sites</p> <p>* No restoration plan proposed for the entire site, which suggests there is no intention to remedy the harm caused. Fears exacerbated by the very poor and dangerous condition of other Sibelco sites such as Bawsey and Leziate</p> <p>Landscape</p> <p>a) Marham village enjoys an elevated position relative to the proposed site, with beautiful long-reaching views across the fen landscape.</p> <p>a1) Bunds or screening will be ineffective and intrusive in their own right.</p> <p>a1) Proposed works will be visually detrimental and out of character with the local landscape.</p> <p>b) Prevailing North and North West winds will aggravate noise and dust pollution concerns and impact on health.</p> <p>c) Irreplaceable loss of agricultural land.</p>	<p>AOS E is an area of search and therefore there is currently no restoration scheme for future mineral extraction within AOS E. Areas of Search Policy MP13 requires a comprehensive working and restoration scheme to be submitted at the planning application stage. Historic permissions such as Bawsey and Pentney did not have detailed restoration schemes agreed as part of the application process, unlike the present situation.</p> <p>a) This landscape comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. Areas of Search Policy MP13 requires a Landscape and Visual Impact Assessment to be submitted at the planning application stage.</p> <p>b) Analysis of the windrose information for RAF Marham shows that the general prevailing wind is south westerly. A noise assessment and dust assessment will be required at the planning application stage. These documents are considered by an Environmental Health Officer. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>c) A future planning application would need to consider the loss of any agricultural land, compared with the need for silica sand for glass making; which is recognised as an important and nationally scarce industrial mineral.</p>



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<p>d) Destruction of ancient footpaths and relocation of rights of way (further than the stipulated 100m permitted) contained both within and adjacent to the proposed site, which are extensively used by local residents, schools and tourists.</p> <p>e) Detrimental impact on the open nature of the landscape and to the setting of the scheduled monuments Pentney Priory Gatehouse and other heritage assets.</p> <p>f) No assurances have been received regarding the possibility of the site being used for Landfill in the future.</p> <p>Archaeology</p> <p>a) This area is potentially very rich in archaeological finds, from Pre-Historic to Roman to Medieval and any undiscovered sites would be destroyed permanently by the project.</p> <p>b) Close proximity to Pentney Priory Gatehouse and the unexplored Cistercian Nunnery in Marham.</p>	<p>d) There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the temporary diversion or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would need to address the footpath locations. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PRowS have been successfully addressed.</p> <p>e) see response to issue (a) under archaeology below.</p> <p>f) It is not proposed for any potential extraction sites within Areas of Search to be used for landfill after mineral extraction. Silica sand extraction sites in Norfolk that have recently been restored and those that are currently being restored have either used the overburden from the site to create a suitable landform, or have been restored to water, or have used the tailing material from the mineral washing process to restore the site.</p> <p>Archaeology</p> <p>a) Areas of Search Policy MP13 requires a Heritage Statement and an archaeological assessment to be submitted at the planning application stage. An archaeology assessment may initially be desk-based but may need to be followed up with field surveys and trial trenching.</p> <p>b) As part of the evidence base for the Preferred Options stage of the Minerals and Waste Local Plan</p>

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<p>In conclusion, nothing in this proposal addresses residents' concerns about the devastating impact the development will have on our community, quality of life, health and wellbeing for decades to come.</p> <p>No assurances have been given that the site will not be abandoned as industrial wasteland with zero potential for leisure or ecological benefit.</p> <p>If you require any clarification of the points raised, we would be happy to discuss the matter further.</p>	<p>Review a Heritage Impact Assessment on SIL 02 and AOS E has been carried out by Norfolk County Council's Historic Environment Service. The HIA recommended that the northern parts of AOS E nearest to Wormegay and Pentney Priory should not be allocated due to the potentially severe impact of mineral extraction in these areas on the setting of the heritage assets at Wormegay and of Pentney Priory. The findings of the HIA will be incorporated into the Preferred Options stage of the Local Plan.</p> <p>The response to the restoration issues raised above also apply to this statement. AOS E is an area of search and therefore there is currently no restoration scheme for future mineral extraction within AOS E. Areas of Search Policy MP13 requires a comprehensive working and restoration scheme to be submitted at the planning application stage. Phased working and progressive restoration are a normal part of modern mineral extraction applications and are controlled by planning conditions.</p>
<p><b>(Object)</b> Representation ID: 92223</p> <p>Respondent: <b>Mr J Carman [17896]</b></p> <p>I would like to lodge my objection to AOS-E - the area of search for silica sand to the northeast of Shouldham on the following grounds...</p> <ul style="list-style-type: none"> <li>- Destruction of local ecology</li> </ul>	<p>Natural England, and a number of other statutory and non-statutory nature conservation bodies were consulted on the Initial Consultation document, and no 'in principle' objections were received. Any future planning application would be required to carry out habitat and species surveys to identify the ecological baseline, and suggest appropriate mitigation for any potential impacts identified.</p>

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<p>- Destruction of valuable agricultural land</p> <p>- Destruction of many acres of forest currently used by local mountain biking clubs, horse riders and hundreds of walkers</p> <p>- Increased noise during periods of excavation, many residents live within a few hundred meters</p>	<p>A future planning application would need to consider the loss of any agricultural land, compared with the need for silica sand for glass making; which is recognised as an important and nationally scarce industrial mineral.</p> <p>Any future planning application for mineral extraction would need to address the footpath locations and public access. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PRowS have been successfully addressed. It is recognised that Shouldham Warren is a commercial timber plantation which will be subject to rotational cropping. It is possible that silica sand extraction could be programmed as part of the harvesting of timber.</p> <p>The boundaries of the area of search are at least 250m from the nearest residential property. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls. Policy MP13, which applies to all areas of search, states that any planning application within an area of search would need to include a programme of mitigation measures (e.g. standoff areas, screening and/or bunding) to deal appropriately with any potential amenity impacts, including noise and dust. Noise and dust assessments would also need to be submitted with any planning application and would be considered by an Environmental Health Officer.</p>

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<ul style="list-style-type: none"> <li>- Destruction of views from houses to the north of Shouldham</li>   <li>- Reduction in local housing value</li>   <li>- Reduction in tourism and visitors - the warren currently attracts people from far and wide to the local area and this helps support the now thriving and award winning local pub.</li>   <li>- Exposure to Silica dust and the associated health issues, this is within 2 km of the local school</li>   <li>- Unsuitable road infrastructure for the removal of any waste material</li> </ul>	<p>As an area of search for future silica sand extraction there are no proposals for a site within the area of search (except where SIL 02 and AOS E overlap). Any future planning application would need to consider landscape impacts and propose mitigation measures through a Landscape and Visual Impact Assessment.</p> <p>Property values are not a material planning consideration.</p> <p>The issue of adverse impacts on local businesses is not a material planning consideration given that the planning system is not in place to protect private business interests. The site assessment considers whether a proposal would result in unacceptable impacts on an existing use of land which ought to be protected in the public interest.</p> <p>The Health and Safety Executive states that "Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust". "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>There is not usually waste material to be removed from a mineral extraction site, as any soils and overburden are stored in screening bunds and then used in the restoration of the site following extraction. A Transport Assessment would be required to be submitted at the planning application</p>

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<p>- Close proximity to the local RAF base, increased water will increase the bird population and will be a risk for jets</p> <p>In Summary this will have a devastating impact on the local community, school and pub and will destroy a thriving local recreational and beauty spot.</p>	<p>stage. In the Preferred Options document, the Areas of Search Policy MP13 will state that there is a preference for the existing processing plant to be accessed via conveyer, pipeline or off-public highway haul route.</p> <p>As an area of search for future silica sand extraction there are no proposals available for the method of working of restoration if a site was to be proposed within the area of search in the future. The Areas of Search Policy (MP13) will include a requirement for a Bird Hazard Assessment to be submitted at the planning application stage. The Defence Infrastructure Organisation have been consulted.</p>
<p><b>(Object)</b> Representation ID: 92211  Respondent: <b>Mr P Barham [17886]</b></p> <p>I appreciate the fact that mineral extraction is to be of considerable importance especially when Sibelco is involved but the main worry for me is Shouldham Warren .Shouldham Warren it will be seen was planted on silica sand a short distance from the proposed site. We must respect the forestry commission involvement here as to have spent a considerable amount of money to provide picnic areas horse riding areas mountain bike areas and general dog walks these are enjoyed by a large amount of people Marham Shouldham Downham market and beyond. I attended a meeting with Sibelco and many local residents to decide what should be done with worked out pits at Bawsey in the wake of drowning in very deep water filled pits. I have since been told from reliable sources that silica is extremely problematic and must therefore be considered as highly dangerous hence the name virgin dust unable to accept weight and is extremely liable to move very easily under these conditions. The plant equipment needed to prepare the site would be large therefore unable to use the road at Marham, there seems to be no way in Shouldham would be out of the question as I am sure you must already know, this being one problem?</p>	<p>Any future planning application for mineral extraction would need to address the footpath locations and public access. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PROWs have been successfully addressed.</p> <p>The existing silica sand extraction sites in West Norfolk use normal construction equipment of a type seen on many development sites. This equipment is normally on the site for the duration of working.</p> <p>The Area of Search is not located within a protected landscape. As an area of search for future silica sand extraction there are no proposals for a site within the area of search (except where SIL 02 and AOS E</p>

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<p>The extraction pits would not be seen to blend in with an extremely attractive and much envied part of the immediate environment. The residents of the two villages most affected have I am sure wondered how it could be allowed to ruin a superior view. Very very strict measures would have to be placed on the shoulders of Sibelco if you were to consider this application possible. The country as a whole is losing to much of its superior environment to industry who or won't respect the natural beauty of the surrounding environment. We should therefore remember the drownings at Sibelco silica extraction pits at Bawsey and imposed considerable restrictions on Sibelco. Health and Safety being just one of many, Sibelco being perhaps multinational would therefore think they are above any restrictions and the law. I remain yours one completely unhappy Marham resident. Thanks for taking time to read my letter of so many I feel sure important points to be taken in to consideration.</p>	<p>overlap). Any future planning application would need to consider landscape impacts and propose mitigation measures through the submission of a Landscape and Visual Impact Assessment.</p> <p>It would be for any future planning application process to determine whether the restoration scheme would be appropriate. Historic permissions such as Bawsey and Pentney did not have detailed restoration schemes agreed as part of the application process, unlike the present situation. Phased working and restoration schemes are controlled by planning conditions.</p>
<p><b>(Object)</b> Representation ID: 92203</p> <p>Respondent: <b>Mr Steve Brewer [17489]</b></p> <p>Please accept this letter as a formal objection to the progress of the Sibelco sand applications with reference to AOS E - Shouldham &amp; Marham silica sand quarry.</p> <p>To echo the many valid points already raised in the various letters I have read I would also like to highlight that by allowing this to pass through planning you run a very high risk of damaging Shouldham village and it's representation as a desirable West Norfolk location to live. Of which if you are interested in the growth of this part of Norfolk with in train connections to London, something you must keep in mind!</p> <p>With the Ofsted outstanding primary school and community ran/owned pub and the increasingly used Warren, Shouldham remains one of a few village locations in West Norfolk that will attract people here to live.</p> <p>Should you allow the quarry to go ahead oppose to looking at the bigger picture you will personally be damaging the future of this village and the surrounding area.</p> <p>There are other other locations which I believe to be of less damage to the environment and economics of this part of Norfolk and the International business that Sibelco is can easily source the same sand elsewhere, just not making such profit along the way....</p>	<p>The boundaries of the area of search are at least 250m from the nearest residential property. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls. Policy MP13, which applies to all areas of search states that any planning application within an area of search would need to include a programme of mitigation measures (e.g. standoff areas, screening and/or bunding) to deal appropriately with any potential amenity impacts, including noise and dust. Norfolk County Council carried out a process as part of the Single-Issue Silica Sand Review which analysed the silica sand mineral resource in relation to a number of constraints (this process is explained in</p>

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<p>Please consider your final decision carefully.</p>	<p>the supporting text to Policy MP2 'Spatial Strategy for Minerals Extraction'). The Areas of Search were those parts of the silica sand resource identified as being least constrained. National Policy requires Mineral Planning Authorities to plan to ensure adequate supplies of mineral to processing plants in their area.</p>
<p><b>(Object)</b></p> <p>Representation ID: 92200 Respondent: <b>Miss L Tanner [17880]</b>  Representation ID: 92224 Respondent: <b>Mr B Greene [17897]</b>  Representation ID: 92210 Respondent: <b>Miss E Greene [17885]</b></p> <p>Please accept this letter as a formal objection to the above at area ref AOS E.  As a resident of Marham living in close proximity to this planned development I, like most other residents, was totally unaware or advised of such a scheme until a neighbour informed me of it a few days ago. Apparently only 10 letters were sent out to properties closest to the site. It now also appears that this plan has been discussed by the county council for over three years. The consultation period for this development ends in the next few days giving the residents of Marham and Shouldham insufficient time to review and comment on such a scheme. Considering the size and nature of this planned development this is totally unacceptable and unprofessional. Why have we not been made aware of this plan earlier?</p> <p>Fortunately a meeting was held by Shouldham Parish Council 6th August 2018 and the following key points were identified;</p> <ul style="list-style-type: none"> <li>* If approved, the first phase of the project will involve the stripping of all vegetation, soil and clay from the fields allowing access to the sand below. This will involve the use of heavy duty earth moving equipment.</li> <li>* The second phase will involve the flooding of the land and dredging on the sand, operating 24 hours a day, 7 days a week. No restriction on working hours has been planned. There are also concerns as this type of dredging has not been carried out by Sibelco in the UK before.</li> <li>* Planned start date 2026 for a period in excess of 20 years.</li> </ul>	<p>The Single Issue Silica Sand Review process was carried out from 2014-2016 and was subject to multiple rounds of public consultation and an Examination in Public by an independent Planning Inspector. A number of Parish Councils engaged in the review process; Marham and Shouldham Parish Councils were informed. The Silica Sand Review was a separate local plan process to the current Minerals and Waste Local Plan Review.</p> <p>This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>As an area of search for future silica sand extraction there are no proposals available for the method of</p>

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<p>The reasons for my objection to the above are as follows;</p> <ol style="list-style-type: none"> <li>1. Environmental issues <ol style="list-style-type: none"> <li>a. Stripping such a large plot of land for over 20 years will totally destroy the wildlife in this area. The Fen in Marham and the woods in Shouldham Warren will become isolated.</li> <li>b. Mow Fen, a country Wildlife site, is located within this area</li> <li>c. The Carbon footprint of the area will be greatly affected by the removal of such a large area of crops. Plants and agricultural farmland.</li> <li>d. Any screening or Bunding of the site to reduce noise and light pollution will ruin this beautiful landscape and views currently seen across the fen. Where will all the removed soil be stored from the land stripping process?</li> </ol> </li> <li>2. Health and safety <ol style="list-style-type: none"> <li>a. The dust created by such a development will cause health and safety issues. Smaller particles of sand and dust will travel long distances and easily reach properties in Marham and Shouldham. This area of land is extremely flat with no natural barriers to slow or prevent the movement of dust and fine particles from the site to the adjacent properties. The effects of this on the health of the elderly, asthma sufferers and those with breathing issues will be significant.</li> </ol> </li> </ol> <p>The government website states the following;  <a href="http://www.hse.gov.uk/construction/healthrisks/cancer-and-construction/silica-dust.htm">www.hse.gov.uk/construction/healthrisks/cancer-and-construction/silica-dust.htm</a></p> <p>Silica is the biggest risk to construction workers after asbestos. Heavy and prolonged exposure to RCS can cause lung cancer and other serious respiratory diseases. HSE commissioned estimates it was responsible for the death of over 500 construction workers in 2005. In addition to the risks from lung cancer, silica is also linked to other serious lung diseases:</p> <ul style="list-style-type: none"> <li>* Silicosis can cause severe breathing problems and increases the risk of lung infections. Silicosis usually follows exposure to RCS over many years, but extremely high exposures can cause acute silicosis more quickly.</li> <li>* Chronic obstructive pulmonary disease is a group of lung diseases including bronchitis and emphysema. It results in severe breathlessness, prolonged coughing and chronic disability. It can</li> </ul>	<p>working or restoration if a site was to be proposed within the area of search in the future.</p> <ol style="list-style-type: none"> <li>1. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. SIL 02 is assessed separately in the Local Plan.</li> <li>2. The Health and Safety Executive states that “Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust”. “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.”</li> </ol>



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<p>be very disabling and is a leading cause of death.</p> <p>The NHS website also states;  <a href="http://www.nhs.uk/conditions/silicosis/">www.nhs.uk/conditions/silicosis/</a>  Silicosis  Silicosis is a long-term lung disease caused by inhaling large amounts of crystalline silica dust, usually over many years.  Silica is a substance naturally found in certain types of stone, rock, sand and clay. Working with these materials can create a very fine dust that can be easily inhaled.  Once inside the lungs, the dust particles are attacked by the immune system.  This causes swelling (inflammation) and gradually leads to areas of hardened and scarred lung tissue (fibrosis). Lung tissue that's scarred in this way doesn't function properly.  People who work in the following industries are particularly at risk:  * stone masonry and stone cutting - especially with sandstone  * construction and demolition - as a result of exposure to concrete and paving materials  * pottery, ceramics and glass manufacturing  * mining and quarrying  * sand blasting</p> <p>3. Noise, dust and light pollution  a. The area under consideration is extremely flat with no natural noise, light or dust barriers. Therefore screening will be ineffective and the entire site will be visible to the majority of the residents of Marham. There is no Bunding large enough to provide a barrier against the noise and light pollution this work will cause. The noise, dust and light pollution from the estimated 11 hour day land stripping and 24 hour a day 7 days a week dredging is totally unacceptable.</p> <p>4. Access to site</p>	<p>3. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>4. As an area of search, there is no further information currently available on any future</p>

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<p>a. The local road network is poor and insufficient for such a project. I believe there is a possibility of installing a pipeline from this site to transport the sand for processing but no allowance has been made for the heavy duty equipment necessary for land stripping. However the Norfolk Minerals and Waste Local Plan (Dec 2017) page 11 states;</p> <p>"The area of search is approximately 15 kilometres from the Leziate processing plant and it is considered likely that any extraction site would transfer mineral to the processing plant by road."</p> <p>There is some confusion and misinformation over this issue.</p> <p>5. The Water Table / Flood plain</p> <p>a. The majority of the land under review is currently part of a HIGH RISK flood plain. The plan by Sibelco is to flood this area in order to dredge the sand. This will only increase the chance of future flooding in the area in the absence of the flood plain. Any Bunding and piles of surface soil and clay will only reduce the natural flow of water and increase the risk of flooding further.</p> <p>b. Anglian water have a sewage pumping station in close proximity to the site. They also have a number of bore holes across Marham Fen for the extraction of clean water, how will these be affected by the plan.</p> <p>c. Concerns have already been expressed and documented by the Council on a restoration plan after the 20 year period involving the creation of a lake and wetlands. The concern is the increase in birds and wild fowl resulting in potential bird strikes on aircraft in close proximity to RAF Marham. Surely the initial flooding of the land for the dredging will also cause this issue.</p> <p>6. Value to the community.</p>	<p>proposals for mineral extraction within AOS E (except for where SIL02 and AOS E overlap). A Transport Assessment would be required to be submitted at the planning application stage. In the Preferred Options document, the Areas of Search Policy MP13 will state that there is a preference for the existing processing plant to be accessed via conveyer, pipeline or off-public highway haul route.</p> <p>5. a &amp; c These comments relate to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. AOS E does include land at high risk of flooding. A site specific flood risk assessment would be required at the planning application stage.</p> <p>5. b. Anglian Water have been consulted and have not raised objections to the area of search. The area of search does not include the Source Protection Zone surrounding the Anglian Water facility. A hydrogeological risk assessment would be required as part of any future planning application.</p> <p>c. As an area of search for future silica sand extraction there are no proposals available for the method of working or restoration if a site was to be proposed within the area of search in the future. The Areas of Search policy MP13 will be amended to state that a Bird Hazard Assessment will be required at the planning application stage.</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>a. What is the value of such a project to the local community and Britain? Sibelco is not a British company, its head offices are based in Belgium. The value of this type of sand is extremely high and profits made from the sale of this material will be of great value to BELGIUM and not the UK.</p> <p>b. There will also be no job benefits to the local community as the manpower required to run the planned dredging operations is less than the current services of those working the land. There will therefore be a reduction in jobs and absolutely no value or benefit of such a scheme to the local community.</p> <p>7. Property Value</p> <p>a. This will significantly reduce the value of properties in and around Marham and Shouldham for at least 28 years. Who wants to live near and look at a Silica sand extraction plant that will be in opened from 2026 and in operation for at least 20 years, probably much longer?</p> <p>Please accept the above points as part of our formal objection to the planned sand extraction by Sibelco,</p>	<p>6. The proposed mineral extraction within Shouldham and Marham does not have proposed economic benefits for those parishes, although there may be workers at the Leziate processing plant who reside in the parishes. Sibelco UK is subject to business rates, to the Borough Council, for the Leziate processing plant. Residents of the parishes benefit from the use of finished goods manufactured from silica sand extracted within Norfolk. The National Planning Policy Framework states that it is essential that there is a sufficient supply of mineral to provide the infrastructure, buildings, energy and goods that the country needs. Silica sand from Norfolk is used in the manufacture of glass in the north of England, and supplies a number of downstream industries including the construction, automotive, and food and drink sectors. The potential operator of the site and their background is not a material planning consideration.</p> <p>b. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>7. Property values are not a material planning consideration.</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92198 Respondent: <b>Mrs Jane Bradley [17861]</b></p> <p>Re: Proposed Silica Sand Extraction Sites SIL 02 and AOS E</p> <p>I wish to object unreservedly regarding the proposal for the above sites for the extraction of silica sand. I appreciate that there will be a need for silica sand in the future, but I firmly believe that this would have a devastating effect, not only on the villages of Marham and Shouldham, but also, on the surrounding environment including the villages of Pentney, Wormegay, Fincham and Narborough. My objections are based on the following grounds:</p> <p>Health, Safety and Environment:</p> <p>Firstly, I believe the Sibelco representative to be totally wrong when he stated at a recent meeting that the use of bunding or barriers will ensure that Marham village will not be affected by noise, dust or light from the excavation. I fail to see how this could possibly be effective as Marham is located on an elevated site, so what is now a stunning view of fenland, fields and forest will be permanently destroyed.</p> <p>The continual 'hum', (the word used by the Sibelco representative) will be totally unacceptable for people who have chosen to live in a rural location. Although residents already experience some aircraft noise from RAF Marham, this only occurs in short bursts and on an irregular basis. Light pollution will also have a disastrous effect on the bats and other nocturnal wildlife which live here and the absolute darkness is another feature enjoyed by many people in the village.</p> <p>It is a well-known fact that silica dust has close links to silicosis and other respiratory diseases which, therefore, violates residents' rights (European Convention on Human Rights, (Article 2) and there are many particularly vulnerable people residing in these villages.</p>	<p>This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. Noise, dust and lighting assessments would be required to be submitted at the planning application stage and they would be considered by an Environmental Health Officer.</p> <p>This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>The Health and Safety Executive states that "Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust". "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>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>Ecology: The destruction of such a vast area of fen and agricultural land, would have a devastating effect on the wildlife here at present. This includes voles, newts, moths, damselflies, and many species of birds, including buzzards, red kite and owls. With the diminishing numbers of many species, we cannot afford to destroy this valuable habitat.</p> <p>Similarly, the River Nar is of significant global importance as a chalk stream supporting a diversity of wildlife. It is a designated SSSI and I fail to see how any restoration could possibly remedy the detrimental impact caused.</p> <p>Landscape and Amenities: This area is used frequently by children from the two local schools in their studies of wildlife, rivers and history. Should this proposal go ahead, the south-western end of Marham village would become completely cut off from the river Nar, making it impossible for children to fulfil these studies. Currently, there is a huge initiative to encourage both children and adults to learn about their environment and to understand the benefits to their mental health, well-being, etc., by being able to enjoy fresh air and pleasant scenery.</p> <p>The proposed area also includes many ancient footpaths which are used extensively by both residents and people from further afield. These would, of course, be permanently destroyed. With no proposed route, as yet, for the option of piping the sand to Leziate, one wonders how many other people's lives will be affected by this proposal.</p>	<p>AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. As an area of search for future silica sand extraction there are no proposals available for the method of working or restoration if a site was to be proposed within the area of search in the future. Natural England, and a number of other statutory and non-statutory nature conservation bodies were consulted on the initial document, and no 'in principle' objections were received. Any future planning application would be required to carry out habitat and species surveys to identify the ecological baseline, and suggest appropriate mitigation for any potential impacts identified. The nearest point of AOS E is just over 260m from the River Nar.</p> <p>This comment relates to SIL 02 and the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the temporary diversion or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would need to address the footpath locations. There have been multiple examples of mineral extraction sites in Norfolk,</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>Benefits to the villages:  I cannot see any. Instead, I see a bleak future of: reduction in house values making it difficult for residents to move, a loss of open space to enjoy, continual pollution by noise, light and dust and a depressing legacy for our children and grandchildren.  In conclusion, I am strongly of the opinion that these proposals have given no consideration to the resulting effects on the lives of the current residents and the lives of the population in the future.</p>	<p>where similar issues regarding PRowS have been successfully addressed.</p> <p>Noted. The proposed mineral extraction within Shouldham and Marham does not have proposed economic benefits for those parishes, although there may be workers at the Leziat processing plant who reside in the parishes. Sibelco UK is subject to business rates, to the Borough Council, for the Leziat processing plant. Residents of the parishes benefit from the use of finished goods manufactured from silica sand extracted within Norfolk. The National Planning Policy Framework states that it is essential that there is a sufficient supply of mineral to provide the infrastructure, buildings, energy and goods that the country needs. Silica sand from Norfolk is used in the manufacture of glass in the north of England, and supplies a number of downstream industries including the construction, automotive, and food and drink sectors. Property values are not a material planning consideration.</p>
<p><b>(Object)</b> Representation ID: 92194  Respondent: <b>Mrs Diane Wederell [17877]</b></p> <p>I didn't attend the Parish Council Meeting in Shouldham Village Hall on the 6th August concerning the removal of sand for silica from The Warren but it has since been brought to my notice and I wish to express my deep concerns. We live in a very community minded village and hold a variety of events during the year to give us a very good quality of life and as you are probably aware the village purchased the pub a few years ago which has helped to make Shouldham a very popular place to live. We have a great enthusiasm with regard to our environment and pride ourselves on this.</p>	<p>AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. As an area of search for future silica sand extraction there are no proposals available for the method of working or restoration if a site was to be proposed within the area of search in the future.</p> <p>1. The Areas of Search Policy MP13 will require a biodiversity survey and report, including a protected species assessment, to be submitted at the planning application stage. If protected species are found on</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>I have grave concerns that the quarrying in the proposed area has lots of adverse implications.</p> <p>1. Wild life. The Warren is a lovely peaceful place to walk with the opportunity to enjoy the flora and the birds and animals. Would this mean deforestation in the area?</p> <p>2. It is quite an historic area with the remains of Shouldham Priory and interesting Saxon finds. Would this have an impact on this?</p> <p>3. The threat to recreational activities, not only is The Warren used by many of the villagers on a daily basis, people come from all over to walk, bird watch, horse ride and cycle. There are also many clubs/organisations that use it to enhance their lives. Would this be hindered in any way?</p>	<p>the proposed extraction site, then appropriate mitigation will be required. Policy MP13 will also require the submission of an Arboricultural Impact Assessment to identify the impact of the development on existing trees and identify appropriate mitigation measures if required. Shouldham Warren is a commercial timber plantation which will be subject to rotational cropping. It is possible that silica sand extraction could be programmed as part of the harvesting of timber.</p> <p>2. As part of the evidence base for the Preferred Options stage of the Minerals and Waste Local Plan Review a Heritage Impact Assessment on SIL 02 and AOS E has been carried out by Norfolk County Council's Historic Environment Service. The HIA recommended that the northern parts of AOS E nearest to Wormegay and Pentney Priory should not be allocated due to the potentially severe impact of mineral extraction in these areas on the setting of the heritage assets at Wormegay and of Pentney Priory. The findings of the HIA will be incorporated into the Preferred Options stage of the Local Plan.</p> <p>The Areas of Search Policy MP13 requires a heritage statement and an archaeological assessment to be submitted at the planning application stage.</p> <p>3. The area of search includes Shouldham Warren. It is noted that public access is permitted in Shouldham Warren and it is used by many local residents for recreation. There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>4. Disturbance. The disruption caused by the proposed setting up of the pipelines to enable the removal of the sand etc. The noise of the plant going to and from the site and the access to do this. I live on the road out of Shouldham to the Warren, a country lane and I am very worried that heavy lorries will be using this for access.</p> <p>5. Health and Safety. Dust and the effort on people's health. We have our fair share of elderly people in the area and this could cause many issues for them. Possible water pollution. Safety of our children if an increase in plant is likely and the over use of small country lanes for long hours of the day. Concerns of 24 hour dredging.</p>	<p>temporary diversion or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would need to address the location of existing footpaths and public access. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PRow's have been successfully addressed.</p> <p>4. A noise assessment would be required at the planning application stage and would be considered by an Environmental Health Officer. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>A Transport Assessment is required to be submitted with any future planning application for mineral extraction within AOS E. The Highway Authority will be consulted on any future planning application for mineral extraction. In the Preferred Options document, the Areas of Search Policy (MP13) will also state that there is a preference for the existing processing plant to be accessed via conveyor, pipeline or off-public highway routes.</p> <p>5. A dust assessment would be required at the planning application stage and would be considered by an Environmental Health Officer. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality</p>



Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>6. Concerns of what will happen to the site when the sand has been removed.</p> <p>I am sure that you have had many emails concerning this proposal, it does seem to have suddenly been brought to our notice and I am very concerned about the way it has been handled, as if it has been done "under cover".</p>	<p>and dust). A Hydrogeological Risk Assessment would be required at the planning application stage to assess potential impacts to water quality and quantity and propose mitigation measures if required. (see also response to point 4 above regarding highway access)</p> <p>6. Areas of Search policy MP13 will require a comprehensive working and restoration scheme to be submitted at the planning application stage. Restoration should incorporate opportunities on restoration for ecological enhancement and improvement of public access.</p> <p>The Initial Consultation stage of the Minerals and Waste Local Plan Review was the first public consultation on the document. All town and parish council's in Norfolk were consulted and all addresses within 250m of a proposed site or area of search were written to.</p>
<p><b>(Object)</b> Representation ID: 92188</p> <p>Respondent: <b>Mr B Ferguson [17873]</b></p> <p>Preferred Area for Silica Sand Extraction SIL02 and AOS E</p> <p>I wish to lodge my strong objection to the sites mentioned above as preferred areas for silica sand extraction. I shall try to be brief.</p> <p>Although it is my understanding that many aspects will fall for careful consideration and critical scrutiny, including cultural/ archaeological impact, environmental aspects, water issues (including the flood plain element), diversion of an ancient footpath from Marham to Pentney, trodden for a thousand years, noise, dust and road safety implications and the diminution in quality of life for all residents of Marham and Shouldham....despite this future analysis, I am very strongly of the opinion that these sites should not designated preferred areas.</p>	<p>AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>My thinking is as follows. The sites are appx 1.5/2.5miles from RAF Marham. It is universally accepted that this base is absolutely pivotal in every sense, not least because of the streamlining of national defence structures, including closure of other RAF bases. If denuclearization were probable or likely, then the decision about preferred sites would be marginal at best. Sadly this is not the case and the world remains a very, very dangerous place, especially on Europe's eastern borders. It follows that our whole nation, not just Marham and Shouldham, relies upon the brave men and women based at RAF Marham. Indeed, it is both fair and true to say that it is not just our nation whom they safeguard, but also Europe/ EU and our NATO allies (which ironically includes Belgium!)</p> <p>So to take even the slightest risk to adversely affect RAF Marham seems monumentally crass. This, of course, cuts no ice with either Sibelco or the owners of the land/ fen in question to whom money/ profit are far more important than security and defence. Shame on them !</p> <p>On a humanitarian level, there are many retired RAF pensioners and staff who live in Marham and Shouldham. Is this a just way of rewarding their loyal service? Diminution of property value and increasing lifestyle anxiety are simply not right. And the families of serving RAF personnel already have unimaginable stress when loved ones are away on duty. Even the notion of awarding preferred status would be a real kick in the teeth for them.</p> <p>For these fundamental reasons ie national/ regional security and the impact on the lives of our brave men and women and their families, these sites should most definitely not be awarded preferred status.</p>	<p>AOS E overlap. As an area of search for future silica sand extraction there are no proposals available for the method of working or restoration if a site was to be proposed within the area of search in the future. The Defence Infrastructure Organisation have been consulted regarding AOS E. The Areas of Search Policy (MP13) will be amended to state that a Bird Hazard Assessment will be required at the planning application stage.</p> <p>This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap.</p> <p>Property values are not a material planning consideration.</p>
<p><b>(Object)</b> Representation ID: 92170 Respondent: <b>Ms S King [17859]</b></p> <p><b>(Object)</b> Representation ID: 92169 Respondent: <b>Mr J Ninham [17858]</b></p> <p>This beautiful woodland area is an essential space for many species of wildlife, a healthy space for all. It provides a safe area of recreation, cycling, running walking. To commune so closely with nature, the smells and sound of a forest are an essential part of good health and fitness. A place to exercise for those living in close proximity, neighbouring villages as far away as Downham</p>	<p>It is noted that public access is permitted in Shouldham Warren and it is used by many local residents for recreation. There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the temporary diversion or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>Market, Kings Lynn and even further. Along with others this is a space to walk, talk and breath! Don't destroy! so much diverse wildlife, birds are well established. Much would be lost and many people depend on it to maintain mental and physical health. Sustainable timber provides jobs and to mine this area would be irresponsible.</p>	<p>need to address the location of existing footpaths and public access. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PRowS have been successfully addressed.</p> <p>Areas of Search Policy MP13 will require a biodiversity survey and report, including a protected species assessment, to be submitted at the planning application stage. If protected species are found on the proposed extraction site, then appropriate mitigation will be required.</p> <p>It is recognised that Shouldham Warren is a commercial timber plantation which will be subject to rotational cropping. It is possible that silica sand extraction could be programmed as part of the harvesting of timber.</p>
<p><b>(Object)</b> Representation ID: 92157 Respondent: <b>Alec Seaman [17849]</b></p> <p><b>(Object)</b> Representation ID: 92155 Respondent: <b>Mrs Svetlana Ignatieva [17833]</b></p> <p>I object to the AOS E Land to the north of Shouldham to be considered for mineral mining. This woodland area provides vital habitat for biodiversity and valuable ecoservices to the communities of Shouldham, Marham, Wormegay and beyond. There are no other woodlands of this size in the vicinity.</p> <p>The Warren provides venue for recreation and nature appreciation , which is essential for mental health and well-being. It is a source of sustainable timber production and local jobs. It a habitat for wildlife and a carbon sink. It is irresponsible to destroy this asset in the interest of short-term exploitation.</p>	<p>Noted. The draft Area of Search Policy MP13 has been amended to include all of the following requirements which will need to be met for a planning application for mineral extraction within an area of search:</p> <ul style="list-style-type: none"> <li>• Submission of a Biodiversity Survey and Report, including a protected species assessment. If protected species are found on the proposed extraction site, then appropriate mitigation will be required;</li> <li>• Submission of an Arboricultural Impact Assessment to identify the impact of the development on existing trees and identify appropriate mitigation measures if required;</li> </ul>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
	<ul style="list-style-type: none"> <li>• Submission of a comprehensive phased working and restoration scheme, incorporating opportunities on restoration for ecological enhancement, the improvement of public access and geological exposures for future study;</li> </ul> <p>West Bilney woods are public access under the CROW Act and accessible on foot via the PROW from Marham to Pentney Gatehouse.</p> <p>It is recognised that Shouldham Warren is a commercial timber plantation which will be subject to rotational cropping. It is possible that silica sand extraction could be programmed as part of the harvesting of timber. Silica sand is a vital mineral resource for the production of glass. Modern flat glass with higher thermal efficiencies can provide positive gains in reducing fuel consumption for heating. Glass containers provide an alternative to single use plastic; however the manufacture of containers from recycled glass requires the input of high purity silica sand as part of the production process.</p>
<p><b>(Object)</b> Representation ID: 92043</p> <p>Respondent: <b>Mrs Mary Maxey Miller [17791]</b></p> <p>I strongly object to the proposed extraction of silica sand from the beautiful countryside between Shouldham and Marham. Besides blighting a well loved area my main objection is that the silica sand is indispensable in the fracking process. Fracking has disastrous consequences, Shouldham and Marham would become part of the supply chain for this destructive wasteful process.</p>	<p>The type of silica sand that the British Geological Survey have mapped as underlying AOS E is glass sand; this has a different structure to the type used as Frac sand; and is unsuitable for that use. The processing plant at Leziate is specifically for the processing of glass sand.</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92007  Respondent: <b>Mrs Tina Hawkins [17746]</b></p> <p>*– the loss of landscape and amenity would be obtrusive and detrimental to the visual amenity of the area as a whole.</p> <p>*– desirability of the adjacent properties in question, or the locality, may affect the potential property values, particularly in the stage up to the permission being granted when the uncertainty of whether the sand extraction is to proceed.</p> <p>*– the quarry sites will be used as landfill, which is a concern due to the inappropriate current regulations of the Landfill Directive.</p>	<p>The potential landscape impact would depend on the specific location of any mineral extraction proposed within one of the areas of search. Mineral extraction is usually phased so as to minimise the working area. At the beginning of each working phase, soils would be stripped and stored in bunds around the area to be extracted, these would form screening. As the extraction would be taking place below ground level, and the plant would be relatively low level, screening would not need to be excessively high. Other mineral extraction sites typically have bunds of 2.5-3.5m, if these were constructed with a shallow outer gradient and grassed, at distance they would not be easily distinguishable as separate features. The Areas of Search Policy (MP13) states that a Landscape and Visual Impact Assessment would need to be submitted at the planning application stage.</p> <p>Property values are not a material planning consideration. The boundaries of each area of search are at least 250m from the nearest residential dwelling.</p> <p>There is no proposal for any part of AOS E to be used for landfill after mineral extraction. Silica sand extraction sites in Norfolk that have recently been restored and those that are currently being restored have either used the overburden from the site to create a suitable landform, or have been restored to water, or have used the tailing material from the mineral washing process to restore the site. There are no operational non-hazardous landfill sites in Norfolk in 2019, although voidspace remains. The</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>*– assurance must be given that each quarry site is reinstated prior to moving onto the next site throughout the development.</p> <p>*– that a corridor of trees is supplied in Spring Lane, the main adjacent landholding to the proposed development.</p> <p>*– that the current Public Right of Way (PRoW), which provides the present link from the village to the river and Shouldham Warren, is retained as it would be detrimental to the village as a whole if this was lost.</p>	<p>market for waste has fundamentally changed over the last few years away from landfill.</p> <p>Policy MP13 requires a comprehensive working and restoration scheme to be submitted at the planning application stage. It is normal practice for sites to be worked in phases and to progressively restore each phase. Draft Policy MP7 details the progressive restoration requirements for mineral extraction sites. Planning conditions are used to specify the date by which a permitted site must be completed and restored.</p> <p>The details of any screening required would be a matter for any future planning application, once the details of a working scheme are known.</p> <p>There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the temporary diversion or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would need to address the footpath location. Alternatively, a phased extraction may allow for the existing footpath to be retained, this would be a matter for a future planning application. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PRoWs have been successfully addressed.</p>
<p><b>(Object)</b> Representation ID: 91997 Respondent: <b>Ms M Austin [17740]</b></p>	<p>The Health and Safety Executive states that “Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust”. “No cases of silicosis have been</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>I went along to a Parish Council meeting this week and heard some details of a potential dredging site for silica sand close to Shouldham, Shouldham Warren and Marham. There were many concerns raised and no doubt many people have written to you on these. I am particularly concerned about the health issues which may result from such fine sand being released into the atmosphere, with a link to silicosis already documented.</p> <p>Apart from that, the Warren is a well used recreational facility for people living in the area and others who visit specifically to cycle, run, etc. and it is much valued by all of us. Turning it into a quarry would be very unwelcome. If it is turned into lakes after the extraction process is finished that would not be satisfactory as it would bring hazards to the nearby RAF Marham, namely with an increase in bird population. An increase in birds may not be popular with farmers either, the other major industry in the area.</p> <p>The roads in this area are little more than lanes, and the thought of trucks of waste being carried through our village or having new roads built close by would totally destroy the local environment.</p> <p>On a personal note, my husband and I moved to the quiet country area of Shouldham to avoid the pollution and noise of London. We had hoped for a quiet retirement in the country. To have those dreams potentially shattered is quite distressing.</p> <p>I understand this is all at a consultative level at the moment, but I would ask you to think again about using this area for any mineral extraction. Although the local population is not large, we are spread out and several people live in the Warren itself and on the approach roads to it such as Spring Lane.</p> <p>I personally worry about the noise, the light pollution of activities being carried out at night, the increased pollution to the atmosphere and potentially the water table in the area, the increased traffic and loss of recreation, and the general disturbance it would cause. Please think again</p>	<p>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>AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. As an area of search for future silica sand extraction there are no proposals available for the method of working or restoration if a site was to be proposed within the area of search in the future. The Defence Infrastructure Organisation have been consulted regarding AOS E. The Areas of Search policy MP13 will be amended to state that a Bird Hazard Assessment will be required at the planning application stage.</p> <p>Any planning application for mineral extraction within AOS E would need to comply with the requirements of Areas of Search Policy MP13, including assessment and mitigation of transport impacts through a Transport Assessment. In the Preferred Options document, Policy MP13 will also state that there is a preference for the existing processing plant to be accessed via conveyor, pipeline or off-public highway routes.</p> <p>Policy MP13, which applies to all areas of search states that any planning application within an area of search would need to include a programme of mitigation measures (e.g. standoff areas, screening and/or bunding) to deal appropriately with any potential amenity impacts, including noise and dust.</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>about including this area in your consideration of this as a suitable area as it most definitely is not!</p>	<p>Noise, dust and lighting assessments would need to be submitted at the planning application stage and they would be considered by an Environmental Health Officer.</p>
<p><b>(Object)</b> Representation ID: 91977  Respondent: <b>Mrs Carly Pontin [17728]</b>  We live in Marham close to the proposed site.  We moved to this area to raise our Daughter in a quiet rural village with clean open areas close to our property to walk in.  We are worried about the increase in traffic and any health issues that may occur due to the site, not to mention the noise and air pollution.  The proposed site is extremely large and will no doubt change the beautiful landscape that first attracted us here, regardless of the buffers and screening suggested.  We hope that this does not go ahead.</p>	<p>AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. As an area of search for future silica sand extraction there are no proposals available for the method of working or restoration if a site was to be proposed within the area of search in the future.</p> <p>The Health and Safety Executive states that "Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust". "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 Assessment is required to be submitted with any future planning application for mineral extraction within AOS E. In the Preferred Options document, the Areas of Search Policy (MP13) will also state that there is a preference for the existing processing plant to be accessed via conveyor, pipeline or off-public highway routes.</p> <p>Policy MP13, which applies to all areas of search states that any planning application within an area of search would need to include a programme of mitigation measures (e.g. standoff areas, screening and/or bunding) to deal appropriately with any</p>



Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
	potential amenity impacts, including noise and dust. A phased working and restoration scheme would also be required.
<p><b>(Object)</b> Representation ID: 91974  Respondent: <b>Mr A Austin [17726]</b></p> <p>Also SIL2 overlaps with the AOS Site E to some degree and it is not acceptable that SIL2 is also and AOS Site E because it provides doubt on the validity of SIL2 and really confirms AOS Site E is not a search area but a really long term proposal being put on hold until SIL2 is worked out.</p> <p>Regarding the drawn area of AOS Site E the summary of the evaluation leaves aside any planning factor which does not support the proposal or can be summarily ignored in that evaluation. I am sure many others will raise a number of concerns but I will summarise mine with a few factors.</p> <ol style="list-style-type: none"> <li>1. Shouldham Warren is a widely used area for recreation - perhaps 50,000 visits each year. The closure of the land for recreational purposes (including people from outside the Kings Lynn catchment area) should be taken into account.</li> <li>2. The area contains colony of adders (however many people hate them, especially when they kill pet animals) and maybe other species and their right to exist should be acknowledged in the evaluation.</li> </ol>	<p>Areas of Search, Preferred Areas, and Site Specific Allocations are not mutually exclusive, and a single area of land can have multiple designations. Area of Search E was designated in the Single Issue Silica Sand review (2104-2016) based on the broad geological information held by the British Geological Survey. At the start of the Minerals and Waste Local Plan Review process, a 'call for sites' was carried out in 2017. Sibelco UK responded to this 'call for sites' by submitting SIL 02, with more detailed geological information, and landowner willingness.</p> <p>1&amp;2. The draft Area of Search Policy MP13 has been amended to include all of the following requirements which will need to be met for a planning application for mineral extraction within an area of search:</p> <ul style="list-style-type: none"> <li>• Submission of a Landscape and Visual Impact Assessment to identify potential landscape impacts, together with suitable mitigation measures to address the impacts and manage change in ways that will best sustain heritage values;</li> <li>• Submission of a Biodiversity Survey and Report, including a protected species assessment. If protected species are found on the proposed extraction site, then appropriate mitigation will be required;</li> </ul>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>3. I suspect that the AOS does not exclude all residential properties within that area. Working from a OS map is suspect as it has not been updated in detail for twenty years or more. Being a rural area not enough units of change in any density have resulted in any detailed updates being made to the map base for 15 years or more.</p> <p>4. The forestation is at risk for any scale of mineral extraction. The life of a tree before felling will be towards 30 years. Mineral extraction will put maybe forty year break on this - and then only if the area was to return to being a managed forest - and this would seriously dent the carbon capture affect of trees in this area.</p> <p>5. There is no benefit of SIL2 becoming a recreation area (water based) after extraction finishes because it is different to the value of Shouldham Warren (foot, bicycle and horse based). There are other worked out quarries in the area providing water based recreational facilities but no alternative to Shouldham Warren exists in this area.</p> <p>6. As AOS-E is adjacent to (and overlaps) SIL02. in these proposals then it would make sense to extend the proposed pipeline from SIL02 to AOS-E as a requirement of any extraction taking place there (should that come to pass).</p> <p>7. SIL01, AOS-F, AOS-I, AOS-J and MN40 also mention silica sand. As SIL02 would be the largest extraction proposal the promoters of this site would clearly wish to concentrate their resources at one place than spread across a collection of smaller sites although some are already being worked. It should be made clear if the other sites are alternatives or additional sites to be added</p>	<ul style="list-style-type: none"> <li>• Submission of an Arboricultural Impact Assessment to identify the impact of the development on existing trees and identify appropriate mitigation measures if required;</li> <li>• Submission of a comprehensive phased working and restoration scheme, incorporating opportunities on restoration for ecological enhancement, the improvement of public access and geological exposures for future study;</li> </ul> <p>3. The assessment of sites does not rely on the OS map used in the printed maps. The OS Mastermap, and OS Addressbase plus are used, which are updated several times a year; and include postal address points to pinpoint residential dwellings.</p> <p>4. It is recognised that Shouldham Warren is a commercial timber plantation which will be subject to rotational cropping. It is possible that silica sand extraction could be programmed as part of the harvesting of timber.</p> <p>5. West Bilney woods are public access under the CROW Act and accessible on foot via the PROW from Marham to Pentney Gatehouse.</p> <p>6. In the Preferred Options document, Areas of Search Policy MP13 will state that there is a preference for the existing processing plant to be accessed via conveyor, pipeline or off-public haul route.</p> <p>7. MIN 40 and SIL 01, are already specific site allocations within the adopted plan, and a planning</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p data-bbox="203 252 1364 320">to a very long term list of proposals and the consequent time scale involved - after all this plan is supposed to be until 2036 not 2066.</p> <p data-bbox="203 619 1364 1046">With regards to MP13 I find the statements contained and in comparison with the indicative maps shown in the document most confusing. The maps clearly show a protection zone around residential premises but the policy does not include any comment on the evaluation of proposals against its effects on people. It concentrates on flora, fauna and ground conditions with absolutely no reference to the destruction of dwellings or any activity of people as though people do not exist. One should either confirm the content of MP13 by showing and dwelling or any structure actually affected by the proposals by not excluding them, or preferably adding to MP13 reference to the effect the proposals would have being judged against any affect on individuals or people in general. (It is not clear if another MP does include that as a factor in the evaluation). Either way this part of the consultation seems to be both a cake and the eating of it! If residential premises can be excluded for sites then recreational areas should also be excluded, meaning AOS-E should fall as a potential extraction site.</p>	<p data-bbox="1386 252 2031 679">application is currently (2019) being determined for MIN 40. There is also an existing silica sand extraction site along side the A47 between Middleton and East Winch. However, there remains a shortfall in the sites required to meet the needs of the processing plant at Leziate. National policy requires that Norfolk County Council as a Mineral Planning Authority, plans for a steady and adequate supply of silica sand to meet the needs of the processing plant. Therefore, SIL 02, AOS E, AOS F, AOS I, and AOS J are all potential locations for future silica sand extraction while a shortfall in permitted mineral reserves exists.</p> <p data-bbox="1386 699 2031 1198">The designation of Areas of Search (AOS) followed a methodology regarding constraints, this is different from the requirements of MP13 and is detailed in the supporting text to Policy MP2 'spatial strategy for minerals extraction'. For example, an area of 250m surrounding residential dwellings was excluded from any land designated as an AOS. This is because no detailed proposals are available for working schemes within Areas of Search because an AOS is a geological area of potential mineral resource. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p data-bbox="1386 1217 2031 1319">In the Initial Consultation document, draft Policy MP13 cross references other policies, legislation and guidance. For example, the second bullet point of</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
	<p>MP13 states that any future planning application would be required to include:</p> <p>'A programme of mitigation measures (e.g. standoff areas, screening and/or bunding) to deal appropriately with any potential amenity impacts, including noise and dust, to comply with the requirements of policy MW2'</p> <p>In land-use planning, permanent residential dwellings are treated differently to recreational areas with permissive access and footpaths are treated differently within planning. There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the temporary diversion or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would need to address the footpath location. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PROWs have been successfully addressed.</p>
<p><b>(Object)</b> Representation ID: 91951  Respondent: <b>Ms S Moss [17721]</b>  I am a resident of Marham and so would like to raise my concerns and objections to proposed mining of Silica in the area.</p> <p>Firstly, I feel that the process so far has not been open and inclusive of the residents. The first document 26th June -4th August 2017 unknown to most residents of Marham</p> <p>The second document was also not publicised for Marham residents and I came across it by accident last Friday. My local Parish councillor stated that they had not known themselves until 4</p>	<p>The stage that took place in June -August 2017 was a 'call for mineral extraction sites' where Norfolk County Council wrote to minerals companies and planning agents asking if they had any sites they wanted to submit for consideration as part of the Minerals and Waste Local Plan Review process. The 'call for sites' was not a public consultation stage.</p> <p>All parish councils in Norfolk, including Marham and Shouldham PCs, and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used</p>

<b>Representations Received about Area of Search E</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>weeks ago. Shouldham residents however were contacted by letter and have since had public meetings. Being able to access on the website without prior notification has been poor.</p>	<p>because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>The consultation process is set out in both the adopted Norfolk County Council Statement of Community Involvement and also in Chapters 2, 3 and 4 of the Initial Consultation document which set out the consultation process, the Local Plan process so far and what happens next.</p> <p>The Local Plan process includes two public consultation stages (the Initial Consultation and the Preferred Options) and one legally required formal representations stage on the proposed Submission version of the Plan.</p> <p>The Local Plan process must be carried out in accordance with the relevant legislation and National planning policy and guidance.</p> <p>Following the formal representations period on the proposed Submission version of the Local Plan, the Plan will be subject to an examination in public carried out by an independent Planning Inspector on behalf of the Secretary of State. The Planning Inspector will consider whether the Plan meets the legal and procedural requirements and if it meets the 'tests of soundness' set out in the National Planning Policy Framework. Following receipt of the Inspector's report, the County Council will then decide whether to adopt the Plan.</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>My objections along with the lack of fair notification are as follows:</p> <ol style="list-style-type: none"> <li>1. The site chosen is farm land and will be lost forever to the Country at a time when we are needing to be self sufficient.</li> <li>2. It also is an area of wildlife and rare birds which also may then be lost for ever if their habitat is disturbed.</li> <li>3. The area provides an area of relaxation and exercise for the residents.....the view of the fen and surrounding farmland attracts residents to the area and house prices locally reflect this. It is crucial to the well being and health of residents</li> <li>4. Marham village already exists alongside a busy air base, which residents tolerate as there is an escape into beautiful countryside. The service personnel also use the local countryside for R and R and would also be affected in their enjoyment of the area.</li> <li>5. The mine will be visible from Marham Village as we are higher than the fen, despite reassurances in the document that it will not be visible (Shouldham residents)</li> </ol>	<ol style="list-style-type: none"> <li>1. Any future planning application would need to consider the loss of agricultural land, compared with the need for silica sand for glass making; which is recognised as an important and nationally scarce industrial mineral.</li> <li>2. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. This would identify potential impacts and appropriate mitigation measures to ensure that there were no unacceptable adverse impacts.</li> <li>3 &amp; 4 There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the temporary diversion or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would need to address footpath locations. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PRoWs have been successfully addressed. Property values are not a material planning consideration.</li> <li>5. This comment relates to SIL 02 and the section of the feedback report for SIL 02 contains a response to these issues. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. Areas of Search Policy MP13 requires a Landscape and Visual</li> </ol>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>6. North Westerly winds will bring pollution regularly from the site which will have serious health effects and inconvenience to local residents and property</p> <p>7. Night time working will also bring light pollution as well as disturbance of sleep which also has significant impact on health.</p> <p>8. The risk of drainage and flooding has not been openly discussed and neither has the disruption after the product has been extracted and the amount of refill which will be required with lorry and machinery causing significant disruption and noise to all residents. The Marham residents not being considered at all.</p>	<p>Impact Assessment to be submitted at the planning application stage.</p> <p>6. Analysis of the windrose information for RAF Marham shows that the general prevailing wind is south westerly. A noise assessment and dust assessment will be required at the planning application stage. These documents are considered by an Environmental Health Officer. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>7. AOS E is an Area of Search and no proposal to extract mineral has been submitted, except where SIL 02 and AOS E overlap. As an area of search for future silica sand extraction there are no proposals available for the method of working or hours of working if a site was to be proposed within the area of search in the future.</p> <p>8. The assessment of AOS E details the flood risk zones of the land. Silica sand extraction is a 'water compatible' land use suitable in all flood zones. A site specific flood risk assessment would be required at the planning application stage. As an area of search, there is no further information currently available on any future proposals for mineral extraction within AOS E, including restoration. It is not proposed for any potential extraction sites within Areas of Search to be used for landfill after mineral extraction. Silica sand extraction sites in Norfolk that</p>

Representations Received about Area of Search E	Norfolk County Council Planning Officer's response
<p>9. The mining is bound to have effect on house prices locally and residents may find themselves in considerable negative equity.</p> <p>I have been unable to find out who my local Borough Councillor is so I would appreciate being given this information as I wish to keep in contact over this issue.</p> <p>I would also appreciate an explanation as to why Marham residents were not given prior warning to this proposal as the Shouldham residents have been.</p> <p>Sadly all the proposal sites seem to be in beautiful locally used locations that have brought happiness to the residents for many years.</p> <p>I understand that farming has become in many instances unsustainable but as we go into the unknown of Brexit we need our farmland more than ever and efforts should be in conserving and not destroying in my view.</p>	<p>have recently been restored and those that are currently being restored have either used the overburden from the site to create a suitable landform, or have been restored to water, or have used the tailing material from the mineral washing process to restore the site.</p> <p>9. Property values are not a material planning consideration.</p> <p>Information on all West Norfolk Borough Councillors is available on the website for the Borough Council of King's Lynn and West Norfolk at:  <a href="https://democracy.west-norfolk.gov.uk/mgMemberIndex.aspx?bcr=1">https://democracy.west-norfolk.gov.uk/mgMemberIndex.aspx?bcr=1</a></p> <p>All town and parish councils in Norfolk were written to about the Initial Consultation and all residential dwellings within 250m of a proposed site or area of search were written to. The residents of Marham and Shouldham were informed of the consultation in the same way at the same time by Norfolk County Council.</p> <p>Any future planning application would need to consider the loss of agricultural land, compared with the need for silica sand for glass making; which is recognised as an important and nationally scarce industrial mineral.</p>



**AOS F land to the north of Stow Bardolph**

Representations Received about Area of Search F	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93209</p> <p>Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b></p> <p>We agree with the conclusion to allocate the area of search, but with the following comments:</p> <p>F.3 should state that the archaeological assessment should include a desk-based assessment and field evaluation. It should also refer to archaeological remains rather than 'deposits'</p>	<p>The text has been amended as requested.</p>
<p><b>(Comment)</b> Representation ID: 93005</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>We note that this area of search forms part of the recently adopted Silica Sand Review. This landscape includes the setting of Wallington Hall (grade I) and its collection of grade II buildings, four listed buildings within Stow Bardolph including its grade I Church of Holy Trinity, and the grade II North Lodge Stow Hall. The two sites combined have a potential cumulative impact on the wider landscape.</p> <p>This landscape has been shaped by parklands and farmed estates, themselves dating to the 16th Century. There is a need for further field evaluation to understand the significance of archaeological deposits. The proposed Areas of Search also sit in a transitional landscape between the Fens and the Brecks and we would expect to see the use of landscape and visual impact assessments.</p>	<p>Noted. The need for field evaluation of archaeological remains has now been included in the site assessment. Policy MP13, which applies to all of the areas of search requires an archaeological assessment at the planning application stage and states that this may initially be desk-based but may need to be followed up with field surveys and trial trenching.</p> <p>The site assessment text and Policy MP13 both state that a Landscape and Visual Impact Assessment will be required at the planning application stage. With regards to the comment that the two sites combined have a potential cumulative impact on the wider landscape, it should be noted that the areas of search are large areas within which permission for silica sand extraction may be able to be granted on a smaller area of land. It is not the intention of the Plan for the whole of each area of search to be extracted and the boundary of an area of search is not necessarily the boundary of a future mineral extraction site.</p>
<p><b>(Comment)</b> Representation ID: 92405</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p>	<p>Broad Meadow Plantation CWS is immediately south of the eastern section of AOS F. Silica sand is recognised as a nationally important industrial mineral, whilst</p>

<b>Representations Received about Area of Search F</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Areas of Search E, F, I, J: We note that in previous iterations of the Minerals plan, it has been considered acceptable to modify Areas of Search to exclude CWS and their immediate surroundings. In order to safeguard multiple CWS from both direct and indirect impacts of minerals extraction, we recommend that similar provisions are made and the Areas of Search are modified to provide sufficient stand off from these CWS to safeguard them from adverse impacts. In particular we note CWS 425 'Mow Fen' which is within AoS E, CWS 424 'Westbrigg's Wood' and CWS 373 'Adj. Adams Plantation' which are both adjacent to AoS E and CWS 365 'Broad Meadow Plantation' which is adjacent to AoS F.</p>	<p>county wildlife sites are of county ecological importance. The NPPF recognises that minerals can only be worked where they are found. There is a shortfall in permitted and allocated sites for silica sand in Norfolk in relation to the forecast need. The Areas of Search are large areas within which permission for silica sand extraction may be able to be granted on a smaller area of land. It is not the intention of the Plan for the whole of each area of search to be extracted and the boundary of an area of search is not necessarily the boundary of a future mineral extraction site. Therefore, it is not considered necessary to amend the boundary of AOS F to provide a stand off from the CWS.</p>

**AOS I land to the east of South Runcton**

Representations Received about Area of Search I	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93210</p> <p>Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b></p> <p>We agree with the conclusion to allocate the area of search, but with the following comments: I.4 should state that the archaeological assessment should include a desk-based assessment and field evaluation. It should also refer to archaeological remains rather than 'deposits'</p>	<p>The text has been amended as requested.</p>
<p><b>(Comment)</b> Representation ID: 93096</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b></p> <p>There are a number of viewpoints which will need to be considered within this area of search, it may be that only part of the area of search is suitable for mineral extraction.</p>	<p>Noted. The assessment of AOS I notes that there are a number of viewpoints in the AoS from roads and PROWs and that any proposed extraction will need to be appropriately screened. Policy MP13 is relevant to all of the areas of search and states that a planning application for mineral extraction within an area of search will need to include a Landscape and Visual Impact Assessment to identify potential landscape impacts, together with suitable mitigation measures to address the impacts.</p>
<p><b>(Comment)</b> Representation ID: 93006</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>We note that this area of search forms part of the recently adopted Silica Sand Review. In the Silica Sand Review, Historic England had no immediate concerns regarding this area of search providing it is well contained and does not impact on the setting of any heritage assets, subject to necessary assessment and mitigation. We identified that this will apply to the setting of the Church of St Andrew (Grade II*), the Church of St Mary the Virgin (Grade II*) and a number of listed buildings together with the setting of the Shouldham Thorpe Conservation Area. Some of these comments have been incorporated into the supporting text for the area of search.</p>	<p>Noted. The assessment of AOS I notes the location of Shouldham Thorpe Conservation Area (which is 1.27km from the AOS boundary). The site assessment also states that the setting of the Church of St Andrew and Church of St Mary the Virgin and a number of Grade II listed buildings should be taken into consideration at the planning application stage. Policy MP13 is relevant to all of the areas of search and states that a planning application for mineral extraction within an Area of Search will need to include a Landscape and Visual Impact Assessment and a Heritage Statement. The LVIA should identify potential landscape impacts together with suitable</p>

Representations Received about Area of Search I	Norfolk County Council Planning Officer's response
	mitigation measures to address the impacts. The Heritage Statement should identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation if required.
<p><b>(Comment)</b> Representation ID: 92404</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Areas of Search E, F, I, J: We note that in previous iterations of the Minerals plan, it has been considered acceptable to modify Areas of Search to exclude CWS and their immediate surroundings. In order to safeguard multiple CWS from both direct and indirect impacts of minerals extraction, we recommend that similar provisions are made and the Areas of Search are modified to provide sufficient stand off from these CWS to safeguard them from adverse impacts. In particular we note CWS 425 'Mow Fen' which is within AoS E, CWS 424 'Westbrigg's Wood' and CWS 373 'Adj. Adams Plantation' which are both adjacent to AoS E and CWS 365 'Broad Meadow Plantation' which is adjacent to AoS F.</p>	<p>The nearest CWS to AOS I is over 600m away and no adverse impacts are expected to the CWS from mineral extraction within AOS I.</p>

**AOS J**                      **land to the east of Tottenhill**

Representations Received about Area of Search J	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93211</p> <p>Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b></p> <p>We agree with the conclusion to allocate the area of search, but with the following comments: J.4 should state that the archaeological assessment should include a desk-based assessment and field evaluation. It should also refer to archaeological remains rather than 'deposits'</p>	<p>The text has been amended as requested.</p>
<p><b>(Comment)</b> Representation ID: 93007</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>We note that this area of search forms part of the recently adopted Silica Sand Review. As identified, this Area of Search is in close proximity to the Church of St Botolph at West Briggs (Grade I) at a distance of 325 metres to the area of search (AOS) boundary and around 1200/1250 metres to the Motte and Bailey castle in Wormegay village and 1600 metres to the Wormegay priory moated site (further to the north west).</p>	<p>These heritage assets have been included in the site assessment. The draft AOS policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation to sustain heritage values if required.</p>
<p><b>(Comment)</b> Representation ID: 92424</p> <p>Respondent: <b>Woodland Trust (Ms V Bankes Price) [16231]</b></p> <p>The following sites have be found to affect ancient woodland, ancient and veteran trees: AOS J - Land to the east of Tottenhill. Proposed for an area of search for mineral extraction. Two veteran oaks to the east of Craven Lane. Grid reference TF65105491</p> <p>We would like to highlight the presence of two veteran oaks to the east of Craven Lane which are listed on the Ancient Tree Inventory but are not listed within the constraints for AOS J. These trees must be listed as a constraint. In the event of any application coming forward these veteran trees should be subject Policy MP2.</p>	<p>AOS J does not include any land at Craven Lane. There are no veteran trees located within AOS J. AOS J is located on land between the A134 to the east, Whin Common Road to the north, Watlington Road to the south and the A10 to the west. Therefore no action is required.</p>
<p><b>(Comment)</b> Representation ID: 92403</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Areas of Search E, F, I, J: We note that in previous iterations of the Minerals plan, it has been considered acceptable to modify Areas of Search to exclude CWS and their immediate surroundings. In order to safeguard multiple CWS from both direct and indirect impacts of</p>	<p>There are no County Wildlife Sites located within or adjacent to AOS J. The site assessment notes that if mineral extraction in the AoS were to go below the water table or involve dewatering, then there could be impacts on the ponds in CWS 385. In that</p>

Representations Received about Area of Search J	Norfolk County Council Planning Officer's response
<p>minerals extraction, we recommend that similar provisions are made and the Areas of Search are modified to provide sufficient stand off from these CWS to safeguard them from adverse impacts. In particular we note CWS 425 'Mow Fen' which is within AoS E, CWS 424 'Westbrigg's Wood' and CWS 373 'Adj. Adams Plantation' which are both adjacent to AoS E and CWS 365 'Broad Meadow Plantation' which is adjacent to AoS F.</p>	<p>instance, a hydrogeological risk assessment would be necessary to identify potential risks and appropriate mitigation. The draft AOS policy requires a hydrogeological risk assessment to be submitted at the planning application stage.</p>
<p><b>(Comment)</b> Representation ID: 92358</p> <p>Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b></p> <p>DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.</p> <p>The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.</p> <p>On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham: MIN 19 &amp; 205;76;77;40; SIL01 SIL02; AOS E &amp; J.</p> <p>Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety. Therefore, we would recommend dry restoration and dry phased working.</p> <p>Follow up response (December 2018): "Wet working and restoration in this location would have the potential to attract and support hazardous waterfowl. The MOD is unable to determine the extent of our concerns without knowing the restoration scheme."</p>	<p>Noted. As an area of search for future silica sand extraction there are no proposals available for the method of working or restoration if a site was to be proposed within the area of search in the future. The area of search policy will be amended to state that a Bird Hazard Assessment will be required at the planning application stage. The Bird Hazard Assessment report would identify the risk of bird hazard to the safe operation of aerodromes and aircraft, identify proposed mitigation of any identified risk, and include a Bird Hazard Management Plan if necessary.</p>

**Policy MP13: Areas of Search for silica sand extraction**

Representations received about Policy MP13: Areas of Search for silica sand extraction	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93193  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the proposed policy.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92923  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  Policy MP13 does not address the need for an FRA, although the requirement to follow the sequential approach to flood risk has been listed. An FRA is vital if the planning authority is to make informed planning decisions. In the absence of an FRA, the flood risk resulting from the proposed development are unknown.</p>	<p>As there is a national planning policy requirement for a Site Specific Flood Risk Assessment to be provided at the planning application stage for all development in Flood Zones 2 and 3 and for all sites of over 1 hectare in size, it is not considered necessary to repeat this requirement in Policy MP13.</p>
<p><b>(Support)</b> Representation ID: 92485  Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b>  Sibelco supports Policy MP13 on Areas of Search for silica sand, subject to our response to Question 9 (regarding Policy MW6 - agricultural soils)</p>	<p>Support noted. Representations regarding Policy MW6 'agricultural soils' are covered in the section of the Feedback Report which deals with Policy MW6.</p>
<p><b>(Support)</b> Representation ID: 92115  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Agree.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 92009  Respondent: <b>Mrs Tina Hawkins [17746]</b>  *– the loss of landscape and amenity would be obtrusive and detrimental to the visual amenity of the area as a whole.</p>	<p>The potential landscape impact would depend on the specific location of any mineral extraction proposed within one of the areas of search. Mineral extraction is usually phased so as to minimise the working area. At the beginning of each working phase, soils would be stripped and stored in bunds around the area to be extracted, these would form screening. As the extraction would be taking place below ground level, and the plant would be relatively low level, screening would not need to be excessively high. Other</p>

Representations received about Policy MP13: Areas of Search for silica sand extraction	Norfolk County Council Planning Officer's response
<p>*– desirability of the adjacent properties in question, or the locality, may affect the potential property values, particularly in the stage up to the permission being granted when the uncertainty of whether the sand extraction is to proceed.</p> <p>*– the quarry sites will be used as landfill, which is a concern due to the inappropriate current regulations of the Landfill Directive.</p> <p>*– assurance must be given that each quarry site is reinstated prior to moving onto the next site throughout the development.</p>	<p>mineral extraction sites typically have bunds of 2.5-3.5m, if these were constructed with a shallow outer gradient and grassed, at distance they would not be easily distinguishable as separate features. The Areas of Search Policy (MP13) states that a Landscape and Visual Impact Assessment would need to be submitted at the planning application stage.</p> <p>Property values are not a material planning consideration. The boundaries of each area of search are at least 250m from the nearest residential dwelling.</p> <p>The areas of search are not proposed to be used for landfill after mineral extraction. Silica sand extraction sites in Norfolk that have recently been restored and those that are currently being restored have either used the overburden from the site to create a suitable landform, or been restored to water or used the tailing material from the mineral washing process to restore the site.</p> <p>Policy MP13 requires a comprehensive working and restoration scheme to be submitted at the planning application stage. It is normal practice for sites to be worked in phases and to progressively restore each phase. Draft Policy MP7 details the progressive restoration requirements for mineral extraction sites. Planning conditions are used to specify the date by which a permitted site must be completed and restored.</p> <p>The required screening for landscape and visual amenity would depend on the specific location of any</p>



Representations received about Policy MP13: Areas of Search for silica sand extraction	Norfolk County Council Planning Officer's response
<p>*– that a corridor of trees is supplied in Spring Lane, the main adjacent landholding to the proposed development.</p> <p>*– that the current Public Right of Way (PRoW), which provides the present link from the village to the river and Shouldham Warren, is retained as it would be detrimental to the village as a whole if this was lost.</p>	<p>mineral extraction proposed within one of the areas of search. Spring Lane is only relevant to mineral extraction within AOS E, but Policy MP13 applies to all areas of search.</p> <p>Policy MP13 applies to all of the areas of search. The PRoW which links Marham to the River Nar and Shouldham Warren is only relevant to AOS E, therefore this is not specified in Policy MP13. However, the supporting text to Policy MW2 (Development Management Criteria) states that applications for mineral development will be required to ensure that PRoWs remain usable at all times or provide satisfactory alternative routes.</p>
<p><b>(Object)</b> Representation ID: 91976 Respondent: <b>Mr A Austin [17726]</b></p> <p>With regards to MP13 I find the statements contained and in comparison with the indicative maps shown in the document most confusing. The maps clearly show a protection zone around residential premises but the policy does not include any comment on the evaluation of proposals against its effects on people. It concentrates on flora, fauna and ground conditions with absolutely no reference to the destruction of dwellings or any activity of people as though people do not exist. One should either confirm the content of MP13 by showing and dwelling or any structure actually affected by the proposals by not excluding them, or preferably adding to MP13 reference to the effect the proposals would have being judged against any affect on individuals or people in general. (It is not clear if another MP does include that as a factor in the evaluation). Either way this part of the consultation seems to be both a cake and the eating of it! If residential premises can be excluded for sites then recreational areas should also be excluded, meaning AOS-E should fall as a potential extraction site.</p>	<p>The Areas of Search do not include any residential dwellings and the boundaries of each area of search are at least 250m from the nearest residential dwelling.</p> <p>Policy MP13 does include the evaluation of proposals against its effects on people – the draft policy requires the submission of an air quality assessment / dust assessment and a programme of mitigation measures (e.g. standoff areas, screening and/or bunding) to deal appropriately with any amenity impacts.</p> <p>The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health.</p>

Representations received about Policy MP13: Areas of Search for silica sand extraction	Norfolk County Council Planning Officer's response
	<p>Policy MP13 does not refer to the destruction of dwellings as there are no dwellings located within the areas of search.</p> <p>Representations regarding AOS E are covered in the section of the Feedback Report which specifically deals with AOS E.</p>

**SIL 02 land at Shouldham and Marham**

Representations received about SIL 02	Norfolk County Council Planning Officer's response
<p>(<a href="#">Comment</a>) Representation ID: 93194                      Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>                      We agree with the initial conclusion for this site.</p>	<p>Noted.                      Norfolk County Council's Historic Environment Service have subsequently carried out an Historic Environment Impact Assessment on proposed site SIL 02 and AOS E. It concluded that mineral extraction within the eastern part of SIL 02 would have a relatively severe impact on the setting of Pentney Priory and that the eastern part of SIL 02 (approximately from the track adjacent to Ashholt Plantation) should therefore not be allocated.                      However, the site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.</p>
<p>(<a href="#">Comment</a>) Representation ID: 93105                      Respondent: <b>Norfolk County Council - Natural Environment Team (Ms C Keightley) [18344]</b>                      This site is located adjacent to the River Nar SSSI, we would advise no extraction takes place outside of the 'reduced development area' between the proposed site and River Nar SSSI to reduce the likelihood of impacts on the River Nar SSSI and its qualifying features.                      We agree that an assessment of potential impacts on the River Nar SSSI and Marham Fen, including from dust deposition and hydrogeology, together with appropriate mitigation would be required as part of any planning application.                      It should be noted in the 'initial conclusion' that an ecological assessment to determine baseline conditions on the site must be prepared which may lead to the need for further surveys and mitigation measures, if necessary. (This should always be the case with 'greenfield sites'. I know this was mentioned in the wider document, however it would be good if this could be included in the</p>	<p>Noted.                      Noted. This information is included within the site assessment.                      Noted. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. Draft Policy MP7 states that proposals for new mineral workings must be accompanied by a scheme for the phased and progressive working and restoration. Policy MP7</p>

Representations received about SIL 02	Norfolk County Council Planning Officer's response
<p>'initial conclusions' for new sites). It would also be useful in the initial conclusions to ensure it is clear that a restoration scheme to protect and enhance biodiversity will be put in place post extraction.</p>	<p>contains further requirements for restoration proposals.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.</p>
<p><b>(Comment)</b> Representation ID: 93097</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b></p> <p>Bunding for this site has the potential to be intrusive. There are a number of views/settings and impacts on the wider landscape that will need to be carefully considered. A combination of advanced planting and bunding may be suitable, but care needs to be taken that the mitigation in itself doesn't have further impacts.</p>	<p>Noted.</p> <p>Norfolk County Council's Historic Environment Service have subsequently carried out an Historic Environment Impact Assessment on proposed site SIL 02 and AOS E. It concluded that mineral extraction within the eastern part of SIL 02 would have a relatively severe impact on the setting of Pentney Priory and that the eastern part of SIL 02 (approximately from the track adjacent to Ashholt Plantation) should therefore not be allocated.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.</p>
<p><b>(Object)</b> Representation ID: 92982</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>This significant allocation is immediately adjacent to grade I Pentney gatehouse, grade II Abbey Farmhouse, and the scheduled remains of Pentney Priory. It is also within c.250m of scheduled Shouldham Priory, Roman road and Bronze Age urnfield, and scheduled Marham Abbey which includes the grade II* remains of Abbey SS Mary Barbara and Edmund. The preferred area also has</p>	<p>Objection noted.</p> <p>Norfolk County Council's Historic Environment Service have subsequently carried out an Historic Environment Impact Assessment on proposed site SIL 02 and AOS E (sites MIN 19 and MIN 205 were not included as they were not proposed to be allocated at the Initial Consultation stage). The HEIA concluded</p>

Representations received about SIL 02	Norfolk County Council Planning Officer's response
<p>to be viewed cumulatively with AOS E, MIN 19 and MIN 205. Owing to all of these factors significant areas have potentially been allocated as a preferred site, areas of search or allocation that cannot be brought forward. A heritage impact assessment should be undertaken to assess whether areas can be taken forward to allocation and, if so, to define that location and set out any mitigation and progressive working measures that may be required. As this work has not been undertaken to define the proposed allocation, we are unable to support its inclusion.</p>	<p>that mineral extraction within the eastern part of SIL 02 would have a relatively severe impact on the setting of Pentney Priory and that the eastern part of SIL 02 (approximately from the track adjacent to Ashholt Plantation) should therefore not be allocated.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.</p>
<p><b>(Comment)</b> Representation ID: 92915  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>I've asked our teams for further guidance relating to SIL 02, and can now provide the following advice relating to effects on groundwater and the River Nar.</p> <p>The site is partially located within an SPZ1 and therefore we may not consider it suitable for mineral extraction. The site is also bound by surface water abstractors as well as groundwater abstractions located adjacent to or on site. If it is taken forward as a site it would have to be worked wet (no de-watering licence would be issued) with strict planning conditions.</p> <p>As the River Nar SSSI is a groundwater fed chalk river and has the characteristics of a lowland fen river in the lower reaches it is very important that the river is protected from adverse impacts as a result of any form of mineral extraction and associated workings. An assessment of potential impacts on the groundwater as well as surface water would be required as well as the need to show no adverse impacts on the ecology and fish populations of the river. Natural England should be consulted on any proposals likely to impact the SSSI.</p>	<p>The proposed extraction area excludes the SPZ 1. The proposal is for the mineral extraction to be worked wet with no de-watering.</p> <p>Noted. Natural England have been consulted on the Minerals and Waste Local Plan. However, the site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.</p>
<p><b>(Support)</b> Representation ID: 92486</p>	<p>Noted. We do not consider that the definition of 'specific site' applies to SIL 02. Whilst viable mineral</p>

Representations received about SIL 02	Norfolk County Council Planning Officer's response
<p>Respondent: <b>Sibelco UK (Mr M Hurley) [8119]</b></p> <p>Sibelco supports the inclusion of SIL02 as an allocated site and would propose that given the promoters knowledge of the local geology, the site should be allocated as a Specific Site. Further silica sand provision will be required at the end of the Plan period.</p> <p>The National Planning Practice Guidance says:</p> <p>a) designating Specific Sites - where viable mineral resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms ....</p> <p>This definition applies to SIL02</p>	<p>resources are known to exist within SIL 02 and landowners are supportive of minerals development we do not consider that 'the proposal is likely to be acceptable in planning terms'. The site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.</p>
<p><b>(Comment)</b> Representation ID: 92386</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.</p> <p>Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p> <p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p>	<p>Noted</p> <p>Noted.</p> <p>Noted. However, the site is concluded to be unsuitable to allocate in the Preferred Options</p>

Representations received about SIL 02	Norfolk County Council Planning Officer's response
<p>SIL 02 - We note the Council identifies SIL 02 as a Preferred Area, within which a smaller area could be subject to an application at a later date. We note the proximity of several CWS to the boundary of SIL 02 and recommend as with all other proposals near CWS that any application would need to demonstrate it could avoid adverse impacts on these sites. We would support any restoration proposals that enhance the landscape connectivity of the CWS network locally.</p>	<p>document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.</p>
<p><b>(Comment)</b> Representation ID: 92346  Respondent: <b>Ministry Of Defence (Defence Infrastructure Organisation) (Ms L Dale) [17971]</b>  DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.  The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.  On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham: MIN 19 &amp; 205; 76; 77; 40; SIL01, SIL02; AOS E &amp; J.  Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety. Therefore, we would recommend dry restoration and dry phased working.  Follow up response (December 2018): "The site is approximately 4.8km north west from RAF Marham. The proposed extension site is a considerable area which is proposed to be restored with large areas of open water. A development of this nature in such proximity to the aerodrome is of great concern to aircraft safety. Even if the site were to be reduced in scale this would be of serious concern to the MOD. Therefore, we would object to this site based on current plans."</p>	<p>Noted. The site is concluded to be unsuitable to allocate in the Preferred Options document "due to the size of the extraction site proposed within 5km of RAF Marham and the likelihood of the site being restored to open water, there is a high risk of unacceptable adverse impacts on aviation safety and the MOD (DIO) has objected to this proposal".</p>
<p><b>(Comment)</b> Representation ID: 92335  Respondent: <b>Borough Council of King's Lynn and West Norfolk (Ms F Pollard) [17968]</b>  SIL02 - land at Shouldham and Marham: This site is considered to be a potential 'Preferred Area' rather than a specific site allocation, from which smaller specific sites could come forward. The nearest residential property is reported to be 81m from the site boundary. There are 10 sensitive receptors within 250m of the site boundary. However, a buffer area is proposed which would mean</p>	<p>Noted. This information is contained within the site assessment. However, the site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of unacceptable adverse impacts on aviation safety</p>

Representations received about SIL 02	Norfolk County Council Planning Officer's response
<p>that the nearest residential would be 280m from the area. We would agree that the buffer area should be enforced and that any planning application for mineral extraction within the site would need to include a dust assessment and a programme of mitigation measures to deal appropriately with any amenity or health impacts.</p>	<p>(RAF Marham) and the MOD DIO has objected to the proposal.</p>
<p><b>(Object)</b> Representation ID: 92266  Respondent: <b>Shouldham parish council (Ms Z Bevan) [17930]</b>  As Shouldham Parish Clerk, I have been actioned to inform you of the Parish Council's objection to the above proposal. This decision was reached at the last Extra-Ordinary meeting of the Parish Council held on 6 August 2018.  The Parish Council's objections are based on the following grounds:  - The loss of landscape and amenity would be obtrusive and detrimental to the visual amenity of the area as a whole.   - Concern about what will happen to the quarry sites afterwards - will the landscape be restored sympathetically?   - What will the impact of the dredging lakes be in the area - particularly regarding the attraction of birds to the area and the potential for bird strikes on aircraft from RAF Marham?  - Impact of the construction of site infrastructure such as pipelines and access roads.</p>	<p>Objection noted</p> <p>Mineral extraction is usually phased so as to minimise the working area. At the beginning of a working phase, soils would be stripped and stored in bunds around the area to be extracted, these would form screening. As the extraction would be taking place below ground level, and the plant would be relatively low level, screening would not need to be excessively high. Other mineral extraction sites typically have bunds of 2.5-3.5m, if these were constructed with a shallow outer gradient and grassed, at distance they would not be easily distinguishable as separate features.</p> <p>No restoration scheme has been proposed by the mineral operator at this stage, therefore it has been assumed that restoration would be to open water.</p> <p>See conclusion below.</p> <p>The detail of a working scheme would be considered as part of any future planning application, mitigation measures would be required to ensure there were no</p>



Representations received about SIL 02	Norfolk County Council Planning Officer's response
<p>- Potential for heavy road traffic and the construction of access roads and routes.</p> <p>- Dust and noise from the extraction area - and its potential health impacts.</p> <p>- Increased light pollution in the area.</p>	<p>unacceptable adverse impacts from preliminary operations. No detail has currently been provided by the proposer of the site.</p> <p>The proposal submitted indicates that mineral will be moved by pipeline from the extraction site SIL02 to the existing processing plant; therefore, only limited vehicle movements would be likely compared with a sand and gravel working where the majority of the mineral is transported by HGV.</p> <p>The Health and Safety Executive states that "Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust". "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 noise assessment and a dust assessment would be required at the planning application stage, they would be considered by an Environmental Health Officer as part of the determination of a planning application. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>The details of any lighting would be a matter for the planning application. Sibelco have not provided any details of the working scheme with the site proposal.</p>

Representations received about SIL 02	Norfolk County Council Planning Officer's response
<p>- Impact on listed buildings/monuments in the area.</p> <p>- Destruction of habitat and SSI's, together with the impact on wildlife.</p>	<p>Any lighting required on site would be subject to a lighting assessment at the planning application stage, and this would consider potential impacts from lighting and require mitigation to ensure that no unacceptable adverse impact occur.</p> <p>Norfolk County Council's Historic Environment Service have subsequently carried out an Historic Environment Impact Assessment on proposed site SIL 02 and AOS E. It concluded that mineral extraction within the eastern part of SIL 02 would have a relatively severe impact on the setting of Pentney Priory and that the eastern part of SIL 02 (approximately from the track adjacent to Ashholt Plantation) should therefore not be allocated.</p> <p>The majority of the site is currently agricultural fields in arable use. Natural England, and a number of other statutory and non-statutory nature conservation bodies were consulted on the Initial Consultation document, and no 'in principle' objections were received. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. These would identify the ecological baseline, and suggest appropriate mitigation for any potential impacts identified.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document because</p>

Representations received about SIL 02	Norfolk County Council Planning Officer's response
	there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.
<p><b>(Comment)</b> Representation ID: 92116  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b>  Given the potential for impacts identified on the River Nar, it would be helpful to include a specific requirement for these to be considered at the planning application stage.</p>	Noted. However, the site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.
<p><b>(Comment)</b> Representation ID: 92044  Respondent: <b>Borough Council of King's Lynn and West Norfolk (Mr Geoff Hall) [9627]</b>  * The area at Shouldham / Marham in Policy SIL02 is a 'Preferred Area' which is something beyond an 'Area of Search', but not as definite as an allocation.  * Whilst it is accepted that additional geological information has come forward from Sibelco, it will be disappointing to those communities locally who could draw some comfort from having a defined Area of Search perhaps containing the expectations of extraction to it.  * The expression of a 'preference' for extraction to take place beyond the Area of Search current boundary (Policy SIL 02) casts doubt of the certainty for other communities near to other Areas of Search.  * Notwithstanding these comments the NCC note that they expect a lesser area to actually come forward for allocation.  * There is a list of significant caveats / issues to be addressed before the potential extraction could proceed.  * It is interesting to note that a form of 'wet extraction' is proposed which could avoid some potential environmental problems.</p>	Comments noted. The extent of the areas of search was based upon the British Geological Survey maps of inferred surface mineral resources. Sibelco UK Ltd have carried out their own geological testing which showed that there was a viable silica sand resource further to the east of AOS E than shown on the BGS maps. The National Planning Practice Guidance defines the terms of 'specific sites', 'preferred areas' and 'areas of search'. SIL 02 has been described as a potential 'Preferred Area' in the M&WLP because it is an area of known mineral resource (whereas Areas of Search are where knowledge of mineral resources may be less certain). SIL 02 was submitted by Sibelco Ltd as a specific site, however, we did not consider that it met the definition.
<p><b>(Comment)</b> Representation ID: 92022  Respondent: <b>CPRE Norfolk (Mr M Rayner) [17775]</b></p>	Noted. However, the site is concluded to be unsuitable to allocate in the Preferred Options

Representations received about SIL 02	Norfolk County Council Planning Officer's response
<p>This is a large site where suitable buffer zones could be employed to ensure protection of the River Nar, Marham Fen County Wildlife Site and Pentney Abbey Gatehouse and its setting.</p>	<p>document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.</p>
<p><b>(Object)</b> Representation ID: 91947</p> <p>Respondent: <b>Marham Parish Council (Mrs S Porter) [17714]</b></p> <p>Loss of landscape &amp; amenity would be obtrusive &amp; detrimental to the visual amenity of the area.</p> <p>Desirability of the adjacent properties, or locality, may affect potential property values.</p> <p>Quarry sites will be used as landfill which is a concern due to the regulations of the Landfill Directive.</p> <p>Each quarry site must be reinstated prior to moving onto the next throughout the development.</p>	<p>Mineral extraction is usually phased so as to minimise the working area. At the beginning of a working phase, soils would be stripped and stored in bunds around the area to be extracted, these would form screening. As the extraction would be taking place below ground level, and the plant would be relatively low level, screening would not need to be excessively high. Other mineral extraction sites typically have bunds of 2.5-3.5m, if these were constructed with a shallow outer gradient and grassed, at distance they would not be easily distinguishable as separate features.</p> <p>Property values are not a material planning consideration.</p> <p>SIL 02 is not proposed to be used for landfill after mineral extraction. Silica sand extraction sites in Norfolk that have recently been restored and those that are currently being restored have either used the overburden from the site to create a suitable landform, or have been restored to water, or have used the tailing material from the mineral washing process to restore the site.</p> <p>It is normal practice for sites to be worked in phases and to progressively restore each phase. Draft Policy</p>

Representations received about SIL 02	Norfolk County Council Planning Officer's response
<p>That a corridor of trees is supplied in Spring Lane, the adjacent landholding.</p> <p>That the current PROW from the village to the river &amp; Shouldham Warren, is retained as it would be detrimental if this were lost.</p>	<p>MP7 details the progressive restoration requirements for mineral extraction sites. Planning conditions are used to specify the date by which a permitted site must be completed and restored.</p> <p>The details of any screening required would be a matter for any future planning application, once the details of a working scheme are known.</p> <p>There is only one Public Right of Way (PROW) within the boundary of SILO2, Marham FP9. There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the temporary diversion or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would need to address the footpath location. Alternatively, a phased extraction may allow for the existing footpath to be retained, this would be a matter for a future planning application. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PROWs have been successfully addressed.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.</p>
<p><b>(Comment)</b> Representation ID: 91941 Respondent: <b>Lead Local Flood Authority (Norfolk County Council) (Ms Elaine Simpson) [17508]</b></p>	<p>Noted. However, the site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of</p>

Representations received about SIL 02	Norfolk County Council Planning Officer's response
SIL02 - Marham - We would like to highlight that we are aware of reports of flooding internally (2016) on The Street, Marham. Although the proposal is downgradient of this location any proposal would need to consider this during its design.	unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.

Responses were received about SIL 02 from the following individuals	
<p>Representation ID: 93229 Respondent: <b>Mr A &amp; Mrs M Murdoch [18266]</b></p> <p>Representation ID: 93228 Respondent: <b>Mr N Mackay [18354]</b></p> <p>Representation ID: 93227 Respondent: <b>Ms J The [18258]</b></p> <p>Representation ID: 93226 Respondent: <b>Mrs A Burrows [18085]</b></p> <p>Representation ID: 93015 Respondent: <b>Mr S Gray [18335]</b></p> <p>Representation ID: 93013 Respondent: <b>Ms E Brewer [17782]</b></p> <p>Representation ID: 93011 Respondent: <b>Mr R Thompson [17779]</b></p> <p>Representation ID: 93010 Respondent: <b>Mr R Allerton [18334]</b></p> <p>Representation ID: 93009 Respondent: <b>Ms O Massam [18333]</b></p> <p>Representation ID: 93008 Respondent: <b>Ms J Caley [18332]</b></p> <p>Representation ID: 92914 Respondent: <b>Miss J Wadham [18289]</b></p> <p>Representation ID: 92829 Respondent: <b>Mrs I Barrett [18290]</b></p> <p>Representation ID: 92828 Respondent: <b>Mrs D Maplesden [18291]</b></p> <p>Representation ID: 92827 Respondent: <b>Mrs B Sampson [18288]</b></p> <p>Representation ID: 92826 Respondent: <b>T The [18287]</b></p> <p>Representation ID: 92825 Respondent: <b>Mr R The [18286]</b></p> <p>Representation ID: 92824 Respondent: <b>Mr E The [18284]</b></p> <p>Representation ID: 92823 Respondent: <b>Ms M The [18249]</b></p> <p>Representation ID: 92822 Respondent: <b>Mr I Goldsmith [18283]</b></p> <p>Representation ID: 92821 Respondent: <b>Ms L MacKay [18282]</b></p> <p>Representation ID: 92820 Respondent: <b>Mrs A Phillips [18281]</b></p> <p>Representation ID: 92819 Respondent: <b>Mr &amp; Mrs S Gadsdon [18280]</b></p> <p>Representation ID: 92818 Respondent: <b>Mr &amp; Mrs D Linford [18279]</b></p> <p>Representation ID: 92817 Respondent: <b>Mr J Webb [18278]</b></p> <p>Representation ID: 92816 Respondent: <b>Mr &amp; Mrs A Devereux [18277]</b></p>	<p>Representation ID: 92809 Respondent: <b>Mrs A Flack [18270]</b></p> <p>Representation ID: 92808 Respondent: <b>Mrs J Cook [18269]</b></p> <p>Representation ID: 92807 Respondent: <b>Mr B Cook [18268]</b></p> <p>Representation ID: 92806 Respondent: <b>Mr R &amp; Mrs J Curtis [18267]</b></p> <p>Representation ID: 92805 Respondent: <b>Mr J Banwell [18265]</b></p> <p>Representation ID: 92804 Respondent: <b>Mr J Banwell [18264]</b></p> <p>Representation ID: 92803 Respondent: <b>Mr K Day [18263]</b></p> <p>Representation ID: 92802 Respondent: <b>Ms N &amp; T Kaye</b></p> <p>Representation ID: 92801 Respondent: <b>Ms S Fox [18261]</b></p> <p>Representation ID: 92800 Respondent: <b>Ms S Moss [18260]</b></p> <p>Representation ID: 92799 Respondent: <b>Mr &amp; Mrs T Goldsmith [17776]</b></p> <p>Representation ID: 92798 Respondent: <b>Mr P Barham [18259]</b></p> <p>Representation ID: 92797 Respondent: <b>Mrs J Glenn [18258]</b></p> <p>Representation ID: 92796 Respondent: <b>E Rolinson [18257]</b></p> <p>Representation ID: 92795 Respondent: <b>Ms F Hindle [18256]</b></p> <p>Representation ID: 92794 Respondent: <b>Mr D Carter [18255]</b></p> <p>Representation ID: 92793 Respondent: <b>Ms A Barnes [18254]</b></p> <p>Representation ID: 92792 Respondent: <b>Mr R Ashby [18253]</b></p> <p>Representation ID: 92791 Respondent: <b>Ms C Ashby [18252]</b></p> <p>Representation ID: 92790 Respondent: <b>Mrs S Black [18251]</b></p> <p>Representation ID: 92789 Respondent: <b>Mrs White [18250]</b></p> <p>Representation ID: 92788 Respondent: <b>Mrs P Bullen [18249]</b></p> <p>Representation ID: 92787 Respondent: <b>Mrs E Cottam [17729]</b></p> <p>Representation ID: 92786 Respondent: <b>H Mitchell [18248]</b></p> <p>Representation ID: 92785 Respondent: <b>L Rawlings [18247]</b></p>

Representation ID: 92815 Respondent: **Ms J Hipperson [18276]**  
Representation ID: 92814 Respondent: **Mrs C Currie [18275]**  
Representation ID: 92813 Respondent: **G Slade [18274]**  
Representation ID: 92812 Respondent: **Ms J Banwell [18273]**  
Representation ID: 92811 Respondent: **Mr J White [18272]**  
Representation ID: 92810 Respondent: **Ms J Callaby [18271]**  
Representation ID: 92778 Respondent: **Mr P Goldspink [18240]**  
Representation ID: 92777 Respondent: **Mr P & Mrs G Bloomfield [18239]**  
Representation ID: 92776 Respondent: **Mr & Mrs Steeles [18238]**  
Representation ID: 92775 Respondent: **Ms D Wilson [18237]**  
Representation ID: 92774 Respondent: **Mr A Wilson [18236]**  
Representation ID: 92773 Respondent: **Miss E Fowler [18235]**  
Representation ID: 92772 Respondent: **Ms E Timms [18234]**  
Representation ID: 92771 Respondent: **Mr A Timms [18233]**  
Representation ID: 92770 Respondent: **Mr B Godden [18232]**  
Representation ID: 92769 Respondent: **Ms M McDonald [18231]**  
Representation ID: 92768 Respondent: **Mrs S Rolph [18230]**  
Representation ID: 92767 Respondent: **Mr M Barrett [18229]**  
Representation ID: 92766 Respondent: **Mr D McCulloch [18228]**  
Representation ID: 92765 Respondent: **Mrs C Guynan [18227]**  
Representation ID: 92764 Respondent: **Ms A Carter [18226]**  
Representation ID: 92763 Respondent: **Mr P Harriss [18225]**  
Representation ID: 92762 Respondent: **Ms R Ballaster [18224]**  
Representation ID: 92761 Respondent: **Ms H Hooper [18223]**  
Representation ID: 92760 Respondent: **Ms S Winstone [18222]**  
Representation ID: 92759 Respondent: **Ms S Hughes [18221]**  
Representation ID: 92758 Respondent: **Mr A Hales [18220]**  
Representation ID: 92757 Respondent: **Mrs J Colmer [18219]**  
Representation ID: 92756 Respondent: **Mr J Goad [18218]**  
Representation ID: 92755 Respondent: **Ms K Hall [18217]**  
Representation ID: 92754 Respondent: **Mr B & Mrs K Howard [18216]**  
Representation ID: 92753 Respondent: **Mr & Mrs J Jarvis [18215]**  
Representation ID: 92752 Respondent: **Ms A Fay [18214]**

Representation ID: 92784 Respondent: **L Freeman [18246]**  
Representation ID: 92783 Respondent: **Mr R Durrant [18245]**  
Representation ID: 92782 Respondent: **Miss J Fowler [18244]**  
Representation ID: 92781 Respondent: **Mr J Shephed [18243]**  
Representation ID: 92780 Respondent: **Ms J Shephed [18242]**  
Representation ID: 92779 Respondent: **L Gabriel & S Egan [18241]**  
Representation ID: 92745 Respondent: **Ms J Gallichan [18208]**  
Representation ID: 92744 Respondent: **Mr A Shearer [18207]**  
Representation ID: 92743 Respondent: **Mrs A Buet [18206]**  
Representation ID: 92742 Respondent: **Mr K Buet [18205]**  
Representation ID: 92421 Respondent: **Mr B & Mrs J Tortice [18204]**  
Representation ID: 92740 Respondent: **Mr B Hullah [18203]**  
Representation ID: 92739 Respondent: **Mrs N Simms [18202]**  
Representation ID: 92738 Respondent: **Mr G Davis [18201]**  
Representation ID: 92737 Respondent: **Mr J W Lock [17717]**  
Representation ID: 92736 Respondent: **Mrs D Marriott [18200]**  
Representation ID: 92735 Respondent: **Mr & Mrs Watson [18199]**  
Representation ID: 92734 Respondent: **Mr C Eves [18198]**  
Representation ID: 92733 Respondent: **Mr & Mrs R Hammond [18197]**  
Representation ID: 92732 Respondent: **Mrs J Lock [18350]**  
Representation ID: 92731 Respondent: **Mr P Barber [18196]**  
Representation ID: 92730 Respondent: **Mrs J Stokes [18195]**  
Representation ID: 92729 Respondent: **Mr & Mrs Williams [18194]**  
Representation ID: 92728 Respondent: **Ms M The [18193]**  
Representation ID: 92727 Respondent: **Mr J Johnson [18192]**  
Representation ID: 92726 Respondent: **Mr C Bradly [18191]**  
Representation ID: 92725 Respondent: **Ms J Bezer [18190]**  
Representation ID: 92724 Respondent: **Mrs J Macpherson [18189]**  
Representation ID: 92723 Respondent: **Ms B Ross [18188]**  
Representation ID: 92722 Respondent: **Mr N Yates [18187]**  
Representation ID: 92721 Respondent: **Mr D Long [18186]**  
Representation ID: 92720 Respondent: **Mr & Mrs I Lamming [18185]**  
Representation ID: 92719 Respondent: **Miss Rowland [18184]**

Representation ID: 92751 Respondent: **Mr P Fay [18213]**  
Representation ID: 92750 Respondent: **Mr D Busse [18212]**  
Representation ID: 92749 Respondent: **Ms A Busse [18211]**  
Representation ID: 92748 Respondent: **Mr M Rolph [18210]**  
Representation ID: 92747 Respondent: **Dr P Bennett [18353]**  
Representation ID: 92746 Respondent: **P Rider & A Kirby [18209]**  
Representation ID: 92712 Respondent: **S Bailey [18177]**  
Representation ID: 92711 Respondent: **Mrs T Trick [18176]**  
Representation ID: 92710 Respondent: **Ms V Hobden [18175]**  
Representation ID: 92709 Respondent: **Mr J Trick [18174]**  
Representation ID: 92708 Respondent: **Mr G Brown [18173]**  
Representation ID: 92707 Respondent: **Mr W & Mrs R Harrison [18172]**  
Representation ID: 92706 Respondent: **J Bradly [18171]**  
Representation ID: 92705 Respondent: **Ms S Dunman [18170]**  
Representation ID: 92704 Respondent: **Mr D & Mrs G Strawguard [18169]**  
Representation ID: 92703 Respondent: **Mr A Edwards [18168]**  
Representation ID: 92702 Respondent: **Ms K Barrow [18167]**  
Representation ID: 92701 Respondent: **Miss D Nudd [18166]**  
Representation ID: 92700 Respondent: **Mrs E Nudd [18165]**  
Representation ID: 92699 Respondent: **Mr N Eves [18164]**  
Representation ID: 92698 Respondent: **Mr R Nudd [18163]**  
Representation ID: 92697 Respondent: **Mr J & Mrs L Peach [18162]**  
Representation ID: 92672 Respondent: **Ms M Adams [18114]**  
Representation ID: 92671 Respondent: **Mr R Saxon [18113]**  
Representation ID: 92670 Respondent: **Mrs W Steeles [18112]**  
Representation ID: 92669 Respondent: **Mr R Steeles [18111]**  
Representation ID: 92668 Respondent: **Ms G Hart [18110]**  
Representation ID: 92667 Respondent: **Mr P Lockyer [18109]**  
Representation ID: 92666 Respondent: **Ms T Reeve [18108]**  
Representation ID: 92665 Respondent: **Mr B Jarvis [18107]**  
Representation ID: 92664 Respondent: **Mrs A Jarvis [18106]**  
Representation ID: 92663 Respondent: **Ms N Pavic [18105]**  
Representation ID: 92662 Respondent: **Mr R Pavic [18104]**

Representation ID: 92718 Respondent: **Mr R & Mrs M Marriott [18183]**  
Representation ID: 92717 Respondent: **Mr N Williams [18182]**  
Representation ID: 92716 Respondent: **Ms E Williams [18181]**  
Representation ID: 92715 Respondent: **Ms P Weal [18180]**  
Representation ID: 92714 Respondent: **Ms L Foster [18179]**  
Representation ID: 92713 Respondent: **Mr F Ross [18178]**  
Representation ID: 92655 Respondent: **Mr R Ludford [18097]**  
Representation ID: 92654 Respondent: **Ms J Qualters [18096]**  
Representation ID: 92653 Respondent: **Mr J & Mrs S Banwell [18095]**  
Representation ID: 92652 Respondent: **Mr & Mrs M Wakefield [18094]**  
Representation ID: 92651 Respondent: **Mr P Silverman [18093]**  
Representation ID: 92650 Respondent: **Ms L Allen [18092]**  
Representation ID: 92649 Respondent: **Ms H Piccoli [18091]**  
Representation ID: 92648 Respondent: **G Chen [18090]**  
Representation ID: 92647 Respondent: **L Chen [18089]**  
Representation ID: 92646 Respondent: **Ms H Chen [18088]**  
Representation ID: 92645 Respondent: **Z Chen [18087]**  
Representation ID: 92644 Respondent: **N Chen [18086]**  
Representation ID: 92643 Respondent: **Miss A Burrows [18084]**  
Representation ID: 92642 Respondent: **Mrs S Canham [17949]**  
Representation ID: 92641 Respondent: **Mr R Canham [18083]**  
Representation ID: 92640 Respondent: **J Canham [18082]**  
Representation ID: 92639 Respondent: **Mr B Jones [18081]**  
Representation ID: 92638 Respondent: **Ms P Jones [18080]**  
Representation ID: 92637 Respondent: **Mr M Sabberton [18079]**  
Representation ID: 92636 Respondent: **Mrs E Pearson [18078]**  
Representation ID: 92635 Respondent: **P Mitchell [18077]**  
Representation ID: 92634 Respondent: **J Mitchell [18076]**  
Representation ID: 92633 Respondent: **C Mitchell [18075]**  
Representation ID: 92632 Respondent: **Mr T Watson [18074]**  
Representation ID: 92631 Respondent: **Mr A Bullock [18073]**  
Representation ID: 92630 Respondent: **Ms J Bullock [18072]**  
Representation ID: 92629 Respondent: **Ms P Wheeler [18071]**



Representation ID: 92661 Respondent: <b>Mr I Duggins [18103]</b>	Representation ID: 92628 Respondent: <b>Mr M Hemingway [18070]</b>
Representation ID: 92660 Respondent: <b>Mr A McKendrick [18102]</b>	Representation ID: 92627 Respondent: <b>Mrs A Matthews [18069]</b>
Representation ID: 92659 Respondent: <b>Mr D Taylor [18101]</b>	Representation ID: 92626 Respondent: <b>C Matthews [18068]</b>
Representation ID: 92658 Respondent: <b>Mr C Taylor [18100]</b>	Representation ID: 92625 Respondent: <b>V Watkins [18067]</b>
Representation ID: 92657 Respondent: <b>Mrs J Taylor [18099]</b>	Representation ID: 92624 Respondent: <b>Ms V Smith-Charlton [18066]</b>
Representation ID: 92656 Respondent: <b>Mr K &amp; Mrs G Bedford [18098]</b>	Representation ID: 92623 Respondent: <b>Ms S Bullen [18065]</b>
Representation ID: 92622 Respondent: <b>J Shelvock [18064]</b>	Representation ID: 92589 Respondent: <b>B Hamblin [18032]</b>
Representation ID: 92621 Respondent: <b>Ms M Mater [18063]</b>	Representation ID: 92588 Respondent: <b>Mr A Bulmer [18031]</b>
Representation ID: 92620 Respondent: <b>J Stone [18062]</b>	Representation ID: 92587 Respondent: <b>Mrs P Dack [18030]</b>
Representation ID: 92619 Respondent: <b>C Madge [18061]</b>	Representation ID: 92586 Respondent: <b>J Vieira [18029]</b>
Representation ID: 92618 Respondent: <b>R Vince [18060]</b>	Representation ID: 92585 Respondent: <b>Mrs S Whinn [18028]</b>
Representation ID: 92617 Respondent: <b>Mr D Pease [18059]</b>	Representation ID: 92584 Respondent: <b>P Whinn [18027]</b>
Representation ID: 92616 Respondent: <b>Mrs S House [18058]</b>	Representation ID: 92583 Respondent: <b>Mrs S Chapman [18026]</b>
Representation ID: 92615 Respondent: <b>Mr R Barker [18057]</b>	Representation ID: 92582 Respondent: <b>C Chapman [18025]</b>
Representation ID: 92614 Respondent: <b>Mrs Peacock [18056]</b>	Representation ID: 92581 Respondent: <b>C &amp; J Hare [18024]</b>
Representation ID: 92613 Respondent: <b>Mr L &amp; Mrs F Goldspink [18055]</b>	Representation ID: 92580 Respondent: <b>Mr B Seymour [18023]</b>
Representation ID: 92612 Respondent: <b>Mr T Harrison [18054]</b>	Representation ID: 92579 Respondent: <b>Mr A Hardy [18022]</b>
Representation ID: 92611 Respondent: <b>Mrs A Harrison [18053]</b>	Representation ID: 92578 Respondent: <b>Mr D Knights [18021]</b>
Representation ID: 92610 Respondent: <b>Mr P Warren [18052]</b>	Representation ID: 92577 Respondent: <b>Mr R &amp; Mrs J Thompson [18020]</b>
Representation ID: 92609 Respondent: <b>K Warren [18051]</b>	Representation ID: 92576 Respondent: <b>Mr F Connor [18019]</b>
Representation ID: 92608 Respondent: <b>Mrs P Blazeby [18050]</b>	Representation ID: 92575 Respondent: <b>Mrs J Connor [18018]</b>
Representation ID: 92607 Respondent: <b>C Blazeby [18049]</b>	Representation ID: 92574 Respondent: <b>Ms M Beacham [18017]</b>
Representation ID: 92606 Respondent: <b>Mrs G Jayes [18048]</b>	Representation ID: 92573 Respondent: <b>C A Chandler [18016]</b>
Representation ID: 92605 Respondent: <b>Mr D Scott [18047]</b>	Representation ID: 92572 Respondent: <b>C E Chandler [18015]</b>
Representation ID: 92604 Respondent: <b>Mrs J Hecklau [18046]</b>	Representation ID: 92571 Respondent: <b>N Wilson [18014]</b>
Representation ID: 92603 Respondent: <b>Mr M Hecklau [18045]</b>	Representation ID: 92570 Respondent: <b>Mrs E Wilson [17942]</b>
Representation ID: 92602 Respondent: <b>Mrs S Johnson [18044]</b>	Representation ID: 92569 Respondent: <b>Mr N Hartis MBE [18013]</b>
Representation ID: 92601 Respondent: <b>Mr J Edwards [18043]</b>	Representation ID: 92370 Respondent: <b>Mr C Green [17977]</b>
Representation ID: 92600 Respondent: <b>M Carter [180442]</b>	Representation ID: 92339 Respondent: <b>Mrs S Bignell [17970]</b>
Representation ID: 92599 Respondent: <b>B Watkins [18041]</b>	Representation ID: 92331 Respondent: <b>Mr J Ninham [17858]</b>
Representation ID: 92598 Respondent: <b>Mr C Child [18040]</b>	Representation ID: 92330 Respondent: <b>Ms S King [17859]</b>
Representation ID: 92597 Respondent: <b>Ms C Snare [18039]</b>	Representation ID: 92329 Respondent: <b>Mr J Buet [17966]</b>
Representation ID: 92596 Respondent: <b>Mrs A Hardy [18038]</b>	Representation ID: 92328 Respondent: <b>Mrs S Day [17965]</b>

Representation ID: 92595 Respondent: <b>Mrs D Wederell [17877]</b>	Representation ID: 92324 Respondent: <b>Mrs D E Flatt [17962]</b>
Representation ID: 92594 Respondent: <b>Mr I Clark [18037]</b>	Representation ID: 92321 Respondent: <b>Mr D Bignell [17938]</b>
Representation ID: 92593 Respondent: <b>Mrs C Bulmer [18036]</b>	Representation ID: 92320 Respondent: <b>Mr D Bignell [17938]</b>
Representation ID: 92592 Respondent: <b>Mr R &amp; Mrs P Watts [18035]</b>	Representation ID: 92319 Respondent: <b>Mr J Sadler [17718]</b>
Representation ID: 92591 Respondent: <b>Mr H Jayes [18034]</b>	Representation ID: 92318 Respondent: <b>Mrs B Sadler [17959]</b>
Representation ID: 92590 Respondent: <b>Mr T &amp; Mrs R Rees [18033]</b>	Representation ID: 92303 Respondent: <b>Mr S &amp; Mrs M Beardmore [17951]</b>
Representation ID: 92301 Respondent: <b>Mrs K Tenney [17952]</b>	Representation ID: 92241 Respondent: <b>Mr A Archibald [17910]</b>
Representation ID: 92300 Respondent: <b>Mr S &amp; Mrs M Beardmore [17951]</b>	Representation ID: 92239 Respondent: <b>Ms B Archibald [17909]</b>
Representation ID: 92299 Respondent: <b>Mr G Claridge [17950]</b>	Representation ID: 92237 Respondent: <b>Ms A Copsey [17908]</b>
Representation ID: 92298 Respondent: <b>Mr A Seaman [17849]</b>	Representation ID: 92236 Respondent: <b>Mr R Perry [17907]</b>
Representation ID: 92296 Respondent: <b>Mr J Pepperill [17837]</b>	Representation ID: 92235 Respondent: <b>Mr &amp; Mrs Chaplin [17906]</b>
Representation ID: 92295 Respondent: <b>Mr R Canham [17948]</b>	Representation ID: 92234 Respondent: <b>Miss M Elmslie [17905]</b>
Representation ID: 92293 Respondent: <b>Mr N House [17947]</b>	Representation ID: 92232 Respondent: <b>Mr C McCallion [17904]</b>
Representation ID: 92290 Respondent: <b>Mr &amp; Mrs Oddey [17945]</b>	Representation ID: 92231 Respondent: <b>Ms A Woolmer [17903]</b>
Representation ID: 92288 Respondent: <b>Mrs K Gibbs [17944]</b>	Representation ID: 92230 Respondent: <b>Mr R Millham [17902]</b>
Representation ID: 92287 Respondent: <b>Mr H Stephenson [17943]</b>	Representation ID: 92229 Respondent: <b>Ms E Millham [17901]</b>
Representation ID: 92286 Respondent: <b>Mrs E Wilson [17942]</b>	Representation ID: 92228 Respondent: <b>Ms A Millham [17900]</b>
Representation ID: 92284 Respondent: <b>Ms M Freedman [17941]</b>	Representation ID: 92227 Respondent: <b>Ms K McCoy [17899]</b>
Representation ID: 92282 Respondent: <b>Mrs S Ignatieva [17833]</b>	Representation ID: 92226 Respondent: <b>Ms K Fletcher [17898]</b>
Representation ID: 92276 Respondent: <b>Mr D Bignell [17938]</b>	Representation ID: 92225 Respondent: <b>Mr B Greene [17897]</b>
Representation ID: 92273 Respondent: <b>Mrs V Scott [17936]</b>	Representation ID: 92222 Respondent: <b>Mr J Carman [17896]</b>
Representation ID: 92272 Respondent: <b>Mrs D Wales [17767]</b>	Representation ID: 92221 Respondent: <b>Mr P &amp; Mrs C Morley [17895]</b>
Representation ID: 92267 Respondent: <b>Mrs J Stephenson [17931]</b>	Representation ID: 92220 Respondent: <b>Sir J Bagge [17894]</b>
Representation ID: 92265 Respondent: <b>Mrs G Flack [17929]</b>	Representation ID: 92219 Respondent: <b>Mr M Boyd [17882]</b>
Representation ID: 92264 Respondent: <b>Mrs P Clarke [17928]</b>	Representation ID: 92218 Respondent: <b>Mr C Dann [17893]</b>
Representation ID: 92263 Respondent: <b>Mr A Bradley [17927]</b>	Representation ID: 92217 Respondent: <b>Mr A Dann [17892]</b>
Representation ID: 92260 Respondent: <b>Ms S Gipson [17924]</b>	Representation ID: 92216 Respondent: <b>Mrs S Dann [17891]</b>
Representation ID: 92259 Respondent: <b>Mr D Bowles [17923]</b>	Representation ID: 92215 Respondent: <b>Mr A Rose-Land [17890]</b>
Representation ID: 92258 Respondent: <b>Ms K Bowles [17922]</b>	Representation ID: 92214 Respondent: <b>Ms J Rose-Land [17889]</b>
Representation ID: 92257 Respondent: <b>Mrs N Bressani [17921]</b>	Representation ID: 92213 Respondent: <b>Ms S Rose-Land [17888]</b>
Representation ID: 92255 Respondent: <b>Mr M Bressani [17920]</b>	Representation ID: 92212 Respondent: <b>Ms W Owen [17887]</b>
Representation ID: 92253 Respondent: <b>Mr D McCoy [17919]</b>	Representation ID: 92209 Respondent: <b>Miss E Greene [17885]</b>
Representation ID: 92252 Respondent: <b>Mr J Clarke [17917]</b>	Representation ID: 92208 Respondent: <b>Ms S Wilson-low [17884]</b>

Representation ID: 92250 Respondent: **Mr J Clarke [17917]**  
Representation ID: 92249 Respondent: **Miss S French [17916]**  
Representation ID: 92247 Respondent: **Ms S Williams [17915]**  
Representation ID: 92246 Respondent: **Ms S Swanson [17914]**  
Representation ID: 92244 Respondent: **Mrs J Hallett [17912]**  
Representation ID: 92242 Respondent: **Mr C Tenney [17911]**  
Representation ID: 92196 Respondent: **Mr P Dixon [17732]**  
Representation ID: 92195 Respondent: **Mr D & Mrs J Bland [17878]**  
Representation ID: 92192 Respondent: **Ms K Tuffin [17876]**  
Representation ID: 92190 Respondent: **Ms R Bartholomew [17875]**  
Representation ID: 92189 Respondent: **Mr A Bartholomew [17874]**  
Representation ID: 92187 Respondent: **Mr B Ferguson [17873]**  
Representation ID: 92186 Respondent: **Mr A Owen [17872]**  
Representation ID: 92185 Respondent: **Mr C Owen [17871]**  
Representation ID: 92184 Respondent: **Mr N Goble [17870]**  
Representation ID: 92183 Respondent: **Mrs J Buttery [17869]**  
Representation ID: 92182 Respondent: **Mr R Hallett [17868]**  
Representation ID: 92181 Respondent: **Ms W Hesselworth [17867]**  
Representation ID: 92180 Respondent: **Ms N Goble [17866]**  
Representation ID: 92179 Respondent: **Mr C Buttery [17865]**  
Representation ID: 92178 Respondent: **Mrs J Saunders [17864]**  
Representation ID: 92177 Respondent: **Ms S Ludford [17863]**  
Representation ID: 92176 Respondent: **Mr K Walton [17862]**  
Representation ID: 92174 Respondent: **Mr K Slade [17703]**  
Representation ID: 92173 Respondent: **Mrs A Walton [17821]**  
Representation ID: 92171 Respondent: **Ms J Matthews [17860]**  
Representation ID: 92167 Respondent: **Ms V Edwards [17857]**  
Representation ID: 92165 Respondent: **Mr G Johnson [17856]**  
Representation ID: 92164 Respondent: **Mr M Wickham [17855]**  
Representation ID: 92163 Respondent: **Mr S Gibbs [17584]**  
Representation ID: 92161 Respondent: **Mr A Flatt [17852]**  
Representation ID: 92160 Respondent: **Mr J Woods [17851]**  
Representation ID: 92152 Respondent: **Mr T Pringle [17846]**

Representation ID: 92135 Respondent: **Ms E Brewer [17782]**  
Representation ID: 92076 Respondent: **Mrs B Fletcher [17803]**  
Representation ID: 92053 Respondent: **Ms P Fearnley [17798]**  
Representation ID: 92206 Respondent: **Ms C Wilson-Low [17816]**  
Representation ID: 92204 Respondent: **Mr R Janiszewski [17881]**  
Representation ID: 92202 Respondent: **Mr S Brewer [17489]**  
Representation ID: 92201 Respondent: **Miss L Tanner [17880]**  
Representation ID: 92199 Respondent: **Mrs J Bradley [17861]**  
Representation ID: 92197 Respondent: **Mrs V Slade [17879]**  
Representation ID: 92051 Respondent: **Mrs LDT Gallagher [17797]**  
Representation ID: 92050 Respondent: **Mr J J Gallagher [17796]**  
Representation ID: 92038 Respondent: **Mr & Mrs T Goldsmith [17776]**  
Representation ID: 92036 Respondent: **Mrs R Briers [17786]**  
Representation ID: 92035 Respondent: **Mr S Male [17784]**  
Representation ID: 92033 Respondent: **Ms S Kedge [17785]**  
Representation ID: 92008 Respondent: **Mr D Hawkins [17745]**  
Representation ID: 92006 Respondent: **Mrs T Hawkins [17746]**  
Representation ID: 92003 Respondent: **Mr & Mrs L Jackson [17742]**  
Representation ID: 91998 Respondent: **Miss D Benns [17720]**  
Representation ID: 91996 Respondent: **Ms M Austin [17740]**  
Representation ID: 91994 Respondent: **Mr R & Mrs N Hayter [17739]**  
Representation ID: 91992 Respondent: **Mrs S Haddleton [17738]**  
Representation ID: 91991 Respondent: **Ms B D Blowers [17737]**  
Representation ID: 91988 Respondent: **Mr P Dixon [17732]**  
Representation ID: 91986 Respondent: **Mrs H Goodchild [17731]**  
Representation ID: 91979 Respondent: **Mrs E Cottam [17729]**  
Representation ID: 91978 Respondent: **Mrs C Pontin [17728]**  
Representation ID: 91975 Respondent: **Mr A Austin [17726]**  
Representation ID: 91954 Respondent: **Mr M & Mrs D Greene [17716]**  
Representation ID: 91952 Respondent: **Ms S Moss [17721]**  
Representation ID: 91948 Respondent: **Mr J W Lock [17717]**  
Representation ID: 91820 Respondent: **Mr B Caley [17609]**

Representation ID: 92151 Respondent: <b>Dr P Harris [17841]</b> Representation ID: 92140 Respondent: <b>Mr J Pepperill [17837]</b> Representation ID: 92138 Respondent: <b>Mrs N Pepperill [17836]</b>	
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<b>Responses received from individuals about SIL 02</b>	<b>Norfolk County Council Planning Officer's response</b>
I understand the need to provide a future source of silica sand, however, I feel that this development will have a disproportionate and devastating impact on a rural community, already affected by a rapidly expanding RAF airbase of strategic national importance.	Silica sand is a scarce and nationally important industrial mineral, that occurs in few locations within England. The specific issues raised regarding potential impacts on the local community are dealt with in the relevant sections below.
<p><b>ALTERNATIVES</b></p> <p>There simply must be a viable alternative, that may not be so profitable, but avoids dumping such a heavy environmental burden on a single community.</p> <p>I am sure Norfolk county council will be able to find an alternative site that will not impact so negatively on the community and environment as proposed site SIL 02 does.</p> <p>The East Anglian corridor is under extreme pressure already with the intent to build thousands more home, roads and facilities to accompany them. The Government and corporations must surely now look to other ways to halt the destruction of our ever diminishing green land.</p> <p>Whilst we understand the need for resources, the amount of time, money and labour that would go into a project like this, would surely be better spent on recycling existing materials, instead of constantly exploiting the earth and nature.</p>	<p>The silica sand resource within England is extremely limited. Norfolk is one of only two locations where silica sand of an appropriate structure and quality for glass making is found.</p> <p>As part of the work for the previous Single Issue Silica Sand Review in 2015, all potential locations of silica sand suitable for glassmaking were assessed during the Area of Search designation process. The four adopted Areas of Search contained in the Initial Consultation represent the only locations for potential future silica sand extraction identified as suitable. SIL02 was not submitted by Sibelco UK Ltd to the Single Issue Silica Sand Review, and was only submitted to the Minerals Local Plan Review in 2017.</p> <p>Significant quantities of glass are already recycled. However, there is no current method of recycling flat glass, and silica sand is required as the feedstock for the manufacture of window and automotive glass. Where a proportion of recycled glass is used in container manufacture, silica sand is needed as part of the feedstock to counteract the level of contaminants which are found in recycled glass.</p>
I would also like to note that the proposal put forward by Sibelco is an optimistic 'best case scenario' which downplays the negative impact on the residents wellbeing, our community, and the environment, especially considering the massive size and time scales involved in the development.	Sibelco UK Ltd have submitted no detailed working or restoration scheme for their proposed extraction site SIL02. The County Council consulted statutory and non-statutory consultees on the proposals in the Initial

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	<p>Consultation document and the responses received have been used in the preparation of the Preferred Options consultation document.</p>
<p><b>CONSULTATION PROCESS</b></p> <p>The process has not adhered to the principles laid out in Norfolk County Council's own Statement of Community Involvement. Residents were completely unaware of these plans, they were not notified of the consultation and had only a few days to prepare a response ahead of the deadline.</p> <p>As a resident of Marham living in close proximity to this planned development I, like most other residents, was totally unaware or advised of such a scheme until a neighbour informed me of it a few days ago. Apparently only 10 letters were sent out to properties closest to the site. It also appears that this plan has been discussed by the County Council for over three years. The consultation period for this development ends in the next few days giving the residents of Marham and Shouldham minimal time to review and comment on such a scheme. Considering the size and nature of this planned development this is totally unacceptable and unprofessional. Why have we not been made aware of this plan earlier? The consultation process does not really work. Using just the prescribed media no longer is fit for purpose. Only specific people will use the Statutory Notices pages of the selected media, not people in general. I was fortunate in that my local parish council clerk had me on an e-mail list otherwise I would not have known of this at all. Out West we have minimal contact with NCC, even less regarding any planning consultation process. You have to be actively looking for information especially through a broadcast medium such as the internet and clearly this has not worked other than through the very narrow base of local government contacts. The consultation system needs a complete overhaul to become meaningful.</p> <p>I feel that the process so far has not been open and inclusive of the residents. The first document 26th June -4th August 2017 unknown to</p>	<p>All parish councils in Norfolk and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>Sibelco UK Ltd submitted site SIL02 in 2017, in response to a 'call for sites'. This was the first time that the County Council were aware of the proposal.</p> <p>The Initial Consultation document is the first stage of the Minerals and Waste Local Plan Review, this will be followed by further rounds of public consultation, and an Examination in Public conducted by an independent Planning Inspector appointed by the Secretary of State.</p> <p>Parish councils are the lowest tier of local government, and all Parish Councils were informed of the consultation. It is up to the Parish Councils to decide how best to engage with their communities, there have been numerous examples of Parish councils engaging with the Minerals and Waste Local Plan.</p> <p>The stage that took place in June -August 2017 was a 'call for mineral extraction sites' where Norfolk County Council wrote to minerals</p>

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<p>most residents of Marham.</p> <p>The second document was also not publicised for Marham residents and I came across it by accident. My local Parish councillor stated that they had not known themselves until 4 weeks ago. Shouldham residents however were contacted by letter and have since had public meetings. Being able to access on the website without prior notification has been poor. I would appreciate an explanation as to why Marham residents were not given prior warning to this proposal as the Shouldham residents have been.</p> <p>I was wholly unaware of the plans or the meetings. It was not well publicised or communicated. The proposal for an email group will only work for the people who know about the proposal. A re-think is needed on communication strategy for the consultation to be meaningful. I would suggest Sibelco invest in a leaflet drop to every home in the villages- a tiny investment for full and proper engagement. Alternatively, most people will be on social media so a sponsored and targeted advert on social media would equally get engagement.</p> <p>I do not understand why this proposal has been 'kept under wraps' until now, and we, the residents, have only just come to hear of it, giving us so little time to find out more about it and to place our objections before the 'deadline'.</p> <p>The residents should have been afforded the courtesy of being notified earlier of this proposed excavation and would expect that prompt and ongoing communications would be held with both villagers as the feeling is very high, fuelled particularly by the lack of notification from the Parish Councils. We would expect updates to all affected, together with an impact statement and schedule of actions and timings, particularly relevant as the local farmers have already given their approvals for this extraction scheme.</p>	<p>companies and planning agents asking if they had any sites they wanted to submit for consideration as part of the Minerals and Waste Local Plan Review process. The 'call for sites' was not a public consultation stage.</p> <p>Marham Parish Council and Shouldham Parish Council were both informed of the consultation by email at the same time. Letters were sent to residents within 250 metres of the proposals in both parishes and were contacted in the same way at the same time.</p> <p>The meetings were organised by the Parish Council and the email group was also organised by the Parish Council. It is up to each Parish Council to decide how they wish to inform their communities of planning matters; including the Minerals and Waste Local Plan Review.</p> <p>How a private company, such as Sibelco, wishes to engage the public with proposals they wish to make about future development is a matter for that particular company.</p> <p>The proposal was subject to a six week public consultation at the first opportunity, as part of the Initial Consultation stage.</p> <p>Norfolk County Council informed residents of the Initial Consultation stage by writing to those properties within 250m of the site boundary and writing to all parish and town councils in Norfolk, as well as putting a notice in the EDP.</p>

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<p>Residents of Marham were completely unaware of these plans, despite them being in development since 2015. There has been no communication from Norfolk County Council, the Borough Council, nor Marham Parish Council, which leads me to believe that information was deliberately withheld to benefit vested interests. The process has been entirely non-transparent. Marham Parish Council failed to inform their constituency or consult with residents prior to making 'objections' on their behalf, and their 'objections' fall very short of reflecting the extent of residents' concerns.</p> <p>Lack of explicate involvement of statutory bodies in the site assessment document. The Environment Agency and organisations such as the Rivers Trust must be consulted. Any mitigating scheme provided within subsequent application stages can be assumed to be un-evidenced and thus unacceptable unless these agencies are involved.</p> <p>There are a number of areas within the site assessment which are undeveloped and there has been a lack of transparency around the consultation process which will have resulted in many residents being unable to make an informed contribution. The following need to be addressed:</p> <p>Advertised consultation deadline stated was incorrect (evidence can be provided on request that the advertised deadline was 4 days later (17/08/18) than the actual deadline of 13/08/18, unfortunately the current web based response system does not allow for evidence to be attached). This should be compensated by an extended consultation deadline. Additionally, the contributors to the site assessment document are unclear. This lack of transparency also raises questions around the fairness and trustworthiness of the process, and therefore the site assessment document, and should be investigated.</p>	<p>Sibelco UK Ltd submitted site SIL02 in 2017, in response to a 'call for sites'. This was the first time that the County Council were aware of the proposal.</p> <p>The proposal was subject to a six week public consultation at the first opportunity, as part of the Initial Consultation document.</p> <p>Statutory and non-statutory bodies are consulted as part of the Initial Consultation document and their comments have been taken into account in the drafting of the Preferred Options document. The bodies to be consulted and the stage at which this should take place in the plan-making process are set out in national regulations.</p> <p>The original deadline was the 13/08/2018, Norfolk County Council agreed to accept responses from Marham and Shouldham residents for an additional four days (until 17/08/2018), at the request of Marham Parish Council. There will be a further opportunity for people to comment at the Preferred Options consultation stage in 2109.</p> <p>The site assessments were written by Planning Officers at Norfolk County Council. Statutory and non-statutory bodies and individuals were consulted as part of the Initial Consultation and the comments received have been taken into account in the drafting of the Preferred Options document. The Minerals and Waste Local Plan will be subject to an examination in public by an independent Planning Inspector on behalf of</p>

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	the Secretary of State. The Planning Inspector will decide whether the plan is 'sound' and legally compliant.
<p><b>AMENITY IMPACTS</b></p> <p>a. Unacceptable increase in Noise, Dust and Light pollution as a direct result of the proposed extraction is in violation of local residents' rights as per European Convention on Human Rights, specifically Article 2 (right of life), given health concerns about silica dust and links to silicosis and respiratory diseases, Article 8 ( respect for one's private and family life, home and correspondence ), and Protocol 1 ( right to peaceful enjoyment of your property), considering the 'excessive burden' placed on thousands of individual residents. The site is known for its keen and prevailing North and North westerly winds which will aggravate the noise and dust pollution. The residents of Marham have not been considered at all.</p>	<p>a. The Health and Safety Executive states that “Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust”. “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>Protocol 1 Article 1 (the substantive right of peaceful enjoyment of one’s possessions)</p> <p>This is a ‘qualified right’, where the planning authority must consider the public interest of a proposal, in terms of providing for society as a whole, and potential effects, and the rights of individual property owners, including neighbours and the landowner/proposer. The question is if coming to a decision, the authority has struck a fair balance between these rights, and the public interest.</p> <p>e.g. Dust, noise and lighting assessments are required to be submitted as part of a planning application and are assessed by an Environmental Health Officer. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>Article 8 of the ECHR – the right to respect for private and family life, home and correspondence. Justice Hickinbottom (2016) set out the relevant principles established from previous cases. Article 8 rights are a material planning consideration and should be respected but are not guaranteed. The rights have to be balanced against all other material considerations and this will be a planning judgment.</p> <p>The purpose of the Minerals Local Plan Review is to consider whether specific sites and areas are suitable for allocation. The revised Minerals Local Plan will be tested at examination for soundness and legal</p>



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<p>b. No restriction on site working hours is proposed. It has been estimated that there will be 11 hour day land stripping and 24 hour a day 7 days a week dredging which is totally unacceptable, particular in terms of noise and light pollution. A representative from Sibelco states that following removal of the top layers of the soil and clay from the site they would use water to create a lake and float a dredge on top to pump the sand out through a pipeline. We would then have excavation noise and pumping noise from the site. What is the Db from the plant?</p> <p>There would be light pollution from the site as presumably it would have to have security lighting around the site. Night time working will also bring light pollution as well as disturbance of sleep which also has significant impact on health. Light pollution will have a severe impact on our dark skies.</p> <p>I personally worry about the noise, the light pollution of activities being carried out at night, the increased pollution to the atmosphere and potentially the water table in the area, the increased traffic and loss of recreation, and the general disturbance it would cause.</p> <p>c. Marham already has high levels of noise pollution from military activity, adding to this is an unreasonable request of the community. The continual 'hum', (the word used by the Sibelco representative) will be totally unacceptable for people who have chosen to live in a rural location. Although residents already experience some aircraft noise from RAF Marham, this only occurs in short bursts and on an irregular basis.</p>	<p>compliance by an independent Planning Inspector on behalf of the Secretary of State for Housing, Communities, and Local Government. Analysis of the windrose information for RAF Marham shows that the general prevailing wind is south westerly.</p> <p>b. Decisions regarding working hours form part of a planning application, and are conditioned as part of planning permissions. No existing mineral extraction site in Norfolk operates 24/7. Land stripping is a short term operation prior to extraction, an extraction phase would be stripped as part of the preparatory work, with the material removed normally formed into screening bunds. The watertable within SIL02 is naturally high, with water only a few metres below the surface, this naturally occurring water would be used to dredge and pump the sand, with water being returned through another pipe in a circulatory system. The details of the noise generated by any plant on site, and any lighting would be a matter for the planning application. Sibelco have not provided any details of the working scheme with the site proposal. Any lighting required on site would be subject to a lighting assessment at the planning application stage, and this would consider potential impacts from lighting and require mitigation to ensure that no unacceptable adverse impact occur. Noise, dust, traffic and hydrogeological assessments would also need to support any future planning application. If potential impacts were determined to be unacceptable with mitigation the application may not be granted.</p> <p>c. If an area already has a level of background noise, then additional noise does not add cumulatively to this, unless the noise from the additional activity is a higher level than the existing background. If the noise from the new activity is lower than the existing background level, then the noise from the new activity would be masked by the background noise. As has been mentioned in the response to the consultation, Marham already has a</p>

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<p>Marham village as a collective are already exposed to significant noise pollution from the adjacent RAF Marham airfield and operations. This can be from early morning to late at night. Traditionally from Tornado aircraft flight operations, but recently exacerbated by the introduction of the Lightning F35 squadrons being built up at RAF Marham. The SIL 02 proposal will add to the noise pollution. The Anglian Water Treatment Works generates 24 hour noise and considerable light pollution. Noise pollution is under-addressed within the site assessment document. It would be unfair to residents (human and fauna) to have another noise pollutant in the area and therefore mitigation must be addressed in any subsequent application stages.</p> <p>The residents of Marham and Shouldham live in a quiet rural community that has provided a peaceful home for the RAF and their families for 100 years. For the community this is an area of natural beauty that is highly valued.</p> <p>The area under consideration is extremely flat with no natural noise, light or dust barriers. The entire site will be visible to the majority of the residents of Marham due to Marham being on higher ground than the proposed site. Screening will, therefore, be ineffective or so tall as to block all views across the Fen from both Marham and Shouldham. There is no bunding large enough to provide a barrier against the noise and light pollution this work will cause.</p> <p>The amount of noise dust and disturbance is intolerable and the proposed plans as to what they replace it with is utterly useless for birds. Deep sided lakes no good for swans or waders they do this to prevent encouraging birds down because of the bird strike threat to RAF Marham. So you dig up a fantastic habitat and replace with something utterly useless for the species that use to use it.</p>	<p>number of noise generating activities including the Anglian Water plant and the operations at RAF Marham.</p> <p>As part of any future planning application, a noise assessment would be required, this would measure the existing noise environment, and then assess any potential impacts from any proposed extraction operations, and then formulate mitigation measures to ensure no unacceptable adverse impacts.</p> <p>No detail of a potential working scheme have been submitted as part of the site proposal by Sibelco UK Ltd. Therefore, the amount of noise, dust and disturbance that may be generated has not been quantified. Noise and dust assessments would need to be submitted at the planning application stage. However, given the distance from the nearest dwellings, on the Street in Marham to the proposed extraction site (640m), it is considered that normal mitigation measures could ensure no unacceptable adverse impacts as a result of noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>Mineral extraction is usually phased so as to minimise the working area. While parts of Marham are on higher ground, the difference in elevation is not such that there are significant ground level views which are unobstructed by intervening buildings. There is also a considerable distance (a minimum of 640m) between the proposed extraction area and the buildings along the Street.</p>

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<p>Any screening or bunding of the site to mitigate noise and light pollution will ruin this beautiful landscape.</p> <p>What will happen to the removed soil from the land stripping process? I believe the Sibelco representative to be totally wrong when he stated at a recent meeting that the use of bunding or barriers will ensure that Marham village will not be affected by noise, dust or light from the excavation. I fail to see how this could possibly be effective as Marham is located on an elevated site, so what is now a stunning view of fenland, fields and forest will be permanently destroyed.</p> <p>Specifically, my family residence at Chapel House is located less than 400m from the proposed site, on the western boundary and would be subject to unacceptable levels of noise due to prevailing westerly winds.</p> <p>There are no guarantees or assurances of the impact to the village of Shouldham on the pollution this site will generate. This industrial complex will generate dust, noise and light pollution which has not been quantified accurately. The village's idyllic rural setting will likely be heavily tarnished by the presence of a pollution generating site within such close proximity.</p> <p>Dust - the planning document states that "adverse impacts of dust from sand extraction are uncommon beyond 250m from the nearest dust generating activities". If this assertion were true, it is not clear why sand dust from the Sahara regularly travels thousands of miles to the UK? If dust were not an issue, why would 'dust deposition' impact need to be further assessed on the River Nar SSSI and adjacent County Wildlife Sites? The plan deliberately understates the issue of dust and uses an arbitrary distance of 250m for unsubstantiated assertions that beyond this distance dust impacts are 'uncommon'. I believe dust would be a serious issue for Chapel</p>	<p>At the beginning of a working phase, soils would be stripped and stored in bunds around the area to be extracted, these would form screening. As the extraction would be taking place below ground level, and the plant would be relatively low level, screening would not need to be excessively high. Other mineral extraction sites typically have bunds of 2.5-3.5m, if these were constructed with a shallow outer gradient and grassed, at distance they would not be easily distinguishable as separate features.</p> <p>Analysis of the windrose information for RAF Marham shows that the general prevailing wind is south westerly. This means that the wind originates from the southwest and therefore would be blowing away from Marham. SIL02 is located to the north of the village. Chapel House is located just over 900m from the nearest point of proposed extraction.</p> <p>The nearest dwelling in the village of Shouldham would be 1.3km southwest of the closest point of the proposed extraction. It is considered that at this distance, any potential impacts could be appropriately mitigated.</p> <p>All applications for mineral extraction require a dust assessment to be submitted at the planning application stage. Mitigation measures to ensure no unacceptable adverse impacts are conditioned as a normal part of a planning permission process, following appropriate assessment as part of the planning application. These have operated effectively at mineral sites across Norfolk for many years. The sand proposed to be extracted would be damp/wet due to the naturally high level of the water table in this area. Saharan dust occurs occasionally in the UK because of dust storms which may be hundreds of thousands of square kilometers across lifting sand which is extremely dry, as a result of the prevailing climatic conditions, high into the atmosphere. These conditions do not occur in the UK.</p>

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<p>House due to the proximity and the prevailing westerly winds.</p> <p>2. no evidence was provided in the site assessment document that 'even without mitigation, adverse dust impacts from sand extraction sites are uncommon beyond 250m from the nearest dust generating activities' (see amenity sub-section). The raised public health and river siltation risk should be outlined explicitly within the site assessment document and therefore mitigation addressed in any subsequent application stages.</p>	<p>The Institute of Air Quality Management has issued a publication entitled 'Guidance on the Assessment of mineral dust impacts for planning'. The information on page 12 of the guidance notes that impacts from dust at sand and gravel workings are uncommon beyond 250m measured from the nearest dust generating activities. Furthermore, on page 19 of the guidance, "Sand and gravel deposits may possess an inherently high moisture content which can cause particles to adhere and thereby affords a high degree of natural mitigation." This would be the case for the sand deposits at SIL02, due to the high natural watertable.</p>
<p><b>HEALTH AND SAFETY</b></p> <p>It is a well-known fact that silica dust has close links to silicosis and other respiratory diseases which, therefore, violates residents' rights (European Convention on Human Rights, (Article 2 – right to life) and there are many particularly vulnerable people residing in these villages. These impacts need quantifying and local residents require credible independent assurances that they will not be affected.</p> <p>Prolonged exposure to Silica dust present significant risk to vulnerable members of the community, particularly the elderly and young, given the village demographics.</p> <p>This area has already has a higher than average level of COPD and other respiratory issues. This along with a large percentage of elderly residents (there are two retirement parks in the village), could have long term consequences for the health of Marham residents.</p> <p>The dust created by such a development will cause health and safety issues. Smaller particles of sand and dust will travel long distances and easily reach properties in Marham and Shouldham. This area of land is extremely flat with no natural barriers to slow or prevent the movement of dust and fine particles from the site to the adjacent properties. The effects of this on the health of the elderly, asthma sufferers and those with breathing issues will be significant.</p> <p>The government website states the following;</p>	<p>The HSE states that "Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust". "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>Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Noise Assessment and a Dust Assessment to be submitted with planning applications for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>An Equality Impact Assessment (EQIA) will be carried out as part of the Pre-submission publication stage. This will assess whether particular sections of the community would be unduly affected by the proposals. An EQIA was carried out for the previous Silica Sand Review which found that Marham Parish had one of the lower percentages of people aged over 65 compared with other parishes containing silica sand resources.</p>

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<p>www.hse.gov.uk/construction/healthrisks/cancer-and-construction/silica-dust.htm</p> <p><i>Silica is the biggest risk to construction workers after asbestos. Heavy and prolonged exposure to RCS can cause lung cancer and other serious respiratory diseases. HSE commissioned estimates it was responsible for the death of over 500 construction workers in 2005. In addition to the risks from lung cancer, silica is also linked to other serious lung diseases:</i></p> <ul style="list-style-type: none"> <li>• <i>Silicosis can cause severe breathing problems and increases the risk of lung infections. Silicosis usually follows exposure to RCS over many years, but extremely high exposures can cause acute silicosis more quickly.</i></li> <li>• <i>Chronic obstructive pulmonary disease is a group of lung diseases including bronchitis and emphysema. It results in severe breathlessness, prolonged coughing and chronic disability. It can be very disabling and is a leading cause of death.</i></li> </ul> <p>The NHS website also states; <a href="http://www.nhs.uk/conditions/silicosis/">www.nhs.uk/conditions/silicosis/</a></p> <p>Silicosis is a long-term lung disease caused by inhaling large amounts of crystalline silica dust, usually over many years.</p> <p>Silica is a substance naturally found in certain types of stone, rock, sand and clay. Working with these materials can create a very fine dust that can be easily inhaled. Once inside the lungs, the dust particles are attacked by the immune system.</p> <p>This causes swelling (inflammation) and gradually leads to areas of hardened and scarred lung tissue (fibrosis). Lung tissue that's scarred in this way doesn't function properly.</p> <p>People who work in the following industries are particularly at risk: ...mining and quarrying..."</p> <p>There has been no studies done into the effects on the local population with regards to COPD, Silicosis and Lung cancers caused by mining silica sand. Every exposure to Silica increases your risk of developing one of the above diseases and it is the fine dust which is less than one twentieth of the diameter of a human hair which is most harmful.</p>	

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<p>1. There would be dust pollution in the air which would come from the site which could potentially cause silicosis or breathing related illnesses. Whilst you state that dust would not travel beyond 250m of the boundary of the site I don't know how this would be able to be controlled as surely it is dependant on wind strength and direction.</p> <p>Extraction and Health Impact: At the meeting the representative from Silbelco said that they would like to use a dredger boat/barge with a pump to extract the Silica sand before transporting it elsewhere, but this again is not the confirmed method, other methods that may be adopted could easily result in heavy machinery releasing fine particles of Silica into the air, this we have been advised, is a serious health risk, especially to the young and elderly. From the proposed site area the Junior school within Marham is clearly visible and higher than its surrounding neighbours.</p> <p>Health objections,</p> <ul style="list-style-type: none"> <li>* There is higher than national average of Lung related conditions (Including COPD, Emphysema and Asthma) in these communities. Exposure to pollutants and increased silica dust exposure will have a significant impact on their health.</li> <li>* Not all dust is visible! Long term exposure (10-20 years) to the minute Silica dust particles carries a risk of Siliceous.</li> <li>* Loss of public rights of way to access the Nar valley will impact negatively on physical and mental wellbeing.</li> <li>* Increased stress and anxiety regarding, noise and pollution will have a detrimental effect on overall health.</li> </ul>	<p>Analysis of the windrose information for RAF Marham shows that the general prevailing wind is south westerly. This means that the wind originates from the southwest and therefore would be blowing away from Marham.</p> <p>The Institute of Air Quality Management has issued a publication entitled 'Guidance on the Assessment of Mineral Dust Impacts for Planning'. The information on page 36 of the guidance indicates that sand and gravel quarries are not significant generators of PM10s, and that in relation to larger particles that make up disamenity dust, the guidance notes on page 12 that impacts from dust at sand and gravel workings are uncommon beyond 250m measured from the nearest dust generating activities. Furthermore, on page 19 of the guidance, "Sand and gravel deposits may possess an inherently high moisture content which can cause particles to adhere and thereby affords a high degree of natural mitigation." This would be the case for the sand deposits at SIL02, due to the high natural watertable.</p>
<p><b>RISK OF SEISMIC ACTIVITY (EARTHQUAKES)</b></p> <p>There is evidence to suggest that the removal of material from the earth causes instability and seismic activity regardless of where it's offshore or inland.</p>	<p>This evidence relates to deep coal extraction in Australia, United States, and China. It relates to the effect of the removal of hundreds of millions of tonnes of coal at depth, which can result in relatively small scale seismic activity. There is no evidence that surface mineral working at the scale proposed at SIL 02 could result in seismic activity.</p>

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<p><b>FLOOD RISK</b></p> <p>This is the only proposal within Norfolk M&amp;WLP that is in a high-risk flood area. Flood risks are further exacerbated by the removal of ancient drainage ditches.</p> <p>a. The majority of the land under review is currently part of a HIGH RISK flood plain. The plan by Sibelco is to flood this area in order to dredge the sand. This will only increase the chance of future flooding in the area in the absence of the flood plain. Any Bunding and piles of surface soil and clay will only reduce the natural flow of water and increase the risk of flooding further.</p> <p>b. While Sibelco asserts that their operations are 'Water compatible', the Environment Agency stated that development should be subject to a Flood Risk Assessment being carried out which demonstrates that the proposal does not result in an unacceptable flood risk to the site itself and without increasing flood risk elsewhere. Many of the houses in Marham are located below sea level and are subject to flood risk.</p>	<p>a. Any future planning application would be required to ensure that it did not result in any increase in flood risk, including downstream effects. This would mean that compensatory drainage features would be required if any ditches were removed.</p> <p>b. There is a high natural water table in the area, only a few feet below groundlevel, this naturally occurring water would be used in any dredging operation. The flood plain would still exist, and on restoration there would be potential for the quarry voids to provide temporary flood storage. Any future application will need to demonstrate that the bunding design will not impede the flow of water downstream in a flood event.</p> <p>c. The national Planning Practice Guidance, states on paragraph 066 that sand and gravel workings are 'water compatible', the sand working proposed at SIL 02 would therefore be 'water compatible' development in terms of its vulnerability. The requirement for a Flood Risk Assessment (FRA) is different to this, any future planning application would need to carry out an FRA due to the size of the proposed site and the current flood risk zones of the site location. The plan-making process includes a higher level FRA of sites. According to the Ordnance Survey data, no houses are below sea level in Marham. Spot heights along the Street, indicate that it is 3-4m above SIL02.</p>
<p><b>WATER QUALITY / QUANTITY</b></p> <p>a. No information has been provided regarding the impact of mineral extraction on local water supply/quality.</p> <p>b. Anglian Water have a sewage pumping station in close proximity to the site. They also have a number of bore holes across Marham Fen for the extraction of clean water. How will these be affected by the plan?</p> <p>I believe there are also main pipelines from Anglian Water's pumping station at Hoggs Drove across the site.</p>	<p>No information has been supplied by Sibelco UK Ltd in relation to the site proposal for SIL02. However, Anglian Water have been consulted, and have not raised objections to the site. The proposed extraction area does not include the Source Protection Zone surrounding the Anglian Water facility, and no dewatering has been proposed. A hydrogeological risk assessment would be required as part of any future planning application.</p> <p>Anglian Water have not indicated that any of their assets would be affected by the proposed extraction.</p>

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<p>The Big Fen at Hoggs Drove on the eastern boundary of the proposed site covers about 142 acres and is leased to Anglian Water for the extraction of drinking water which is treated at their Marham site and pumped to many villages and towns. Any disturbance or contamination must not be allowed. SA10 claims that there will be no impact on the water in the area around the site. Marhams' drinking water comes from underground on the fen and so this hole is going to be dug close by, can you honestly say that there will be no impact on the water table and our drinking through pollution and drainage. The Sibelco representative at recent meeting in Shouldam suggested that there would be no impact on the water table, but if you, dig water will naturally seep in until the hole is filled and the water levels equal, so this will be taken from the surrounding area.</p>	<p>Anglian Water have been consulted, and have not raised objections to the site. The proposed extraction area does not include the Source Protection Zone surrounding the Anglian Water facility, and no dewatering has been proposed. A hydrogeological risk assessment would be required as part of any future planning application.</p>
<p><b>RAF MARHAM</b></p> <p>The site is in proximity to RAF Marham. It is accepted that this base is absolutely pivotal in every sense, not least because of the streamlining of national defence structures, including closure of other RAF bases. It follows that our whole nation, not just Marham and Shouldham, relies upon the brave men and women based at RAF Marham.</p> <p>A restoration plan after the 20 year extraction period involving the creation of a lake and wetlands would lead to an increase in birds and wild fowl resulting in potential bird strikes on aircraft in close proximity to RAF Marham, with the risk of a major catastrophe from an aircraft crashing into a local built up area. This would be a catastrophic event for the aircrew, the aircraft and the community if there is a crash and a total waste of taxpayers money to replace or repair the aircraft. The initial flooding of the land for the dredging will also cause this issue.</p> <p>Hopefully the RAF has been invited to comment on the increased risk of bird strike that will accrue for aircraft landing and taking off at the air station, in addition to the risk for low flying aircraft negotiating routes over and around this proposed site.</p>	<p>Noted.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options Consultation document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the the Defence Infrastructure Organisation, who respond to planning matters on behalf of the Ministry of Defence has objected to the proposal.</p>



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<p>The RAF concern about bird strike over wetlands is surely spurious, as they are surrounded by disused gravel workings and choose to fly and train over The Wash (which has some of the highest concentrations of wetland birds in Europe).</p>	
<p><b>ECONOMIC</b></p> <p>a. No proposed economic benefit for the villages of Marham or Shouldham. What is the value of such a project to the local community and Britain? Sibelco is not a British company, its head offices are based in Belgium. The value of this type of sand is extremely high and profits made from the sale of this material will be of great value to BELGIUM and not the UK.</p> <p>b. There will also be no job benefits to the local community as the manpower required to run the planned dredging operations is less than the current services of those working the land. There will therefore be a reduction in jobs and absolutely no value or benefit of such a scheme to the local community.</p> <p>c. This site will significantly reduce the value of properties in and around Marham and Shouldham for at least 28 years. The site will lead to the creation of trapped residents unable to move due to the inevitable slowing of the housing market. Who wants to live near and look at a Silica sand extraction plant that will be in opened from 2026 and in operation for at least 20 years, possibly longer? The current uncertainty about the proposal and its potential impact is also adversely affecting the value of property and land in the area.</p>	<p>a. Noted. The proposed mineral extraction within Shouldham and Marham does not have proposed economic benefits for those parishes, although there may be workers at the Leziate processing plant who reside in the parishes. Sibelco UK is subject to business rates, to the Borough Council, for the Leziate processing plant. Residents of the parishes benefit from the use of finished goods manufactured from silica sand extracted within Norfolk. The National Planning Policy Framework states that it is essential that there is a sufficient supply of mineral to provide the infrastructure, buildings, energy and goods that the country needs. Silica sand from Norfolk is used in the manufacture of glass in the north of England and supplies a number of downstream industries including the construction, automotive, and food and drink sectors. The potential operator of the site and their background is not a material planning consideration.</p> <p>b. Sibelco UK Ltd, currently have a processing plant and railhead at Leziate, approximately 6.5km north of SIL 02. The proposed extracton would retain this processing plant. There has been no detail submitted with the site proposal to indicate the likely direct and indirect employment, this would form part of the detail of any future planning application.</p> <p>c. The effect of a proposed development on house prices is not a material planning consideration and therefore cannot be taken into account.</p> <p>d. Any future planning application will need to include a site specific flood risk assessment which will need to demonstrate that the proposed mineral extraction will not increase flood risk elsewhere.</p>

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<p>d. Potential impact on home insurance due to increased flood risk.</p> <p>e. There will be no enhancement to local infrastructure.</p> <p>f. The residents will require compensation commensurate with the devaluation of house prices, increase in insurance costs and loss of ecosystem services.</p> <p>g. Reduction in tourism and visitors to the Nar Valley Way.</p>	<p>e. The planning applicant would only be required to improve infrastructure affected as a direct result of the proposed development.</p> <p>f. Compensation would not be offered and does not form part of the landuse planning process. Property values are not a material planning consideration.</p> <p>g. As the extraction would be taking place below ground level, and the plant would be relatively low level, screening would not need to be excessively high. Other mineral extraction sites typically have bunds of 2.5-3.5m, if these were constructed with a shallow outer gradient and grassed, at distance they would not be easily distinguishable as separate features. There are a significant number of mineral workings in other areas visited by tourists, both along the North Norfolk coast and in other areas of the country.</p>
<p>I do not think the assessment work takes into account the unusual nature of Marham. Here, the RAF airfield in effect closes off one entire side of a village that has grown as a long, ribbon development along the main road. We make no complaint about that: the airfield was there long before us. As a result, however, the only real pedestrian access to open land is to the west, towards the Nar, across the very area that is proposed for the silica site.</p> <p>Marham village will be effectively stuck between a very busy RAF camp on one side and a Silica extraction site on the other, the village forming a narrow corridor between the two very significant environmental detractors. The negative impact of either operation (disturbed sleep, noise, light and air pollution) is significant but combined places an unacceptable impact on a village of people stuck between the two.</p>	<p>There is only one Public Right of Way within the boundary of SILO2, Marham FP9. Any future planning application for mineral extraction would need to address the footpath location. Alternatively, a phased extraction may allow for the existing footpath to be retained, this would be a matter for a future planning application. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding Public Rights of Way have been successfully addressed. Marham FP1, FP2, FP3, FP4, and FP6 are all Public Rights of Way which also connect to the Street.</p> <p>A noise assessment and dust assessment would be required to be submitted as part of any future planning application for mineral extraction. These assessments would be considered by an Environmental Health Officer. Mitigation measures to ensure no unacceptable adverse impacts are conditioned as a normal part of a planning permission process, following appropriate assessment as part of the planning application.</p>

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<p>The communities of Shouldham and Marham might reasonably be expected to accommodate a silica sand extraction site a quarter of the proposed size of approximately 1000 acres involving instead 5 years of work and disruption with an area that could be discreetly absorbed. Instead they are confronted with no less than 20 years of blight arising from a massive project scale that will nudge against the boundaries of both communities. The scheme map gives the impression that the only thing stopping its desired expansion is the physical existence of Shouldham and Marham which are inconveniently in the way.</p> <p>Whilst acknowledging the need for Norfolk County Council to extract mineral resources in appropriate areas - these sites of extraction should be commensurate with the needs of existing communities rather than simply bludgeoning them aside. I feel that the scale of this proposed development is unreasonable given its immediate proximity to the communities involved.</p>	<p>These have operated effectively at mineral sites across Norfolk for many years.</p> <p>There is also a considerable distance (a minimum of 640m) between the proposed extraction area and the buildings along the Street.</p> <p>The proposed extraction area is just over 530 hectares in total. Mineral extraction is usually phased so as to minimise the active working area at any one time. The nearest point of extraction will be approximately 640m from the Street, Marham, and the nearest point to Shouldham will be 1.3km.</p> <p>At the beginning of a working phase, soils would be stripped and stored in bunds around the area to be extracted, these would form screening. As the extraction would be taking place below ground level, and the plant would be relatively low level, screening would not need to be excessively high. Other mineral extraction sites typically have bunds of 2.5-3.5m, if these were constructed with a shallow outer gradient and grassed, at distance they would not be easily distinguishable as separate features.</p> <p>Mineral extraction is undertaken by private companies who have entered into a commercial contract with willing landowners. Sibelco UK Ltd have proposed the site SIL 02. Norfolk County Council is the Mineral Planning Authority and has a statutory duty, placed upon it by Central Government, to plan for a steady and adequate supply of industrial minerals.</p>
<p><b>HIGHWAY ACCESS</b></p> <p>a. Existing road infrastructure is unsuitable for HGV and plant access. There is no way into the site that does not pass through a village with narrow, poorly maintained roads. Precedence has been established by RAF Marham who are prohibited from using village roads for access purposes. Consideration has not been given to the lack of appropriate roads for the necessary plant and HGV that would be required to transport the raw material to the Leziate processing plant should it be decided to not use a</p>	<p>a. The surrounding road network would be unlikely to be found suitable for the transportation of mineral, a pipeline would be the most appropriate method. However, this is different from the movement of vehicles and equipment during the initial phases of the operation. There is no restriction on the surrounding highway for HGV traffic, the agreement with RAF Marham is not the result of a Traffic Regulation Order. As the majority of plant would remain on site for the whole of the extraction period, these movements would not result in significant adverse impacts.</p>

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<p>pipeline. The roads around Marham and Shouldham would not be able to cope with this amount of traffic or weight of vehicles.  Concern about how the increased HGV traffic will affect the integrity of very old houses in the vicinity.  Increased danger to road users, including cyclists, from the greater number of vehicles using the narrow roads. Widening the roads might be one option, but would fundamentally destroy the charm of the area. Improved roads would also encourage even more traffic. At the moment they are avoided for the very reason they are narrow.  Increased noise and pollution from HGV movements.</p> <p>b. Local trunk roads will be negatively affected by increased traffic (A47 &amp; A10 ). More clarity is needed on the volume of traffic increase that would occur.</p> <p>c. No proposal for Sibelco's preferred option for above ground pipelines between proposed site and their current site at Leziate taking into account natural and transport barriers and is not in keeping with a very rural location.</p> <p>d. No allowance has been made for the heavy duty equipment necessary for land stripping to prepare the site for each new dredge. There are not even single carriageway roads in the site area, with single tracks currently used by the farmers. The disruption to the road network will only add to an already notoriously congested area. No major roads, railways or waterways exist locally to provide methods for transportation, as currently silica sand is moved from Leziate by trains.</p>	<p>A transport assessment or statement would form part of any future planning application which would consider potential transport impacts as a result of the proposed development, and suggest appropriate mitigation if required. The Highway Authority would be consulted on any future planning application for mineral extraction.</p> <p>b. If the proposal for a pipeline forms part of any future planning application, this would remove the need for HGV traffic to transport the mineral. As such there would be few regular movements of vehicles associated with the mineral extraction.</p> <p>c. Noted. Sibelco has not provided any details on the proposed pipeline route from the land at Shouldham and Marham (SIL02) to their existing processing plant at Leziate. Pipelines to transfer minerals are used in other extraction sites in England, and have successfully addressed natural and transport barriers, either by bridging or culverting. Potential routes northward would cross or be in close proximity to a number of previous mineral extraction sites. It is noted that there is the potential for the pipelines themselves to have a landscape impact, but no detail has been provided by Sibelco. The landscape is already crossed by electricity pylons, which are considered to be landscape detractors.</p> <p>d. Potentially an excavator, bulldozer and a few articulated dumptrucks, as used on most construction sites, may be needed at the start of each working phase to enable soil stripping and bund formation. Mineral sites routinely create internal haul roads so that vehicles can access different parts of the site without using the public highway. The detail of a working scheme would be assessed at the planning application stage.</p>

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<p><b>ECOLOGY</b></p> <p>a. Destruction of habitat of endangered wildlife species including:</p> <p>a1) Voles, Newts, scarce Emerald Damselfly, Mayfly, Moths including the Grizzled Skipper, Dingy Skipper.</p> <p>a2) Birds - conservation priority red list of British birds of concern: Skylark, Lapwing, House Sparrow, Linnet, Yellowhammer, Song Thrush, Grey Wagtail, Tree Pipit, Nightjar, Woodlark, Grey Partridge. The area around Button Fen and around the back of the warren has had breeding Lapwing, Yellowhammer, Linnet and Grey Partridge this year. Birds using this land include Barn Owls and Kingfishers, Buzzards, Red Kites, Bearded Tits, Fieldfares, Plovers, Oyster Catchers, and some of these are protected species. Reed Bunting, Mute Swan, Little Grebe, Black headed Gull all nest around here to and are on the amber list of British birds of concern.</p> <p>Habitat disturbance: I note in the paperwork that the area is one of the last areas of untouched grassland in Norfolk. How can it be right to allow this to be destroyed forever?</p> <p>b. The site is extremely close to the River Nar SSSI, which is an important chalk stream habitat, which is of high amenity value to the residents of the area and integral to the landscape. As well as the amenity value, there is a high conservation value, with protected species including water voles, great crested newts and white clawed crayfish. Any further quarrying in this area or indeed construction of a dredging pipeline, could have disastrous consequences for important and rare species and would affect the river system. Concern about impacts to the River Nar from mineral extraction including dust deposition and hydrogeology.</p> <p>The River Nar is of significant global importance as a chalk stream supporting a diversity of wildlife. It is a designated SSSI and I fail to see how any restoration could possibly remedy the detrimental impact caused. The impact to the beautiful river Nar, the wildlife is all undetermined and at least requires a significant survey to understand the impact</p>	<p>a. Natural England, and a number of other statutory and non-statutory nature conservation bodies were consulted on the Initial Consultation document, and no 'in principle' objections were received. Any future planning application would be required to carry out habitat and species surveys to identify the ecological baseline, and suggest appropriate mitigation for any potential impacts identified.</p> <p>The majority of the site is currently agricultural fields in arable use.</p> <p>b. The northern boundary of the proposed site is in close proximity to the River Nar, on the opposite side of the drainage ditch to the riverside footpath. The River Nar is an SSSI and therefore recognised as being nationally important. The River Nar is divided into two parts, Upper and Lower, this change occurs at Narborough with the Upper river being a chalk stream and the Lower being a fen river with a sand, gravel and peat bed. 14 surveys have been carried out in the past, but have only provided negative results for white clawed crayfish, and sightings of Great Crested newts have been limited to the Upper river around Castle Acre. The nearest point of the proposed extraction area is 185m away from the River Nar. The site proposal indicates that the site would be worked wet, with no dewatering. Therefore, it should be possible in principle to work the site without adverse hydrogeological impacts. Any future planning application would need contain a hydrogeological assessment to ensure that the detailed working scheme would not result in unacceptable adverse impacts. A dust assessment would also be required to support any future</p>

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<p>High risk of damage to the river Nar's chalk bed is under-addressed in the site assessment document. The river is of great importance and has already been classified as being in only 'moderate condition' (Environment Agency) due to current land uses of the surrounding area. Any mitigating scheme provided within subsequent application processes needs to specifically address how the river's integrity will be maintained and how the target of 'good condition', set by the Environment Agency for 2027, will be achieved.</p> <p>Environmental and biodiversity impacts - the plans state that the SSSI within the Impact Zone will not be affected 'as long as no dewatering is proposed' - it is not clear how no dewatering will occur if the plan is to pipe millions of tons of sand mixed in water out of the area?</p> <p>c. The village has a significant number of bat roosts. How will you ensure these protected species will not be disturbed by the proposals, including from light pollution?</p> <p>It is the major area of dark sky between Marham airbase and Middleton aggregates at Pentney. The increased light pollution would adversely affect the Bat populations within this area and other nocturnal wildlife.</p> <p>An owl box in the roof of Chapel House is inhabited by a family of protected Barn Owls, and the proposed site will deprive them of hunting grounds. I strongly object to the development on the grounds of harm to the environment and biodiversity habitat loss.</p> <p>We have a lot of wildlife in the area- deer amongst the species. What safeguards and considerations are being given to the wildlife protection during extraction?</p> <p>The proposed area to be affected by this development is vast, the land in this area is predominantly agricultural with wooded areas and a river. Other than when crops are being set, tended to or harvested, the area is quiet and a beautiful place to walk, because of this there is a huge array of wildlife, including swans, deer, owls and bats. We feel that we are very</p>	<p>planning application to ensure no unacceptable adverse impacts from potential dust deposition to the River Nar, which is downwind of the proposed extraction area. This would include the site preparation phases. In accordance with the guidance published by the Institute of Air Quality Management, it is considered that the proposed wet working, and the natural moisture content within the sand beds would provide a degree of natural mitigation to dust generation.</p> <p>The pipeline would contain a return pipe to deliver water back to the working once the sand had been removed. This creates a circulatory system so that no dewatering takes place.</p> <p>c. A lighting assessment would be required as part of any future planning application. This would assess the potential for unacceptable adverse impacts from any lighting required on site, and then propose appropriate mitigation to address any impacts.</p> <p>A planning application would also need to include habitat and species surveys and assessments (required by Norfolk County Council's 'Local List for Validation of Planning Applications'), which would include mitigation measures necessary to prevent unacceptable adverse impacts.</p>

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<p>lucky to be close to such a haven and are concerned that the development will impact greatly on this.</p> <p>d. No proposal as to how the Core River Valley (of the River Nar) will be enhanced following mineral extraction. For mineral extractions to be acceptable within a Core River Valley proposals need to demonstrate that they will result in landscape enhancement on restoration.</p> <p>e. Detrimental impact on ecology and biodiversity on nearby Country Wildlife Sites, such as Mow Fen, Marham Fen and and Bowl Wood ancient woodland.</p> <p>f. Stripping such a large plot of land for over 20 years will totally destroy the wildlife in this area. The Fen in Marham and the woods in Shouldham Warren will become isolated. Concern for the protected plant species growing in the forest areas adjacent to the area. Some of these are internationally rare and nationally scarce plant species. Impact on flora, fauna and wildlife may not be expected, but cannot be conclusively ruled out. The demolition of the ancient drainage system which runs across the site would further affect the environment.</p> <p>If approved, the project will strip all vegetation, soil and clay from the fields to allow quarrying equipment access to the sand below. This will involve heavy duty equipment brought to the site, plus the noise, pollution and disruption to the villages affected by this project. This large plot of land will be 'mined' for over 20 years, this WILL totally destroy the flora and fauna of this area and the landscape changed forever.</p> <p>5. Wildlife -as a local primary school teacher, Shouldham Warren is an invaluable resource for 'Forest Schools' to allow children to explore the</p>	<p>d. The proposal submitted by Sibelco UK Ltd contains no detailed working scheme; however the proposed extraction area is outside the area defined as part of the Core River Valley.</p> <p>e &amp; f. The distance of the County Wildlife Sites to the proposed extraction area, (Mow Fen 1.78km, Marham Fen 0.74km, and the ancient woodland Bowl Wood 1.60km) would provide a degree of mitigation, especially considering the proposal for wet working. Any future planning application would need to include a biodiversity survey and report (as required by the Norfolk County Council 'Local List for Validation of Planning Applications') to assess to the potential for adverse impacts and propose appropriate mitigation if required.</p> <p>Mineral extraction is usually phased so as to minimise the working area, soil stripping will only take place on one phase at a time. It is recognised that the site is likely to be restored to open water and not to farmland, therefore there would be a permanent landscape change.</p>

Responses received from individuals about SIL 02	Norfolk County Council Planning Officer's response
<p>woodland and the wide range of wildlife to observe -this will be destroyed with the proposed site.</p>	<p>The site boundary of SIL02 does not include any parts of Shouldham Warren.</p>
<p><b>AGRICULTURAL LAND</b></p> <p>a. The Carbon Footprint of the area will be greatly affected by the removal of such a large area of crops. 390 hectares of good quality agricultural farmland will be lost forever as it will not be restored back to agricultural land. With an increasing UK population this land should remain in agricultural use. Farmland should be conserved, not destroyed.</p> <p>b. This proposal effectively devalues the natural and economic contribution this land makes to the local and UK population as agricultural land producing sugar beet, which is processed at Wissington in Norfolk. It is a significant and sustainable employer and contributor to an important UK based industry. The ability of the UK to feed its own population is paramount.</p> <p>c. The Small Fen is of about 63 acres south of the site and is arable and grazing. It also contains the allotments for the villagers. As Trustees we are charged with looking after these two sites and income generated is distributed to the pensioners and sick of the village.</p>	<p>a&amp;b: A future planning application would need to consider the loss of agricultural land, compared with the need for silica sand for glass making; which is recognised as an important and nationally scarce industrial mineral. The extraction area would be approximately 200 hectares, which based upon previous silica sand extraction sites is likely to be restored mostly to waterbodies, and would therefore be lost to agriculture. It is recognised that these 200 hectares would make a contribution, all be it a small one, to food production, including sugar beet production, following crop rotation patterns. Silica sand from Norfolk provides the majority of the feedstock for England's glassworks, which in turn provide products to the construction, automotive and food and drink industries.</p> <p>c. The Small Fen is just over 600m from the nearest point of potential extraction. A noise and dust assessment would be required to be submitted at the planning application stage. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p>
<p><b>RESTORATION</b></p> <p>a. No restoration plan proposed for the entire site, which suggests there is no intention to remedy the harm caused, fears exacerbated by the very poor and dangerous condition of other Sibelco sites, such as Bawsey and Leziate.</p> <p>b. It is very concerning that there is no agreed restoration plan for this site. I would have thought that this a fundamental issue that underpins the sustainability and suitability of any development of this kind.</p> <p>c. The site has a limited period of effective use, the future is unknown and this unsettles the local residences. Although there may be</p>	<p>a,b&amp;c. While no restoration scheme has been submitted so far as part of the site proposal, one would be required to support any future planning application. Based on previous silica sand extraction sites it is likely to be restored mostly to waterbodies. It would be for any future planning application to determine whether the restoration scheme would be appropriate. Historic permissions such as Bawsey and Pentney did not have detailed restoration schemes agreed as part of the application process, unlike the present situation.</p>



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<p>promises of restoring the site back to farm land, this can never be guaranteed.</p> <p><b>d.</b> No restoration plan has been proposed. This is possibly the most important issue, as many companies have simply abandoned workings leaving dangerous sites full of deep water and abandoned equipment, such as that which has happened at Bawsey. Another example of this happened at Pentney: the inappropriate development of what is effectively a new village around the workings disguised as "holiday cabins" because a normal development would not have been permitted. This type of working can so easily be used as a gateway to other semi-industrial or residential uses in a sensitive landscape. A detailed and ultimately enforceable restoration plan should be consulted upon and in place before any other permissions are granted, as this will be the ultimate legacy of this development.</p> <p><b>e.</b> It could be restored to a wetland habitat or grazing marsh, which is historically what most of the river valley was before the river was canalized for navigation, and the surrounding land drained for agriculture. There is now less than one percent of this habitat left in England! Norfolk Wildlife Trust, Norfolk Rivers Trust and Natural England would, surely, be more than happy to be involved in the development of a plan which could benefit the local environment and public enjoyment of the area. A sympathetic restoration of the site could improve the habitat from its current intensive agricultural use.</p> <p><b>f.</b> Concern regarding security at the site to prevent anyone drowning at the site, as flooded quarries like Bawsey have had drownings as people are attracted to swim in them during summer months. Also vandalism and theft and unauthorised camping which has also happened at Bawsey as these types of sites can attract unsociable behaviour to the area.</p>	<p><b>d.</b> Modern planning permissions for mineral extraction require sites to be cleared of equipment at the end of extraction and restoration to the approved scheme to be carried out. The holiday park development at Pentney was permitted by the Borough Council, and was not part of a mineral restoration scheme.</p> <p><b>e.</b> Prior to the fen drainage in the 18<sup>th</sup> and 19<sup>th</sup> century , the River Nar would have occupied a larger part of the valley floor, and it is likely that open water played a significantly larger role in the landscape of the surrounding valley. However, no restoration proposal has been submitted by Sibelco UK Ltd. While, the majority of previous silica sand extraction sites in Norfolk have been restored to waterbodies, the proximity to RAF Marham makes this more problematic, in ensuring that it does not result in an increased bird strike hazard.</p> <p><b>f.</b> Risks in relation to former mineral workings are often related to the degree of public access to sites. The site at Bawsey has particular issues, as the site was designated as a Country Park as part of the historic planning permission, and public access formed part of this. However, unlike other Country Park sites such as Whitlingham, there are no park rangers. It would be unlikely that unfettered public access would form part of any future restoration scheme, and this would limit the potential risk.</p>

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<p><b>g.</b> Assurance must be given that each quarry site is reinstated prior to moving onto the next site throughout the development.</p> <p><b>h.</b> The fear is the area will be turned into a landfill site which would have a clearly devastating impact on all with lorries and machinery causing significant disruption and noise to all residents.</p> <p>If it is turned into lakes after the extraction process is finished that would not be satisfactory as it would bring hazards to the nearby RAF Marham, namely with an increase in bird population. An increase in birds may not be popular with farmers either, the other major industry in the area. The light at the end of a very long tunnel will be the promise of recreational resource rich in natural biodiversity including I would expect significantly increased numbers of wading birds and wildfowl.</p>	<p><b>g.</b> Phased working and progressive restoration are a normal part of modern mineral extraction applications and are required by planning conditions.</p> <p><b>h.</b> The site would be unsuitable in principle as a non-hazardous landfill due to the underlying geology. There are currently (2019) no operational non-hazardous landfill sites in Norfolk, although voidspace remains. The market for waste management has fundamentally changed over the last few years away from landfill.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the the Defence Infrastructure Organisation, who respond to planning matters on behalf of the Ministry of Defence has objected to the proposal. Sibelco UK Ltd have been asked to supply details of how any proposed restoration of the site would mitigate the Bird Strike hazard to a level acceptable to the DIO. No restoration proposal has been submitted.</p>
<p><b>LANDSCAPE</b></p> <p><b>a.</b> Marham village enjoys an elevated position relative to the proposed site, with beautiful long-reaching views across the fen landscape. Bunds or screening to reduce noise and light pollution will be ineffective and intrusive in their own right – they will ruin this beautiful landscape and the views currently seen across the fen. Where will all the removed soil be stored from the land stripping process?</p> <p>The Proposed works will be obtrusive, visually detrimental and out of character with the local landscape and detrimental to the visual amenity of the area. Negative effect on health and well-being of residents whose present uninterrupted view across the fen landscape to the River Nar will be ruined.</p>	<p><b>a.</b> Mineral extraction is usually phased so as to minimise the working area. While parts of Marham are on higher ground, the difference in elevation is not such that there are significant ground level views which are unobstructed by intervening buildings. There is also a considerable distance (a minimum of 640m) between the proposed extraction area and the buildings along the Street.</p> <p>At the beginning of a working phase, soils would be stripped and stored in bunds around the area to be extracted, these would form screening. As the extraction would be taking place below ground level, and the plant would be relatively low level, screening would not need to be excessively high. Other mineral extraction sites typically have bunds of 2.5-3.5m, if these were constructed with a shallow outer gradient and grassed, at distance they would not be easily distinguishable as separate features.</p>

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<p>b. Prevailing North and North West winds will aggravate noise and dust pollution concerns and impact on health.</p> <p>c. Detrimental impact on the open nature of the landscape and to the setting of the scheduled monuments Pentney Priory Gatehouse and other heritage assets.</p> <p>d. A corridor of trees must be supplied in Spring Lane, the main adjacent landholding to the development.</p> <p>The proposed area sits next to the river Nar and Shouldham Warren, surrounded by prime agriculture land. The introduction of an industrial site in this area will devastate this beautiful views, both during operations and when decommissioned in the future. The area is used by not only villagers by a significant number of people for both walking and our pursuits such a mountain biking. Impact on footpaths and entry and exit to the Warren is unknown.</p> <p>This proposed excavation site is totally inappropriate for a rural area, that lacks infrastructure. The mess, noise, tipper trucks, upheaval and general scars on the countryside can be seen in and around the many sand / gravel quarries already operating in West Norfolk.</p>	<p>b. Analysis of the windrose information for RAF Marham shows that the general prevailing wind is south westerly. A noise assessment and dust assessment would be required to be submitted at the planning application stage and they would be considered by an Environmental Health Officer as part of the planning application process. Normal planning conditions for mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>c. A Heritage Impact Assessment has been carried out by the Norfolk Historic Environment Service analysing potential impacts from SIL02 on the historic environment. This has suggested that the eastern part of the site should not be allocated due to the potential impact on the setting of Pentney Priory.</p> <p>d. The detail of what may be appropriate mitigations measures could only be finalised as part of any future planning application, when details of the working scheme are known.</p> <p>At the beginning of a working phase, soils would be stripped and stored in bunds around the area to be extracted, these would form screening. As the extraction would be taking place below ground level, and the plant would be relatively low level, screening would not need to be excessively high. Other mineral extraction sites typically have bunds of 2.5-3.5m, if these were constructed with a shallow outer gradient and grassed, at distance they would not be easily disguishable as separate features. There is only one Public Right of Way within the boundary of SIL 02 (see PRoW section below).</p> <p>The proposal submitted indicates that mineral will be moved by pipeline from the extraction site SIL02 to the existing processing plant; therefore, only limited vehicle movements would be likely compared with a sand and gravel working where the majority of the mineral is transported by HGV.</p>

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<p>Loss of beauty: Looking at other sites where extraction happens they look just awful. They look like what they are- industrial. The signage is industrial. The fencing is industrial. The dust and dirt on the roads is god awful ugly. That is before you consider the horror that will be left afterwards.</p>	<p>Many extraction sites in Norfolk only use agricultural style fencing and bunds around the extraction sites. Processing plant sites which are permanent may have security fencing in the same way that some agricultural undertakings such as poultry units do. It would be a matter for the detail of a planning application to determine what boundary treatments would be appropriate. However, the proposal submitted indicates that all processing would take place at the existing site at Leziate, with SIL02 just being an extraction site.</p>
<p><b>PUBLIC RIGHTS OF WAY</b></p> <p>Destruction of ancient footpaths and relocation of rights of way (further than the stipulated 100m permitted) contained both within and adjacent to the proposed site, which are extensively used by local residents, schools and tourists. It would be detrimental to the village as a whole if this was lost.</p> <p>Shouldham/Marham proposal would require diversion of PRoW FP9. This is the only direct route to the river from the village and if removed would leave just the path via Marham Fen, or a route through Shouldham Warren. Both at unacceptable distances from FP9 and this part of the village. FP9 diversion not to be greater than 100m at any point from present position.</p> <p>Between Narborough and Blackborough End, New Road, there are only two places where the River Nar can be crossed, the Eastgate Farm and Pentney Abbey bridges.</p> <p>Access to the former is through Marham Fen and the latter by the footpath that runs directly down to the river from the village, at the end of Fen Lane, through the proposed site.</p> <p>The quarry will therefore cut off this part of Marham from the only crossing point that is on the River Nar circular route, the footpath continues on the north side of the river so the footbridge at Pentney is an essential feature of the walk. From the plans submitted so far there is no satisfactory diversion.</p>	<p>There is only one Public Right of Way (PRoW) within the boundary of SIL02, Marham FP9. There is legislation (s.261 of the Town and Country Planning Act 1990) to allow the temporary diversion or stopping up of a Public Right of Way for mineral extraction. Any future planning application for mineral extraction would need to address the footpath location. Alternatively, a phased extraction may allow for the existing footpath to be retained, this would be a matter for a future planning application. There have been multiple examples of mineral extraction sites in Norfolk, where similar issues regarding PRoWs have been successfully addressed. As part of a planning application for mineral extraction, there is no maximum distance permitted for a diversion, so long as on restoration the PRoW is not substantially less convenient for the public. Marham FP3, FP4, and FP6 are all Public Rights of Way which also connect to the Street. Marham FP8 which runs along the River Nar and links to the footbridge at Pentney, will not be affected by the proposed site, and the proposed extraction area is at least 185m from this PRoW.</p> <p>Norfolk County Council's Historic Environment Service have subsequently carried out an Historic Environment Impact Assessment on proposed site SIL 02 and AOS E. It concluded that mineral extraction within the eastern part of SIL 02 would have a relatively severe impact on the setting of Pentney Priory and that the eastern part of SIL 02 (approximately from the</p>

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<p>Historically access to the River Nar, the Nar Valley Way and the historical grounds of Pentney Abbey have been via a legal right of way (designated footpath). The route is detailed Ordnance Survey Map 236 Kings Lynn, Downham Market &amp; Swaffham. Within 20 minutes Nar Valley Way can be accessed from the southern end of the village across the beautiful Fen countryside. This is a popular and legally recognised throughfare, that judging by the outline plan, will cease to exist if the proposal is accepted.</p> <p>There is no other alternative footpath, access via Spring Lane and Shouldham Warren is significantly longer, and has no footpath so is not safe. At the opposing end of the village access is also significantly longer with stretches of the route again with no footpath.</p> <p>The area provides an area of relaxation and exercise for the residents and is crucial to the health and well-being of residents and RAF Marham service personnel.</p> <p>This area is used frequently by children from the two local schools in their studies of wildlife, rivers and history. Should this proposal go ahead, the south-western end of Marham village would become completely cut off from the river Nar, making it impossible for children to fulfil these studies. Currently, there is a huge initiative to encourage both children and adults to learn about their environment and to understand the benefits to their mental health, well-being, etc., by being able to enjoy fresh air and pleasant scenery.</p> <p>3. modification to PRow impacts on daily living and quality of life of all residents in the area as this is a well used outdoor space providing boundless benefits to local people. Even if right of way to the river is maintained the public will have to enter a zone of increased risk to respiratory and auditory health and the mental health benefit of the current tranquil setting will be lost. Therefore, the public health impact should be outlined explicitly within the site assessment document and therefore mitigation addressed in any subsequent application stages.</p>	<p>track adjacent to Ashholt Plantation) should therefore not be allocated. Footpath FP9 is within this eastern portion of the site.</p>

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<p>Apart from that, the Warren is a well used recreational facility for people living in the area and others who visit specifically to cycle, run, etc. and it is much valued by all of us. Turning it into a quarry would be very unwelcome.</p> <p>Nar Valley Way is one of the main walking arteries that brings tourists to the area, advertised by the Norfolk Council as "An enjoyable walk along the south bank of the River Nar, with beautiful landscape views, and historic interest along the way". There are a number of Public Right of Ways within or adjacent to the site, which would be either lost entirely or degraded. Village residents, including me, use the public footpath to the river and Nar Valley Way on a daily basis.</p> <p>Increased danger: This is a safe area. Safe for children and animals. I cannot see anywhere in your plans how the increased danger to people and animals has been addressed. Children explore, animals roam. How will they be kept safe from the dangers of extraction, or the pits that are left behind.</p>	<p>The area covered by the proposed site SIL 02 does not include the Warren.</p> <p>The area covered by the proposal SIL02, is virtually all agricultural land, in either arable or grazing use. It does not have public access except for the Public Right of Way FP9. It is likely that agricultural style fencing would be used to help prevent unauthorised access.</p>
<p><b>HISTORIC ENVIRONMENT</b></p> <p>a. This area is potentially very rich in archaeological finds, from Pre-Historic to Roman to Medieval and any undiscovered sites would be destroyed permanently by the project. The significant Historic Environment records of pre-historic to Late Neolithic finds plus other finds from later periods are of singular importance.</p> <p>b. There is the possibility of an Iron Age settlement and the possibility of other as yet unknown precious archaeological finds. Without doing a full and proper investigation there is a significant loss of archaeology which would be unacceptable.</p> <p>c. Close proximity to and negative impact on the Scheduled Monument Pentney Priory Gatehouse and Grade 1 Remains of an</p>	<p>a &amp; b: Any future planning application would be required to carry out an archaeological assessment, in consultation with the Norfolk Historic Environment Service. These will require as a minimum a deskbased assessment, and dependent on the findings, is likely to be followed up with site investigations and trial trenching.</p> <p>C &amp; d: A Heritage Impact Assessment has been carried out by the Norfolk Historic Environment Service analysing potential impacts from SIL 02 on the</p>

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<p>Augustinian Priory and the unexplored Cistercian Nunnery in Marham.</p> <p>d. The proximity of the site to a number of heritage assets will have an unacceptable impact on the character of the historic environment. The screening by bunding would be inappropriate for a river valley setting, especially with the historic connections between Pentney Abbey and Marham Priory. This would obstruct a view across the fen valley that has been there for nearly a thousand years.</p> <p>e. While Chapel House is not a Scheduled Monument, it is a prominent feature building constructed in 1836 and has an important place in the history of the village.</p> <p>f. Narborough Bone Mill is a site of historical interest and must be protected if it is to remain preserved for future generations.</p>	<p>historic Environment. This has suggested that mitigation measures to limit the northern boundary of the site would be required.</p> <p>e. Chapel House is not a listed building. It is a former chapel converted to a dwelling. Any future planning application would consider the potential amenity impacts of extraction to dwellings, and propose mitigation if required.</p> <p>f. Narborough Mill is 3.8km to the east of the closest point of extraction, it is not considered that extraction at SIL o2 would be likely to adverse impact the Mill. A heritage assessment would be carried out as part of any future planning application.</p>
<p><b>LOCAL PLAN PROCESS</b></p> <p>The current consultation documentation is unacceptable, it is vague, not legally binding and therefore subject to variation. The reality is once this kind of development begins the terms of reference change and developments expanded both in scale and duration.</p> <p>Whilst I recognise this is a consultation document the reality is that it will be used as the basis for going forward and as such the suggestion that the local community has been fully consulted will be inferred. I therefore oppose the proposals in principle as the primary stakeholder (the community) has not been fully informed or consulted. The consultation process has not been set out in detail. Guidance on the rights of the community to determine how they can shape decision making has not been provided.</p> <p>Once a consultation process has been properly completed and due process seen to be done the County Council must undertake and fund a local referendum on this matter due to the scale and impact of the proposal. Local people must have control over the decisions that impact and shape their communities and environment. Elected representatives, Borough</p>	<p>The Initial Consultation document is not legally binding and is subject to variation because it is an Initial Consultation document. The final version of the Minerals and Waste Local Plan will not be subject to variation once it has been adopted, but it will not be legally binding because it is a planning policy document and is not part of legislation. Planning applications for mineral extraction sites are determined in accordance with relevant legislation and planning policy. If planning permission is granted for mineral extraction operations, then the planning permission only relates to the boundary of the site applied for and the duration of the operations are limited by the conditions of the planning permission. Therefore, if the duration of a mineral extraction operation is to be increased, a planning application would be required to change this planning condition stating the date when the site must be finished and restored. If the operator wants to extract mineral from a larger area of land, then a new planning application would be required to be submitted and determined for the additional land area.</p>

<b>Responses received from individuals about SIL 02</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Councillors, County Councillors and Members of Parliament, must support and respect the democratic will of local people.</p>	<p>The consultation process is set out in both the adopted Norfolk County Council Statement of Community Involvement and also in Chapters 2, 3 and 4 of the Initial Consultation document which set out the consultation process, the Local Plan process so far and what happens next.</p> <p>The Local Plan process includes two public consultation stages (the Initial Consultation and the Preferred Options) and one legally required formal representations stage on the proposed Submission version of the Plan.</p> <p>The Local Plan process must be carried out in accordance with the relevant legislation and National planning policy and guidance, which does not allow for a referendum to be used to determine the contents of the Minerals and Waste Local Plan, or to determine whether the final version of the Local Plan should be adopted.</p> <p>Following the formal representations period on the proposed Submission version of the Local Plan, the Plan will be subject to an examination in public carried out by an independent Planning Inspector on behalf of the Secretary of State. The Planning Inspector will consider whether the Plan meets the legal and procedural requirements and if it meets the 'tests of soundness' set out in the National Planning Policy Framework. Following receipt of the Inspector's report, the County Council will then decide whether to adopt the Plan.</p>
<p><b>OVERLAP BETWEEN LAND IN SIL 02 and AOS E</b></p> <p>Also SIL2 overlaps with the AOS Site E to some degree and it is not acceptable that SIL2 is also and AOS Site E because it provides doubt on the validity of SIL2 and really confirms AOS Site E is not a search area but a really long term proposal being put on hold until SIL2 is worked out.</p>	<p>SIL 02 has been submitted to the Minerals and Waste Local Plan Review process by Sibelco UK Ltd with the agreement of the landowners. The areas of search have been defined by Norfolk County Council based on the location of silica sand resources, according the British Geological Survey maps, and taking into account constraints to development (such as landscape, ecology and heritage designations and the location of residential dwellings). The areas of search do not have to have the agreement of landowners to be included in the plan and they are not being promoted for mineral extraction by a mineral operator. Part of SIL 02 falls within AOS E, which is not surprising as it is based on the location of silica sand resources. The only reason that part of SIL 02 is located outside of AOS E is because Sibelco have found viable silica sand resources to be</p>



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	located outside of the area shown on the BGS map. AOS E is not a long term proposal being put on hold until SIL 02 is worked out because there it not currently landowner willingness for mineral to be extracted from the rest of AOS E and there is not a mineral operator currently interested in the rest of AOS E.
<p><b>CUMULATIVE IMPACTS</b></p> <p>5. The site assessment document does not adequately address the cumulative impact of all proposed extraction on the river Nar. Independent surveys and prediction modelling must be used to ascertain the combined impact of silica sand extraction along with the sand a gravel extraction proposed in 'MIN 19 and MIN 205 - land north of river Nar, Pentney'.</p>	<p>While MIN 19 and MIN 205 have been submitted as potential sand and gravel extraction sites, the conclusions for both sites in the Initial Consultation and the Preferred Options document was that they were unsuitable for allocation. Therefore, there would not be any cumulative impacts from these sites being extracted.</p>

## North Norfolk sites

**MIN 69** land north of Holt Road, Aylmerton

Representations received about site MIN 69	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93212</p> <p>Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b></p> <p>Although the archaeology section mentions the need for archaeological assessment, the initial conclusion does not include a requirement for it. A requirement should be added, to ensure clarity for applicants and consistency with the initial conclusions on other allocations.</p>	<p>Noted. The draft site policy has been amended to include the requirement for an archaeological assessment to be provided at the planning application stage.</p>
<p><b>(Comment)</b> Representation ID: 93145</p> <p>Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b></p> <p>The Highway Authority considers the site is not acceptable due to concerns with the road network because Briton's Lane is sub-standard and narrow and the junction onto the A148 is also substandard.</p>	<p>Noted. It is recognised that Briton's Lane is currently sub-standard and narrow and that the junction with the A148 is also substandard. Therefore, the draft site policy requires "improvements to Briton's Lane and the A148 junction being upgraded with a right-turn lane to the satisfaction of the Highway Authority". It is understood that subject to these improvements and the continuation of the routing onto / from the A148 then the site could be acceptable to the Highway Authority.</p>
<p><b>(Comment)</b> Representation ID: 93098</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b></p> <p>This site lays within the Norfolk Coast AONB therefore screening will be of utmost importance. Restoration would need to demonstrate that after the site has been worked it could become exceptionally beneficial to both the landscape and the public.</p>	<p>Noted. The majority of the site boundaries are already screened by trees and hedges. The draft site policy requires further advance planting along the southern and eastern boundaries of the land to screen the site from public viewpoints. The draft site policy also requires improved public access on restoration and details the landscape and ecology requirements on restoration. The site assessment also details how the extension (MIN 69) to the</p>

Representations received about site MIN 69	Norfolk County Council Planning Officer's response
	existing permitted site should lead to a higher quality restoration for both the existing site and the extension area.
<p><b>(Comment)</b> Representation ID: 92983</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>We would highlight that grade II* Church of St John the Baptist is c. 1km from the proposed site allocation. The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. The site assessment has been amended to also note that the Church of St John the Baptist is 1.3km from the site boundary. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p>
<p><b>(Comment)</b> Representation ID:92894</p> <p>Respondent: <b>Norfolk Coast Partnership (Ms E Hook) [18323]</b></p> <p>I make this response on behalf of the Norfolk Coast Partnership (NCP), the organisation responsible for conserving and enhancing the Norfolk Coast Area of Outstanding Natural Beauty. As such, I have only commented on the Local Plan as it impacts on the landscape and natural beauty of this area.</p> <p>As such, at this time, I only intend to comment on site MIN 69 - land north of Holt Road, Aylmerton, which falls within the AONB boundary.</p> <p>I agree with the initial conclusion that the site could be considered suitable for sand and gravel extraction but only on condition that a very high quality working and restoration scheme was developed and fully implemented.</p> <p>Comments: The NCP would usually object to this type of development within the AONB and suggest that, in line with the NPPF, it should take place outside of the AONB boundaries. This proposed site would undoubtedly have a landscape impact and an impact on the landscape impact of users, in particular in terms of views from the A148, and also on the local rights of way network. There would be negative effects on the landscape, geodiversity, biodiversity and amenity.</p>	<p>Noted. The draft site policy states that the development of a very high quality working and restoration scheme for both MIN 69 and the existing site is needed showing clearly how the two sites could be worked and progressively restored together to minimise landscape and amenity harm during the operational stages and to maximise benefits on restoration. The policy also provides further requirements regarding public access and restoration. The policy also requires a formal aftercare agreement for maintenance of the heathland habitats and footpath maintenance.</p> <p>The proposed site is already well-screened by existing trees and hedges on all but the north-eastern part of the boundary. Advanced planting on the boundaries to ensure the site is screened from public view points is also a requirement of the draft site policy. A Landscape and Visual Impact</p>

Representations received about site MIN 69	Norfolk County Council Planning Officer's response
<p>However, I would be willing to consider this development as acceptable if the proposed working and restoration scheme described in this Initial Consultation document were developed, fully implemented, and audited. I would expect any scheme to be developed in consultation with stakeholders, including the NCP.</p>	<p>Assessment is required to be submitted at the planning application stage.</p> <p>The site assessment has concluded that the site would not be expected to have negative effects on biodiversity due to the distance from designated sites and because the site would be worked dry.</p> <p>The draft site policy contains requirements for the geodiversity to be studied and a section of the Cromer Ridge to be retained.</p> <p>The draft site policy contains requirements regarding amenity and the PROW network, including a requirement for footpaths to only be diverted when necessary during the operation stage and for improved public access to be provided as part of the site restoration scheme. Noise and dust assessments, including mitigation measures where necessary, will also be required at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity.</p>
<p><b>(Object)</b> Representation ID: 92523</p> <p>Respondent: <b>About with Friends (Ms H Dalton Hare) [17999]</b></p> <p>Having looked at the consultation we are very concerned about this proposed site.</p> <p>It will produce a lot of noise - right opposite a school for autistic children who do not tolerate noise. It will also give increased traffic in Britons lane, and then beyond all this will increase the amount of dust in the air and bring health risks to locals.</p> <p>We would like to register a NO against the plan.</p>	<p>Objection Noted. The proposed site is on the opposite side of the A148 to the school and would be set behind an existing screen of trees. The noise of mineral extraction operations are not expected to increase the existing noise levels arising from the traffic on the A148. As a proposed extension to an existing site the number of vehicle movements is expected to remain the same, but continue for more years.</p>

Representations received about site MIN 69	Norfolk County Council Planning Officer's response
	<p>The draft site policy requires a noise and dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Comment)</b> Representation ID: 92387  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes .</p> <p>Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p> <p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 69 - Whilst we are unable to comment on the wider impacts of this proposal as they are outside of our remit, should this site be progressed, then we strongly support the Council's</p>	<p>Noted</p> <p>Noted</p> <p>Noted. The proposed restoration for the site is a steeply sided valley restored to dry acid health land with re-established public rights of way. The draft</p>

Representations received about site MIN 69	Norfolk County Council Planning Officer's response
<p>recommendations that this site should be subject to high quality restoration creating a large new area of heathland with benefits both for wildlife and for green infrastructure provision.</p>	<p>site policy requires a heathland led restoration and improved public access.</p>
<p><b>(Comment)</b> Representation ID: 92363  Respondent: <b>D K Symes Associates (Mr D K Symes) [146]</b>  Agree with initial conclusion.</p> <p>Comment: The recognition that this site when developed as an extension to Briton's Lane Quarry, will offer considerably improved restoration to create heathland habitat with a range of micro-scale biodiversity is supported. In addition, the development offers the opportunity to increase the geological interest by providing additional exposed sections of the Briton's Lane Formation.</p> <p>The suggested requirement for the road junction with the A148 to be upgraded is noted. Advice from Highway Consultants is that the number of turning movements generated by the development is below the guidance level to justify a full right hand turn lane. However, site measurements of the road indicate that with limited widening sufficient additional 'road' width can be secured that will avoid through traffic being held up by the occasional turning lorry. This suggestion does not result in a 'full' standard right turn lane, but will achieve the same objective. It would be helpful if the comments were less specific by referring to road improvements at the A148 / Briton's Lane junction to allow some flexibility.</p>	<p>Noted</p> <p>The Highway Authority considers that the A148 / Britons Lane junction requires upgrading with a right-hand turn lane and that improvements to Britons Lane are also required. Therefore, this will remain a policy requirement for site MIN 69.</p>
<p><b>(Object)</b> Representation ID: 92126  Respondent: <b>St Andrew's School Trust (Julie Evans) [17818]</b></p> <p>As a Special School directly opposite the proposed site and within 250mtr of the site we are dismayed to see that this has not been taken into account in any of the appraisal reports. As all the pupils at the school have social and communication difficulties (most of whom have ASD) they have high levels of sensory issues. Several of the pupils wear ear defenders on a regular basis as they struggle to cope with day to day noise levels. High noise levels can result in the pupils going into meltdown which is not conducive to their education.</p> <p>This possible increase in dust levels is also a concern to us and the wellbeing of our pupils and staff.</p>	<p>Objection noted. The proposed site is on the opposite side of the A148 to the school and would be set behind an existing screen of trees. The noise of mineral extraction operations are not expected to increase the existing noise levels arising from the traffic on the A148. As a proposed extension to an existing site the number of vehicle movements is expected to remain the same; but continue for more years.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation</p>

Representations received about site MIN 69	Norfolk County Council Planning Officer's response
	measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).
<p><b>(Support)</b> Representation ID: 92117</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>Please also refer to our comments on protected landscapes in our letter of 13 August 2018. We note that this is proposal, although set within the AONB, is an extension to an existing quarry and is well screened. We support the proposal to deliver a high quality restoration scheme that will deliver landscape, biodiversity, geodiversity and amenity benefits. A range of organisations should be consulted and involved when the restoration proposals are drawn up to deliver maximum benefits.</p> <p>Protected landscapes</p> <p>Several allocations are either within protected landscapes or lie close to their boundaries or 'settings' which means that the highest sensitivity must be afforded to the landscape. It would be advisable to include a specific policy for protected landscapes within the Plan to reflect their protection as both the Norfolk Coast AONB and The Broads, which has the equivalent status of a national park, may be impacted by minerals development. Any proposal which may affect a protected landscape or its setting should be subject at application stage to a Landscape and Visual Impact Assessment (LVIA) for all stages of the operation.</p> <p>The LVIA should consider how a proposal may impact the statutory purposes for which a protected landscape is designated, including impacts on landscape character and tranquillity, together with full details of mitigation and restoration. All restoration measures proposed will need to be in keeping with the local landscape character. Consideration should be given to each landscape character's sensitivity and its capacity to accommodate the proposed development. The requirement for a LVIA and mitigation measures should be identified in the Plan for each relevant allocation.</p> <p>Further information needs to be provided for these allocations which demonstrates that impacts to protected landscape features have been avoided where possible, and mitigation measures put</p>	<p>Noted. The draft site policy contains requirements regarding the site restoration, and the provision of landscape, biodiversity, geodiversity and amenity benefits as part of the restoration. The Norfolk Coast Partnership have been consulted on the M&amp;WLPR and have requested that they are consulted as part of the development of the scheme for the site.</p> <p>Noted. The draft site policy for MIN 69 includes a requirement for a Landscape and Visual Impact Assessment to be submitted at the planning application stage. Norfolk County Council's 'Local List for the Validation of Planning Applications' also requires an LVIA to be submitted with applications for mineral extraction. The site assessment for MIN 69 details why it is considered that there are exceptional circumstances for allocating this site within the AONB and considers that, due to existing site screening, there would be limited landscape and amenity harm from the development and the opportunity for a much improved restoration for the existing adjacent site and a high quality biodiversity led restoration for the proposed site.</p>

Representations received about site MIN 69	Norfolk County Council Planning Officer's response
<p>in place for those impacts which cannot be avoided, and a programme of monitoring agreed to ensure the measures are effective. The views of the relevant organisation for each protected landscape need to be taken into account fully on these proposed allocations.</p>	
<p><b>(Object)</b> Representation ID: 92137</p> <p>Respondent: <b>Mr Jason Lane [17835]</b></p> <p>Summary: It is an area of AONB; SSSI; a school in very close proximity; increased heavy goods traffic to an already congested road system.; noise, water and air pollution.</p> <p>Objections to proposed expansion of existing quarry are:</p> <ol style="list-style-type: none"> <li>1. The proposed site is an area of outstanding natural beauty and close to the existing coastal ridge which holds numerous species of flora and fauna including Woodlark and Nightjars.</li> <li>2. An expansion of the existing site will increase heavy traffic/Heavy Goods Vehicles on local roads, especially Britons Lane and the A148.</li> <li>3. The site is adjacent to a Site of Special Scientific Interest (SSSI). Extracting minerals from this area will have a detrimental impact on important species and habitat.</li> <li>4. There is a school opposite the proposed site. Increased heavy traffic and access/egress to/from the proposed site could impact on safety.</li> <li>5. There is a health concern to users and children of the local school and to local residents from air pollutants and noise from the proposed site as well as increased traffic.</li> <li>6. There is a concern regarding increased noise due to explosives use (which does occur on the current site) which will be much closer to residents and school children.</li> <li>7. There is a concern regarding possible water pollution to the surrounding area, especially once the area is quarried below the water table.</li> </ol>	<ol style="list-style-type: none"> <li>1. The site assessment for MIN 69 details why it is considered that there are exceptional circumstances for allocating this site within the AONB and considers that, due to existing site screening, there would be limited landscape and amenity harm from the development and the opportunity for a much-improved restoration for the existing adjacent site and a high quality biodiversity led restoration for the proposed site. The draft site policy for MIN 69 includes a requirement for a Landscape and Visual Impact Assessment to be submitted at the planning application stage. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</li> <li>2. As a proposed extension to an existing site the number of vehicle movements is expected to remain the same; but continue for more years.</li> <li>3. The adjacent SSSI is Briton's Lane Gravel Pit. This is geological SSSI notified due to the geological</li> </ol>



Representations received about site MIN 69	Norfolk County Council Planning Officer's response
	<p>deposits uncovered by previous mineral extraction rather than species or habitat.</p> <p>4. The proposed site is on the opposite side of the A148 to the school and would be set behind an existing screen of trees. As a proposed extension to an existing site the number of vehicle movements is expected to remain the same.</p> <p>5. The draft site policy requires a noise and dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>6. Explosives are not used for mineral extraction on this site or anywhere in Norfolk. The county's geology is unsuitable for mineral extraction by those means.</p> <p>7. As noted in paragraph M69.21 of the Preferred Options consultation document, the limit of the proposed extraction would be above the water level, as is also the case for the existing extraction.</p>

**MIN 71**            **land west of Norwich Road, Holt**

<b>Representations received about site MIN 71</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93195  Respondent: <b>Norfolk County Council Historic Environment Service (Dr J Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted. However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Comment)</b> Representation ID: 93144  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and continued routing arrangements.</p>	<p>Noted. As the site is proposed by a different company to that operating the adjacent site, a separate access may need to be formed to the satisfaction of the Highway Authority. However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Comment)</b> Representation ID: 93099  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  This site has the potential to have detrimental impact on residential amenity, a suitably designed strategy will need to demonstrate that this amenity can be protected and views minimised. I would agree with conclusions that a buffer for Holt itself will be required.</p>	<p>The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRow along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92984  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  No comment</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92563  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  The following section outlines the constraints at certain sites, which will need to be considered at the application stage to ensure that ecology is not adversely affected. MIN 71 Proximity to Holt Lows SSSI and potential impact on groundwater dependant habitat.</p>	<p>The site assessment refers to the location of Holt Lowes SSSI and states that the site can only be worked if it would not affect groundwater flows. Therefore, it must be worked dry (above the water table) and a hydrogeological risk assessment would be required at the planning application stage to determine a suitable depth of mineral extraction. In the absence of detailed hydrogeological data impacts on the Norfolk Valley Fens SAC are uncertain.</p> <p>The site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Comment)</b> Representation ID: 92388  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes .  Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.  Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an</p>	<p>Noted</p> <p>Noted</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 71 - We are concerned about this proposal due to its close proximity to the Norfolk Valley Fens SAC and Holt Lowes SSSI. The plan will need to demonstrate that it would not result in an adverse effect on the SAC in order to demonstrate that it is deliverable, and in addition to any project level HRA that would be required to accompany any planning application. Should the site be considered deliverable in the local plan HRA, then we strongly recommend that the site is restored to nature conservation with public access, given the significant potential the site has to make landscape scale connections with the multiple designated and county wildlife sites in the area, as well as provide valuable new green infrastructure on the edge of Holt.</p>	<p>Noted. The site assessment refers to the location of Holt Lowes SSSI and states that the site can only be worked if it would not affect groundwater flows. Therefore, it must be worked dry (above the water table) and a hydrogeological risk assessment would be required at the planning application stage to determine a suitable depth of mineral extraction. In the absence of detailed hydrogeological data impacts on the Norfolk Valley Fens SAC are uncertain.</p> <p>The site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Support)</b> Representation ID: 92362 Respondent: <b>D K Symes Associates (Mr D K Symes) [146]</b> The identification of MIN 71 is supported.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92159 Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b> Likely significant effect, Please refer to our comments on Habitats Regulations Assessment in our letter of 13 August 2018. Annex 1: Natural England's comments on the Draft Habitats Regulations Assessment of the M&amp;WLPR, dated May 2018</p>	<p>Noted. However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>A recent judgment from the Court of Justice of the European Union (Case C-323/17 People Over Wind v Coillte Teoranta) has provided authoritative interpretation relating to the use of mitigation measures at the screening stage of a Habitats Regulations Assessment (HRA). The judgment concluded that it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site. However, when determining whether the plan or project will have an adverse effect on the integrity of the European site at appropriate assessment, a competent authority may take account of those avoidance and mitigation measures.</p> <p>The Local Planning Authority, as competent authority for the Minerals and Waste Local Plan, should consider this judgment when undertaking the HRA screening under the Conservation of Habitats and Species Regulations 2017 and may wish to take its own legal advice on the implications of the judgment.</p> <p>This means that for any sites where avoidance and mitigation measures have been identified to protect designated Natura 2000 sites such as Special Areas of Conservation (SACs), Special Areas of Protection (SPAs) or Ramsar sites, the sites should not be screened out for likely significant effect but carried forward to Appropriate Assessment, at which point any mitigation measures, eg not de-watering, conditions to control dust or lighting etc, can be assessed in detail and taken into account.</p> <p>Our specific comments on various individual allocations included in the initial consultation are intended to reflect this ruling. That is, where measures have been identified specifically to protect a Natura 2000 site, then these allocations should be screened in to Appropriate Assessment. At this stage the effectiveness of any proposed avoidance and mitigation measures and all the evidence should be examined to reach a conclusion of likely significant effect, either alone or in combination with other plans or projects, and to ascertain whether an adverse effect on the integrity of the site can be ruled out.</p> <p>Note that any proposal which may affect a Natura 2000 designated site must go through a project level HRA in addition to this strategic plan-level HRA. This should be identified for each relevant allocation and reflected in the policy wording, including what avoidance and mitigation measures would be necessary. This can be at a 'high' level, e.g. work would take place outside the bird breeding season to avoid disturbance to nesting birds. However, more detail would be expected in the HRA at planning application stage.</p> <p>The future conclusions and recommendations of the HRA will need to be incorporated into</p>	

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>later revisions of the Sustainability Appraisal (SA) report, and be reflected in the allocations and policies of the M&amp;WLPR.</p>	
<p><b>(Object)</b> Representation ID: 92191 and 91851</p> <p>Respondent: <b>Holt Town Council (Ms Elaine Oliver) [17621]</b></p> <p>Holt Town Council strongly objects to this site MIN71.</p> <p>The Council is concerned that this site is creeping towards the town and is far too close to the market town and also residential dwellings.</p> <p>Holt Town Council have already made a comment via the web page but feel we need to put in further comment to express our very real concerns as follows:-</p> <ul style="list-style-type: none"> <li>* This site is encroaching nearer to Holt with the nearest property only 10M away.</li> <li>* This will result in noise, dirt and dust and be unacceptable to the properties near to the site and to the town that depends on a tourist economy.</li> <li>* We have concern that this bigger site will unduly affect the water table</li> <li>* There will be a significant increase in heavy HGVs traffic</li> <li>* With the vulnerable Glaven river and Spouts Common in very close proximity, we are concerned about the negative effect on this sites.</li> <li>* The access to this site is very poor and dangerous with the potential to be an accident hot spot.</li> </ul>	<p>Objection noted.</p> <p>The proximity to Holt and local residents is noted. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>The site assessment refers to the location of Holt Lowes SSSI and states that the site can only be worked if it would not affect groundwater flows. Therefore, it must be worked dry (above the water table) and a hydrogeological risk assessment would be required at the planning application stage to determine a suitable depth of mineral extraction. In the absence of detailed hydrogeological data impacts on the Norfolk Valley Fens SAC are uncertain.</p> <p>Dust management and mitigation measures, which would be required to ensure no unacceptable adverse effect on local amenity for residents would also ensure no unacceptable adverse dust impacts on River Glaven and</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>Spout Common, which are further from site MIN 71 than the nearest residential properties.</p> <p>The Highway Authority considers the site is acceptable subject to the use of the existing access (to the adjacent southern mineral extraction site) and continued routing arrangements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
RESPONSES FROM INDIVIDUALS	
<p><b>(Object)</b> Representation ID: 92913</p> <p>Respondent: <b>Mr R Carter [17533]</b></p> <p>Petition relating to MIN 71 Proposed sand and gravel quarry in Holt</p> <p>We the undersigned object to a sand and gravel quarry being sites on the Holt boundary at Norwich Road. We wish to object on the grounds of:</p> <ol style="list-style-type: none"> <li>1. Proximity to Holt 26m, closest residents 11m, 200 residents within 250m.</li> <li>2. Inappropriate infrastructure - heavy lorries congesting B roads and key junctions</li> <li>3. Damage to environment -landscape and wildlife impact to the Glaven Valley Conservation area.</li> <li>4. Adverse dust and noise - residential and school impacted due to prevailing wind direction</li> <li>5. Detrimental to tourism - negative image impact on main road into the Georgian town of</li> </ol>	<p>Objection noted.</p> <p>1. &amp; 4. The proximity to Holt and local residents is noted. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>Holt.</p> <p>Petition signed by 113 local residents.</p>	<p>provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>2. The Highway Authority considers the site is acceptable subject to the use of the existing access (to the adjacent southern mineral extraction site) and continued routing arrangements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>3. Landscape and wildlife impact to the Glaven Valley Conservation Area - Conservation Areas are defined to manage and protect the historic interest of a place; they are not an ecological designation. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. The Local List also require a Landscape and Visual Impact Assessment and a Heritage Statement to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural or historic environment.</p> <p>5. Tourism – Moving the northern boundary of the extraction area at least 100 metres south would move the</p>



Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>extraction area away from the Norwich Road so that that operation only takes place along the Hunworth Road (C267).</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 92911  Respondent: <b>Mr R Carter [17533]</b>  Site MIN 71 - land west of Norwich Road, Holt. Question 76  I would ask that these comments be read in conjunction with my previous submission. I object to the initial conclusion that MIN 71 is a suitable site for the extraction of sand and gravel on the grounds that the Planning Authority is unable to demonstrate a need for extra resources of sand and gravel aggregates in Norfolk.</p> <p>Supply/Demand  The apportionment targets set as Norfolk's share of the sub-national guideline figures have been missed by very wide margins every year for the last 20 years (averaging only 51.2% of apportionment in the last 10 years).</p> <p>Market forces have shown that demand levels are significantly lower than the supply apportionment levels, and that Core Strategy Policy CS1 supply figures need to be severely downgraded in line with demand.</p> <p>"Neighbouring Minerals Planning Authorities plan to supply the demand in their own areas, by allocating sites, and therefore Norfolk does not need to make planned provision to supply additional aggregates".(1)</p> <p>"Norfolk is a net importer of sand and gravel" (1)</p> <p>Norfolk quarries have supplied "90% of local consumption" whilst exporting between 30%-50% of production. (1)</p>	<p>Objection noted. The issues raised in the objection, regarding how the need for mineral resources over the plan period have been calculated, have been raised in relation to whether there is a need for site MIN 71 to be allocated for future mineral extraction. These issues are more relevant to draft Policy MP1 and therefore have been responded to in the section of the Feedback Report regarding Policy MP1.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>Norfolk should not be subsidising exported aggregates (reduced transport costs) for the benefit of surrounding Mineral Planning Authorities and Companies at the cost of the Norfolk Countryside and amenity of local residents.</p> <p>"Norfolk, due to its geology, has considerable sand and gravel resources", consequently, there are minimal short or medium term supply risks if demand does increase - however, there is a significant risk to the countryside, the tourism industry, residents and existing agricultural if unsuitable and unwarranted sites are opened.</p> <p>Methodology</p> <p>"The MPA does not think it prudent... to base allocation purely on a rolling average of 10 years sales as having regard to paragraph 14 of the NPPF, flexibility is required in allocations". (1) Instead, however, the MPA chose to base its allocation on a 20 year rolling average against the following guidance:</p> <ul style="list-style-type: none"> <li>- Guidelines from the NPPF in March 2012 para 145 state that "MPAs... determine their own levels of aggregate production based on a rolling average of 10 years sales data..."</li> </ul> <p>Guidance from the NPPG requires that LAAs should provide:</p> <p>"a forecast of the demand for aggregates based on both the rolling average of ten-year sales data and local information"</p> <p>It also stated that "The rolling average of 10 years sales data will inform the targets for mineral extraction data" (1)</p> <p>All these guidelines unequivocally call for the 10 year rolling average to be the basis to consider supply forecasts, and any variant of this would need to be justified by compelling reasons.</p> <p>The MPA has chosen to double the length of the recommended time-base against this advice, and to use a 20 year average, leading to the following supply differences -</p> <ul style="list-style-type: none"> <li>- based on a 20 year rolling average 1.98 million tpa would be needed.</li> <li>- based on a 10 year rolling average 1.41 million tpa would be needed</li> </ul> <p>The difference over a 20 year plan is some 11.4 million tonnes at 570,000 tonnes a year - this clearly stretches the meaning of the phrase 'flexible' beyond any reasonable interpretation.</p>	

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<p>Conclusion The clear evidence is that existing supply levels of aggregates are significantly greater than demand exhibited by market forces in Norfolk, and any new policies/calculations should address this significant imbalance.</p> <p>(1) figures/narrative quoted are from - 'Norfolk Minerals and Waste Local Plan: Monitoring report - Mineral data Local Aggregate Assessment and Silica Sand Assessment 2016 (published October 2017)</p>	
<p><b>(Object)</b> Representation ID: 92162 Respondent: <b>Mr G Chapman [17853]</b></p> <p>I am writing with my objections to this proposed new quarry which would be situated so close to Holt. I am surprised that the County Council planning officers are even contemplating this site.</p> <p>As I understand it there are "82 sensitive receptors" (approx. 250people) live within 250 metres of the site, and an undisclosed number within 100 metres. My property is adjacent to the proposed site. We already have a new sand and quarry site at Sheringham, so I feel there is no need for this proposed site. You must consider the noise and dust pollution being so close to Holt. This is completely unacceptable to have this industrial site nearly in Holt and so close to residential properties.</p>	<p>Objection noted.</p> <p>The proximity to Holt and local residents is noted. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRow along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>The Minerals and Waste Local Plan Review is planning for the forecast need of an additional 20.31 million tonnes of sand and gravel in Norfolk in the period up to 2036. The potential start date for site MIN 71 is 2030 – after extraction has ceased at the adjacent operational site.</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 92078  Respondent: <b>Mr Hunter &amp; Ms Raven [17804]</b></p> <p>We do not agree with the proposed mineral extraction development at this site. Our house is less than 100 metres from the site and the main entrance to all 6 barns is directly facing the location. There would be a great loss of amenity to all the barns as a result of dust, noise and the planned 20 to 30 HGV lorries a day. At present the main view from the barns is a lovely expanse of hedges and arable fields which would be replaced with an industrial development.</p> <p>The footpath to the north of the site is a public right of way which is well-used by locals and visitors for country walks and exercising dogs. Users of the path would lose this amenity if it was a gravel extraction site as their peaceful enjoyment of the walk would no longer exist.</p> <p>We are also concerned about the pond at the entrance to Lodge Farm Barns which is a habitat to many frogs, toads and hedgehogs as well as insects such as dragonflies. The dust would impact this habitat and water levels could also be affected. Birds and bats nest in the buildings and would be impacted by noise and dust.</p> <p>We are also concerned at the likely adverse impact on all local wildlife in the Holt Lowes SSSI, the Glaven Valley Conservation Area and the Norfolk Valley Fens SAC.</p> <p>There would be a negative effect on the heritage character of Holt itself, as visitors approaching from the Norwich direction would regard the town as an industrial rather than a conservation area. It could well reduce visitor numbers to Holt and as a result</p>	<p>Objection noted.</p> <p>The proximity to Holt and local residents is noted. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>The Local List also requires a Landscape and Visual Impact Assessment and a Heritage Statement to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural or historic environment.</p> <p>Tourism – Moving the northern boundary of the extraction area at least 100 metres south would move the extraction area away from the Norwich Road and the Public Right of</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>income to local cafes and shops. Local small businesses are already struggling and depend on the unique Georgian appearance and atmosphere of the town to attract tourists.</p> <p>The high number of HGV lorries would increase the hazards on this road. The sharp bend where the Norwich Road meets Hunworth Road is already a difficult junction with traffic approaching at speed, despite the 30 mph sign. It is currently risky for residents of Lodge Farm Barns to emerge by car towards Holt as there is a blind corner and this would be made more dangerous with many large lorries moving in and out of the proposed site.</p>	<p>Way so that that operation only takes place along the Hunworth Road (C267).</p> <p>With regards to the issue of adverse impacts on local businesses, this is not a material planning consideration given that the planning system is not in place to protect private business interests. The site assessment considers whether the proposal would result in unacceptable amenity impacts (such as noise, dust etc.) and whether any existing use of land ought to be protected in the public interest.</p> <p>The Highway Authority considers the site is acceptable subject to the use of the existing access (to the adjacent southern mineral extraction site) and continued routing arrangements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 92071</p> <p>Respondent: <b>Mr &amp; Mrs Fell [17801]</b></p> <p>I write in regard to MIN 71 which is land to the west of Norwich Road, Holt. Both my wife and myself disagree with the Planning Officers initial conclusion that the site is suitable for sand and gravel extraction.</p> <p>We object for the following reasons:</p>	<p>Objection noted.</p> <p>The proximity to Holt and local residents is noted. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site.</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>All properties on Norwich Road will be affected by the proximity of the site with noise, dust and not least traffic. There are a number of elderly residents on Norwich Road and we are sure that some of them will suffer from the dust exacerbating any medical conditions they may have.</p> <p>Winds in the right direction will direct dust and noise over properties other than Norwich Road.</p> <p>If access to this site is along Candlestick Lane then this will be a traffic hazard has cars ignore the 30 mph speed limit and career around the bend from the direction of Holt Country Park and could easily find a lorry blocking the path. The B1149 is the main artery to and from Norwich and the traffic is heavy and constant with a junction (to Briston) on a bend about 40 metres from Candlestick Lane. This road, at this point, is an accident waiting to happen as it is.</p> <p>People visit Holt because it is a lovely town. Imagine the visual impact coming from the direction of Norwich. Seeing a bund wall built to hide the site is not a great first impression. This is North Norfolk not the industrial North of England. Other sites that have been found 'unacceptable' are MIN 23, MIN 32, MIN 74 and MIN 116 and we ask that the same is applied to MIN 71.</p>	<p>Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>Access is not proposed along Candlestick Lane. Access would need to be onto to Hunworth Road, joining the B1149 Norwich Road only at the existing road junction. The Highway Authority considers the site is acceptable subject to the use of the existing access (to the adjacent southern mineral extraction site) and continued routing arrangements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 92049 Respondent: <b>Mr N Gray [17795]</b></p>	<p>Objection noted.</p> <p>The proximity to Holt and local residents is noted. The extraction area of the site would need to be set back at</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>Regarding the above planning application. I live directly opposite the land ear marked for the application. The noise, dust and intrusion this will cause must not go without saying. My property runs directly along the side of the Norwich road opposite the proposed site and being built back in the 1800's does not have footings. The impact from numerous heavy vehicles pounding down the Norwich road daily and the risk to my property needs serious consideration. From my experience living at this address for over 15 years, is that the wind normally blows from a SW direction, this means any dirt/dust pollution from the site will come straight towards my property, along with all the noise from the site (I have yet to visit a quiet quarry).</p> <p>The visual impact to the surrounding area will be devastating for Holt residents.</p>	<p>least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points.</p> <p>In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>The estimated number of HGV movements is 20 to 30 per day. Extraction is not proposed to start at the site until after the existing extraction operation to the south has ceased. Therefore, the HGV movements from the new site would be instead of the current HGV movements from the existing site to the south.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 92048</p> <p>Respondent: <b>Mr B Donovan [17794]</b></p> <p>I received a letter explaining proposed site MIN 71. I appreciate the balanced content of it. Agreeing to this change of use from agricultural use to a gravel extraction site raises many concerns, many of which you have mentioned.</p>	<p>Objection noted.</p> <p>* Due to the dispersed nature of settlements within Norfolk, many mineral extraction sites have been similar distances from residential areas and have operated without unacceptable amenity impacts.</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>My concerns include :</p> <ul style="list-style-type: none"> <li>* How often have gravel extraction sites opened in Norfolk so close to a town, indeed to a residential area?</li> <li>* How often have gravel extraction sites opened in Norfolk so close to protected or sensitive areas?</li> <li>* How long the working day is, and how many days of the week?</li> <li>* Will the site need to be flood lit during the shorter days of the week (i.e. winter)</li> <li>* The plan refers to the time period up to 2036, but how long will this site stay operational?</li> <li>* The impact on the value of nearby properties from now on (not just when it is operational)</li> <li>* The impact on the wide range of wildlife in the direct area and surrounding. (insects to plants to birds and mammals)</li> </ul> <p>* I am trying to understand the local traffic impact...please correct me if I am wrong on the following potential concerns:</p> <ul style="list-style-type: none"> <li>→ Your link* below suggests that at least 500,000 tonnes could be extracted between 2030 and 2036?</li> <li>→ When full, I understand eight wheeler trucks carry up to 20 tonnes, so that will be a minimum of <math>500,000/20 = 25,000</math> journeys over 5 years approximately, i.e. 5,000 journeys per year.</li> <li>→ At 25 loads per day (letter says 20 to 30), that means the trucks will leave site <math>5000/25 = 200</math> days of the year.</li> <li>→ There are only about 250 working days in each year, so the site will be working maximum at <math>200/250</math> , i.e. 80% of the weekdays.</li> <li>→ The truck loads may average 25 times a day, but all trucks will have to go and come back so that doubles the number of times a truck may pass by me daily to 50 times a day. Over an 8 hour day, that a truck nearly every <math>(8 \times 60 \text{ mins})/50 = 9.6</math> trucks per hour... nearly every 6 minutes.</li> </ul>	<ul style="list-style-type: none"> <li>* In 2017/18 there were 6 mineral extraction sites in Norfolk within 250m of a Conservation Area, there were 20 mineral extraction sites within 250m of a County Wildlife Site and 36 mineral extraction sites within 2km of a SSSI. However, site MIN 71 is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI (0.62km) and its location within the Glaven Valley Conservation Area.</li> <li>* The hours of operation would be determined at the planning application stage. However, for information, the Cemex sand and gravel extraction site to the south has the following permitted operational hours: 7am-6pm Monday to Friday and 7am to 1pm on Saturdays.</li> <li>* Mineral sites may have lighting in and around the processing plant; however, extraction areas are normally unlit and worked during daylight. Stockpiles in processing areas allow for this. A lighting assessment would be required to support any future planning application if lighting is required.</li> <li>* As stated in the site assessment, the potential start date of the site is 2030 and the estimated extraction rate is 50,000 – 100,000 tonnes per annum. The estimated sand and gravel resource at the site is 1,100,000 tonnes. Therefore, the site could be operational for between 11 and 22 years.</li> <li>* Property values are not a material planning consideration.</li> <li>* Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which</li> </ul>



Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>*(<a href="https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/norfolk-minerals-and-waste-local-plan-review">https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/norfolk-minerals-and-waste-local-plan-review</a> )</p> <p>I can see from the plans and your letter that the following subjects have been noted , but what impact will all these aspects have, and have they been carefully and fairly reviewed:</p> <p>Issue to Manage: Noise Effects: General noise emission standards; Noise standards associated with particular types of activities; Standards associated with buffer zones; Timing restrictions on operations; Part of quarry management plan? Use of noise barriers such as earth bunds or acoustic fences; Equipment type and insulation</p> <p>Issue to manage: Vibration Effects: General vibration standards; Timing restrictions on operations; Part of quarry management plan?</p> <p>Issue to manage: Dust and air quality effects Effects: Performance standards for particulate matter; Assessment criteria to determine dust effects; Best practicable option; Part of quarry management plan?</p> <p>Issue to manage: Earthworks, stockpiling and overburden Effects: Part of quarry management plan? (including an earthworks management plan; Assigning council responsibility; Screening and landscaping</p> <p>Issue to manage: Traffic Effects: General traffic movement standards; Part of quarry management plan? (which often includes a traffic management plan)</p> <p>Issue to manage: Water quality and use Effects: Guidelines; Activity performance standards; Part of quarry management plan?</p>	<p>could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>*Traffic – The estimated extraction rate is 50,000 to 100,000 tonnes per annum. At the maximum extraction rate of 100,000 tpa, and 20 tonnes per HGV that is 5,000 HGV movements out of the site per year. If the site is working 5.5 days of the week that is 18 HGVs out of the site per full day (34 two way movements per day). Based on the operational hours of the adjacent site that is an 11 hour day with 3 vehicle movements per hour, i.e. one every 20 minutes.</p> <p>Noise – NCC's Local List for the Validation of Planning Applications requires a noise assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts (such as bunds, silencers on machinery etc). The implementation of mitigation measures (as detailed in a noise management plan) would be controlled through planning conditions if permission was granted. Operational hours of the site would be controlled through planning conditions. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health. The National Planning Practice Guidance sets out appropriate noise standards for mineral operations. The Environmental Health Officer is s statutory consultee on planning applications.</p>

<b>Representations received about site MIN 71</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Issue to manage: Vegetation removal and ecological effects Effects: Activity performance standards; Offsetting; Quarry and landscape management plan</p> <p>Issue to manage: Visual effects Effects: General bulk and location standards; Part of quarry management plan? Progressive restoration and rehabilitation; Use of visual barriers such as earth bunds or solid fences</p> <p>Issue to manage: Cultural and historic heritage values Effects: Policies relating to archaeological sites; Consultation policies and agreements; Cultural impact assessments and cultural value reports; Part of quarry management plan? Avoiding specific sites,</p> <p>Issue to manage: Rehabilitation Effects: Part of quarry management plan? Rehabilitation plan</p>	<p>Vibration – sand and gravel extraction operations would not be expected to cause vibration.</p> <p>Dust and air quality – NCC's Local List requires a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The implementation of mitigation measures (as detailed in a dust management plan) would be controlled through planning conditions if permission was granted. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health. The Environmental Health Officer is a statutory consultee on planning applications.</p> <p>Earthworks, stockpiling and overburden – these issues would be dealt with as part of any future planning application. The height of stockpiles would be controlled through planning conditions. NCC's Local List requires a Landscape and Visual Impact Assessment to be submitted at the planning application stage. Compliance with an approved landscape scheme for the site would be controlled through planning conditions.</p> <p>Traffic – NCC's Local List requires a Transport Statement or Assessment to be submitted at the planning application stage. The Highway Authority is a statutory consultee on planning applications. Compliance with the recommendations of the Highway Authority (such as highway improvements or routing agreements) would be controlled through planning conditions.</p>

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	<p>Water quality and use – a Hydrogeological Risk Assessment would need to be submitted at the planning application stage. The Environment Agency is a statutory consultee on planning applications. Compliance with the recommendations of the Risk Assessment and the advice of the EA would be controlled through planning conditions.</p> <p>Vegetation removal and ecological effects - NCC's Local List requires a Biodiversity Survey and Report to be submitted at the planning application stage. Compliance with the recommendations of this report and the requirements of the County Council's ecologist (or relevant statutory consultees) would be controlled through planning conditions.</p> <p>Visual effects – NCC's Local List requires a Landscape and Visual Impact Assessment to be submitted at the planning application stage, which will include proposed mitigation measures such as screening with bunds and/or planting etc. Compliance with the recommendations of the LVIA would be controlled through planning conditions. (see also comments below regarding site restoration)</p> <p>Cultural and historic heritage values – NCC's Local List requires a Heritage and Archaeology Statement to be submitted at the planning application stage, which will include proposed mitigation measures. A field evaluation is required for sites of archaeological interest. Historic England and NCC's Historic Environment Service are consultees on planning applications. Compliance with the recommendations of the Heritage Assessment and the advice of statutory consultees would be controlled through planning conditions.</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>Rehabilitation - NCC's Local List requires a progressive working, restoration and afteruse scheme to be submitted at the planning application stage. Compliance with an approved restoration scheme would be controlled through planning conditions.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 92001  Respondent: <b>Mr A Eke [17741]</b></p> <p>As you know, this potential mineral extraction site. MIN 71, is a serious concern for us and many of our neighbours. We live in The Laurels, which is located on Holt Road (B1149), directly opposite the Hunworth Road (C267) and this proposed site.</p> <p>I appreciate that you are only carrying out the Initial Public Consultation and that this doesn't grant Norfolk Gravel the right to proceed and that planning consent will be required. However, there are serious issues that both the County Council and District Council should consider before taking this matter any further.</p> <p>1. Infrastructure / Highways</p> <p>As you are no doubt aware, traffic congestion in and around the Georgian market town of Holt is often very serious, particularly during the holiday periods when there is an increase in the number of visitors and tourists to the area and the current infrastructure is of concern. The B1149 Holt Road is only-a 'B' road, but it carries 'A' - road traffic being the main route that runs from Norwich, past Holt and on to Fakenham. It is of major concern that there will 30 plus trucks per day using a narrow 'C' road, approaching the dangerous junction at Holt Road. We would appreciate further input from your highways department as to how this junction will be changed to accommodate the increased traffic load on an already very dangerous junction. Presumably, this can be dealt with in a S.106 agreement with the owners, should they be successful with achieving planning consent in due course. Please confirm.</p>	<p>Objection noted.</p> <p>1. infrastructure/ Highways - The Highway Authority considers the site is acceptable subject to the use of the existing access (to the adjacent southern mineral extraction site) and continued routing arrangements. Therefore, at this stage, the Highway Authority does not consider that changes to the junction with the Hunworth Road (C267) and the Norwich Road (B1149) are required. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>2 &amp; 3. Dust &amp; Noise – Holt Primary School site is located approximately 450m north of the proposed site boundary. Gresham's School grounds are approximately 700m north of the proposed site boundary. Even without mitigation, adverse dust impacts from sand and gravel extraction are uncommon beyond 250m from the nearest dust generating activities. There are 82 sensitive receptors (residential</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>2. Dust There is no doubt that this potential mineral extraction site will create a dust problem, not only for the immediate local residents and those inhabiting Holt, but it will also affect the young children at Holt Primary School, situated no more than 100 m from this site, and also the children at Gresham's pre-prep and prep schools, whose boundary adjoins the main Cromer Road. We would appreciate a full report on how the dust will affect the location. I note that you have concluded that 'Dust suppression measures will be necessary to ensure that dust deposition does not affect the integrity of Norfolk Valley Fens SAC', but surely it is more important to protect the people that live in the immediate vicinity?</p> <p>3. Noise impact I can clearly hear the works and transporters that are using the existing Cemex site daily and it can also be heard by residents in the centre of Holt. The proposed site will be closer to us and to Holt, so the noise impact will increase and be a serious concern.</p> <p>4. Other matters I note that you have requested other matters to be resolved and reports completed, as outlined below, and I look forward to receiving copies of these, in addition to the matters raised above.</p> <ul style="list-style-type: none"> <li>* Hydrogeological Risk Assessment;</li> <li>* Standoff /buffer zone plans;</li> <li>* Confirmation of site restoration;</li> <li>* A Landscape and Visual Impact Assessment;</li> <li>* A Heritage Statement;</li> <li>* An Archaeological Assessment.</li> </ul> <p>I understand that there are already three mineral extraction sites within the immediate vicinity- Cemex (Hunworth Road), Gresham Sand and Gravel (Cromer Road), which is a new quarry, and Norfolk Gravel - Sheringham Quarry- (Britons Lane). There are also sites further south and west. Please could we have an explanation as to why there needs to be further extraction from North Norfolk close to a Georgian town and where the products are sold? Are the minerals extracted for use in the UK or are they exported? Please take this letter as formal notice of our objection to this land being designated as a potential Mineral Extraction site.</p>	<p>properties) within 250m of the proposed site. However, the extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRow along the northern boundary of the site. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>4. Other matters – Any future planning application would require a Hydrogeological Risk Assessment, a Landscape and Visual Impact Assessment, a Heritage Statement and an Archaeological Assessment to be submitted at the planning application stage. At the time that a planning application is submitted these documents will be made publicly available on Norfolk County Council's website as part of the statutory consultation stage of determining a planning application. A planning application would also need to contain a restoration scheme, together with a working scheme showing standoff areas and screening.</p> <p>5. I can confirm that there are three other sand and gravel extraction sites in the vicinity (at Hunworth Road, Cromer Road and Britons Lane), as well as other sand and gravel extraction site in Norfolk. The Minerals and Waste Local Plan Review is planning for the forecast need of an additional 20.31 million tonnes of sand and gravel in Norfolk in the period up to 2036. The minerals are extracted for use in the UK and are usually for a local</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>market within approximately 30 miles of the extraction site as it is not efficient to transport sand and gravel further afield by road.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Comment)</b> Representation ID: 91989</p> <p>Respondent: <b>Mr Chris Chinn [17679]</b></p> <p>The best result is for this site not to be considered at all for many reasons:-</p> <ol style="list-style-type: none"> <li>1. It will be much too close to the very beautiful town centre of Holt where tourists visit all year round and make this area, with its obviously wonderful surroundings very popular and benefit the town financially.</li> <li>2. Just the position of the Holt country park, which is home to much wild life, being even closer to the proposed quarry shows a total lack of consideration to nature.</li> <li>3. The potential of an additional 20-30 lorries a day discharging onto the B1149 cannot surely be considered as an acceptable living environment to HUMANS, OR ANIMALS in respect to noise levels and dust, which impacts on clean air to for all, in addition to the dust created by the existing extraction work and noise which is also noticeable from the existing quarry on the Hunworth road. Also the volume and speed of such large vehicles passing through domestic housing and passing Holt primary school cannot be acceptable for any reason, even making money.</li> <li>4. I am 250 metres away from the boundary having moved here 13 months ago and have accepted the noise of local traffic. Having had the wonderful experience of deer in my garden many times and birds of prey flying over the fields, that my bungalow overlooks We are therefore very lucky as you might say and I agree, but this wonderful wildlife may have to move, even if we cannot, because our property will be devalued through no fault of our own.</li> <li>5. Please explain how this proposition can be justified to make local life even bareable, let</li> </ol>	<p>Objection noted.</p> <ol style="list-style-type: none"> <li>1. With regards to the issue of adverse impacts on local businesses, this is not a material planning consideration given that the planning system is not in place to protect private business interests. The assessment considers whether the proposal would result in unacceptable amenity impacts (such as noise, dust etc.) and whether any existing use of land ought to be protected in the public interest. With regards to Holt town centre, which is designated as a Conservation Area, in accordance with Norfolk County Council's Local List for the Validation of Planning Applications' a Landscape and Visual Impact Assessment and a Heritage Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the historic environment.</li> <li>2. The site assessment has been revised to include Holt Country Park which is designated as a County Wildlife Site. See also response to point 4 below regarding the requirement for a Biodiversity Survey and Report.</li> <li>3. The Highway Authority considers the site is acceptable subject to the use of the existing access (to the adjacent</li> </ol>

<b>Representations received about site MIN 71</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>alone acceptable for our wellbeing? Can you justify the impact on the health and wellbeing of people living close by?</p>	<p>southern mineral extraction site) and continued routing arrangements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The proximity to Holt and local residents of site MIN 71 is noted. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>4. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>Property values are not a material planning consideration.</p> <p>5. There are many permitted mineral extraction sites within Norfolk. These sites operate without resulting in unacceptable amenity impacts due to the controls placed on them through planning conditions, and the monitoring of those sites by the County Council. See also the response to point 3 regarding noise and dust assessments.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 91970</p> <p>Respondent: <b>Mr John Wollocombe [17722]</b></p> <p>Notwithstanding all of the concerns (and mitigating measures) set out in pages 233 to 236 of the Initial Consultation document, I would wish to object to the development of site MIN 71 for the following reasons:</p> <p>1. Min 71 is immediately adjacent to the town of Holt. North Norfolk is sparsely populated and there is therefore ample scope for this kind of development to take place on sites where the pollution and disruption caused will affect relatively small numbers of people. I note from a review of the other 40 proposed sites featured in the Consultation document that none of them is adjacent to a town with a population of a size comparable with Holt and to that extent MIN 71 seems out of line with all of the others.</p> <p>2. The potential for noise and air pollution and general inconvenience for the adjacent population is likely to be exacerbated by the fact that the prevailing winds place Holt downwind of MIN 71. Holt primary school is particularly vulnerable in this regard. The issue of air pollution would be of particular concern if landfill activities were to form part of this site's ultimate restoration.</p> <p>3. MIN 71 is skirted by the B1149. This is the main road both into and out of Holt to the South. Tourism is fundamental to the economic wellbeing both of Holt and the wider North Norfolk region and this stems from its reputation as a scenic and unspoilt holiday</p>	<p>Objection noted.</p> <p>1. &amp; 2. The Minerals and Waste Local Plan Review is assessing all of the sites proposed to Norfolk County Council for mineral extraction (by landowners, mineral companies and their agents) in response to a 'call for sites'. Some of the sites that are close to only a few residential properties have other significant constraints. The proximity to Holt and local residents of site MIN 71 is noted. Holt Primary School site is located approximately 450m north of the proposed site boundary. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust</p>



<b>Representations received about site MIN 71</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>destination. If MIN 71 were to be developed, there would be a risk that every visitor's first and last impression of the town from this direction could be compromised. In terms of local economic activity and employment, tourism exceeds by far the potential benefits associated with a mining development of this type and it would be wrong to allow it to proceed if there was any question that it might negatively impact upon the potential for tourism in the area.</p> <p>4. There are currently three working mining sites close to the town of Holt, one of which (Gresham's Gravel) has only recently opened. It is not clear from the Consultation document how long these existing local resources are expected to remain on stream. However, unless it can be demonstrated that within the relevant planning period, local supply of sand and gravel from these existing workings is expected to decline, or that local demand is expected to increase, I believe it would seem excessive to consider opening a fourth site in this area, particularly while it remains the case that a large proportion of the sand and gravel currently extracted in Norfolk is consumed outside of the county. I very much hope the issues I have raised will be taken into consideration in the Preferred Options consultation process.</p>	<p>assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>There are no proposals for landfill to form part of the restoration of the site.</p> <p>3. Moving the northern boundary of the extraction area at least 100 metres south would move the extraction area away from the Norwich Road so that that operation only takes place along the Hunworth Road (C267). In addition, any future development would require advance screen planting on the site boundaries to screen public views of the site. The existing mineral extraction site to the south is well screened by mature trees and similar screen planting would be required for site MIN 71. The National Planning Policy Framework states that 'great weight should be given to the benefits of mineral extraction, including to the economy'. With regards to potential adverse impacts on local businesses, this is not a material planning consideration given that the planning system is not in place to protect private interests of one another. The assessment is regarding whether the proposal would unacceptably impact on their amenities (such as noise, dust etc) and existing use of land which ought to be protected in the public interest.</p> <p>4. Minerals extraction is planned for on a county-wide basis and therefore the landbank of permitted reserves for sand and gravel extraction is also calculated on a county-wide basis. Planning permission for the Gresham Gravel site at</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>East Beckham (C/1/2013/1012) requires the development to cease and the site to be restored by the end of 2031. The Carter Concrete site at Beeston Regis has planning permission for mineral extraction until 2042, although the mineral reserve within the site is expected to be worked out within the next few years. Planning permission for the Cemex site at Hunworth Road, Holt requires the development to cease and the site to be restored by the end of 2030. The Minerals and Waste Local Plan Review is planning for the forecast need of an additional 20.31 million tonnes of sand and gravel in Norfolk in the period up to 2036. The potential start date for the proposed site is not until 2030, which is when the existing adjacent Cemex site is required to have ceased operating. At least 80% of sand and gravel produced in Norfolk is used in Norfolk. Sand and gravel is not efficient to transport over more than 30 miles by road. Therefore cross-boundary movements of Norfolk sand and gravel are usually only to Suffolk and Cambridgeshire and would be due to the location of sites close to the county border.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 91919  Respondent: <b>Mr J Browne [17697]</b>  I am writing to inform you that I strongly disagree to proposed quarry at Holt MIN 71.  I would like you to respond to the following points please:</p>	<p>Objection noted.</p> <p>1. There is not currently a planning application for the proposed site. The site has been submitted to Norfolk County Council in response to a 'call for mineral extraction sites' for the Norfolk Minerals and Waste Local Plan which covers the period to 2036. This is why the site has been</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>1/ How can Carter Concrete can be so sure that Cemex will cease operation in 2030, and why would Carter Concrete seek permission 12 years before Cemex has finished?</p> <p>Surely, it would be madness for Carter Concrete Ltd to get a planning permission, spend money, develop site, and not be able to operate new quarry, as Cemex are still extracting. Indeed, Cemex could easily apply to extend their operation for 20, 30 or 50 years with the land they have available. Cemex could even "go slow", as it is not really in their interests to have another aggregate competitor. The only opinion I can give is that both companies must be in collusion with one another. If this site is approved, I would not be surprised if Cemex suddenly stopped extracting aggregate from their better located quarry.</p> <p>With the above in mind, why would the planning department take the risk of granting early permission for a new, closer quarry, when there is an existing quarry with decades of aggregate, most of which can be extracted without impacting the nearby historic Georgian Town of Holt?</p> <p>2/ How can a site in such close proximity of one of Norfolk's prettiest Georgian towns be considered suitable for allocation for sand and gravel extraction? I was under the impression it was extremely difficult to obtain planning permission for a quarry next to a village, let alone permission next to a historic Georgian market town. I would also like to draw your attention to the prevailing wind direction. You can see from the diagram attached below that all dust and noise will be carried directly over the adjacent Georgian market town of Holt.</p> <p>3/ I would also like to point out, it will not just be 20-30 plus aggregate lorries a day, it will also be supplemented by 20-30 plus concrete lorries. The clue can be found in the name "Carter Concrete Ltd".</p> <p>I look forward to your response.</p>	<p>proposed by Carter Concrete for consideration in the Local Plan so far in advance of the potential start date. The existing planning permission for the existing Cemex site in Holt requires the site to be completed and restored by the end of 2030. If Cemex required a longer time period to complete extraction and restore the existing site they would need to apply to Norfolk County Council to amend this condition of their current planning permission. A developer wishing to extract mineral from site MIN 71 will still need to apply for and be granted planning permission before mineral extraction can take place.</p> <p>2. The proposed site is approximately 45m from Holt Conservation Area and is located within the Glaven Valley Conservation Area, which covers over 4,600 hectares of North Norfolk. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications' a Landscape and Visual Impact Assessment and a Heritage Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the historic environment.</p> <p>Even without mitigation, adverse dust impacts from sand and gravel extraction are uncommon beyond 250m from the nearest dust generating activities. There are 82 sensitive receptors (residential properties) within 250m of the proposed site. However, the extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site and be suitably screened with tree planting. In accordance with Norfolk County</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>Council's Local List for the Validation of Planning Applications, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>3. The Highway Authority considers the site is acceptable subject to the use of the existing access (to the adjacent southern mineral extraction site) and continued routing arrangements. There are no proposals for concrete production to take place at the proposed site. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 91912</p> <p>Respondent: <b>Mr &amp; Mrs Bond [17691]</b></p> <p>We wish to object to the proposed extraction of minerals at Hunworth Road/Norwich road Holt Norfolk. The reasons for the objections are:</p> <p>1) The noise pollution that will have a detrimental impact on the quality of our lives, both from the operation that would take place on the site and the numerous HGV's servicing the site.</p> <p>2) The dust that will have a detrimental impact on our health.</p>	<p>Objection noted.</p> <p>1. &amp; 2. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
<p>3) Increase in traffic on the Norwich Road and Hunworth Road especially leading out to the junction on the Norwich Road.</p>	<p>3. The Highway Authority considers the site is acceptable subject to the use of the existing access (to the adjacent southern mineral extraction site) and continued routing arrangements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 91903</p> <p>Respondent: <b>Mr David Lowes [17680]</b></p> <p>I disagree that this is a suitable location for sand and gravel extraction. The settlement of Holt is 26m away. This is basically a Quarry in the town.</p> <p>The proximity to a high number of residential properties is unacceptable. I estimate our property to be 20m from the site boundary.</p> <p>These properties, regardless of mitigating actions, will be impacted by dust, lorry traffic, noise and a negatively changing landscape.</p> <p>This site is also in close proximity to Holt Country Park and this seems irrational given its purpose of providing a peaceful nature experience.</p>	<p>Objection noted.</p> <p>The proximity to Holt and local residents is noted. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points. In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>The Highway Authority considers the site is acceptable subject to the use of the existing access (to the adjacent southern mineral extraction site) and continued routing arrangements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The site assessment has been revised to include Holt Country Park. Holt Country Park is approximately 270m from the site boundary and adjacent to the B1149 Norwich Road. Due to the distance from the site and the adjacent road it is unlikely that the proposed mineral extraction operations would have an unacceptable adverse noise impact on users of Holt Country Park.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 91885</p> <p>Respondent: <b>Ms Julie McManus [17481]</b></p> <p>I'm one of the residents living within 20 metres of the proposed site boundary. Noise from the current site 200m away can be heard clearly here. No 'mitigation' would suppress the level of noise we'll suffer. Our dwelling/the proposed site is in an extremely elevated position - winds tend to be stronger here-potential for dust pollution will be significant. We enjoy a variety of wildlife within our boundary; deer/barn owls/hares/hedgehogs/small mammals.</p>	<p>Objection noted.</p> <p>The proximity to Holt and local residents is noted. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points. In accordance with Norfolk County Council's</p>

<b>Representations received about site MIN 71</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>A Quarry site on main road entering Holt will be an eyesore, ruin the town's image and would have an adverse effect on property prices and businesses.</p>	<p>Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>Moving the northern boundary of the extraction area at least 100 metres south would move the extraction area away from the Norwich Road so that that operation only takes place along the Hunworth Road (C267). Advance planting on the site boundaries would need to ensure that the site does not have an adverse impact on public views along roads into Holt.</p> <p>Property values are not a material planning consideration.</p> <p>With regards to potential adverse impacts on local businesses, this is not a material planning consideration given that the planning system is not in place to protect private interests of one another. The assessment is regarding whether the proposal would unacceptably impact on their amenities (such as noise, dust etc) and existing use of land which ought to be protected in the public interest.</p>

Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 91867  Respondent: <b>Mr Paul Jackson [17638]</b>  It is wholly unacceptable for further ravages of the landscape close to the ancient Market Town of Holt to be under consideration by NCC, the result of which would be only in the interests of commercial profiteers and to the detriment of those of us who have invested heavily in the lifestyle that Holt and District provides in retirement. It is inevitable that there will be air and noise pollution within an indeterminate area according to changes in wind force &amp; direction, and perpetuation and unwelcome increases of heavy commercial traffic in and around Holt and surrounding settlements. Absolutely NO.</p>	<p>Objection noted.</p> <p>The proximity to Holt and local residents is noted. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRoW along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points.</p> <p>In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity (including noise, air quality and dust).</p> <p>Property values are not a material planning consideration.</p> <p>HGV traffic - The Highway Authority considers the site is acceptable subject to the use of the existing access (to the adjacent southern mineral extraction site) and continued routing arrangements. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning</p>



Representations received about site MIN 71	Norfolk County Council Planning Officer's response
	<p>application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>
<p><b>(Object)</b> Representation ID: 91832 Respondent: <b>Mr R Carter [17533]</b></p> <p>I disagree with the initial conclusion of the Planning Officer that: the site is considered suitable for sand and gravel extraction, subject to any planning application addressing the requirements below..."</p> <p>I would comment as follows:</p> <p><b>AMENITY:</b></p> <p>1. "The nearest residential property is 11m from the site boundary" An inspection of local maps shows that a number of properties directly share a boundary with the mineral site, or are the width of a road from the boundary.</p> <p>2. "There are 82 sensitive receptors within 250m of the site boundary. Most of these properties are in the settlement of Holt, which is 26m away." This statement fails to convey the fact that significant numbers of people living in Holt will be affected by the proximity of the site. No figure of actual numbers is given but it would not be unreasonable to estimate a figure in the range of 160 to 240.</p> <p>3. "The greatest impact will be within 100 metres of a source..." No number is given here, but in the context of the above statement, it clearly needs to be addressed.</p> <p><b>LANDSCAPE:</b> There are a number of properties on different sides of the quarry which require stand off protection, and substantive landscape treatments to properly protect the inhabitants. It is clear that the scale and extent of works needed to the quarry would cause</p>	<p>Objection noted.</p> <p>The distance is to the dwelling not the curtilage.</p> <p>The proximity to Holt and local residents is noted. The site assessments have been amended to include the number of properties within 100m of the site boundary – there are 17 properties within 100m of the site boundary at Holt. The extraction area of the site would need to be set back at least 100 metres from the residential properties at the north-eastern and north-western corners of the site and from the PRow along the northern boundary of the site. Advance tree planting for screening would also be required on all of the site boundaries to screen the site from public view points.</p> <p>In accordance with Norfolk County Council's Local List for the Validation of Planning Applications, a Landscape and Visual Impact Assessment, a noise assessment and a dust assessment would need to be provided at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable</p>

<b>Representations received about site MIN 71</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>a serious loss of amenity to residents and tourists alike, and would visually impair the open and attractive landscapes of one of the major roads into Holt.</p> <p>ECOLOGY: There are numerous references to County Wildlife Sites, giving the distance from the site boundary. There is though, no mention of Holt Country Park, which is a Green Flag award winner and is situated near the site - it is a woodland dominated by Scots pines and native broadleaves, with orchids, a wide variety of butterflies, dragonflies and damselflies and an abundant display of wildlife including goldcrests, greater spotted woodpeckers and deer.</p> <p>CONCLUSION: There are significant numbers of residents within a short distance of the site boundaries. Many of them are of retirement age with respiratory and medical complaints which are exacerbated by dust, pollution and contaminants. In order to mitigate the risk of quarrying to residents in such close proximity, significant landscape and groundworks need to be undertaken, which in themselves risk being intrusive in their own right. The visual impact on nearby dwellings and the disruption to the surrounding landscape would be severe, and it would significantly affect the residents and visiting tourists' quiet enjoyment of the surrounding countryside.</p> <p>I would refer the Planning Department to other sites in their consultation document that they found 'unacceptable' due to the detrimental impact quarrying would have on the landscape and residential properties (MIN 23, MIN 116, MIN 74, MIN 32), and ask that they apply the same policy to MIN 71.</p>	<p>adverse impact on local amenity (including noise, air quality and dust).</p> <p>Moving the northern boundary of the extraction area at least 100 metres south would move the extraction area away from the Norwich Road so that that operation only takes place along the Hunworth Road (C267). Advance planting on the site boundaries would need to ensure that the site does not have an adverse impact on public views along roads into Holt.</p> <p>The site assessment has been amended to include reference to Holt County Park as it is also a County Wildlife Site. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>However, the site is concluded to be unsuitable to allocate in the Preferred Options document, due to the proximity of the site to Holt Lowes SSSI and its location within the Glaven Valley Conservation Area.</p>

**MIN 115**      **land at Lord Anson’s Wood, near North Walsham**

Representations received about site MIN 115	Norfolk County Council Planning Officer’s response
<p><b>(Comment)</b> Representation ID: 93213  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  The text needs to flag up that that aircraft crash site is legally protected under Protection of Military Remains Act (1986) to ensure potential applicants are fully informed.</p>	<p>The text has been updated to contain this information as requested.</p>
<p><b>(Comment)</b> Representation ID: 93158  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority require clarification on the proposed access strategy for the site in order to come to a view on its suitability.</p>	<p>The site proposer has suggested an access route through the existing woodland to the south east to form a junction with the B1150. The Highway Authority subsequently advised that access onto the B1150 could only be supported with appropriate visibility splays and levels of forward visibility. In addition, depending on the results of a Transport Assessment, a right-hand turn lane may be required.</p>
<p><b>(Comment)</b> Representation ID: 93115  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms A Crotty) [18343]</b>  I would disagree that this site is suitable for allocation, in accordance with section 170b of the NPPF. The removal of this section of woodland would degrade the overall capital value, ecosystem services and recreational values provided by the woodland.  The landscape paragraph details mature trees and woodland that are to be retained and enhanced. The initial conclusion also states that a wide screen of trees is to be left around the site. I therefore propose that if this site remains allocated that a full AIA is required to achieve this and this should be listed in the initial conclusion.</p>	<p>Section 170b of the NPPF states “Planning policies and decisions should contribute to and enhance the natural and local environment by: recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystems services – including the economic and other benefits of the BMV agricultural land, and of trees and woodland”. The woodland is a coniferous plantation and therefore as well as natural capital, it has an economic value when it is harvested by felling. The proposed mineral extraction and restoration could take place as part of the felling and replanting cycle, therefore it is considered that there would not be a loss of natural capital or ecosystem services as the woodland could be</p>

Representations received about site MIN 115	Norfolk County Council Planning Officer's response
	<p>replanted following mineral extraction. The woodland does not have public access and therefore does not currently have any recreation value. In addition, the draft policy states that an appropriately wide screen of trees will need to be left around the site.</p> <p>The draft site policy will be amended to include a requirement for an Arboricultural Impact Assessment to be submitted at the planning application stage.</p>
<p><b>(Comment)</b> Representation ID: 93109</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms C Keightley) [18344]</b></p> <p>Woodland is located within the allocated area for this site. These woodland areas are of ecological value and likely support protected species and other wildlife. We would like to see woodland areas retained where possible. Where woodland areas are proposed for removal then an ecological assessment needs to be undertaken and any further surveys need to be carried out or mitigation proposed, if necessary.</p>	<p>The woodland is a coniferous plantation. The draft policy for the site states that a full ecological survey will be necessary at the planning application stage and mitigation proposed, if necessary. The draft policy states that an appropriately wide screen of trees will need to be left around the site.</p>
<p><b>(Comment)</b> Representation ID: 93100</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b></p> <p>I am in agreement with my Arboriculture colleague that this site is not suitable for allocation. Should the allocation remain in place it would be necessary to ensure a suitable tree belt screen is maintained to minimise views from adjacent Public Rights of Way.</p>	<p>The draft site policy states that an appropriately wide screen of trees will need to be left around the site to minimise views on users of the Public Rights of Way that are close to the site (North Walsham FP9, North Walsham BR16, North Walsham FP8, North Walsham FP7).</p>
<p><b>(Comment)</b> Representation ID: 92985</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>No comment</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92561</p>	<p>The site is currently a coniferous plantation. Although the site does contain some deciduous</p>

Representations received about site MIN 115	Norfolk County Council Planning Officer's response
<p>Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b></p> <p>The following section outlines the constraints at certain sites, which will need to be considered at the application stage to ensure that ecology is not adversely affected. MIN 115 Potential loss of deciduous woodland priority habitat.</p>	<p>trees it is not a deciduous woodland. Therefore mineral extraction within this site would not lead to the loss of deciduous woodland. The draft site policy states that a full ecological survey will be necessary at the planning application stage.</p>
<p><b>(Comment)</b> Representation ID: 92389</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.</p> <p>Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p> <p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 115 - We note the proximity of this proposal to several CWS, including CWS 1170 'Lord Anson's Wood'. We support the Council's recommendations for ecological assessment to accompany any application, due to the proximity to the CWS as well as for protected species, and also support the restoration recommendations for a mix of deciduous woodland and heathland, to complement the habitats in nearby CWS.</p>	<p>Noted</p> <p>Noted</p> <p>Noted. The draft policy requires a full ecological survey to be carried out at the planning application stage. The draft policy requires restoration to a mix of deciduous woodland and heathland.</p>

Representations received about site MIN 115	Norfolk County Council Planning Officer's response
<p data-bbox="206 252 656 280"><b>(Comment)</b> Representation ID: 92119</p> <p data-bbox="206 300 871 328">Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p data-bbox="206 347 1368 448">The site is in close proximity to North Walsham, a settlement that is likely to increase in size in future years. There is limited accessible greenspace on this side of the town currently. There is an opportunity for the site restoration to include proposals to help address this.</p>	<p data-bbox="1408 252 2029 459">Noted. No details on proposed restoration of the site have been provided at the Local Plan preparation stage. The preferred restoration is to a mix of deciduous woodland and heathland. The draft site policy now states that there would be a preference for public access on restoration.</p>

**MIN 207**      **land at Pinkney Field, Briston**

Representations received about site MIN 207	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93196  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93146  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and continued routing arrangements.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92986  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p>
<p><b>(Comment)</b> Representation ID: 92397  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.  Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.  Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing</p>	<p>Noted</p> <p>Noted</p>

Representations received about site MIN 207	Norfolk County Council Planning Officer's response
<p>habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 207, MIN 208, MIN 209, MIN 210, MIN 211, MIN 212, MIN 79, MIN 80 We support the Council's recommendations for restoration to nature conservation after use on these sites.</p>	<p>Noted. The proposed restoration for site MIN 207 is to an agricultural reservoir in the west and agricultural grassland on the eastern, unworked part of the site.</p>
<p><b>(Support)</b> Representation ID: 92361 Respondent: <b>D K Symes Associates (Mr D K Symes) [146]</b> The identification of MIN 207 is supported.</p>	<p>Noted</p>
<p><b>(Support)</b> Representation ID: 91968 Respondent: <b>Mineral Services Ltd (Mr P Orrock) [4073]</b> The Initial conclusion that MIN 207 'Land at Pinkney Field' is considered to be suitable for allocation for sand and gravel extraction, subject to any planning application addressing the itemised requirements, is supported.</p>	<p>Noted</p>



**MIN 208**      **land south of Holt Road, East Beckham**

Representations received about site MIN 208	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93197  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	Noted
<p><b>(Comment)</b> Representation ID: 93147  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access.</p>	Noted
<p><b>(Comment)</b> Representation ID: 92987  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	Noted. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.
<p><b>(Comment)</b> Representation ID: 92398  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.  Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.  Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between</p>	<p>Noted</p> <p>Noted</p>

Representations received about site MIN 208	Norfolk County Council Planning Officer's response
<p>existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 207, MIN 208, MIN 209, MIN 210, MIN 211, MIN 212, MIN 79, MIN 80 We support the Council's recommendations for restoration to nature conservation after use on these sites.</p>	<p>The proposed restoration is to a mosaic of native woodland, scrub, acid grasslands and exposed faces. The draft site policy states that the site should be restored to a nature conservation afteruse to provide landscape and biodiversity gains.</p>
<p><b>(Object)</b> Representation ID: 92139 Respondent: <b>Mr Jason Lane [17835]</b></p> <p>Summary: It opposite an area of AONB; increased heavy goods traffic to an already congested road system; detrimental effect on local tourist industry; noise, water and air pollution; objection to expansion of current licence that has only recently been granted.</p> <p>Objections to proposed expansion of existing quarry are:</p> <ol style="list-style-type: none"> <li>1. It is opposite an Area of Outstanding Natural Beauty, in particular Pretty Corner Woods, Sheringham. The area is a popular tourist attraction and an increase in traffic will make this less so.</li> <li>2. An expansion of the existing site will increase heavy traffic/Heavy Goods Vehicles on local roads, especially A148.</li> <li>3. The site is adjacent to a Site of Special Scientific Interest (SSSI). Extracting minerals from this area will have a detrimental impact on important species and habitat.</li> <li>4. There is a health concern to local residents from air pollutants and increased noise from the proposed site as well as increased traffic.</li> <li>5. There is a concern regarding possible water pollution to the surrounding area, especially once the area is quarried below the water table.</li> <li>6. A licence has only recently been granted for mineral extraction to this site and was not granted on further expansion of the site.</li> </ol>	<ol style="list-style-type: none"> <li>1. The site is approximately 210m from the boundary of the AONB. The site is generally well screened. The draft site policy requires the submission of a Landscape and Visual Impact Assessment at the planning application stage. The LVIA will identify any potential landscape or visual intrusion impacts and appropriate mitigation measures to address these, which will form part of the working scheme. As noted in response to point 2 below, there is not expected to be an increase in traffic from the proposal.</li> <li>2. The site is proposed as an extension to the existing site, but it would be a phased operation so that only one site is worked for extraction at a time. Therefore, the number of HGV movements per day is not proposed to increase as the site would operate at the current rate, but for a longer time period (an additional 14 years).</li> <li>3. The site is not adjacent to a SSSI. The nearest SSSI is 1.45km away. The proposed extraction would be worked dry (above the water table) and is located in a different hydrological catchment to the</li> </ol>

Representations received about site MIN 208	Norfolk County Council Planning Officer's response
	<p>SSSI. Therefore, there would be no adverse impact on the SSSI.</p> <p>4. The draft site policy requires a noise and dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust). As noted in response to point 2 above, there is not expected to be an increase in traffic from the proposal.</p> <p>5. The site would be worked dry (above the water table) and therefore no effect on water resources is expected. The draft site policy states that the site will need to be worked without dewatering unless a hydrogeological risk assessment identifies either no unacceptable hydrogeological impacts or appropriate mitigation is identified to ensure no unacceptable impact to hydrogeology.</p> <p>6. A separate planning application would need to be submitted, and granted, for the additional site area before mineral extraction could take place.</p>

## South Norfolk sites

### MIN 209 land adjacent to the A143, Earsham (Extension Area 1)

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93214</p> <p>Respondent: <b>Norfolk County Council Historic Environment Service (Dr J Albone) [8137]</b></p> <p>We agree with the initial conclusion for this site. MIN 209 (area 1) has been subject to recent field evaluation and NCCES has provided advice to the owner's archaeological consultant on the required mitigation strategy.</p>	Noted
<p><b>(Comment)</b> Representation ID: 93148</p> <p>Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b></p> <p>The Highway Authority considers the site is acceptable subject to the proposed highway improvements being suitable.</p>	Noted
<p><b>(Comment)</b> Representation ID: 93101</p> <p>Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b></p> <p>I would support the movement of the processing plant to an area to be worked over the choice to relocate it to an already restored area.</p>	Noted. The draft site policy requires: 'The existing processing plant to be relocated, as soon as practicable, out of the Broads Authority Executive Area into one of the new extraction areas allocated by this policy.'
<p><b>(Comment)</b> Representation ID: 92988</p> <p>Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b></p> <p>Cumulative impacts of these three sites should be assessed. If some or all of the sites are taken forwards, the recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	Noted. The draft site policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. The draft site policy also requires each extension area to be passed with the other mineral extraction sites in the area so that only one site is worked for extraction at a time. The draft policy also requires a progressive restoration scheme to a wet grassland nature conservation afteruse.
<p><b>(Comment)</b> Representation ID: 92393</p> <p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p>	Noted

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
<p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.</p> <p>Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p> <p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 207, MIN 208, MIN 209, MIN 210, MIN 211, MIN 212, MIN 79, MIN 80 We support the Council's recommendations for restoration to nature conservation after use on these sites.</p>	<p>Noted</p> <p>Noted. The site is proposed to be restored to wet grassland with landscaping, ponds/ scrape and geological exposure, all to a nature conservation afteruse. The draft site policy requires a progressive restoration scheme to a wet grassland nature conservation afteruse to provide landscape and biodiversity gains.</p>
<p><b>(Support)</b> Representation ID: 91915</p> <p>Respondent: <b>Earsham Parish Council (Mrs Lynda Ling) [17695]</b></p> <p>The plans were explained to the parish council in detail, Questions were asked and answered by a representative from Earsham Gravels, and overall parish councillors were happy with the screening of the site and the envisaged noise levels.</p> <p>There appeared to be no increase in vehicle movement and would mean continued employment for the workforce which is important in a rural location such as this.</p>	<p>Support noted.</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
<p>At a recent parish council meeting, members of the public were in attendance and also had the opportunity to discuss their queries with the Earsham Gravels representative.</p>	
<p><b>(Comment)</b> Representation ID: 91839  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>  MIN 209, 210, 211; For information, the Broads Landscape Character Assessment 2016 says that this area is LCA Outney Common and Bath Hills, Industrial / Early post-industrial LCT borders MIN 211. The Authority strongly requests that Norfolk County Council liaise with us regarding this site and the policy prior to the next version of the Local Plan. Support removal of plant site from BA executive area. What will go in its place?</p>	<p>Following removal of the existing plant site it would be restored in accordance with the current planning permission which includes an area of pasture, an area of wet grassland with a lake and pools, a car park and picnic area. We will continue to liaise with the Broads Authority as requested.</p>
<p><b>(Support)</b> Representation ID: 92052  Agent: Stephen M Daw Limited (Mr Stephen Daw) [143]  Respondent: <b>Earsham Gravels Limited [4031]</b>  Further information is provided in support of this Allocation including alterations to the original submission. This are illustrated on drawings submitted under separate cover, replacing the original versions.  The information/alterations comprise:  (i) The processing plant site will be relocated out of the Broads Authority Executive Area and into Extraction Area 1. This will take place once sufficient space has been created within the Area to accommodate the plant site, estimated to be 5 years from commencing the development.  (ii) The order of working Areas 2 and 3 has been reversed.  (iii) Additional screening of the development by means of bunding and advance planting is proposed.  (iv) Revised restoration proposals aimed at further increasing biodiversity.  (v) A replacement Location Plan to illustrate the extent of a future Application Area.  (vi) A replacement Access Plan to reflect the new position of the processing plant site.</p>	<p>The additional information supplied is noted.</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
<b>RESPONSES FROM INDIVIDUALS</b>	
<p><b>(Object)</b> Representation ID: 93063</p> <p>Respondent: <b>Ms K Squire [18339]</b></p> <p>I attach a petition from 19 residents of Earsham objecting to the applications as they stand and asking for an extended and more transparent consultation period for all three proposed sites.</p> <p>I hope that you will take into account all of the concerns mentioned above and honour the request for an extended consultation period so that all residents of Earsham can have a fair say in the proposed changes to their village.</p> <p>Action petitioned for: We, the undersigned, are concerned citizens who urge the council and all involved parties to act now to extend the consultation period beyond the initial six weeks and asks that a more thorough consultation be undertaken with all residents.</p> <p>Written comments made by residents who signed the petition are:</p> <ul style="list-style-type: none"> <li>* concerned about pollution</li> <li>* noise, dust, disturbance</li> <li>* traffic too close to village</li> <li>* too close to housing / too close to village</li> <li>* moving noisy plant closer village, dust from sites.</li> <li>* I don't want noise, dust, lorries in village</li> <li>* undesired affect on Earsham</li> <li>* road construction</li> <li>* sand on verges. What is meant by waste.</li> <li>* Lack of info / not enough information / more information / badly communicated</li> <li>* extended consultation</li> </ul>	<p>Objection noted.</p> <p>The Initial Consultation period was for six weeks. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>The Initial Consultation document included an assessment of the proposed Earsham sites on amenity, landscape, the historic environment, archaeology, highway access, ecology, flood risk and hydrogeology. A planning application has not been submitted for the Earsham sites proposed in the Minerals and Waste Local Plan Review at the current time (June 2019). If a planning application is submitted then there will also be a formal public consultation period on the planning application as part of the decision making process.</p> <p>The plant site is proposed to be moved from its current location within the Broads Authority Executive Area, into site MIN 209. This would be for a temporary period during the mineral extraction operations at MIN 209, MIN 210 and MIN 211. Once mineral extraction has ceased the plant site will then be required to be removed and the site restored to wet grassland with ponds. Restoration would be to a lower level and therefore the proposals do not include any waste management operations.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
	<p>number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. It is noted that there are 60 residential properties within 250m of the proposed extraction area of site MIN 209, but none are within 100m. The village of Earsham is over 100m away from the proposed extraction area of site MIN 209. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 93060  Respondent: <b>Ms K Squire [18339]</b>  I am writing to voice my objections to the three sites proposed for gravel extraction by Earsham Gravel Ltd In Earsham (Min 209, 210 and 211). My objections and concerns around the proposals and the way they have been communicated are as follows:</p> <p>Concerns around communications and insufficient consultation:  * There has been a distinct lack of transparency and communication around this proposal. Only residents within a small radius of the proposed sites have been informed by post (even some within the designated radius didn't receive a letter). Many people in the village are only now finding out about the application with only a matter of days before the consultation closes.  * The proposal report has not been made readily available, there are many elderly people in the village for whom viewing documents online and sending emails isn't an</p>	<p>Objection noted.  The consultation period was for six weeks. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.  Responses to the consultation could be submitted by the consultation website, by email or letter. The consultation documents were made available in accordance with the adopted NCC Statement of Community Involvement.  The map in the consultation document uses an ordnance survey base map and shows all of the village of Earsham. Individual</p>



Representations received about site MIN 209	Norfolk County Council Planning Officer's response
<p>option. Although some print copies were available in Libraries these were not located in the village and would require transportation to go and view.</p> <p>* The map on the proposal application is misleading, I am not sure of the age of the map but it doesn't show any indication of the housing that would be directly opposite the proposed site at the end of Hall Road (station road etc). (the map wasn't even provided in the letter to residents)</p> <p>Concerns around the impact of the proposed Gravel extraction sites (material considerations and social impact):</p> <p>* The sites are extremely close to the village and the dust, noise and emissions would negatively impact residents.</p> <p>* Hall road is used by residents and visitors as a tranquil place of beauty and nature for walks and recreation leading on to Pheasants walk and many other natural public paths. The traffic of heavy vehicles would spoil this and make Earsham a less attractive place for visitors and residents alike. This could impact on business for the attractions we have such as the Wetland centre and our lovely Village pub and would be disruptive to the habitats of the varied wildlife in the area.</p> <p>* Although it is proposed that the sites would eventually be turned into natural areas there is no mention if these would be public and available for the village residents to enjoy or be used for other purposes.</p>	<p>houses are not shown on the map due to the scale of the map used. However, the location of properties was taken into account in the site assessment undertaken by planning officers. The map of the Earsham sites was not provided in the letter to residents because a standard letter was sent to all addresses located within 250m of any of the 45 potential mineral extraction sites.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019.</p> <p>Whilst there are 60 residential properties within 250m of the proposed extraction area of site MIN 209, none of them are within 100m of the proposed extraction area as the village of Earsham is over 100m from the site. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Site MIN 209 is over 300m away from Earsham wetland centre, which is on the opposite side of the A143 and no adverse impacts are expected.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
	<p>adverse impact on the safety and capacity of the road network, road users and pedestrians.</p> <p>With regards to the issue of adverse impacts on local businesses (such as the village pub), this is not a material planning consideration given that the planning system is not in place to protect private interests of one another.</p> <p>The site is currently an arable field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The site is proposed to be restored to wet grassland with ponds for a nature conservation afteruse which would result in a long term biodiversity improvement. The current site restoration proposal does not include public access.</p>
<p><b>(Object)</b> Representation ID: 93033</p> <p>Respondent: <b>Mr P Miles [18337]</b></p> <p>I would like to object to the proposed mineral and gravel extraction at the sites along the A143 corridor in the vicinity of Fritton and Earsham. I am a resident of Belton and regularly use the A143 which is the main access point for the village. I am concerned about the increase in heavy good vehicles along this single carriageway road that these proposed developments will bring. This is due to increased exhaust fumes damaging health, increased wear and tear to the road surface and historic buildings, noise and vibrations spoiling peace and quiet, increased traffic jams &amp; congestion on what is already a busy and often dangerous road.</p> <p>I would also like to object due to the loss of habitat to wildlife and green space. This is especially important with the proposed developments being so close to the broads</p>	<p>Objection noted.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The site is currently an arable field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
<p>national park and the detrimental affect to tourism which is essential to the local economy.</p> <p>I do not wish for my health to be affected by increases in particles from both vehicle emissions and from the mineral extraction itself.</p> <p>For these reasons I specifically object to the developments proposed at Waveney Forrest / Fritton Woods and at Earsham and any other sites located or requiring access to the A143 and therefore impacting on my quality of life at Belton.</p>	<p>feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The proximity of the Earsham sites to the Broads Authority Executive Area is noted. The extraction area of site MIN 209 is over 200m from the boundary of the Broads Authority Executive Area. Site MIN 209 is currently an arable field. The M&amp;WLPR consultation document assesses the potential landscape impact of extraction at the proposed site MIN 209 as follows: "The impact of the proposed mineral working on the wider landscape would predominantly be the decreased long distance views and increased roadside vegetation due to bunding and advanced planting to screen the mineral working from view." Norfolk County Council's Local List for the Validation of Planning Applications' requires a Landscape and Visual Impact Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the appearance, quality and character of the landscape and countryside.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 92999</p> <p>Respondent: <b>Mr L &amp; Mrs C Hare [17496]</b></p> <p>Question 80 - MIN 209</p> <p>We strongly disagree with this site being used to extract gravel. Comments: - The</p>	<p>The contents of the Initial Consultation document are not a planning application, the Earsham sites are proposed as mineral site allocations in the Local Plan. If MIN 209 was considered suitable for allocation following examination by a Planning</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
<p>application by Mr Bennett, the owner of Earsham Gravels is seriously flawed and makes light of serious issues. The map used in the application is years old and does not show 'the village' of Earsham as it stands today. There are no residential roads shown by either sidings, Station Road, Beach Tree Way or the location and number of people's homes or the nearby sheltered housing complex. We own a property on Hall Road which is not shown and is probably the nearest to MIN 209. The application states it is 118 metres from the site boundary. Then goes on to admit dust impacts are uncommon beyond 250 metres.</p> <p>If I was a newt no disturbance would be allowed within 500 metres, but then we are only a pair of elderly humans trying to live out our retirement in peace, as are our neighbours.</p> <p>58 sensitive 'receptors' within 250 metres of the site? 'Receptors', do they mean people's homes? If so, say so.</p> <p>'Settlement' of Earsham. It is not a settlement it is a full blown village with 200 plus houses and still expanding. A church, village green, village hall, in which Parish Councillor Bennett sits on the parish council meetings. A pub owned by Mr Bennett. Is this just another attempt to dumb down the area? Earsham Gravel company has raped most of the countryside around Bath Hills and now seems set on raping the last bits of land near the village. MIN 209 must be kept as a buffer zone and remain agricultural land. Mr Bennett has stated if he gets permission he will move all his processing plant from Bath Hills to the Hall Road end of MIN 209. So not just dust but noise as well for Earsham residents.</p> <p>There are public rights of way adjacent to site MIN 209 Pheasant Walk which runs between MIN 209 and MIN 210 is a redundant public road which has been blocked to vehicles and is popular with pedestrians and dog walkers and Hall Road (C365) the proposed access route for HGVs (46 movements a day) is part of the long distance 'Angles Way' footpath, a popular path for hikers and bikers.</p> <p>MIN 209 and the field opposite (the other side of the A143) is an important site for day time roosting and feeding for lapwings in the autumn and early winter. What will happen to them?</p> <p>We have no wish to see Earsham Gravels Ltd go out of business. We have no objections to MIN 210. We understand there is a vast seem stretching from MIN 210 all the way to</p>	<p>inspector, a planning application would be required prior to any future development. While the site was proposed by Earsham Gravels, the contents of the Initial Consultation document including the assessments and maps have been carried out by Planning Officers at Norfolk County Council.</p> <p>The map in the consultation document used the most current available Ordnance Survey base map and shows all of the village of Earsham. Individual houses are not shown on the map due to the scale of the map used. However, the location of properties was taken into account in the site assessment undertaken by planning officers. The map could be viewed in more detail on the consultation website where the scale could be varied to see individual houses.</p> <p>The Initial Consultation document states that '<b>Even without mitigation</b>, adverse dust impacts from sand and gravel sites are uncommon beyond 250m from the nearest dust generating activities. The greatest impacts will be within 100 metres of a source, <b>if uncontrolled.</b>' The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The term 'sensitive receptors' is used in planning for land uses which may be adversely affected by amenity impacts, such as noise and dust. This includes residential dwellings but may include other uses such as schools, hospitals etc.</p> <p>Settlement is a term used in national government planning policy. It is a term applied to all scales of human habitation from</p>

<b>Representations received about site MIN 209</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Harleston. Surely a site can be found further up the valley, away from peoples homes with direct access to the A143 and leave the village of Earsham in peace. Please turn down this application for MIN 209 and MIN 211, a gravel pit has no place beside a village.</p>	<p>hamlets to metropolitan conurbations and does not indicate any particular size or importance.</p> <p>The draft site policy states that 'Submission of a Landscape and Visual Impact Assessment which will identify any potential impacts to the wider landscape and suggest appropriate mitigation measures, particularly regarding views from nearby properties, and long-range views from the Waveney Valley and the Broads Authority Executive Area.'</p> <p>It is proposed for the site to be restored to a wet grassland nature conservation use, this would form part of any future planning application, and if granted would be controlled by planning condition.</p> <p>The Highway Authority considers that with improvements the highway access is suitable. The volume of HGV movements proposed is the same as the existing permitted mineral operations so does not represent an increase.</p> <p>Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment. Therefore, any surveys of potential lapwing habitats would be carried out by the applicant and submitted as part of a planning application for assessment.</p> <p>The Minerals Local Plan Review can only consider those sites put forward by mineral operators and/or landowners. Deliverability is a key consideration for Local Plans; and therefore, specific sites must be proposed with a willing</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
	<p>landowner otherwise they would be very unlikely to be found sound for inclusion, by a Planning Inspector at examination.</p> <p>The route of the Angles Way long distance trail does not include Hall Road or Pheasants Walk. The Angles Way walk goes along Bath Hills Road which is used as the HGV access route from the existing plant site, but it avoids Hall Road. Therefore, the proposed HGV access along Hall Road would not be expected to affect the Angles Way walk.</p>
<p><b>(Object)</b> Representation ID: 92524 Respondent: <b>Mr J Brown [17497]</b></p> <p>I would like to object to the proposed extraction site near my house on Hall Road, Earsham. As my house is within 250 metres of the proposed extraction site, I am concerned about the increased lorry traffic, noise and dust.</p>	<p>Objection noted.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 92493</p> <p>Respondent: <b>Ms Z Sprake [17994]</b></p> <p>I have only just heard about the application for extensions to Earsham Gravel Ltd's mineral extraction sites. I am very surprised that there has not been full consultation in the village as, the last time a major extension was proposed to Earsham Gravel, there was a display of the proposals in the village hall and local people were notified and</p>	<p>Objection noted.</p> <p>The contents of the Initial Consultation document are not a planning application, the Earsham sites are proposed as mineral site allocations in the Local Plan. The previous consultation that is referred to would have been for a planning application and the display in the village hall would have been arranged by the applicants (Earsham Gravels Ltd). A planning application has</p>

<b>Representations received about site MIN 209</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>encouraged to comment. This time, only a few people have received notification and little publicity has been given, with a short public consultation period.</p> <p>Having read the proposal for each site, a number of questions and points of comment come to mind. I recognise that Earsham Gravel Ltd is a valued local business and that it needs new sites for ongoing development; also that the local gravel is prized throughout the country. However, I think that there should be genuine local consultation, not the absolute minimum possible, and that people need to have their concerns addressed before the application goes to the next stage. For this reason, I object to the proposed expansion of Earsham Gravel Ltd's sites in Earsham and ask for an extended consultation period, with full communication to all residents of the village and answers to questions raised.</p> <p>The Initial Consultation Policies document states (4g) that the planning period extends to October 2020 and specific planning permission would follow that, yet the application for the site MIN 209 gives a potential start date of 2018 - that is, within the next four months. The dates for each project follow each other closely with no apparent allowance given for preparation or restoration, yet the documents also state that there will not be an overlap of projects and I would like to know a clearer timeframe of the whole procedure.</p> <p>Restoration, in each case, is proposed to be wet grassland with ponds, landscaping etc and "geological exposure" (whatever that means) but whether that would be a public amenity, enclosed wildlife sanctuary, commercial or private fishing lakes, or anything else is not said. In addition, some 18 hectares of agricultural land will be permanently lost.</p> <p>The land under consideration is at the bottom of a hill and, even with bundings in place to hide the sites from the village and main road, I wonder how much dust will be likely to drift towards the village over the main road and how much noise and visible disruption will affect those on higher ground. Two of the three sites are right by the A143 and I note that noise and dust assessments will be carried out and trust that careful consideration will be given to the results of the assessments.</p> <p>In the plan for MIN 211, under Landscape, it is stated that part of the proposal is for the plant site to be moved into a restored area of the existing quarry site. However, it says</p>	<p>not been submitted for the Earsham sites proposed in the Minerals and Waste Local Plan Review at the current time (June 2019). If a planning application is submitted then there will also be a formal public consultation period on the planning application as part of the decision making process.</p> <p>The Initial public consultation period was for six weeks. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in summer 2019.</p> <p>Earsham Gravels had stated a proposed start date for the first site (MIN 209) of 2018. However, a planning application has not been submitted yet for the site (as at June 2019) and therefore the expected start date has been moved to 2019.</p> <p>The time period for the production of the Norfolk Minerals and Waste Local Plan Review (with to public consultation periods, a formal representations procedure and examination in public with an independent Planning Inspector) is expected to take until 2021. However, a planning application is expected to be submitted for the Earsham sites in 2019. The time period for determining a planning application for mineral extraction is 13 or 16 weeks (unless an extension of time is agreed between the County Council and the applicant). Therefore it would be possible for a planning application for mineral extraction to be determined prior to the adoption of the Minerals and Waste Local Plan. The current proposed timescales for extraction are</p>

<b>Representations received about site MIN 209</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>it would be "preferable" for the plant site to be moved into one of the extension areas. This, slipped in so casually, is quite startling. I can see that, for the business of Earsham Gravel itself, it would be of great benefit to have the plant site by the main road rather than a long way down the single track Bath Hills Road. However, it's a huge, ugly area with great heaps of gravel and many lorries coming and going and the advantage of its present placement is that it affects very few residents. It's stated that it would be a "landscape improvement," but for whom or what? If one site is replaced by another, there is no overall improvement and there certainly would be a great impact on the new site; which would then not be restored as wet grassland.</p> <p>I see that the estimated number of vehicle movements would be the same, but over a longer period - does this mean per day? The meaning is unclear and no explanation is given why the same number of vehicle movements needs a longer period of use.</p> <p>Having only just read the application documents today and yet having immediately seen so many points that need to be clarified and addressed, I do hope that my concerns and objections are considered; initially in regard to the request for further public consultation.</p>	<p>MIN 209 (2019-2024), MIN 210 (2030-2039), MIN 211 (2024-2030). No further details on the phasing of the sites are currently available, but would be required at the planning application stage.</p> <p>The current restoration proposal is not for fishing lakes or an enclosed wildlife sanctuary and does not include public access. It is recognised that this would lead to a permanent loss of agricultural land, however, the proposed restoration would lead to a biodiversity improvement.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The current plant site is located within the Broads Authority Executive Area which has the highest status of landscape protection. Therefore, it would be preferable for the plant site to not be located there and the restoration of the existing plant site would lead to a landscape improvement. The plant site is therefore proposed to be moved into site MIN 209 for a temporary period during the operation of sites MIN 209, MIN 210 and MIN 211 and the plant site would then be required to be removed and site MIN 209 restored to wet grassland.</p> <p>The number of HGV movements per day from site MIN 209 will be the same as the number of HGV movements per day produced by the existing mineral extraction site at Earsham. Therefore there would not be any increase in the total number of HGV movements per day, because the new site would replace the old site. However, the vehicle movements would take place over a longer period of time (years) because mineral</p>



Representations received about site MIN 209	Norfolk County Council Planning Officer's response
	<p>extraction would continue to take place in Earsham for more years as once mineral extraction ceases in the old site, mineral extraction would start in a new site. MIN 209, MIN 210 and MIN 211 would be worked one at a time, therefore the total number of HGV movements per day would remain the same as existing, but would continue until 2039 if all three sites were worked. The hours of operation of the new sites are expected to remain the same as the permitted hours of operation of the existing site.</p>
<p><b>(Object)</b> Representation ID: 92421</p> <p>Respondent: <b>Mr &amp; Mrs T &amp; B Lee [17982]</b></p> <p>We have just been informed of this entirely unacceptable proposal to extract minerals from sites adjacent to the A143 at Earsham. The impact to the local environment and quality of life to the residents of Earsham is beyond comprehension.</p> <p>Therefore: I object to the proposed expansion Earsham Gravel Ltd's sites in Earsham and to request an extended consultation period and more transparent communication to residents of the village.</p>	<p>Objection noted.</p> <p>Whilst there are 60 residential properties within 250m of the proposed extraction area of site MIN 209, none of them are within 100m of the proposed extraction area as the village of Earsham is over 100m from the site. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Site MIN 209 is currently an arable field. The M&amp;WLPR consultation document assesses the potential landscape impact of extraction at the proposed site MIN 209 as follows: "The impact of the proposed mineral working on the wider landscape would predominantly be the decreased long distance views and increased roadside vegetation due to bunding and advanced planting to screen the mineral working from view." Norfolk County Council's Local List for the Validation of Planning Applications' requires a Landscape and Visual Impact Assessment to be submitted with any planning application for mineral extraction. A planning application would need to</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
	<p>demonstrate that there would not be an unacceptable adverse impact on the appearance, quality and character of the landscape and countryside.</p> <p>Mineral extraction at site MIN 209 is expected to take six years, however the proposal for the plant site to be located within site MIN 209 for the duration of the mineral extraction operations in sites MIN 210 and MIN 211 means that the plant site would be located within MIN 209 from 2024 until 2039. The site is proposed to be restored to wet grassland with ponds, for a nature conservation afteruse. This would be a long term biodiversity benefit.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation.</p>
<p><b>(Object)</b> Representation ID: 92418</p> <p>Respondent: <b>Mr &amp; Mrs Palmer [17981]</b></p> <p>I object to the proposed expansion of Earsham gravel ltd's site in Earsham and ask to have an extended consultation period and more transparent communications to residents of the village.</p> <p>I live opposite to (within 200m)of the proposed site so would like more information on :</p> <ul style="list-style-type: none"> <li>*the implications of the main road as hall Road will be widened... There is also a foot path opposite (down the side of our house) so would this make it more difficult to cross the road which we do daily to walk our dog.</li> <li>*how will this impact on my property value?</li> <li>*my way of life as at the moment I have the back door open, and the field views (which I understand will be restored after 6years?)</li> </ul>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation.</p> <p>Hall Road is proposed to be widened on one side, between the junction with Bath Hills Road and the A143. There would not be an increase in the number of HGV movements on the A143 because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
<p>*I have a young child and would like to know the working hours as I wouldn't want loud noise when trying to get him to bed.</p> <p>*this will impact on us for the 6 year period.</p> <p>Due to the above concerns what compensation would we be offered? I look forward to hearing from you and answers to my questions.</p>	<p>would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The proposed extraction area for site MIN 209 is around 170m away from your property. The proposed screening for the site includes advanced tree and hedgerow planting on the land to the west of the junction of Hall Road and the A143 and along the boundary of the site with the A143. This planting and bund is expected to screen views of the site from your property.</p> <p>The working hours of the site would be determined at the planning application stage. However, for information, the current Earsham Gravels extraction site has the following permitted operational hours: 7am-6pm Monday to Friday and 7am to 1pm on Saturdays.</p> <p>The expected time period for extraction of site MIN 209 is six years, however the proposal for the plant site to be located within site MIN 209 for the duration of the mineral extraction operations in sites MIN 210 and MIN 211 means that the plant site would be located within MIN 209 from 2024 until 2039. The proposed restoration of site MIN 209 is wet grassland with ponds and trees for a nature conservation afteruse.</p> <p>Property values are not a material planning consideration. Compensation would not be offered and does not form part of the landuse planning process. Earsham Gravels Ltd is a private company and has submitted these sites for consideration into the Minerals and Waste Local Plan Review process. Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan and to determine planning applications for mineral extraction.</p>
<p><b>(Object)</b> Representation ID: 92371 Respondent: <b>Mr P &amp; Mrs C Clarke [17978]</b></p> <p><b>(Object)</b> Representation ID: 92063 Respondent: <b>Mr &amp; Mrs B &amp; C Rivett [17792]</b></p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92072 Respondent: <b>Mr B Lowe [17802]</b></p> <p>We object to the proposed expansion of Earsham Gravel Ltd's sites in Earsham and ask for an extended consultation period and more transparent communications with residents of the village.</p>	<p>public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation.</p>
<p><b>(Comment)</b> Representation ID: 92313</p> <p>Respondent: <b>Dr Murray Gray [1844]</b></p> <p>I write as (a) District Councillor for the Earsham Ward, and (b) a glacial geomorphologist and geodiversity expert (author of 2 editions of the book "Geodiversity: valuing and conserving abiotic nature" (Wiley-Blackwell, 2004 &amp; 2013)).</p> <p>As District Councillor my primary concern is the well-being of residents and the impact on them of quarrying activities. All 3 extension sites have houses nearby where impacts of noise, dust, traffic, etc. will need to be assessed. Site MIN209 is on the opposite side of the A143 to a field that has been submitted for housing allocation in the South Norfolk Council Local Plan, though no decision has been reached on this as yet.</p> <p>As a glacial geomorphologist, the dilemma is that excavation of land often leads to evidence for past processes and environments yet also destroys physical features. Recent research at the existing quarry in Pheasants Walk, Earsham (Proceedings of the Geologists' Association, Vol 129, pps 70-88, 2018) has shed new light on the origin of the Earsham Terrace that has traditionally been interpreted as an outwash terrace deposited from a glacier whose terminus may have lain at Homersfield. The important point is that the gravel terrace and gravels at Earsham are scientifically important and this needs to be taken into account in the allocation sites for gravel extraction in this area. As such I have no objection to site MIN211 on Bath Hills Road which is east of the existing quarry and remote from the main terrace surface below Park Farm. Similarly, on geomorphological grounds, I have no objection to site MIN209 as an extension to the existing quarry. I have more problems with site MIN210 as it extends westwards into the main terrace surface, and would object to its allocation as a gravel extraction extension site.</p>	<p>It is noted that there are 60 residential properties within 250m of the proposed extraction area for site MIN 209, however, none of these are within 100m of the proposed extraction area. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>Noted that there is no geomorphological object to site MIN209.</p>
<p><b>(Object)</b> Representation ID: 92310 Respondent: <b>Ms L Jolly [17955]</b></p> <p><b>(Object)</b> Representation ID: 92307 Respondent: <b>Mr L Green [17954]</b></p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
<p>I object to the proposed expansion of Earsham Gravel Ltd's sites in Earsham and to ask for an extended consultation period and more transparent communications to the residents of Earsham Village.</p> <p>It will clearly impact all residents of the village and yet very few of us were notified or given any information of the proposal, which is unacceptable.</p>	<p>public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p>
<p><b>(Object)</b> Representation ID: 92304 Respondent: <b>Mrs L Wright [17953]</b></p> <p>I am writing to express concerns I have about the three sites proposed for the expansion of Earsham Gravel Ltd In Earsham (Min 209, 210 and 211). My concerns about the proposals and the way they have been communicated are as follows:</p> <ul style="list-style-type: none"> <li>* The map on the proposal application is misleading as it doesn't show most of the housing in the area.</li> <li>* The sites are extremely close to the village and the dust, noise and emissions would negatively impact residents</li> <li>* Only some residents, within a small radius of the proposed sites, have been informed by post with a very short notice period in which to voice any concerns they may have. In addition, many of the residence that would be effected by the expansion of Earsham Gravel are elderly and are unable to access the documents online and would find it difficult to travel to Libraries to access the information.</li> <li>* Widening Hall road and increasing traffic (especially large industrial trucks) would discourage many from using Pheasants walk and other public paths, which would make Earsham a less attractive place for visitors and residents.</li> <li>* long term the proposals have no solid offer of improving the village</li> <li>* the proposals for the site after gravel has been extracted are ambiguous</li> </ul> <p>I feel that there should be an extended consultation period and clear, accessible information provided for the residents of Earsham.</p>	<p>Objection noted.</p> <p>The map used in the consultation document uses an ordnance survey base map and shows all of the village of Earsham. Individual houses are not shown on the map due to the scale of the map used. However, the location of properties was taken into account in the site assessment undertaken by planning officers.</p> <p>Whilst there are 60 residential properties within 250m of the proposed extraction area of site MIN 209, none of them are within 100m of the proposed extraction area as the village of Earsham is over 100m from the site. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
	<p>number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. Mineral extraction at site MIN 209 is expected to take six years. The site is proposed to be restored to wet grassland with ponds, for a nature conservation afteruse. This would be a long term biodiversity benefit.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019.</p>
<p><b>(Object)</b> Representation ID: 92091  Respondent: <b>Mr M Hannant [17809]</b></p> <p>I am writing this email to express my disappointment and objection to the expansion of the gravel quarry in Earsham.</p> <p>As a regular visitor of Earsham and Bungay area I feel that this expansion would have a drastically negative impact on the local area and surrounding landscape. Additional noise, traffic and air pollution are all big concerns (to name just a few) of mine as well as the many friends and family I have who live locally - those of whom will also be writing to address their concerns.</p> <p>I hope that in this case, the needs of the local area and residents will be taken into account (as they clearly haven't been thus far - considering that the efforts of the consultation have been so limited!).</p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>The M&amp;WLPR consultation document assesses the potential landscape impact of extraction at the proposed site MIN 209 as follows: "The impact of the proposed mineral working on the wider landscape would predominantly be the decreased long distance views and increased roadside vegetation due to bunding and advanced planting to screen the mineral working from view." The site is proposed to be restored to a wet grassland with ponds and trees, for a nature conservation</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
	<p>afteruse. Norfolk County Council's Local List for the Validation of Planning Applications' requires a Landscape and Visual Impact Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the appearance, quality and character of the landscape and countryside.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 92057 Respondent: <b>Mrs A Benterman [17800]</b></p> <p><b>(Object)</b> Representation ID: 92045 Respondent: <b>Mrs N Power [17793]</b></p> <p>I am writing to raise my objections regarding the gravel quarry that is being proposed at Earsham. This will spoil the natural beauty of the village, the Wetland centre and public walkways. I am particularly concerned about the noise, traffic, dust and air pollution that will be created, as well as the obvious destruction of the natural habitats of a number of our precious wildlife.</p>	<p>Objection noted. Site MIN 209 is over 300m away from Earsham wetland centre, which is on the opposite side of the A143 and no adverse impacts are expected.</p> <p>Five Acre Lane runs between sites MIN 209 and MIN 210 and is closed to vehicle traffic but open to walkers and cyclists. The existing hedgerows either side of Five Acre Lane would be thickened up and increased in height where required. There would be additional trees planted in the eastern corner of MIN 210 and a screen bund behind the hedge within site MIN 209.</p>

Representations received about site MIN 209	Norfolk County Council Planning Officer's response
	<p>This measures are intended to mitigate potential landscape, noise and dust impacts from the mineral sites on users of Five Acre Lane.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The site is currently an arable field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 92040  Respondent: <b>Ms B Atkins [17788]</b>  I am writing to raise my objections regarding the gravel quarry that is being proposed in Earsham village. Only people within 250 meters of the site got a letter and even some of those residents didn't receive one. So few people have been informed and the</p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial</p>



<b>Representations received about site MIN 209</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>documents and comments form being online means that it is not accessible to everyone in the village. Furthermore, I believe this will effect people outside of the village too in regards to the Wetland centre and public walkways. I am particularly concerned about the noise, traffic, dust and air pollution that will be created, as well as the disruption of the natural habitats home to a number of our wildlife.</p>	<p>Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls. Site MIN 209 is over 300m away from Earsham wetland centre, which is on the opposite side of the A143 and no adverse impacts are expected.</p> <p>Five Acre Lane runs between sites MIN 209 and MIN 210 and is closed to vehicle traffic but open to walkers and cyclists. The existing hedgerows either side of Ten Acre Lane would be thickened up and increased in height where required. There would be additional trees planted in the eastern corner of MIN 210 and a screen bund behind the hedge within site MIN 209. This measures are intended to mitigate potential landscape, noise and dust impacts from the mineral sites on users of Five Acre Lane.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. The site is currently an arable field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning</p>

<b>Representations received about site MIN 209</b>	<b>Norfolk County Council Planning Officer's response</b>
	<p>application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>

**MIN 210**      **land adjacent to the A143, Earsham (Extension Area 2)**

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93198  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93149  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the proposed highway improvements being suitable.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92989  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  Cumulative impacts of these three sites should be assessed. If some or all of the sites are taken forwards, the recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted.  The draft site policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. The draft site policy also requires each extension area to be passed with the other mineral extraction sites in the area so that only one site is worked for extraction at a time. The draft policy also requires a progressive restoration scheme to a wet grassland nature conservation afteruse.</p>
<p><b>(Comment)</b> Representation ID: 92394  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes .  Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.  Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we</p>	<p>Noted</p> <p>Noted</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
<p>strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 207, MIN 208, MIN 209, MIN 210, MIN 211, MIN 212, MIN 79, MIN 80 We support the Council's recommendations for restoration to nature conservation after use on these sites.</p>	<p>Noted. The site is proposed to be restored to wet grassland with landscaping, ponds/ scrape and geological exposure, all to a nature conservation afteruse. The draft site policy requires a progressive restoration scheme to a wet grassland nature conservation afteruse to provide landscape and biodiversity gains.</p>
<p><b>(Comment)</b> Representation ID: 92158 Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b> Please refer to our comments on protected landscapes in our letter of 13 August 2018.</p> <p><b>Protected landscapes</b> Several allocations are either within protected landscapes or lie close to their boundaries or 'settings' which means that the highest sensitivity must be afforded to the landscape. It would be advisable to include a specific policy for protected landscapes within the Plan to reflect their protection as both the Norfolk Coast AONB and The Broads, which has the equivalent status of a national park, may be impacted by minerals development. Any proposal which may affect a protected landscape or its setting should be subject at application stage to a Landscape and Visual Impact Assessment (LVIA) for all stages of the operation.</p> <p>The LVIA should consider how a proposal may impact the statutory purposes for which a protected landscape is designated, including impacts on landscape character and</p>	<p>Noted. The draft site policy for the Preferred Options states that 'Submission of a Landscape and Visual Impact Assessment which will identify any potential impacts to the wider landscape and suggest appropriate mitigation measures, particularly regarding views from nearby properties, and long-range views from the Waveney Valley and the Broads Authority Executive Area.'</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
<p>tranquillity, together with full details of mitigation and restoration. All restoration measures proposed will need to be in keeping with the local landscape character. Consideration should be given to each landscape character's sensitivity and its capacity to accommodate the proposed development. The requirement for a LVIA and mitigation measures should be identified in the Plan for each relevant allocation.</p> <p>Further information needs to be provided for these allocations which demonstrates that impacts to protected landscape features have been avoided where possible, and mitigation measures put in place for those impacts which cannot be avoided, and a programme of monitoring agreed to ensure the measures are effective. The views of the relevant organisation for each protected landscape need to be taken into account fully on these proposed allocations.</p>	
<p><b>(Support)</b> Representation ID: 91916</p> <p>Respondent: <b>Earsham Parish Council (Mrs Lynda Ling) [17695]</b></p> <p>The plans were explained to the parish council in detail, Questions were asked and answered by a representative from Earsham Gravels, and overall parish councillors were happy with the screening of the site and the envisaged noise levels.</p> <p>There appeared to be no increase in vehicle movement and would mean continued employment for the workforce which is important in a rural location such as this.</p> <p>At a recent parish council meeting, members of the public were in attendance and also had the opportunity to discuss their queries with the Earsham Gravels representative.</p>	<p>Support noted.</p>
<p><b>(Comment)</b> Representation ID: 91840</p> <p>Respondent: <b>Broads Authority (Natalie Beal) [16282]</b></p> <p>MIN 209, 210, 211; For information, the Broads Landscape Character Assessment 2016 says that this area is LCA Outney Common and Bath Hills, Industrial / Early post-industrial LCT borders MIN 211. The Authority strongly requests that Norfolk County Council liaise with us regarding this site and the policy prior to the next version of the Local Plan. Support removal of plant site from BA executive area. What will go in its place?</p>	<p>Noted. Following removal of the existing plant site it would be restored in accordance with the current planning permission which includes an area of pasture, an area of wet grassland with a lake and pools, a car park and picnic area. We will continue to liaise with the Broads Authority as requested.</p>
<p><b>(Support)</b> Representation ID: 92054</p>	

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
<p>Agent: Stephen M Daw Limited (Mr S Daw) [143] Respondent: <b>Earsham Gravels Limited [4031]</b></p> <p>Further information is provided in support of this Allocation including alterations to the original submission. This are illustrated on drawings submitted under separate cover, replacing the original versions.</p> <p>The information/alterations comprise:</p> <p>(i) The processing plant site will be relocated out of the Broads Authority Executive Area and into Extraction Area 1. This will take place once sufficient space has been created within the Area to accommodate the plant site, estimated to be 5 years from commencing the development.</p> <p>(ii) The order of working Areas 2 and 3 has been reversed.</p> <p>(iii) Additional screening of the development by means of bunding and advance planting is proposed.</p> <p>(iv) Revised restoration proposals aimed at further increasing biodiversity.</p> <p>(v) A replacement Location Plan to illustrate the extent of a future Application Area.</p> <p>(vi) A replacement Access Plan to reflect the new position of the processing plant site.</p>	<p>The additional information supplied is noted.</p>
<p><b>RESPONSES FROM INDIVIDUALS</b></p>	
<p><b>(Object)</b> Representation ID: 93064</p> <p>Respondent: <b>Ms K Squire [18339]</b></p> <p>I attach a petition from 19 residents of Earsham objecting to the applications as they stand and asking for an extended and more transparent consultation period for all three proposed sites.</p> <p>I hope that you will take into account all of the concerns mentioned above and honour the request for an extended consultation period so that all residents of Earsham can have a fair say in the proposed changes to their village.</p> <p>Action petitioned for:</p> <p>We, the undersigned, are concerned citizens who urge the council and all involved parties to act now to extend the consultation period beyond the initial six weeks and asks that a more thorough consultation be undertaken with all residents.</p>	<p>Objection noted.</p> <p>The Initial Consultation period was for six weeks. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls. The Initial Consultation document included an assessment of the proposed Earsham sites on amenity, landscape, the historic environment, archaeology, highway access, ecology, flood risk and hydrogeology. A planning application has not been</p>

<b>Representations received about site MIN 210</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Written comments made by residents who signed the petition are:</p> <ul style="list-style-type: none"> <li>* concerned about pollution</li> <li>* noise, dust, disturbance</li> <li>* traffic too close to village</li> <li>* too close to housing / too close to village</li> <li>* moving noisy plant closer village, dust from sites.</li> <li>* I don't want noise, dust, lorries in village</li> <li>* undesired affect on Earsham</li> <li>* road construction</li> <li>* sand on verges. What is meant by waste.</li> <li>* Lack of info / not enough information / more information / badly communicated</li> <li>* extended consultation</li> </ul>	<p>submitted for the Earsham sites proposed in the Minerals and Waste Local Plan Review at the current time (June 2019). If a planning application is submitted then there will also be a formal public consultation period on the planning application as part of the decision making process.</p> <p>The plant site is proposed to be moved from its current location within the Broads Authority Executive Area, into site MIN 209. This would be for a temporary period during the mineral extraction operations at MIN 209, MIN 210, and MIN 211. Once mineral extraction has ceased the plant site will then be required to be removed and the site restored to wet grassland with ponds. Restoration would be to a lower level and therefore the proposals do not include any waste management operations.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. It is noted that there are 2 residential properties within 100m of the proposed extraction area of site MIN 210. However, the village of Earsham is approximately 390m away from the proposed extraction area of site MIN 210. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 93061 Respondent: <b>Ms K Squire [18339]</b></p> <p>I am writing to voice my objections to the three sites proposed for gravel extraction by Earsham Gravel Ltd In Earsham (Min 209, 210 and 211). My objections and concerns around the proposals and the way they have been communicated are as follows:</p> <p>Concerns around communications and insufficient consultation:</p> <ul style="list-style-type: none"> <li>* There has been a distinct lack of transparency and communication around this proposal. Only residents within a small radius of the proposed sites have been informed by post (even some within the designated radius didn't receive a letter). Many people in the village are only now finding out about the application with only a matter of days before the consultation closes.</li> <li>* The proposal report has not been made readily available, there are many elderly people in the village for whom viewing documents online and sending emails isn't an option. Although some print copies were available in Libraries these were not located in the village and would require transportation to go and view.</li> <li>* The map on the proposal application is misleading, I am not sure of the age of the map but it doesn't show any indication of the housing that would be directly opposite the proposed site at the end of Hall Road (station road etc). (the map wasn't even provided in the letter to residents)</li> </ul> <p>Concerns around the impact of the proposed Gravel extraction sites (material considerations and social impact):</p> <ul style="list-style-type: none"> <li>* The sites are extremely close to the village and the dust, noise and emissions would negatively impact residents.</li> <li>* Hall road is used by residents and visitors as a tranquil place of beauty and nature for walks and recreation leading on to Pheasants walk and many other natural public paths. The traffic of heavy vehicles would spoil this and make Earsham a less attractive place for visitors and residents alike. This could impact on business for the attractions</li> </ul>	<p>an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Objection noted.</p> <p>The consultation period was for six weeks. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>Responses to the consultation could be submitted by the consultation website, by email or letter. The consultation documents were made available in accordance with the adopted NCC Statement of Community Involvement.</p> <p>The map in the consultation document uses an ordnance survey base map and shows all of the village of Earsham. Individual houses are not shown on the map due to the scale of the map used. However, the location of properties was taken into account in the site assessment undertaken by planning officers. The map of the Earsham sites was not provided in the letter to residents because a standard letter was sent to all addresses located within 250m of any of the 45 potential mineral extraction sites.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019.</p> <p>Whilst there are 2 residential properties within 100m of the proposed extraction area of site MIN 210, the village of Earsham is nearly 400m from the site. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning</p>



<b>Representations received about site MIN 210</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>we have such as the Wetland centre and our lovely Village pub and would be disruptive to the habitats of the varied wildlife in the area.</p> <p>* Although it is proposed that the sites would eventually be turned into natural areas there is no mention if these would be public and available for the village residents to enjoy or be used for other purposes.</p>	<p>application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Site MIN 210 is over 100m away from Earsham wetland centre, which is on the opposite side of the A143 and no adverse impacts are expected.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network, road users and pedestrians.</p> <p>With regards to the issue of adverse impacts on local businesses (such as the village pub), this is not a material planning consideration given that the planning system is not in place to protect private interests of one another.</p> <p>The site is currently used for pig farming and arable farming. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment. The site is proposed to be restored to wet grassland with ponds for a nature conservation afteruse which would result in a long term biodiversity improvement. The current site restoration proposal does not include public access.</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 93034</p> <p>Respondent: <b>Mr P Miles [18337]</b></p> <p>I would like to object to the proposed mineral and gravel extraction at the sites along the A143 corridor in the vicinity of Fritton and Earsham. I am a resident of Belton and regularly use the A143 which is the main access point for the village. I am concerned about the increase in heavy good vehicles along this single carriageway road that these proposed developments will bring. This is due to increased exhaust fumes damaging health, increased wear and tear to the road surface and historic buildings, noise and vibrations spoiling peace and quiet, increased traffic jams &amp; congestion on what is already a busy and often dangerous road.</p> <p>I would also like to object due to the loss of habitat to wildlife and green space. This is especially important with the proposed developments being so close to the broads national park and the detrimental affect to tourism which is essential to the local economy.</p> <p>I do not wish for my health to be affected by increases in particles from both vehicle emissions and from the mineral extraction itself.</p> <p>For these reasons I specifically object to the developments proposed at Waveney Forrest / Fritton Woods and at Earsham and any other sites located or requiring access to the A143 and therefore impacting on my quality of life at Belton.</p>	<p>Objection noted.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. The site is currently used for pig farming and arable farming. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The proximity of the Earsham sites to the Broads Authority Executive Area is noted. The boundary of site MIN 210 is over 500m from the boundary of the Broads Authority Executive Area. Site MIN 210 is currently used for pig farming and arable farming. The M&amp;WLPR consultation document assesses the potential landscape impact of extraction at the proposed site MIN 210 as follows: "The impact of the proposed mineral working on the wider landscape would predominantly be the decreased long distance views and increased roadside vegetation due to bunding and advanced planting to screen the mineral working from view." Norfolk County Council's Local List for the Validation of Planning Applications' requires a Landscape and Visual Impact Assessment to be submitted with</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
	<p>any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the appearance, quality and character of the landscape and countryside.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Comment)</b> Representation ID: 93001 Respondent: <b>Mr L &amp; Mrs C Hare [17496]</b> We have no objections to MIN 210.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 92494 Respondent: <b>Ms Z Sprake [17994]</b></p> <p>I have only just heard about the application for extensions to Earsham Gravel Ltd's mineral extraction sites. I am very surprised that there has not been full consultation in the village as, the last time a major extension was proposed to Earsham Gravel, there was a display of the proposals in the village hall and local people were notified and encouraged to comment. This time, only a few people have received notification and little publicity has been given, with a short public consultation period.</p> <p>Having read the proposal for each site, a number of questions and points of comment come to mind. I recognise that Earsham Gravel Ltd is a valued local business and that it needs new sites for ongoing development; also that the local gravel is prized throughout the country. However, I think that there should be genuine local consultation, not the absolute minimum possible, and that people need to have their concerns addressed before the application goes to the next stage. For this reason, I object to the proposed expansion of Earsham Gravel Ltd's sites in Earsham and ask for</p>	<p>Objection noted.</p> <p>The contents of the Initial Consultation document are not a planning application, the Earsham sites are proposed as mineral site allocations in the Local Plan. The contents of the Initial Consultation document are not a planning application, the Earsham sites are proposed as mineral site allocations in the Local Plan. The previous consultation that is referred to would have been for a planning application and the display in the village hall would have been arranged by the applicants (Earsham Gravels Ltd). A planning application has not been submitted for the Earsham sites proposed in the Minerals and Waste Local Plan Review at the current time (June 2019). If a planning application is submitted then there will also be a formal public consultation period on the planning application as part of the decision making process.</p> <p>The public consultation period was for six weeks. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance</p>

<b>Representations received about site MIN 210</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>an extended consultation period, with full communication to all residents of the village and answers to questions raised.</p> <p>The Initial Consultation Policies document states (4g) that the planning period extends to October 2020 and specific planning permission would follow that, yet the application for the site MIN 209 gives a potential start date of 2018 - that is, within the next four months. The dates for each project follow each other closely with no apparent allowance given for preparation or restoration, yet the documents also state that there will not be an overlap of projects and I would like to know a clearer timeframe of the whole procedure.</p> <p>Restoration, in each case, is proposed to be wet grassland with ponds, landscaping etc and "geological exposure" (whatever that means) but whether that would be a public amenity, enclosed wildlife sanctuary, commercial or private fishing lakes, or anything else is not said. In addition, some 18 hectares of agricultural land will be permanently lost.</p> <p>The land under consideration is at the bottom of a hill and, even with bundings in place to hide the sites from the village and main road, I wonder how much dust will be likely to drift towards the village over the main road and how much noise and visible disruption will affect those on higher ground. Two of the three sites are right by the A143 and I note that noise and dust assessments will be carried out and trust that careful consideration will be given to the results of the assessments.</p> <p>In the plan for MIN 211, under Landscape, it is stated that part of the proposal is for the plant site to be moved into a restored area of the existing quarry site. However, it says it would be "preferable" for the plant site to be moved into one of the extension areas. This, slipped in so casually, is quite startling. I can see that, for the business of Earsham Gravel itself, it would be of great benefit to have the plant site by the main road rather than a long way down the single track Bath Hills Road. However, it's a huge, ugly area with great heaps of gravel and many lorries coming and going and the advantage of its present placement is that it affects very few residents. It's stated that it would be a "landscape improvement," but for whom or what? If one site is replaced by another,</p>	<p>of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019.</p> <p>The previous consultation that is referred to would have been for a planning application and the display in the village hall would have been arranged by the applicants (Earsham Gravels Ltd). A planning application has not been submitted for the Earsham sites proposed in the Minerals and Waste Local Plan Review at the current time (June 2019). If a planning application is submitted then there will also be a formal public consultation period on the planning application as part of the decision making process.</p> <p>Earsham Gravels had stated a proposed start date for the first site (MIN 209) of 2018. However, a planning application has not been submitted yet for the site (as at June 2019) and therefore the expected start date has been moved to 2019.</p> <p>The time period for the production of the Norfolk Minerals and Waste Local Plan Review (with to public consultation periods, a formal representations procedure and examination in public with an independent Planning Inspector) is expected to take until 2021. However, a planning application is expected to be submitted for the Earsham sites in 2019. The time period for determining a planning application for mineral extraction is 13 or 16 weeks (unless an extension of time is agreed between the County Council and the applicant). Therefore it would be possible for a planning application for mineral extraction to be determined prior to the adoption of the Minerals and Waste</p>

<b>Representations received about site MIN 210</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>there is no overall improvement and there certainly would be a great impact on the new site; which would then not be restored as wet grassland.</p> <p>I see that the estimated number of vehicle movements would be the same, but over a longer period - does this mean per day? The meaning is unclear and no explanation is given why the same number of vehicle movements needs a longer period of use.</p> <p>Having only just read the application documents today and yet having immediately seen so many points that need to be clarified and addressed, I do hope that my concerns and objections are considered; initially in regard to the request for further public consultation.</p>	<p>Local Plan. The current proposed timescales for extraction are MIN 209 (2019-2024), MIN 210 (2030-2039), MIN 211 (2024-2030). No further details on the phasing of the sites are currently available, but would be required at the planning application stage.</p> <p>The current restoration proposal is not for fishing lakes or an enclosed wildlife sanctuary and does not include public access. It is recognised that this would lead to a permanent loss of agricultural land (although the majority of site MIN 210 is currently used for pig farming which indicates a lower quality of agricultural land), however, the proposed restoration would lead to a biodiversity improvement.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The current plant site is located within the Broads Authority Executive Area which has the highest status of landscape protection. Therefore, it would be preferable for the plant site to not be located there and the restoration of the existing plant site would lead to a landscape improvement. The plant site is therefore proposed to be moved into site MIN 209 for a temporary period during the operation of sites MIN 209, MIN 210 and MIN 211 and the plant site would then be required to be removed and site MIN 209 restored to wet grassland.</p> <p>The number of HGV movements per day from site MIN 211 will be the same as the number of HGV movements per day produced by the existing mineral extraction site at Earsham. Therefore there would not be any increase in the total number</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
	<p>of HGV movements per day, because the new site would replace the old site. However, the vehicle movements would take place over a longer period of time (years) because mineral extraction would continue to take place in Earsham for more years as once mineral extraction ceases in the old site, mineral extraction would start in a new site. MIN 209, MIN 210 and MIN 211 would be worked one at a time, therefore the total number of HGV movements per day would remain the same as existing, but would continue until 2039 if all three sites were worked. The hours of operation of the new sites are expected to remain the same as the permitted hours of operation of the existing site.</p>
<p><b>(Object)</b> Representation ID: 92422</p> <p>Respondent: <b>Mr T &amp; Mrs B Lee [17982]</b></p> <p>We have just been informed of this entirely unacceptable proposal to extract minerals from sites adjacent to the A143 at Earsham. The impact to the local environment and quality of life to the residents of Earsham is beyond comprehension.</p> <p>Therefore: I object to the proposed expansion Earsham Gravel Ltd's sites in Earsham and to request an extended consultation period and more transparent communication to residents of the village.</p>	<p>Objection noted.</p> <p>Whilst there are 2 residential properties within 100m of the proposed extraction area of site MIN 210, the village of Earsham is nearly 400m from the site. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Site MIN 210 is currently used for pig farming and arable farming. The M&amp;WLPR consultation document assesses the potential landscape impact of extraction at the proposed site MIN 210 as follows: "The impact of the proposed mineral working on the wider landscape would predominantly be the decreased long distance views and increased roadside vegetation due to bunding and advanced planting to screen the mineral working from view." Norfolk County Council's Local List for the Validation of Planning Applications' requires a</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
	<p>Landscape and Visual Impact Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the appearance, quality and character of the landscape and countryside.</p> <p>Mineral extraction at site MIN 210 is expected to take nine years and the proposed restoration of the site is wet grassland with ponds/scrapes and tree planting, for a nature conservation afteruse. This would be a long term biodiversity benefit.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation.</p>
<p><b>(Object)</b> Representation ID: 92419  Respondent: <b>Mr &amp; Mrs Palmer [17981]</b>  I object to the proposed expansion of Earsham gravel ltd's site in Earsham and ask to have an extended consultation period and more transparent communications to residents of the village.  I would like more information on :  *the implications of the main road as hall Road will be widened... There is also a foot path opposite (down the side of our house) so would this make it more difficult to cross the road which we do daily to walk our dog.  *how will this impact on my property value?  *my way of life as at the moment I have the back door open, and the field views (which I understand will be restored after 6years?)  *I have a young child and would like to know the working hours as I wouldn't want loud noise when trying to get him to bed.</p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation.</p> <p>Hall Road is proposed to be widened on one side, between the junction with Bath Hills Road and the A143. There would not be an increase in the number of HGV movements on the A143 because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
<p>*this will impact on us for the 6 year period.</p> <p>Due to the above concerns what compensation would we be offered? I look forward to hearing from you and answers to my questions.</p>	<p>The proposed extraction area for site MIN 210 is over 560m away from your property to the west. The proposed screening for the sites includes advanced tree and hedgerow planting all along the boundary with the A143 and on the land to the west of the junction of Hall Road and the A143. This planting would screen views of site MIN 210 from your property.</p> <p>The working hours of the site would be determined at the planning application stage. However, for information, the current Earsham Gravels extraction site has the following permitted operational hours: 7am-6pm Monday to Friday and 7am to 1pm on Saturdays.</p> <p>The expected time period for extraction of site MIN 210 is nine years and the proposed restoration of site MIN 210 is wet grassland with ponds/scrapes and tree planting, for a nature conservation afteruse.</p> <p>Property values are not a material planning consideration. Compensation would not be offered and does not form part of the landuse planning process. Earsham Gravels Ltd is a private company and has submitted these sites for consideration into the Minerals and Waste Local Plan Review process. Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan and to determine planning applications for mineral extraction.</p>
<p><b>(Object)</b> Representation ID: 92092</p> <p>Respondent: <b>Mr M Hannant [17809]</b></p> <p>I am writing this email to express my disappointment and objection to the expansion of the gravel quarry in Earsham.</p> <p>As a regular visitor of Earsham and Bungay area I feel that this expansion would have a drastically negative impact on the local area and surrounding landscape. Additional noise, traffic and air pollution are all big concerns (to name just a few) of mine as well</p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise</p>



<b>Representations received about site MIN 210</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>as the many friends and family I have who live locally - those of whom will also be writing to address their concerns.</p> <p>I hope that in this case, the needs of the local area and residents will be taken into account (as they clearly haven't been thus far - considering that the efforts of the consultation have been so limited!).</p>	<p>and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>The M&amp;WLPR consultation document assesses the potential landscape impact of extraction at the proposed site MIN 210 as follows: "The impact of the proposed mineral working on the wider landscape would predominantly be the decreased long distance views and increased roadside vegetation due to bunding and advanced planting to screen the mineral working from view." The site is proposed to be restored to wet grassland with ponds/scrapes and trees, for a nature conservation afteruse. Norfolk County Council's Local List for the Validation of Planning Applications' requires a Landscape and Visual Impact Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the appearance, quality and character of the landscape and countryside.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92314 Respondent: <b>Dr Murray Gray [1844]</b></p> <p>I write as (a) District Councillor for the Earsham Ward, and (b) a glacial geomorphologist and geodiversity expert (author of 2 editions of the book "Geodiversity: valuing and conserving abiotic nature" (Wiley-Blackwell, 2004 &amp; 2013)).</p> <p>As District Councillor my primary concern is the well-being of residents and the impact on them of quarrying activities. All 3 extension sites have houses nearby where impacts of noise, dust, traffic, etc. will need to be assessed. Site MIN209 is on the opposite side of the A143 to a field that has been submitted for housing allocation in the South Norfolk Council Local Plan, though no decision has been reached on this as yet.</p> <p>As a glacial geomorphologist, the dilemma is that excavation of land often leads to evidence for past processes and environments yet also destroys physical features. Recent research at the existing quarry in Pheasants Walk, Earsham (Proceedings of the Geologists' Association, Vol 129, pps 70-88, 2018) has shed new light on the origin of the Earsham Terrace that has traditionally been interpreted as an outwash terrace deposited from a glacier whose terminus may have lain at Homersfield. The important point is that the gravel terrace and gravels at Earsham are scientifically important and this needs to be taken into account in the allocation sites for gravel extraction in this area. As such I have no objection to site MIN211 on Bath Hills Road which is east of the existing quarry and remote from the main terrace surface below Park Farm. Similarly, on geomorphological grounds, I have no objection to site MIN209 as an extension to the existing quarry. I have more problems with site MIN210 as it extends westwards into the main terrace surface, and would object to its allocation as a gravel extraction extension site.</p>	<p>that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Objection noted. The draft site policy for Preferred Options states that any future mineral development would require 'Submission of noise and dust assessments and a programme of mitigation measures to deal appropriately with any amenity impacts'.</p> <p>The potential geodiversity interest of the site is recognised. The draft site policy states that any future mineral development would be required to include 'Provision of opportunities during working for any geodiversity assets to studied, and if compatible with the landscape and ecology objectives an open face to be included within any restoration scheme for future scientific study'. The area of land close to Park Farm (MIN 07) was proposed for potential mineral extraction in the previous iteration of the Minerals Local Plan. Following examination it was concluded that this was unsuitable for mineral extraction due to its geological value, thus retaining the feature on that site insitu.</p>
<p><b>(Object)</b> Representation ID: 92311 Respondent: <b>Ms L Jolly [17955]</b> <b>(Object)</b> Representation ID: 92308 Respondent: <b>Mr L Green [17954]</b></p> <p>I object to the proposed expansion of Earsham Gravel Ltd's sites in Earsham and to ask for an extended consultation period and more transparent communications to the</p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
<p>residents of Earsham Village. It will clearly impact all residents of Earsham village and yet very few of us were notified or given any information of the proposal, which is unacceptable.</p>	<p>proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p>
<p><b>(Object)</b> Representation ID: 92305 Respondent: <b>Mrs L Wright [17953]</b></p> <p>I am writing to express concerns I have about the three sites proposed for the expansion of Earsham Gravel Ltd In Earsham (Min 209, 210 and 211). My concerns about the proposals and the way they have been communicated are as follows:</p> <ul style="list-style-type: none"> <li>* The map on the proposal application is misleading as it doesn't show most of the housing in the area.</li> <li>* The sites are extremely close to the village and the dust, noise and emissions would negatively impact residents</li> <li>* Only some residents, within a small radius of the proposed sites, have been informed by post with a very short notice period in which to voice any concerns they may have. In addition, many of the residence that would be effected by the expansion of Earsham Gravel are elderly and are unable to access the documents online and would find it difficult to travel to Libraries to access the information.</li> <li>* Widening Hall road and increasing traffic (especially large industrial trucks) would discourage many from using Pheasants walk and other public paths, which would make Earsham a less attractive place for visitors and residents.</li> <li>* long term the proposals have no solid offer of improving the village</li> <li>* the proposals for the site after gravel has been extracted are ambiguous</li> </ul> <p>I feel that there should be an extended consultation period and clear, accessible information provided for the residents of Earsham.</p>	<p>Objection noted.</p> <p>The map used in the consultation document uses an ordnance survey base map and shows all of the village of Earsham. Individual houses are not shown on the map due to the scale of the map used. However, the location of properties was taken into account in the site assessment undertaken by planning officers.</p> <p>Whilst there are 2 residential properties within 100m of the proposed extraction area of site MIN 210, the village of Earsham is nearly 400m from the site. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
	<p>Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>Mineral extraction at site MIN 211 is expected to take six years. The site is proposed to be restored to wet grassland with ponds, for a nature conservation afteruse. This would be a long term biodiversity benefit.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019.</p>
<p><b>(Object)</b> Representation ID: 92372 Respondent: <b>Mr &amp; Mrs Clarke [17978]</b></p> <p><b>(Object)</b> Representation ID: 92073 Respondent: <b>Mr B Lowe [17802]</b></p> <p><b>(Object)</b> Representation ID: 92064 Respondent: <b>Mr &amp; Mrs Rivett [17792]</b></p> <p>We object to the proposed expansion of Earsham Gravel Ltd's sites in Earsham and ask for an extended consultation period and more transparent communications with residents of the village.</p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation.</p>
<p><b>(Object)</b> Representation ID: 92058 Respondent: <b>Mrs A Benterman [17800]</b></p> <p><b>(Object)</b> Representation ID: 92046 Respondent: <b>Mrs N Power [17793]</b></p> <p>I am writing to raise my objections regarding the gravel quarry that is being proposed at Earsham. This will spoil the natural beauty of the village, the Wetland centre and public walkways. I am particularly concerned about the noise, traffic, dust and air pollution that will be created, as well as the obvious destruction of the natural habitats of a number of our precious wildlife.</p>	<p>Objection noted. Site MIN 210 is over 100m away from Earsham wetland centre, which is on the opposite side of the A143 and no adverse impacts are expected.</p> <p>Five Acre Lane runs between sites MIN 209 and MIN 210 and is closed to vehicle traffic but open to walkers and cyclists. The existing hedgerows either side of Ten Acre Lane would be thickened up and increased in height where required. There would be additional trees planted in the eastern corner of MIN 210 and a screen bund behind the hedge within site MIN 209. This measures are intended to mitigate potential landscape, noise and dust impacts from the mineral sites on users of Five</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
	<p>Acre Lane. The existing hedges along the boundary of MIN 210 and Pheasants Walk would also be thickened and increased in height where required to provide similar mitigation.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network, the safety of road users and pedestrians.</p> <p>Site MIN 210 is currently used for pig farming and arable farming. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 92041 Respondent: <b>Ms B Atkins [17788]</b></p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring</p>

<b>Representations received about site MIN 210</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>I am writing to raise my objections regarding the gravel quarry that is being proposed in Earsham village. Only people within 250 meters of the site got a letter and even some of those residents didn't receive one. So few people have been informed and the documents and comments form being online means that it is not accessible to everyone in the village. Furthermore, I believe this will effect people outside of the village too in regards to the Wetland centre and public walkways. I am particularly concerned about the noise, traffic, dust and air pollution that will be created, as well as the disruption of the natural habitats home to a number of our wildlife.</p>	<p>2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls. Site MIN 210 is over 100m away from Earsham wetland centre, which is on the opposite side of the A143 and no adverse impacts are expected.</p> <p>Five Acre Lane runs between sites MIN 209 and MIN 210 and is closed to vehicle traffic but open to walkers and cyclists. The existing hedgerows either side of Ten Acre Lane would be thickened up and increased in height where required. There would be additional trees planted in the eastern corner of MIN 210 and a screen bund behind the hedge within site MIN 209. This measures are intended to mitigate potential landscape, noise and dust impacts from the mineral sites on users of Five Acre Lane. The existing hedges along the boundary of MIN 210 and Pheasants Walk would also be thickened and increased in height where required to provide similar mitigation.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. Site MIN 210 is currently used for pig farming and arable farming. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and</p>

Representations received about site MIN 210	Norfolk County Council Planning Officer's response
	<p>Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>

**MIN 211 land west of Bath Hills Road, Earsham (Extension Area 3)**

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
<p>(<b>Comment</b>) Representation ID: 93199  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p>(<b>Comment</b>) Representation ID: 93150  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the proposed highway improvements being suitable.</p>	<p>Noted</p>
<p>(<b>Comment</b>) Representation ID: 92990  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  Cumulative impacts of these three sites should be assessed. If some or all of the sites are taken forwards, the recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted.  The draft site policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. The draft site policy also requires each extension area to be passed with the other mineral extraction sites in the area so that only one site is worked for extraction at a time. The draft policy also requires a progressive restoration scheme to a wet grassland nature conservation afteruse.</p>
<p>(<b>Comment</b>) Representation ID: 92395  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes .  Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.  Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we</p>	<p>Noted</p> <p>Noted</p>



Representations received about site MIN 211	Norfolk County Council Planning Officer's response
<p>strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 207, MIN 208, MIN 209, MIN 210, MIN 211, MIN 212, MIN 79, MIN 80 We support the Council's recommendations for restoration to nature conservation after use on these sites.</p>	<p>Noted. The site is proposed to be restored to wet grassland with landscaping, ponds/ scrape and geological exposure, all to a nature conservation afteruse. The draft site policy requires a progressive restoration scheme to a wet grassland nature conservation afteruse to provide landscape and biodiversity gains.</p>
<p><b>(Support)</b> Representation ID: 91917 Respondent: <b>Earsham Parish Council (Mrs Lynda Ling) [17695]</b> The plans were explained to the parish council in detail, Questions were asked and answered by a representative from Earsham Gravels, and overall parish councillors were happy with the screening of the site and the envisaged noise levels. There appeared to be no increase in vehicle movement and would mean continued employment for the workforce which is important in a rural location such as this. At a recent parish council meeting, members of the public were in attendance and also had the opportunity to discuss their queries with the Earsham Gravels representative.</p>	<p>Support noted</p>
<p><b>(Comment)</b> Representation ID: 91841 Respondent: <b>Broads Authority (Natalie Beal) [16282]</b> MIN 209, 210, 211; For information, the Broads Landscape Character Assessment 2016 says that this area is LCA Outney Common and Bath Hills, Industrial / Early post-</p>	<p>Noted. Following removal of the existing plant site it would be restored in accordance with the current planning permission which includes an area of pasture, an area of wet grassland with</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
<p>industrial LCT borders MIN 211. The Authority strongly requests that Norfolk County Council liaise with us regarding this site and the policy prior to the next version of the Local Plan. Support removal of plant site from BA executive area. What will go in its place?</p>	<p>a lake and pools, a car park and picnic area. We will continue to liaise with the Broads Authority as requested.</p>
<p><b>(Support)</b> Representation ID: 92056 Agent: Stephen M Daw Limited (Mr S Daw) [143] Respondent: <b>Earsham Gravels Limited [4031]</b></p> <p>Further information is provided in support of this Allocation including alterations to the original submission. This are illustrated on drawings submitted under separate cover, replacing the original versions. The information/alterations comprise:</p> <ul style="list-style-type: none"> <li>(i) The processing plant site will be relocated out of the Broads Authority Executive Area and into Extraction Area 1. This will take place once sufficient space has been created within the Area to accommodate the plant site, estimated to be 5 years from commencing the development.</li> <li>(ii) The order of working Areas 2 and 3 has been reversed.</li> <li>(iii) Additional screening of the development by means of bunding and advance planting is proposed.</li> <li>(iv) Revised restoration proposals aimed at further increasing biodiversity.</li> <li>(v) A replacement Location Plan to illustrate the extent of a future Application Area.</li> <li>(vi) A replacement Access Plan to reflect the new position of the processing plant site.</li> </ul>	<p>The additional information supplied is noted.</p>
<b>RESPONSES FROM INDIVIDUALS</b>	
<p><b>(Object)</b> Representation ID: 93065 Respondent: <b>Ms K Squire [18339]</b></p> <p>I attach a petition from 19 residents of Earsham objecting to the applications as they stand and asking for an extended and more transparent consultation period for all three proposed sites.</p>	<p>Objection noted. The Initial Consultation period was for six weeks. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity</p>

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<p>I hope that you will take into account all of the concerns mentioned above and honour the request for an extended consultation period so that all residents of Earsham can have a fair say in the proposed changes to their village.</p> <p>Action petitioned for: We, the undersigned, are concerned citizens who urge the council and all involved parties to act now to extend the consultation period beyond the initial six weeks and asks that a more thorough consultation be undertaken with all residents.</p> <p>Additional written comments made by residents who signed the petition are:</p> <ul style="list-style-type: none"> <li>* concerned about pollution</li> <li>* noise, dust, disturbance</li> <li>* traffic too close to village</li> <li>* too close to housing / too close to village</li> <li>* moving noisy plant closer village, dust from sites.</li> <li>* I don't want noise, dust, lorries in village</li> <li>* undesired effect on Earsham</li> <li>* road construction</li> <li>* sand on verges. What is meant by waste.</li> <li>* Lack of info / not enough information / more information / badly communicated</li> </ul>	<p>impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls. The Initial Consultation document included an assessment of the proposed Earsham sites on amenity, landscape, the historic environment, archaeology, highway access, ecology, flood risk and hydrogeology. A planning application has not been submitted for the Earsham sites proposed in the Minerals and Waste Local Plan Review at the current time (June 2019). If a planning application is submitted then there will also be a formal public consultation period on the planning application as part of the decision making process.</p> <p>The plant site is proposed to be moved from its current location within the Broads Authority Executive Area, into site MIN 209. This would be for a temporary period during the mineral extraction operations at MIN 209, MIN 210 and MIN 211. Once mineral extraction has ceased the plant site will then be required to be removed and the site restored to wet grassland with ponds. Restoration would be to a lower level and therefore the proposals do not include any waste management operations.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. It is noted that there are 7 residential properties within 100m of the proposed extraction area of site MIN 211. However, the village of Earsham is approximately 390m away from the</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
	<p>proposed extraction area of site MIN 211. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 93062  Respondent: <b>Ms K Squire [18339]</b></p> <p>I am writing to voice my objections to the three sites proposed for gravel extraction by Earsham Gravel Ltd In Earsham (Min 209, 210 and 211). My objections and concerns around the proposals and the way they have been communicated are as follows:</p> <p>Concerns around communications and insufficient consultation:</p> <ul style="list-style-type: none"> <li>* There has been a distinct lack of transparency and communication around this proposal. Only residents within a small radius of the proposed sites have been informed by post (even some within the designated radius didn't receive a letter). Many people in the village are only now finding out about the application with only a matter of days before the consultation closes.</li> <li>* The proposal report has not been made readily available, there are many elderly people in the village for whom viewing documents online and sending emails isn't an option. Although some print copies were available in Libraries these were not located in the village and would require transportation to go and view.</li> <li>* The map on the proposal application is misleading, I am not sure of the age of the map but it doesn't show any indication of the housing that would be directly opposite the proposed site at the end of Hall Road (station road etc). (the map wasn't even provided in the letter to residents)</li> </ul> <p>Concerns around the impact of the proposed Gravel extraction sites (material considerations and social impact):</p> <ul style="list-style-type: none"> <li>* The sites are extremely close to the village and the dust, noise and emissions would</li> </ul>	<p>Objection noted.</p> <p>The consultation period was for six weeks. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>Responses to the consultation could be submitted by the consultation website, by email or letter. The consultation documents were made available in accordance with the adopted NCC Statement of Community Involvement.</p> <p>The map in the consultation document uses an ordnance survey base map and shows all of the village of Earsham. Individual houses are not shown on the map due to the scale of the map used. However, the location of properties was taken into account in the site assessment undertaken by planning officers. The map of the Earsham sites was not provided in the letter to residents because a standard letter was sent to all addresses located within 250m of any of the 45 potential mineral extraction sites.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019.</p>

<b>Representations received about site MIN 211</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>negatively impact residents.</p> <p>* Hall road is used by residents and visitors as a tranquil place of beauty and nature for walks and recreation leading on to Pheasants walk and many other natural public paths. The traffic of heavy vehicles would spoil this and make Earsham a less attractive place for visitors and residents alike. This could impact on business for the attractions we have such as the Wetland centre and our lovely Village pub and would be disruptive to the habitats of the varied wildlife in the area.</p> <p>* Although it is proposed that the sites would eventually be turned into natural areas there is no mention if these would be public and available for the village residents to enjoy or be used for other purposes.</p>	<p>It is noted that there are 7 residential properties within 100m of the proposed extraction area of site MIN 211. However, the village of Earsham is approximately 390m away from the proposed extraction area of site MIN 211. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Site MIN 211 is over 700m away from Earsham wetland centre, which is on the opposite side of the A143 and no adverse impacts are expected.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network, road users and pedestrians.</p> <p>With regards to the issue of adverse impacts on local businesses (such as the village pub), this is not a material planning consideration given that the planning system is not in place to protect private interests of one another.</p> <p>The site is currently an arable field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
	<p>application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment. The site is proposed to be restored to wet grassland with ponds for a nature conservation afteruse which would result in a long term biodiversity improvement. The current site restoration proposal does not include public access.</p>
<p><b>(Object)</b> Representation ID: 93035  Respondent: <b>Mr P Miles [18337]</b></p> <p>I would like to object to the proposed mineral and gravel extraction at the sites along the A143 corridor in the vicinity of Fritton and Earsham. I am a resident of Belton and regularly use the A143 which is the main access point for the village. I am concerned about the increase in heavy good vehicles along this single carriageway road that these proposed developments will bring. This is due to increased exhaust fumes damaging health, increased wear and tear to the road surface and historic buildings, noise and vibrations spoiling peace and quiet, increased traffic jams &amp; congestion on what is already a busy and often dangerous road.</p> <p>I would also like to object due to the loss of habitat to wildlife and green space. This is especially important with the proposed developments being so close to the broads national park and the detrimental affect to tourism which is essential to the local economy.</p> <p>I do not wish for my health to be affected by increases in particles from both vehicle emissions and from the mineral extraction itself.</p> <p>For these reasons I specifically object to the developments proposed at Waveney Forrest / Fritton Woods and at Earsham and any other sites located or requiring access to the A143 and therefore impacting on my quality of life at Belton.</p>	<p>Objection noted.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. The site is currently an arable field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The proximity of the Earsham sites to the Broads Authority Executive Area is noted. The boundary of site MIN 211 is adjacent to the boundary of the Broads Authority Executive Area. Site MIN 211 is currently an arable field. The M&amp;WLPR consultation document assesses the potential landscape impact of extraction at the proposed site MIN 211 as follows: "The impact of the proposed mineral working on the wider landscape would predominantly be the decreased long distance views and</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
	<p>increased roadside vegetation due to bunding and advanced planting to screen the mineral working from view." Norfolk County Council's Local List for the Validation of Planning Applications' requires a Landscape and Visual Impact Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the appearance, quality and character of the landscape and countryside.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 93000  Respondent: <b>Mr L &amp; Mrs C Hare [17496]</b>  We disagree with this site being used to extract gravel because it is too near the village of Earsham.</p>	<p>Objection noted. It is noted that there are 7 residential properties within 100m of the proposed extraction area of site MIN 211. However, the village of Earsham is approximately 390m away from the proposed extraction area of site MIN 211. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 92525 Respondent: <b>Mr J Brown [17497]</b>  I would like to object to the proposed extraction site near my house on Hall Road, Earsham. As my house is within 250 metres of the proposed extraction site, I am concerned about the increased lorry traffic, noise and dust.</p>	<p>Objection noted.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
	<p>planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 92495 Respondent: <b>Ms Z Sprake [17994]</b></p> <p>I have only just heard about the application for extensions to Earsham Gravel Ltd's mineral extraction sites. I am very surprised that there has not been full consultation in the village as, the last time a major extension was proposed to Earsham Gravel, there was a display of the proposals in the village hall and local people were notified and encouraged to comment. This time, only a few people have received notification and little publicity has been given, with a short public consultation period.</p> <p>Having read the proposal for each site, a number of questions and points of comment come to mind. I recognise that Earsham Gravel Ltd is a valued local business and that it needs new sites for ongoing development; also that the local gravel is prized throughout the country. However, I think that there should be genuine local consultation, not the absolute minimum possible, and that people need to have their concerns addressed before the application goes to the next stage. For this reason, I object to the proposed expansion of Earsham Gravel Ltd's sites in Earsham and ask for an extended consultation period, with full communication to all residents of the village and answers to questions raised.</p> <p>The Initial Consultation Policies document states (4g) that the planning period extends to October 2020 and specific planning permission would follow that, yet the application for the site MIN 209 gives a potential start date of 2018 - that is, within the next four</p>	<p>Objection noted.</p> <p>The contents of the Initial Consultation document are not a planning application, the Earsham sites are proposed as mineral site allocations in the Local Plan. The previous consultation that is referred to would have been for a planning application and the display in the village hall would have been arranged by the applicants (Earsham Gravels Ltd). A planning application has not been submitted for the Earsham sites proposed in the Minerals and Waste Local Plan Review at the current time (June 2019). If a planning application is submitted then there will also be a formal public consultation period on the planning application as part of the decision making process.</p> <p>The public consultation period was for six weeks. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019.</p>



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<p>months. The dates for each project follow each other closely with no apparent allowance given for preparation or restoration, yet the documents also state that there will not be an overlap of projects and I would like to know a clearer timeframe of the whole procedure.</p> <p>Restoration, in each case, is proposed to be wet grassland with ponds, landscaping etc and "geological exposure" (whatever that means) but whether that would be a public amenity, enclosed wildlife sanctuary, commercial or private fishing lakes, or anything else is not said. In addition, some 18 hectares of agricultural land will be permanently lost.</p> <p>The land under consideration is at the bottom of a hill and, even with bundings in place to hide the sites from the village and main road, I wonder how much dust will be likely to drift towards the village over the main road and how much noise and visible disruption will affect those on higher ground. Two of the three sites are right by the A143 and I note that noise and dust assessments will be carried out and trust that careful consideration will be given to the results of the assessments.</p> <p>In the plan for MIN 211, under Landscape, it is stated that part of the proposal is for the plant site to be moved into a restored area of the existing quarry site. However, it says it would be "preferable" for the plant site to be moved into one of the extension areas. This, slipped in so casually, is quite startling. I can see that, for the business of Earsham Gravel itself, it would be of great benefit to have the plant site by the main road rather than a long way down the single track Bath Hills Road. However, it's a huge, ugly area with great heaps of gravel and many lorries coming and going and the advantage of its present placement is that it affects very few residents. It's stated that it would be a "landscape improvement," but for whom or what? If one site is replaced by another, there is no overall improvement and there certainly would be a great impact on the new site; which would then not be restored as wet grassland.</p> <p>I see that the estimated number of vehicle movements would be the same, but over a longer period - does this mean per day? The meaning is unclear and no explanation is</p>	<p>The previous consultation that is referred to would have been for a planning application and the display in the village hall would have been arranged by the applicants (Earsham Gravels Ltd). A planning application has not been submitted for the Earsham sites proposed in the Minerals and Waste Local Plan Review at the current time (June 2019). If a planning application is submitted then there will also be a formal public consultation period on the planning application as part of the decision making process.</p> <p>Earsham Gravels had stated a proposed start date for the first site (MIN 209) of 2018. However, as a planning application had not been submitted for the site by the end of 2018 the expected start date has been moved to 2019. The time period for the production of the Norfolk Minerals and Waste Local Plan Review (with to public consultation periods, a formal representations procedure and examination in public with an independent Planning Inspector) is expected to take until 2021. However, a planning application is expected to be submitted for the Earsham sites in 2019. The time period for determining a planning application for mineral extraction is 13 or 16 weeks (unless an extension of time is agreed between the County Council and the applicant). Therefore it would be possible for a planning application for mineral extraction to be determined prior to the adoption of the Minerals and Waste Local Plan. The current proposed timescales for extraction are MIN 209 (2019-2024), MIN 210 (2030-2039), MIN 211 (2024-2030). No further details on the phasing of the sites are currently available, but would be required at the planning application stage.</p> <p>The current restoration proposal is not for fishing lakes or an enclosed wildlife sanctuary and does not include public access. It is recognised that this would lead to a permanent loss of</p>

<b>Representations received about site MIN 211</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>given why the same number of vehicle movements needs a longer period of use.</p> <p>Having only just read the application documents today and yet having immediately seen so many points that need to be clarified and addressed, I do hope that my concerns and objections are considered; initially in regard to the request for further public consultation.</p>	<p>agricultural land, however, the proposed restoration would lead to a biodiversity improvement.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust). The current plant site is located within the Broads Authority Executive Area which has the highest status of landscape protection. Therefore, it would be preferable for the plant site to not be located there and the restoration of the existing plant site would lead to a landscape improvement. The plant site is therefore proposed to be moved into site MIN 209 for a temporary period during the operation of sites MIN 209, MIN 210 and MIN 211 and the plant site would then be required to be removed and site MIN 209 restored to wet grassland. The number of HGV movements per day from site MIN 211 will be the same as the number of HGV movements per day produced by the existing mineral extraction site at Earsham. Therefore there would not be any increase in the total number of HGV movements per day, because the new site would replace the old site. However, the vehicle movements would take place over a longer period of time (years) because mineral extraction would continue to take place in Earsham for more years as once mineral extraction ceases in the old site, mineral extraction would start in a new site. MIN 209, MIN 210 and MIN 211 would be worked one at a time, therefore the total number of HGV movements per day would remain the same as existing, but would continue until 2039 if all three sites were worked. The hours of operation of the new sites are expected</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
	to remain the same as the permitted hours of operation of the existing site.
<p><b>(Object)</b> Representation ID: 92423</p> <p>Respondent: <b>Mr T Lee &amp; Mrs B Lee [17982]</b></p> <p>We have just been informed of this entirely unacceptable proposal to extract minerals from sites adjacent to the A143 at Earsham. The impact to the local environment and quality of life to the residents of Earsham is beyond comprehension.</p> <p>Therefore: I object to the proposed expansion Earsham Gravel Ltd's sites in Earsham and to request an extended consultation period and more transparent communication to residents of the village.</p>	<p>Objection noted.</p> <p>Whilst there are 5 residential properties within 100m of the proposed extraction area of site MIN 211, the village of Earsham is nearly 400m from the site. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p> <p>Site MIN 211 is currently an arable field. The M&amp;WLPR consultation document assesses the potential landscape impact of extraction at the proposed site MIN 211 as follows: "The impact of the proposed mineral working on the wider landscape would predominantly be the decreased long distance views and increased roadside vegetation due to bunding and advanced planting to screen the mineral working from view." Norfolk County Council's Local List for the Validation of Planning Applications' requires a Landscape and Visual Impact Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the appearance, quality and character of the landscape and countryside.</p> <p>Mineral extraction at site MIN 211 is expected to take six years. The site is proposed to be restored to wet grassland with ponds, for a nature conservation afteruse. This would be a long term biodiversity benefit.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
	<p>the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation.</p>
<p><b>(Object)</b> Representation ID: 92420  Respondent: <b>Mr &amp; Mrs K Palmer [17981]</b>  I object to the proposed expansion of Earsham gravel ltd's site in Earsham and ask to have an extended consultation period and more transparent communications to residents of the village.</p> <p>I would like more information on :</p> <ul style="list-style-type: none"> <li>*the implications of the main road as hall Road will be widened... There is also a foot path opposite (down the side of our house) so would this make it more difficult to cross the road which we do daily to walk our dog.</li> <li>*how will this impact on my property value?</li> <li>*my way of life as at the moment I have the back door open, and the field views (which I understand will be restored after 6years?)</li> <li>*I have a young child and would like to know the working hours as I wouldn't want loud noise when trying to get him to bed.</li> <li>*this will impact on us for the 6 year period.</li> </ul> <p>Due to the above concerns what compensation would we be offered? I look forward to hearing from you and answers to my questions.</p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation.</p> <p>Hall Road is proposed to be widened on one side, between the junction with Bath Hills Road and the A143. There would not be an increase in the number of HGV movements on the A143 because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The proposed extraction area for site MIN 211 is over 360m away from your property. The proposed screening for the sites includes advanced tree and hedgerow planting on land north of the junction of Hall Road and Bath Hills Road and on the land to the west of the junction of Hall Road and the A143. This planting is expecting to screen views of the sites from your property.</p> <p>The working hours of the site would be determined at the planning application stage. However, for information, the current Earsham Gravels extraction site has the following permitted operational hours: 7am-6pm Monday to Friday and 7am to 1pm on Saturdays.</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
	<p>The expected time period for extraction of site MIN 211 is six years and the proposed restoration of site MIN 211 is wet grassland with ponds for a nature conservation afteruse.</p> <p>Property values are not a material planning consideration. Compensation would not be offered and does not form part of the landuse planning process. Earsham Gravels Ltd is a private company and has submitted these sites for consideration into the Minerals and Waste Local Plan Review process. Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan and to determine planning applications for mineral extraction.</p>
<p><b>(Comment)</b> Representation ID: 92315 Respondent: <b>Dr Murray Gray [1844]</b></p> <p>I write as (a) District Councillor for the Earsham Ward, and (b) a glacial geomorphologist and geodiversity expert (author of 2 editions of the book "Geodiversity: valuing and conserving abiotic nature" (Wiley-Blackwell, 2004 &amp; 2013)).</p> <p>As District Councillor my primary concern is the well-being of residents and the impact on them of quarrying activities. All 3 extension sites have houses nearby where impacts of noise, dust, traffic, etc. will need to be assessed. Site MIN209 is on the opposite side of the A143 to a field that has been submitted for housing allocation in the South Norfolk Council Local Plan, though no decision has been reached on this as yet.</p> <p>As a glacial geomorphologist, the dilemma is that excavation of land often leads to evidence for past processes and environments yet also destroys physical features. Recent research at the existing quarry in Pheasants Walk, Earsham (Proceedings of the Geologists' Association, Vol 129, pps 70-88, 2018) has shed new light on the origin of the Earsham Terrace that has traditionally been interpreted as an outwash terrace deposited from a glacier whose terminus may have lain at Homersfield. The important point is that the gravel terrace and gravels at Earsham are scientifically important and this needs to be taken into account in the allocation sites for gravel extraction in this area. As such I have no objection to site MIN211 on Bath Hills Road which is east of the</p>	<p>It is noted that there are five residential properties within 100m of the proposed extraction area for site MIN 211.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust). The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>Noted that there is no geomorphological object to site MIN211.</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
<p>existing quarry and remote from the main terrace surface below Park Farm. Similarly, on geomorphological grounds, I have no objection to site MIN209 as an extension to the existing quarry. I have more problems with site MIN210 as it extends westwards into the main terrace surface, and would object to its allocation as a gravel extraction extension site.</p>	
<p><b>(Object)</b> Representation ID: 92312 Respondent: <b>Ms L Jolly [17955]</b>  <b>(Object)</b> Representation ID: 92309 Respondent: <b>Mr L Green [17954]</b></p> <p>I object to the proposed expansion of Earsham Gravel Ltd's sites in Earsham and to ask for an extended consultation period and more transparent communications to the residents of Earsham Village. It will clearly impact all residents of the village and yet very few of us were notified or given any information of the proposal, which is unacceptable.</p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p>
<p><b>(Object)</b> Representation ID: 92306  Respondent: <b>Mrs L Wright [17953]</b></p> <p>I am writing to express concerns I have about the three sites proposed for the expansion of Earsham Gravel Ltd In Earsham (Min 209, 210 and 211). My concerns about the proposals and the way they have been communicated are as follows:</p> <ul style="list-style-type: none"> <li>* The map on the proposal application is misleading as it doesn't show most of the housing in the area.</li> <li>* The sites are extremely close to the village and the dust, noise and emissions would negatively impact residents</li> <li>* Only some residents, within a small radius of the proposed sites, have been informed by post with a very short notice period in which to voice any concerns they may have. In addition, many of the residence that would be effected by the expansion of Earsham Gravel are elderly and are unable to access the documents online and would find it difficult to travel to Libraries to access the information.</li> <li>* Widening Hall road and increasing traffic (especially large industrial trucks) would discourage many from using Pheasants walk and other public paths, which would make</li> </ul>	<p>Objection noted.</p> <p>The map used in the consultation document uses an ordnance survey base map and shows all of the village of Earsham. Individual houses are not shown on the map due to the scale of the map used. However, the location of properties was taken into account in the site assessment undertaken by planning officers.</p> <p>Whilst there are 5 residential properties within 100m of the proposed extraction area of site MIN 211, the village of Earsham is nearly 400m from the site. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
<p>Earsham a less attractive place for visitors and residents.</p> <ul style="list-style-type: none"> <li>* long term the proposals have no solid offer of improving the village</li> <li>* the proposals for the site after gravel has been extracted are ambiguous</li> </ul> <p>I feel that there should be an extended consultation period and clear, accessible information provided for the residents of Earsham.</p>	<p>The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. Mineral extraction at site MIN 211 is expected to take six years. The site is proposed to be restored to wet grassland with ponds, for a nature conservation afteruse. This would be a long term biodiversity benefit.</p> <p>There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019.</p>
<p><b>(Object)</b> Representation ID: 92093</p> <p>Respondent: <b>Mr M Hannant [17809]</b></p> <p>I am writing this email to express my disappointment and objection to the expansion of the gravel quarry in Earsham.</p> <p>As a regular visitor of Earsham and Bungay area I feel that this expansion would have a drastically negative impact on the local area and surrounding landscape. Additional noise, traffic and air pollution are all big concerns (to name just a few) of mine as well as the many friends and family I have who live locally - those of whom will also be writing to address their concerns.</p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls.</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
<p>I hope that in this case, the needs of the local area and residents will be taken into account (as they clearly haven't been thus far - considering that the efforts of the consultation have been so limited!).</p>	<p>The M&amp;WLPR consultation document assesses the potential landscape impact of extraction at the proposed site MIN 211 as follows: "The impact of the proposed mineral working on the wider landscape would predominantly be the decreased long distance views and increased roadside vegetation due to bunding and advanced planting to screen the mineral working from view." The site is proposed to be restored to a wet grassland with ponds, for a nature conservation afteruse. Norfolk County Council's Local List for the Validation of Planning Applications' requires a Landscape and Visual Impact Assessment to be submitted with any planning application for mineral extraction. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the appearance, quality and character of the landscape and countryside.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network. The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 92373 Respondent: <b>Mr P &amp; Mrs C Clarke [17978]</b></p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week</p>



Representations received about site MIN 211	Norfolk County Council Planning Officer's response
<p>(Object) Representation ID: 92074 Respondent: <b>Mr B Lowe [17802]</b></p> <p>(Object) Representation ID: 92065 Respondent: <b>Mr &amp; Mrs B &amp; C Rivett [17792]</b></p> <p>We object to the proposed expansion of Earsham Gravel Ltd's sites in Earsham and ask for an extended consultation period &amp; more transparent communications to residents of the village.</p>	<p>public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation.</p>
<p>(Object) Representation ID: 92059 Respondent: <b>Mrs A Benterman [17800]</b></p> <p>(Object) Representation ID: 92047 Respondent: <b>Mrs N Power [17793]</b></p> <p>I am writing to raise my objections regarding the gravel quarry that is being proposed at Earsham. This will spoil the natural beauty of the village, the Wetland centre and public walkways. I am particularly concerned about the noise, traffic, dust and air pollution that will be created, as well as the obvious destruction of the natural habitats of a number of our precious wildlife.</p>	<p>Objection noted. Site MIN 211 is over 700m away from Earsham wetland centre, which is on the opposite side of the A143 and no adverse impacts are expected.</p> <p>Ten Acre Lane runs between sites MIN 209 and MIN 210 and is closed to vehicle traffic but open to walkers and cyclists. There are no Public Rights of Way that would be affected by mineral extraction within site MIN 211.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The site is currently an arable field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
	<p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 92042  Respondent: <b>Ms B Atkins [17788]</b></p> <p>I am writing to raise my objections regarding the gravel quarry that is being proposed in Earsham village. Only people within 250 meters of the site got a letter and even some of those residents didn't receive one. So few people have been informed and the documents and comments form being online means that it is not accessible to everyone in the village. Furthermore, I believe this will effect people outside of the village too in regards to the Wetland centre and public walkways. I am particularly concerned about the noise, traffic, dust and air pollution that will be created, as well as the disruption of the natural habitats home to a number of our wildlife.</p>	<p>Objection noted. There will be another opportunity for residents to respond to the proposed sites during the six week public consultation on the Preferred Options stage in spring 2019. The parish council and all addresses within 250m of the proposed site boundary were informed of the Initial Consultation. A distance of 250 metres was used because this represents a distance at which amenity impacts (such as noise and dust) from mineral extraction could be mitigated to acceptable levels with the minimum of controls. Site MIN 211 is over 700m away from Earsham wetland centre, which is on the opposite side of the A143 and no adverse impacts are expected.</p> <p>Ten Acre Lane runs between sites MIN 209 and MIN 210 and is closed to vehicle traffic but open to walkers and cyclists. There are no Public Rights of Way that would be affected by mineral extraction within site MIN 211.</p> <p>The proposed highway access is considered to be suitable by the Highway Authority. There would not be an increase in the number of HGV movements because the site would replace an existing site at Earsham. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p>

Representations received about site MIN 211	Norfolk County Council Planning Officer's response
	<p>The site is currently an arable field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>The draft site policy requires noise and dust assessments to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>

**MIN 25 land at Manor Farm (between Loddon Road and Thorpe Road), Haddiscoe**

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93200  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Support)</b> Representation ID: 93079  Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b>  MIN 25: The Company supports the identification of land at Manor Farm (between Loddon Road and Thorpe Road), Haddiscoe, as suitable for allocation for sand and gravel extraction.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 92991  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  This site is close to grade I St Mary's Church. If this site is brought forward the recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Objection noted. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the historic environment. A planning appeal decision in 2014 (regarding proposed mineral extraction at this site and land to the south of the Loddon Road) concluded that only the extraction area to the south of Loddon Road would have an adverse impact on the setting of the Church and this parcel of land is not included in the proposed site allocation.</p>
<p><b>(Comment)</b> Representation ID: 92562  Respondent: <b>Environment Agency (Miss E Stewart) [18012]</b>  The following section outlines the constraints at certain sites, which will need to be considered at the application stage to ensure that ecology is not adversely affected.  MIN 25 Potential impacts on Priority Habitats - deciduous woodland and coastal and floodplain grazing marsh.</p>	<p>Noted. The proposed site is currently an agricultural field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment. A planning appeal</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
	<p>decision in 2014 (regarding proposed mineral extraction at this site and land to the south of the Loddon Road) did not conclude that there would be any adverse impacts on biodiversity from the proposed site.</p>
<p><b>(Comment)</b> Representation ID: 92510</p> <p>Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b></p> <p>MIN25 at Haddiscoe - the site is very close to the nearest dwelling and the village generally, it would seem to be quite a significant site in terms of volume of material to be extracted, number of lorry movements etc. (we note there is a balance to be struck between length of extraction time and daily vehicle movements, to address concerns raised by the previous refusal of permission).</p> <p>Is there any scope to reduce the extent of the site, moving the boundary away from nearby dwellings and/or phasing the extraction as part of any mitigation? This, along with the impact on the Grade I Listed church and the visual impact of the proposed bunding, was a concern that South Norfolk Council raised in respect of the previous application on this site. In addition, the landscape assessment refers to mature screen planting, it would be useful if retention of this was picked up in the Initial Conclusion.</p>	<p>The previous planning application in this location included land to the south of Loddon Road. The proposed site in the Minerals and Waste Local Plan Review does not include the land to the south of Loddon Road.</p> <p>The site assessment recognises that there are 15 properties within 100m of the site boundary and 55 properties with 25m of the site boundary. The draft site policy states that the extraction area would need to be set back at least 100 metres from residential properties, with advance screen planting. The draft site policy requires a future planning application to include the submission of a phased working and progressive restoration scheme to a nature conservation afteruse to provide landscape and biodiversity gains.</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The draft site policy requires a future planning application to include a "Landscape and Visual Impact Assessment which will</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
	<p>identify any potential impacts to the wider landscape and suggest appropriate mitigation measures; particularly regarding views from nearby properties, surrounding roads, and provide protection of the setting of nearby listed buildings. The mitigation measures should include a combination of advanced planting with native species and bunds". The existing mature screen planting would be a benefit to the completion of any LVIA, and it would be the site proposer's best interest to retain it.</p> <p>With regards to the potential impact on the Grade I Listed Church, the draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the historic environment. A planning appeal decision in 2014 (regarding proposed mineral extraction at this site and land to the south of the Loddon Road) concluded that only the extraction area to the south of Loddon Road would have an adverse impact on the setting of the Church and this parcel of land is not included in the proposed site allocation.</p>
<p><b>(Comment)</b> Representation ID: 92390  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b>  Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes.  Our comments below relate specifically to sites in proximity to our reserves, SSSIs,</p>	<p>Noted</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p>CWSs and ancient woodland sites.</p> <p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 25 - Provided potential ecological impacts on the nearby CWS 2221, 'Devil's End Meadow' can be avoided, we support the restoration proposals to acid grassland, woodland and wetland.</p>	<p>Noted</p> <p>Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment. Support for the restoration proposals is noted.</p>
<p><b>(Comment)</b> Representation ID: 92121</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>Please refer to our comments on protected landscapes in our letter of 13 August 2018.</p> <p><b>Protected landscapes</b></p> <p>Several allocations are either within protected landscapes or lie close to their boundaries or 'settings' which means that the highest sensitivity must be afforded to the landscape. It would be advisable to include a specific policy for protected landscapes within the Plan to reflect their protection as both the Norfolk Coast AONB and The Broads, which has the equivalent status of a national park, may be impacted by minerals development. Any proposal which may affect a protected landscape or its setting should be subject at application stage to a Landscape and Visual Impact Assessment (LVIA) for all stages of the operation.</p>	<p>Noted.</p> <p>The proposed site MIN 25 is adjacent to the Broads Authority Executive Area. There are mature hedges on three boundaries of the site which screen the site from public views. The draft site policy in the Preferred Options requires a future planning application to include a LVIA which would consider potential impacts on the wider landscape and identify appropriate mitigation measures (such as additional screen planting); this would include the Broads Authority Executive Area. The Broads Authority have been consulted on the Minerals and Waste Local Plan.</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p>The LVIA should consider how a proposal may impact the statutory purposes for which a protected landscape is designated, including impacts on landscape character and tranquillity, together with full details of mitigation and restoration. All restoration measures proposed will need to be in keeping with the local landscape character. Consideration should be given to each landscape character's sensitivity and its capacity to accommodate the proposed development. The requirement for a LVIA and mitigation measures should be identified in the Plan for each relevant allocation. Further information needs to be provided for these allocations which demonstrates that impacts to protected landscape features have been avoided where possible, and mitigation measures put in place for those impacts which cannot be avoided, and a programme of monitoring agreed to ensure the measures are effective. The views of the relevant organisation for each protected landscape need to be taken into account fully on these proposed allocations.</p>	
<p><b>(Object)</b> Representation ID: 91896  Respondent: <b>Haddiscoe Parish Council (Mrs Sarah Daines) [17662]</b>  I am writing to you in my capacity of Parish Clerk to Haddiscoe Parish Council. Could you please include our comments below in your Consultation:</p> <p>This Parish Council are implacably opposed to developing the site you identify as MIN 25 in the village of Haddiscoe. We are also surprised that we were not a recipient of your letter dated 26.06.18, notifying only the immediate residents of the proposed site. We supported the residents of this village in preventing an identical development four years ago, planning ref APP/X2600/A/13/2197841. The original Planning application was refused, despite the Planning Officer's recommendation for approval, thanks to our parishioners energetic campaign called "Stopit". The reasons for the original refusal and the upholding of the Council's decision on Appeal in 2014, were the protection of heritage assets, in particular our Grade I Listed Church, and an unacceptable impact on the environment and residential amenities, from what would have been an industrial scale development in the heart of our village. The Stopit campaign raised £ 19,300 by private subscription from residents in order to fund legal fees. Of 227 households in the village, 120 were active Stopit members and in the planning process there were 175</p>	<p>Objection noted.  Haddiscoe Parish Council were emailed on 28 June 2018 to inform them of the Initial Consultation. The content of the email was very similar to the letter sent to local residents. The objections from local residents to the planning application (appeal ref. APP/X2600/A/13/2197841) are noted. However, the proposal in the Minerals and Waste Local Plan Review is not identical to the planning application and appeal in 2014 because the M&amp;WLP site only includes the field between Church Road and Loddon Road and does not include any land south of Loddon Road.</p> <p>The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the historic environment. The appeal decision in 2014 concluded that only the extraction</p>



<b>Representations received about site MIN 25</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>objections and just 1 supporting letter (from the owner of the site). This was a stressful and anxious six years which we do not wish to repeat. We would earnestly request that this site is excluded from the Local Plan review.</p>	<p>area to the south of Loddon Road would have an adverse impact on the setting of the Church and this parcel of land is not included in the proposed site allocation.</p> <p>The proposed site is currently an agricultural field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment. The appeal decision in 2014 did not conclude that there would be any adverse impacts on biodiversity from the proposed site.</p> <p>The appeal decision in 2014 stated that the land to the north of Loddon Road "creates very little visual harm during operations". There is mature screen planting forming hedgerows on all sides of the site except for a section on the eastern boundary close to Manor Farm. The draft site policy requires a detailed landscaping and screening scheme to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on landscape character.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise, air quality and dust).</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 91838  Respondent: <b>Broads Authority (Natalie Beal) [16282]</b>  Broads Landscape Character Assessment 2016; Norton Marshes to Haddiscoe Dismantled Railway LCA immediately NE. Adjacent LCT is settlement fringe which would be covered in time by the Broads settlement fringe policy. Support submission of Heritage statement. Whilst this is not within the Broads, the Authority strongly requests that Norfolk County Council liaise with us regarding this site and the policy prior to the next version of the Local Plan.</p>	<p>The Landscape Character information is noted. The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. We will continue to liaise with the Broads Authority as requested.</p>
<p><b>RESPONSES FROM INDIVIDUALS</b></p>	
<p><b>(Object)</b> Representation ID: 93036  Respondent: <b>Mr P Miles [18337]</b>  I would like to object to the proposed mineral and gravel extraction at the sites along the A143 corridor in the vicinity of Fritton and Earsham. I am a resident of Belton and regularly use the A143 which is the main access point for the village. I am concerned about the increase in heavy good vehicles along this single carriageway road that these proposed developments will bring. This is due to increased exhaust fumes damaging health, increased wear and tear to the road surface and historic buildings, noise and vibrations spoiling peace and quiet, increased traffic jams &amp; congestion on what is already a busy and often dangerous road.</p> <p>I would also like to object due to the loss of habitat to wildlife and green space. This is especially important with the proposed developments being so close to the broads national park and the detrimental affect to tourism which is essential to the local economy.</p> <p>I do not wish for my health to be affected by increases in particles from both vehicle emissions and from the mineral extraction itself.</p> <p>For these reasons I specifically object to the developments proposed at Waveney Forrest / Fritton Woods and at Earsham and any other sites located or requiring access to the A143 and therefore impacting on my quality of life at Belton.</p>	<p>Objection noted.</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The site is currently an agricultural field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
	<p>The site assessment recognises that proposed site MIN 25 is adjacent to the Broads Authority Executive Area. There are mature hedges on three boundaries of the site which screen the site from public views. The draft site policy requires a future planning application to include a LVIA which would consider potential impacts on the wider landscape and identify appropriate mitigation measures (such as additional screen planting). With regards to the issue of adverse impacts on tourism businesses, this is not a material planning consideration given that the planning system is not in place to protect private interests of one another. The assessment of the proposal considers whether there would be unacceptable impacts on local amenity (such as dust, noise etc) and if there is an existing use of land which ought to be protected in the public interest.</p> <p>The draft site policy requires a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 92316</p> <p>Respondent: <b>Mr D Townsend [17957]</b></p> <p>We went through 6 years of Hell (2008 - 2014) fighting and winning a traumatic, stress-inducing, time-consuming and costly battle against proposals to have a gravel pit on this site and you have the audacity to write to me and ask if I want to object to it all starting again? Do I want to object? DO I WANT TO OBJECT?</p> <p>How strange things are in this 18th century staging post Forge, where I write, with roots back to the Domesday Book and beyond - Saxon ? , it nestles into a Hill Fort Rampart, a Ley Line runs through the Church and Forge - right through one of the hearths, where we light our Fire and pray-chant-spell: Ignei—Aerii—Aquantani—Terra, Spiritus salvete! Here, in the front line of muck and bullets, we live life to the full, with all its ancient</p>	<p>Objection noted.</p> <p>The proposal in the Minerals and Waste Local Plan Review is not the same as the planning application and appeal in 2014 because the M&amp;WLP site only includes the field between Church Road and Loddon Road and does not include any land south of Loddon Road.</p> <p>National planning policy requires Norfolk County Council as a Mineral Planning Authority to provide for a steady and adequate of aggregate mineral. Assessment of future needs for aggregate indicate that further mineral sites will be required to meet this need in the period up to 2036. The sites proposed for</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p>traditions, rituals, ceremonies intact.  Hasn't the village suffered enough ?  NO, WE DO NOT WANT THE BLOODY PIT  NO, NORFOLK DOES NOT NEED OUR GRAVEL  Haddiscoe has given enough gravel in the past, Wiggs Lane, behind the village hall, the -  now- fishing lake (Cemex) and the Parish Pit, Gravel Pit Lane. There is a huge operation  at Norton/Heckingham, only 3-4 miles away, which will be producing gravel for many  more years, so I think we've done and are doing our bit!  NO It's too near two beautiful churches  Too near lots of peoples' houses.  Too near, across the fields, a school.  Too near a Dog Kennels, why should the doggies have to suffer dust, grit and noise.  Yours, in real anger (real politik) at the audacity I have been asked to comment on,</p>	<p>allocation within the Minerals Local Plan Review are to meet this need.</p> <p>Mineral can only be extracted from areas where it exists and there are willing mineral operators, and landowners who support mineral extraction on their land.</p> <p>The existing mineral extraction operation at Norton is included in the assessment of future need, and the sites proposed for allocation in the Minerals Local Plan Review are required in addition to those existing sites. The mineral proposed to be extracted at Haddiscoe would be transported to Norton for processing.</p> <p>The draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the historic environment. The appeal decision in 2014 concluded that only the extraction area to the south of Loddon Road would have an adverse impact on the setting of the Church and this parcel of land is not included in the proposed site allocation.</p> <p>The site assessment recognises that there are 15 properties within 100m of the site boundary and 55 properties with 25m of the site boundary. The draft site policy states that the extraction area would need to be set back at least 100 metres from residential properties, with additional tree planting in the corner of the site closest to the properties in Gravel Pit Lane. Glebeland Primary School is over 1km from the proposed extraction site and therefore there would be no adverse amenity impacts.</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92280</p> <p>Respondent: <b>Mr M Kemp [17940]</b></p> <p>With reference to the above project I am disgusted that this situation has again arisen in the light of the previous application for a gravel pit in this area was defeated several times in the courts and finally rejected by Norfolk County Council.</p> <p>This is a small village with narrow roads totally unsuitable for constant use by heavy lorries etc. We strongly protest at this back door attempt to bring to this village a project that was so vigorously fought over just for what appears to be the profit of a local farmer.</p> <p>The benefit to the local community is virtually nil with few if any jobs for locals. The disruption that would be caused is totally unacceptable.</p> <p>We therefore request you drop this idea and look elsewhere - to a place that will not affect so many people for such little return.</p>	<p>Objection noted.</p> <p>The proposal in the Minerals and Waste Local Plan Review is not the same as the planning application and appeal in 2014 because the M&amp;WLP site only includes the field between Church Road and Loddon Road and does not include any land south of Loddon Road.</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise, air quality and dust).</p> <p>The site has been proposed to Norfolk County Council by Cemex, in response to a 'call for mineral sites' for the Norfolk Minerals and Waste Local Plan Review. Any site allocated in the Minerals and Waste Local Plan would still require planning permission to be granted before mineral extraction could take place.</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 92277</p> <p>Respondent: <b>Mr Daryl Packer [17845]</b></p> <ol style="list-style-type: none"> <li>1. Where is the detailed plan outlining all areas affected by the exploitation ie areas under potential risk "Devil's End Meadow" by Min25?</li> <li>2. Where is the site specific plan showing position of the processing plant?</li> <li>3. What compensation will be offered to properties directly affected by the works?</li> <li>4. What will the closest proximity of the deposit exploitation be to the boundary of any directly affected property?</li> <li>5. To what depth will the deposit be extracted to?</li> <li>6. Will the reinstatement of the site be 100% accessible to the public after the works cease? Will the reinstatement be phased or will it start once the deposit has been exploited?</li> <li>7. What will happen to the public right of way through the site during and after the works?</li> <li>8. What detailed conservation proposals are drafted for the reinstatement?</li> <li>9. The fall off from the deposit slopes towards the marshes within the Broads Authority boundary. There is a natural spring there where there are lots of newts. Will the works alter the hydrostatic fall and affect the Flora and Fauna? ie Devils End Meadow.</li> <li>10. Will any jobs for locals be generated?</li> <li>11. Will any plans for waste disposal as part of the reinstatement works be proposed?</li> <li>12. What operating hours will be proposed for the site (any weekend work)?</li> <li>13. What pollution controls will be proposed for dust, noise, mud on the road?</li> <li>14. What upgrades to Crab Apple Lane junction are proposed?</li> </ol>	<p>Objection noted.</p> <ol style="list-style-type: none"> <li>1. The site map shows the County Wildlife Sites, including 'Devil's End Meadow'. Any future mineral application would need to contain an assessment of potential impacts to such sites, together with identification of appropriate mitigation measures.</li> <li>2. The proposal is only for a mobile dry screen to be located at the site. The extracted material is proposed to be processed at the existing Norton Subcourse site where there is an existing processing plant.</li> <li>3. Compensation would not be offered and does not form part of the landuse planning process. Cemex is a private company and has submitted this site for consideration into the Minerals and Waste Local Plan Review process. Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan and to determine planning applications for mineral extraction.</li> <li>4. The site assessment recognises that there are 15 properties within 100m of the site boundary and 55 properties with 25m of the site boundary. The draft site policy states that the extraction area would need to be set back at least 100 metres from residential properties, with additional tree planting in the corner of the site closest to the properties in Gravel Pit Lane.</li> <li>5. The depth of the proposed mineral extraction has not been provided by Cemex at the Local Plan stage, but it could be up to 13m in places.</li> <li>6. There are no proposals for the restored site to be 100% accessible to the public. The extraction and restoration of the site will be phased.</li> <li>7. The Public Right of Way will need to be diverted while mineral extraction takes place and be reinstated as part of the restoration of the site.</li> </ol>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
	<p>8. At the Local Plan preparation stage there are no detailed proposals available for the restoration of the site. Draft Policy MP&amp; requires planning applications for mineral workings to be accompanied by a scheme for the phased and progressive working and restoration of a site throughout its life.</p> <p>9. The proposal by the mineral operator does not indicate that dewatering would form part of the scheme. Therefore, it is not expected that water resources would be affected.</p> <p>10. This is unknown at the Local Plan stage.</p> <p>11. There are no proposals for waste disposal as part of the restoration of the site.</p> <p>12. The working hours of the site would be determined at the planning application stage. However, for information, the current Norton Subcourse extraction site has the following permitted operational hours: 7am-6pm Monday to Friday and 7am to 1pm on Saturdays</p> <p>13. The site policy requires the submission of noise and dust assessments at the planning application stage which would include mitigation measures to deal with any amenity impacts. Planning conditions would require the noise mitigation strategy and the dust management plan to be implemented and adhered to. Draft Development Management Criteria Policy MW2 requires planning applications to not have an unacceptable impact on local amenity and health. At the planning application stage, conditions would require no mud on the road and vehicle wheel washing facilities could be provided in order to ensure that there would not be mud on the road.</p> <p>14. No proposals for highway improvements to Crab Apple Lane have been provided by Cemex as part of the Local Plan process. A Transport Statement would need to be submitted at the planning application stage. A planning application would need</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
	to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.
<p><b>(Object)</b> Representation ID: 92275 <b>Respondent: Mr A Burton [17822]</b></p> <p><b>(Object)</b> Representation ID: 92274 <b>Respondent: Mrs S Burton [17937]</b></p> <p>As a resident of Haddiscoe and living in close proximity to the proposed extraction site I would like raise objections to the proposals.</p> <p>I am concerned about Potential Noise ,Dust ,Traffic and Environmental issues which will ensue as a result of the works and impact on those Residences which are in its vicinity The Village is a very quiet area and the constant movement of gravel loading and vehicles reversing and beeping constantly will almost certainly detract from this pleasant rural location.</p> <p>This proposal is far too close to residences for it not to have an impact and consequently will devalue property prices</p> <p>There have been previous applications for Gravel Extraction in the village. Notably the land to the South of Loddon Road</p> <p>Fortunately these applications were rejected and at the time we were advised that there was a sufficient Gravel Bank in Norfolk to meet projected demand.</p> <p>Therefore there is no need to start any extraction at Haddiscoe within the next 40 years</p> <p>Currently the nearest working Extraction site is only a short distance from the proposed site and has been given permission to extend the extraction process</p>	<p>Objection noted.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise, air quality and dust).</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The site assessment recognises that there are 15 properties within 100m of the site boundary and 55 properties with 25m of the site boundary. The draft site policy states that the extraction area would need to be set back at least 100 metres from residential properties, with advanced screen planting. Property values are not a material planning consideration.</p> <p>The proposal in the Minerals and Waste Local Plan Review is not the same as the planning application and appeal in 2014 because the M&amp;WLP site only includes the field between</p>



Representations received about site MIN 25	Norfolk County Council Planning Officer's response
	<p>Church Road and Loddon Road and does not include any land south of Loddon Road.</p> <p>It is noted that Norton Subcourse quarry is only around 3.6km from the proposed site at Haddiscoe. The current planning permission for Norton Subcourse quarry requires mineral extraction to cease and the site to be restored by February 2036.</p> <p>Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan. In the plan period to the end of 2036 we have forecast a need for an additional 20.3 million tonnes of sand and gravel resources to be provided in Norfolk.</p>
<p><b>(Object)</b> Representation ID: 92268</p> <p>Respondent: <b>Mr D Beevor [17932]</b></p> <p>I wish to object in the strongest possible terms to the inclusion of the Manor Farm site at Haddiscoe on the list of proposed mineral extraction sites in the Initial Consultation document.</p> <p>The siting of a gravel pit so close to our village is completely inappropriate. The peace and tranquillity of my house and garden would be ruined by noise, dust and grit produced by the extraction processes and all the lorries.</p> <p>We fought against this for many years, through a Planning procedure initiated in 2008, which was rejected by planning committee in 2012, and again thrown out on Appeal in 2014.</p> <p>Inclusion of this site on the proposed mineral extraction sites Initial Consultation document is unnecessary and inappropriate and I trust will not receive serious consideration from the Council.</p>	<p>Objection noted.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise, air quality and dust).</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
	<p>an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The site assessment recognises that there are 15 properties within 100m of the site boundary and 55 properties with 25m of the site boundary. The draft site policy states that the extraction area would need to be set back at least 100 metres from residential properties, with advance screen planting.</p> <p>The proposal in the Minerals and Waste Local Plan Review is not the same as the planning application and appeal in 2014 because the M&amp;WLP site only includes the field between Church Road and Loddon Road and does not include any land south of Loddon Road.</p>
<p><b>(Comment)</b> Representation ID: 92154</p> <p>Respondent: <b>Mrs Anne Smith [17848]</b></p> <p>Initial conclusion regarding highway access.</p> <p>You state that any planning application addresses the requirement to have a highway access that is considered suitable by the Highway Agency. I would hope that this would include a thorough investigation and consultation on the adequacy of the existing routes serving the site and the impact that the increased traffic (80HGV lorries a day) would have on the environment and residents of Haddiscoe.</p>	<p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p>
<p><b>(Object)</b> Representation ID: 92148</p> <p>Respondent: <b>Mrs Eve Basford [17842]</b></p> <p>Object on basis of noise, dust, increased traffic. The boundary towards the village has no screening planting. 25% of the village is in close proximity to the proposed site. The old gravel pit, once owned by Cemex is an eyesore with a dangerous lake (drownings have occurred) and has been semi abandoned for many years. No trust that an idyllic grassland would be restored. Current boundary screening lends itself to fly</p>	<p>Objection noted.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an</p>

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<p>tipping and is more open during winter months. Have no wish to listen to heavy machinery, gravel being tipped, constant reversing alarms, and have sand blowing through the streets</p>	<p>unacceptable impact on local amenity and health (including noise, air quality and dust).</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The draft site policy requires a future planning application to include a Landscape and Visual Impact Assessment which would consider potential impacts on the wider landscape and identify appropriate mitigation measures; this would include assessment of whether additional planting was required.</p> <p>The draft site policy requires a future planning application to include a phased working and progressive restoration scheme to a nature conservation afteruse. Implementation of the restoration scheme would be controlled by a planning condition if permission was granted.</p>
<p><b>(Object)</b> Representation ID: 92133</p> <p>Respondent: <b>Mr Robert Green [17832]</b></p> <p>1/ The road infrastructure is both unsuitable and incapable of supporting the increase in heavy goods traffic that would result. Manor farm is surrounded by minor roads and country lanes which at times struggle to cope with domestic traffic.</p> <p>2/ The impact on properties in the surrounding area will be devastating in both noise nuisance, and consequent devaluation. Developing Manor farm in this way would alter</p>	<p>Objection noted.</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p>the character and enjoyment of the locality.  3/ This development would have a negative impact to the village, it's wildlife and movement of traffic. Haddiscoe is already a road traffic accident hot spot.</p>	<p>submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise, air quality and dust).</p> <p>Property values are not a material planning consideration.</p> <p>The draft site policy requires a future planning application to include a Landscape and Visual Impact Assessment which would consider potential impacts on the wider landscape and identify appropriate mitigation measures.</p> <p>The proposed site is currently an arable agricultural field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p>
<p><b>(Object)</b> Representation ID: 92125  Respondent: <b>Miss Sari Kelsey [17814]</b>  Tree screening will not stop the significant noise pollution from the extraction. Resulting in damage to enjoyment of rural environment. Dangerous junction with A146 80 lorries daily means increased risk to life. The impact on Landspring bec and water</p>	<p>Objection noted.  The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need</p>

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<p>levels potentially effects the whole village as past disruption to the water table continues to be problematic. Despite promises in any application there is no protection that if this plan is followed that subsequent requests to fill the remaining hole with rubbish will not be made as has happened in all the other excavation sites within and near to the village.</p>	<p>to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise, air quality and dust).</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The proposal by the mineral operator does not indicate that dewatering would form part of the scheme. Therefore, it is not expected that water resources would be affected.</p> <p>The draft site policy requires a future planning application to include a phased working and progressive restoration scheme to a nature conservation afteruse. Implementation of the restoration scheme would be controlled by a planning condition if permission was granted.</p>
<p><b>(Object)</b> Representation ID: 92124</p> <p>Respondent: <b>Mr Clive Griffiths [17813]</b></p> <p>Strongly opposed to this application that seems to ignore the result of a previous attempt AND THE FEELINGS of the residents of Haddiscoe.</p> <p>The extra traffic, noise and dust that it will generate is not acceptable, the previous application was not felt to be beneficial and the case for it was dismissed, as should this one.</p>	<p>Objection noted.</p> <p>The proposal in the Minerals and Waste Local Plan Review is not the same as the planning application and appeal in 2014 because the M&amp;WLP site only includes the field between Church Road and Loddon Road and does not include any land south of Loddon Road.</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by</p>

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	<p>the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise, air quality and dust).</p> <p>Property values are not a material planning consideration.</p>
<p><b>(Support)</b> Representation ID: 92123  Respondent: <b>Mrs Naomi Butcher [17812]</b>  There have been pits in Haddiscoe historically &amp; I see no reason to block this pit now. It will bring much needed employment to the area &amp; potentially boost local businesses</p>	<p>Support noted</p>
<p><b>(Object)</b> Representation ID: 92037  Respondent: <b>Windmill Cottage Kennels (Miss Helen Gough) [17772]</b>  I am writing to put in an objection regarding the possible planning for extraction of minerals and local waste in the field that is directly opposite us. Being a business I believe that this would have a negative impact on ourselves as a whole business, that is before also putting a negative valuation on the business. There are also the wider aspects to the procedure of obtaining from this particular area. The impact on the wildlife and the marshes themselves would be a huge concern. Another objection that I would have would be the health concerns, the amount of dust that there would be to</p>	<p>Objection noted.  With regards to the issue of adverse impacts on neighbouring businesses, this is not a material planning consideration given that the planning system is not in place to protect private interests of one another. The assessment of the proposal considers whether there would be unacceptable impacts on local amenity (such as dust, noise etc) and if there is an existing use of land which ought to be protected in the public interest.</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p>contend with, causing breathing problems. I would also like to ask what the impact would be to the actual soil stability and drainage, I cannot imagine that there would not be a detrimental affect on the eco system, as well as the noise pollution in the area. I think as well that this would affect more people than at first thought. Thank you for your time in this matter and if my comments could be taken on board it is very much appreciated.</p>	<p>The proposed site is currently an arable agricultural field. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>Working schemes for mineral workings require that proposals do not compromise soil stability; given the likely depth of workings it is considered that any potential soil stability issues could be adequately mitigated.</p> <p>The proposal by the mineral operator does not indicate that dewatering would form part of the scheme. Therefore, it is not expected that water resources or drainage would be affected.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise, air quality and dust).</p>
<p><b>(Object)</b> Representation ID: 91897 Respondent: <b>Mr R Kelsey [9955]</b> Norfolk Minerals and Waste Local Plan Review: Initial Consultation I write in response to your letter of 26th June concerning the above subject. I was surprised that you were writing to me. The site at Haddiscoe (Min25) in the last consultation document received objections from 175 Haddiscoe residents. It was turned down by the Parish Council and the District</p>	<p>Objection noted.</p> <p>Noted. When submitted for consideration in the Minerals Site Specific Allocations DPD site MIN 25 included land to the south</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p>Council, and did not make it on to the County Council's own "preferred list. as it was deemed in your own policy documents of 2011 "inappropriate for allocation due to potential landscape, amenity and highways impacts."</p> <p>Despite this the proposers pursued the application with support from an officer in your department. The application was rejected by the County Council's planning committee voting against the recommendation of your department.</p> <p>The applicants appealed, forcing your department into a U turn, as you now had to defend the committee's decision. The appeal was dismissed by Her Majesty's planning Inspector in 2014. All this at considerable cost to the County Council and the residents of Haddiscoe.</p> <p>Now only four years later you are proposing to put the community through this ridiculous, over elaborate, expensive, and evidently flawed process again.</p> <p>Hence my surprise.</p>	<p>of Loddon Road. The planning application that was refused also included land to the south of Loddon Road. The proposed site in the Minerals and Waste Local Plan Review does not include the land to the south of Loddon Road.</p> <p>The site has been proposed to Norfolk County Council by Cemex, in response to a 'call for mineral sites' for the Norfolk Minerals and Waste Local Plan Review.</p>
<p><b>(Object)</b> Representation ID: 91834</p> <p>Respondent: <b>Ms W Alford [17617]</b></p> <p>I wish to object in the strongest possible terms to the proposal to extract and process sand and gravel and batch concrete on this site at Haddiscoe.</p> <p>The area included in the scheme is on the top of a hill with commanding views across the marshes and rolling countryside. Our village is directly adjacent on 2 sides, our two Saxon/Norman Churches, Thorpe and Haddiscoe, overlook from opposite corners, my house overlooks both areas to the south and north of Loddon Road and the Blacksmith's Forge I run with my partner is just to the south of this, with my wild flower meadow in between.</p> <p>The increase in traffic from Earsham Gravel's own lorries and those vehicles coming to the site to buy sand, gravel and concrete will cause a good deal more noise and add greatly to the danger of already busy, narrow (for main) roads: the B1136 and A143. There is no pavement from my house to the village and for villagers walking to the allotments next to the church, on the B1136, and for those of us who cycle or ride horses along these roads, it is already quite hair-raising. Cars travel very fast along the</p>	<p>Objection noted.</p> <p>The proposal in the Minerals and Waste Local Plan Review only includes the field between Church Road and Loddon Road and does not include any land south of Loddon Road. There is no proposal to batch concrete at the site.</p> <p>The draft site policy requires a future planning application to include a Landscape and Visual Impact Assessment which would consider potential impacts on the wider landscape and identify appropriate mitigation measures.</p> <p>The site is proposed by Cemex, not by Earsham Gravels Ltd. The proposal is for the extracted mineral to be processed at the existing site at Norton Subcourse. Therefore vehicles would not be coming to the Haddiscoe site to buy aggregate.</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by</p>



<b>Representations received about site MIN 25</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>B1136 coming towards Haddiscoe, often overtaking in a dangerous manner on the stretch leading up to the 30 mph limit sign. This has a reputation as a racetrack, particularly for motorcycles, since the removal of hedges by the Manor Farm owners many years ago gives the illusion of being able to see a great distance along the road. However, the bends and dips are often not clearly discernible until almost upon them. There have been several accidents this year; the added traffic and vehicles passing in and out of the entrance to a gravel pit and plant can only exacerbate this situation.</p> <p>Although I appreciate that the modern rubber-surfaced equipment is much quieter than the clanging and rattling of the all metal machinery, there will still be industrial type noises of engines, vehicles and the carrying on of trade, very intrusive in the countryside, adding another dimension to the already existing traffic noise, which is sporadic most of the day, increasing only during the early morning and evening "rush hours".</p> <p>There is nothing in the proposal to give any incentive to the village by way of reward for the disruption, inconvenience and nuisance for 20 years: we are not offered access to appreciate the "landscaped" nature reserve promised after extraction is complete, the landowners can offer the amenity to a private association or keep it to themselves, albeit one public path passes through or around the area. There is no convincing offer of any local employment opportunities. Many of the villagers are retired, hoping to live out the remainder of their lives in peace without this industrial scale disruption and disturbance; they may not be around to appreciate any amenity proposal in 20 years time, were it even to be offered.</p> <p>There is a large supply of gravel to be extracted over the next 14 years from the Norton/ Heckingham pits only 3-4 miles away from our village and not adjacent to people's homes, gardens and churches.</p> <p>This pit proposal is unnecessary and inappropriate and I trust will not receive serious consideration from the Council.</p>	<p>the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health.</p> <p>The proposal is for the site to be restored to a combination of acid grassland, woodland planting and shallow wetland/pond. There are currently no proposals for public access to the restored site.</p> <p>The proposed extraction rate would mean that the mineral would be extracted within nine years. The site would need to be worked in phases with progressive restoration. Restoration would normally be required to be completed within a year of mineral extraction ceasing. At the planning application stage this would be required by planning condition.</p> <p>It is noted that Norton Subcourse quarry is only around 3.6km from the proposed site at Haddiscoe. The current planning permission for Norton Subcourse quarry requires mineral extraction to cease and the site to be restored by February 2036.</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p>I enclose my poem written upon first hearing the outline proposals in 2008, which further expresses my and many others' views.</p>	<p>The site has been proposed to Norfolk County Council by Cemex, in response to a 'call for mineral sites' for the Norfolk Minerals and Waste Local Plan Review. Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan. In the plan period to the end of 2036 we have forecast a need for an additional 20.3 million tonnes of sand and gravel resources to be provided in Norfolk.</p>
<p><b>(Object)</b> Representation ID: 91826  Respondent: <b>Mr D Newton [17612]</b></p> <p>I hereby object to the proposal MIN 25 as laid out in the M&amp;WLPR. To start with, this site was previously looked at (and dismissed in 2014 as stated in the document), but this is the first notification I have had regarding the new proposal. Surely given the previous plan and subsequent years of claim and counter claim, residents of Haddiscoe deserved to be informed of the new proposal before this review.</p> <p>The proposal suggests 9 years to extract the minerals. What if there is a lack of demand for the materials, how long will it go on for then? Will there be a time limit on the proposer to complete? Or will Haddiscoe be left with another hole in the ground! We hear on the news etc. that there is an increasing need to feed an increasing population, but here we are removing agricultural land from the system. I am no expert on how good the land is, but I can see with my own eyes that the crops grow.</p> <p>Also, the proposal mentions how far Gorleston and Gt Yarmouth are from the site, is this where the materials are to be transported to? What consideration has been given to the 'carbon footprint' regarding transporting extracted minerals over this distance? Should not the strategy be trying to look at other alternatives, such as dredging materials from the sea beds at these locations. Another 'carbon footprint' concern is the number of HGV lorry movements (80 per day), increasing diesel pollution and noise. The document states "There are mature screen planting.....on all sides of the site, except a section of the eastern boundary closest to Manor Farm". I wish to point out that I can see farm vehicles working in the field, from my garden! Therefore, we are not screened!</p>	<p>Objection noted.</p> <p>The proposal in the Minerals and Waste Local Plan Review is not the same as the planning application and appeal in 2014 because the M&amp;WLP site only includes the field between Church Road and Loddon Road and does not include any land south of Loddon Road. The Initial Consultation stage of the Minerals and Waste Local Plan Review is the first consultation stage in the process and therefore is the first time that we have consulted on the proposed sites.</p> <p>The fact that the field is currently in agricultural use is recognised. In any future planning application on assessment of the agricultural land would be required. This would be balanced against the benefits of mineral extraction which is recognised through national policy. As grade 3 agricultural land, there is no reason in principle why the site should not be allocated.</p> <p>Mineral extraction is a temporary use of land and permissions are time limited. All businesses are subject to changes in demand over time. If the mineral was not extracted during the permitted time, the operator would need to apply to extend the time period and it would be considered whether this was appropriate. The draft site policy requires a future planning application to include a phased working and progressive restoration scheme to a nature conservation afteruse and the</p>

<b>Representations received about site MIN 25</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>In my opinion, the way the document has been laid out, it would appear this site has already been given the 'green light'. It seems to lack any consideration for the residents of Haddiscoe, who will suffer the noise, dust and pollution this proposal will produce: as well as possible health problems caused by it.</p>	<p>implementation of this scheme would be controlled by a planning condition if permission was granted.</p> <p>The market for aggregate minerals is generally within 30 miles of the mineral site. Mineral can only be extracted where it exists. Great Yarmouth and Gorleston are mentioned as these as the closest urban areas where significant growth is planned. Mineral from the existing site at Norton Subcourse is transported a similar distance.</p> <p>Marine dredging is already considered when planning for minerals. The Mineral Local Plan Review is assessing the need for land won minerals. Great Yarmouth has no marine aggregate landing wharves, the nearest wharf is in Ipswich.</p> <p>The draft site policy requires provision of a highway access that is considered suitable to the Highway Authority. Any future development would also need to be in compliance with policy MW3 Transport. A planning application would need to demonstrate that there would not be unacceptable adverse impacts from the proposed HGV traffic.</p> <p>The draft site policy requires a future planning application to include a Landscape and Visual Impact Assessment which would consider potential impacts on the wider landscape and identify appropriate mitigation measures; this would include assessment of whether additional planting was required to screen the site.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health.</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
<p><b>(Object)</b> Representation ID: 91825  Respondent: <b>Mrs L Newton [17613]</b></p> <p>With reference to your letter dated 26th June 2018, regarding the initial proposal for sand and gravel extraction, MIN25, Manor Farm, Haddiscoe.</p> <p>This site has been the subject of a planning application and was rejected on appeal in 2014.</p> <p>This site lies close to our property and we feel strongly that, if approved this time, it would have a negative impact on our quality of life. While we recognise that three sides of the site are screened with a mature hedge, our home borders the site on the same side as Manor Farm, and the report clearly states that there is no screening of any sort along this boundary. We are approx. 100 meters from the site boundary, and the resulting noise, disruption and threat to health from air born small dust particles would have a negative effect on us.</p> <p>The three homes that are situated along this border seem to have been given no consideration and no mention in the initial report. We find this very disturbing as the report itself clearly states that "the greatest impacts will be within 100 metres of the source, if uncontrolled". As no mention of protection for ourselves or our neighbours seems planned we can only assume that we will be given no consideration by the company seeking to work this site for 9 long years.</p> <p>The plan will inevitably lower the value of our property, lower the quality of our lives and has the possibility of affecting our health. As I am 67 years old I feel that the effect this will have on me will be considerable, and the likelihood of chest and breathing problems from the small dust particles almost inevitable.</p>	<p>Objection noted.</p> <p>The proposal in the Minerals and Waste Local Plan Review is not the same as the planning application and appeal in 2014 because the M&amp;WLP site only includes the field between Church Road and Loddon Road and does not include any land south of Loddon Road.</p> <p>The draft site policy requires a future planning application to include a Landscape and Visual Impact Assessment which would consider potential impacts on the wider landscape and identify appropriate mitigation measures; this would include assessment of whether additional planting was required.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health.</p> <p>The site assessment recognises that there are 15 properties within 100m of the site boundary and 55 properties with 25m of the site boundary. The extraction area would need to be set back at least 100 metres from residential properties, with additional tree planting in the corner of the site closest to the properties in Gravel Pit Lane.</p> <p>Property values are not a material planning consideration.</p>
<p><b>(Object)</b> Representation ID: 91819  Respondent: <b>Ms S Aldren [17607]</b></p> <p>It is with regret and astonishment that I am writing to express my opinions on the councils Minerals and Waste strategy proposal using land adjacent to the village of Haddiscoe.</p>	<p>Objection noted.</p> <p>The objections from local residents to the planning application (appeal ref. APP/X2600/A/13/2197841) are noted. The appeal decision in 2014 concluded that only the extraction area to the south of Loddon Road would have an adverse impact on the</p>

<b>Representations received about site MIN 25</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Having been through a full and thorough testing of the site, a previous planning application was totally rejected by all councils as wholly unsuitable. The application was taken to the highest appeal and ministers rejected it unanimously.</p> <p>The issues which led to rejection are still applicable and therefore make this site unacceptable for the council's future plans, namely: proximity to the village, (my property borders onto the proposed site), the road infrastructure and traffic volume would be a serious concern, along with pollutants which would lead to health issues for residents. The effect on the water table and wildlife being on the Broads National Park would also have a considerable effect.</p> <p>I feel there is no case to answer as this site has been fully investigated and found lacking, therefore, common sense suggests no more time or money should be wasted by considering its inclusion on the Minerals and Waste proposal.</p>	<p>setting of the Church; this was the only reason for dismissal of the appeal. The proposal in the Minerals and Waste Local Plan Review is not identical to the planning application and appeal in 2014 because the M&amp;WLP site only includes the field between Church Road and Loddon Road and does not include any land south of Loddon Road.</p> <p>The site assessment recognises that there are 15 properties within 100m of the site boundary and 55 properties with 25m of the site boundary. The extraction area would need to be set back at least 100 metres from residential properties, with additional tree planting in the corner of the site closest to the properties in Gravel Pit Lane.</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health.</p>

Representations received about site MIN 25	Norfolk County Council Planning Officer's response
	<p>The proposal by the mineral operator does not indicate that dewatering would form part of the scheme. Therefore, it is not expected that water resources or drainage would be affected.</p> <p>Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Biodiversity Survey and Report to be submitted with planning applications for mineral extraction operations which affect a feature which could provide a habitat for wildlife. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment. Cemex has submitted this site for consideration into the Minerals and Waste Local Plan Review process. Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan and to consider the alternative sites proposed for allocation.</p>
<p><b>(Object)</b> Representation ID: 91818</p> <p>Respondent: <b>Mr M Aldren [17608]</b></p> <p>I cannot believe that I am having to write again on the Minerals and Waste strategy proposal for the land adjacent to Hall Farm in the village of Haddiscoe. As you are aware, this site went through a full planning application in 2014, was unanimously rejected as unsuitable by the parish, District and Norfolk County Council and then went to appeal to the minister and inspectors and was rejected as wholly unsuitable.</p> <p>The issues with the site then are still issues now, namely proximity and disturbance to the village of Haddiscoe, the unsuitability of the road infrastructure and the impact of the historical church. There is also a public footpath across the site which would be rendered inoperable by any development.</p> <p>Like many of the houses in the village, we are adjacent to the proposed site, our properties would be blighted and our retirement plans ruined by such a site. I am extremely concerned by the health impacts on myself and my family and other villagers from the dust and particulate matters. If it were to be approved, then we would have</p>	<p>Objection noted.</p> <p>The planning application that was refused included land to the south of Loddon Road. The proposed site in the Minerals and Waste Local Plan Review does not include the land to the south of Loddon Road.</p> <p>The site assessment recognises that there are 15 properties within 100m of the site boundary and 55 properties with 25m of the site boundary. The extraction area would need to be set back at least 100 metres from residential properties, with additional tree planting in the corner of the site closest to the properties in Gravel Pit Lane.</p> <p>The estimated number of HGV movements is 80 per day. The B1136 and the A143 are both suitable roads for HGV traffic. The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements along Crab Apple Lane. In accordance with</p>

<b>Representations received about site MIN 25</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>little choice but to seek compensation from the council and developers through the legal system.</p>	<p>Norfolk County Council's 'Local List for the Validation of Planning Applications' a Transport Statement would need to be submitted at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the safety and capacity of the road network.</p> <p>With regards to potential impacts on the Church of St Mary, the draft policy states that a Heritage Statement will be required at the planning application stage to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the historic environment. A planning appeal decision in 2014 (regarding proposed mineral extraction at this site and land to the south of the Loddon Road) concluded that only the extraction area to the south of Loddon Road would have an adverse impact on the setting of the Church and this parcel of land is not included in the proposed site allocation.</p> <p>The public footpath would need to be diverted during mineral extraction operations and reinstated on restoration of the site.</p> <p>Property values are not a material planning consideration.</p> <p>The draft site policy requires a noise assessment and a dust assessment to be submitted at the planning application stage, along with mitigation measures to deal appropriately with any amenity impacts. The draft Development Management Criteria Policy states that proposals for minerals development will need to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise, air quality and dust).</p>

<b>Representations received about site MIN 25</b>	<b>Norfolk County Council Planning Officer's response</b>
	<p>Compensation would not be offered and does not form part of the landuse planning process. Cemex is a private company and has submitted this site for consideration into the Minerals and Waste Local Plan Review process. Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan and to determine planning applications for mineral extraction.</p>



**MIN 92**            **land east of Ferry Lane, Heckingham**

<b>Representations received about site MIN 92</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93152  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and continued routing arrangements. The haul route crossing of Ferry Road will need to conform to design and visibility standards.</p>	<p>Noted. However, site MIN 92 is concluded to be unsuitable to allocate due to unacceptable landscape impacts.</p>
<p><b>(Comment)</b> Representation ID: 93116  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms A Crotty) [18343]</b>  I agree with the conclusion that this site is unsuitable for allocation due to the line of mature oaks in the centre of the site.</p>	<p>Noted. Site MIN 92 is concluded to be unsuitable to allocate due to unacceptable landscape impacts.</p>
<p><b>(Comment)</b> Representation ID: 93111  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms C Keightley) [18344]</b>  We agree with the Arboricultural officers comments that this site is unsuitable for allocation.</p>	<p>Noted. Site MIN 92 is concluded to be unsuitable to allocate due to unacceptable landscape impacts.</p>
<p><b>(Comment)</b> Representation ID: 93102  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  The retention of the hedgerow oaks is important with their place in the landscape being intrinsic in the attractiveness of the area. I agree that this combined with the location adjacent to the Broads Authority Executive Area make the site unsuitable for allocation.</p>	<p>Noted. Site MIN 92 is concluded to be unsuitable to allocate due to unacceptable landscape impacts.</p>
<p><b>(Comment)</b> Representation ID: 92992  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. However, site MIN 92 is concluded to be unsuitable to allocate due to unacceptable landscape impacts.</p>
<p><b>(Comment)</b> Representation ID: 92366  Respondent: <b>Cemex UK Materials Ltd (Mr S Denny) [17975]</b>  MIN 92: The Company does not agree with the initial conclusions of the Minerals Planning Authority regards this site, land east of Ferry Lane, Heckingham.  The proposed site abuts the boundary of the Broads Authority Executive Area to the north, south and west, albeit separated by a minor road in all bar the latter. It is noted, however, that the</p>	<p>The Broads Authority have responded to the Initial Consultation and stated that they do not support</p>

<b>Representations received about site MIN 92</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Broads Authority concluded that the extant permitted quarry immediately to the east would have a "negligible" impact on the character of the Broads. The statement that "... more open views from the road to the west..." is not supported by evidence 'in the field' as it is apparent that a significant body of existing trees sever all visibility of the site from the Broads area. It has been acknowledged that to the south the site is more open, but it is proposed that the area between the power cables and Beacon Farm be subject to an advanced planting programme. This would have the benefits of mimicking the tree screen to the north and west, screening Beacon Farm from the proposed development, and linking existing woodland to woodland areas planted by the Company in the course of implementing extant planning permissions. Given that the reserves within the proposed site are not likely to be required for at least 11 years there is ample time for any advanced planting to be undertaken and mature so as to be effective. Furthermore, there are no publicly accessible viewpoints to the south of the site until the Norton Road, from which only the most fleeting views of the site are available due to intervening vegetation, topography and buildings.</p> <p>It is acknowledged that the site is bisected on an east to west axis by a row of mature trees, possibly remnants of a removed hedgerow. None of the trees in question appear to be the subject of Tree Preservation Orders. It is the Company's view that this site can be worked for sand and gravel economically with these trees being retained whilst not being materially affected by that working. Conversely, it is considered premature to take the view that the felling of these trees would constitute an "...unacceptable landscape impact..." in the absence of mitigation measures or an assessment of the condition of the trees themselves. As discussed above, the Company would propose as part of any development programme to implement an extensive advanced tree planting scheme along the site's southern boundary. As part of any proposed restoration it is quite possible that the original field boundaries, dividing the site into quarters, could be reinstated. It is also possible that these trees may not be in a condition that would secure their long term retention. It is the Company's view that the site should be identified as a Specific Site for minerals extraction and that it will be for an applicant to demonstrate that these matters of acknowledged significance can be adequately mitigated. The site is suitable for minerals extraction in principle and should be identified as such in the draft Plan.</p>	<p>this site being allocated for mineral extraction due to the landscape issues raised in the site assessment. There are views into the site from the road to the west as the existing trees are on the western side of the road (not on the site boundary). To the south the site is more open. The proposal for advanced planting between the power cables and Beacon Farm is noted, however, due to the sloping nature of the site it is not considered that this would sufficiently screen views into the site from the Norton Road to the south-west.</p> <p>Norfolk County Council's Natural Environment Team (which includes arboriculture, ecology, green infrastructure and landscape matters) considers that felling the line of oak trees would constitute an unacceptable landscape impact. It is noted that the condition of the trees has not currently been assessed. It is noted that the company considers that the site can be worked for sand and gravel with these trees being retained whilst not being materially affected by the working. However, we consider that protecting the roots and drainage area of the existing trees whilst working the site would make an acceptable working scheme unlikely.</p> <p>The proposal for advanced tree planting along the site's southern boundary is noted, although no details have been provided.</p>

Representations received about site MIN 92	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 92365  Respondent: <b>Savills (Mr G Warde-Aldam) [17974]</b></p> <p>We are responding to site MIN 92 included in the consultation document. We are the authorized agents for the landowner, the Raveningham Estate.</p> <p>We note that the initial conclusion is that the site is not suitable for allocation. We respond to the reasons that have been stated in the consultation document as follows:-</p> <ol style="list-style-type: none"> <li>1. There is a tall hedge long the eastern boundary and a large wood to the North and West. Impact on the Broads Authority Executive Area will be minimal. Advanced tree planting would help to mitigate any adverse impact as well.</li> <li>2. The line of trees crossing the site could be removed or left in situ and material could still be extracted from the site.</li> <li>3. The site is adjacent to an existing working gravel pit so there are benefits as sand and gravel can be processed on the adjacent site with no need to install new machinery which would be the case on a greenfield site.</li> </ol> <p>All in all we believe that the provisional grounds for refusing to allocate this site are incorrect and the issues that have been raised can all be dealt with at the planning stage. We believe the site is suitable for mineral extraction and should be identified as such in the Draft Plan.</p>	<ol style="list-style-type: none"> <li>1. It is recognised that there is existing woodland to the north and west of the site and a tall hedge along the eastern boundary. The proposal for advanced tree planting is noted, although no details have been provided. However, due to the sloping nature of the site, the views of the site from the road to the west and the Broads Authority Executive Area to the south-west in particular, would be difficult to screen.</li> <li>2. Removing the line of trees crossing the site would have an unacceptable landscape impact. Protecting the roots and drainage area of the existing trees whilst working the site would exclude some of the site from being extracted and would make an acceptable working scheme unlikely.</li> <li>3. Noted. However, it is not considered that being able to use the existing processing plant on the adjacent site outweighs the landscape impacts of mineral extraction at the proposed site MIN 92.</li> </ol>
<p><b>(Comment)</b> Representation ID: 92156 and 92122  Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>Agree due the landscape impacts on the Broads. Potential for adverse impacts on SSSI.  Please refer to our comments on protected landscapes in our letter of 13 August 2018.</p> <p>Protected landscapes  Several allocations are either within protected landscapes or lie close to their boundaries or 'settings' which means that the highest sensitivity must be afforded to the landscape. It would be advisable to include a specific policy for protected landscapes within the Plan to reflect their protection as both the Norfolk Coast AONB and The Broads, which has the equivalent status of a national park, may be impacted by minerals development. Any proposal which may affect a</p>	<p>Noted. However, site MIN 92 is concluded to be unsuitable to allocate due to unacceptable landscape impacts.</p>

Representations received about site MIN 92	Norfolk County Council Planning Officer's response
<p>protected landscape or its setting should be subject at application stage to a Landscape and Visual Impact Assessment (LVIA) for all stages of the operation.</p> <p>The LVIA should consider how a proposal may impact the statutory purposes for which a protected landscape is designated, including impacts on landscape character and tranquillity, together with full details of mitigation and restoration. All restoration measures proposed will need to be in keeping with the local landscape character. Consideration should be given to each landscape character's sensitivity and its capacity to accommodate the proposed development. The requirement for a LVIA and mitigation measures should be identified in the Plan for each relevant allocation.</p> <p>Further information needs to be provided for these allocations which demonstrates that impacts to protected landscape features have been avoided where possible, and mitigation measures put in place for those impacts which cannot be avoided, and a programme of monitoring agreed to ensure the measures are effective. The views of the relevant organisation for each protected landscape need to be taken into account fully on these proposed allocations.</p> <p>Designated sites The assessment of a proposal on nearby designated sites, including SSSIs, must include a consideration of likely changes to hydrology and increased disturbance of sensitive species from noise, lighting, vibration etc. Suitable mitigation might include avoidance of the breeding season, provision of screening etc. The impact assessment should provide evidence that there will be no adverse effects on the nationally and internationally designated features from dust blow, changes to hydrology etc. The requirement to include this information at application stage should be made clear in each relevant allocation.</p>	
<p><b>(Object)</b> Representation ID: 91837</p> <p>Respondent: <b>Broads Authority (Natalie Beal) [16282]</b></p> <p>Broads Landscape Character Assessment 2016; Chet Valley LCA, Carr woodland LCT to west and upland LCT to the north and south. Recommended not to support this site going forward (in terms of landscape) for reasons as set out in the supporting text under 'landscape'.</p>	<p>Noted. Site MIN 92 is concluded to be unsuitable to allocate due to unacceptable landscape impacts.</p>

**MIN 212 land south of Mundham Road, Mundham**

<b>Representations received about site MIN 212</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93201  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93153  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and continued routing arrangements.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 92993  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p>	<p>Noted. The draft site policy states that a Heritage Statement will be required at the planning application stage, to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.</p>
<p><b>(Comment)</b> Representation ID: 92511  Respondent: <b>South Norfolk District Council (Mr J Walchester) [17997]</b>  MIN 212 at Mundham - The relationship between the site and the processing plant seems to be quite poor, although it is acknowledged that the number of movements are relatively small and this is an existing route. The proposal includes increased bunding to screen the minerals workings, but doesn't indicate if that would be acceptable in terms of the landscape character type within which the site is located.</p>	<p>The site is proposed to be operated for 11 years. As stated in the site assessment, the impact of the proposed mineral working on the wider landscape would predominantly be the decreased long-distance views due to bunding to screen the mineral working from view. The views of the mineral working from nearby properties will predominantly be screened by bunding. The bunding proposed to screen views of the site would be removed on restoration of the site and the current open views across the site would be reinstated. Therefore, the landscape impacts would be temporary. The proposed bunding would not have any impacts on the listed sensitivities and vulnerabilities of the Chet Tributary Farmland landscape character type.</p>
<p><b>(Comment)</b> Representation ID: 92396</p>	

Representations received about site MIN 212	Norfolk County Council Planning Officer's response
<p>Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes . Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p> <p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 207, MIN 208, MIN 209, MIN 210, MIN 211, MIN 212, MIN 79, MIN 80</p> <p>We support the Council's recommendations for restoration to nature conservation after use on these sites.</p>	<p>Noted</p> <p>Noted</p> <p>Noted. The proposed site restoration is nature conservation afteruse with species rich acid grassland with scrub woodland and a water body fringed with reeds. The draft site policy requires a progressive restoration scheme to a nature conservation afteruse to provide landscape and biodiversity gains.</p>

**MIN 79**                      **land north of Hickling Lane, Swardeston**

<b>Representations received about site MIN 79</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93202  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93154  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93103  Respondent: <b>Norfolk County Council - Natural Environment Team (Ms E Smith) [18345]</b>  Sprow's pit copse should be retained throughout the works and become a focus on in the restoration scheme. The restoration scheme should incorporate and extend the copse and strengthen the boundary planting.</p>	<p>Noted. However, the site has been withdrawn from the M&amp;WLPR process by the mineral operator and landowner who were promoting the site for mineral extraction. Therefore the site will no longer be considered in the M&amp;WLPR process.</p>
<p><b>(Object)</b> Representation ID: 92994  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  MIN 79 and MIN 80 have to be looked a cumulatively and with the proposed location for a sub-station for the Hornsea off-shore wind farm. Owing to the landscape, all these impact negatively on grade II* Mangreen Hall in particular. However, we would note the close proximity of grade II* Gowthorpe Manor and scheduled Venta Icenorum among a number of designated heritage assets in the vicinity. We expect a heritage impact assessment to ascertain whether and how much of the area could be allocated for minerals extraction and set out what mitigation measures would be appropriate. We would expect these to be incorporated into policy should the site come forward as an allocation.</p>	<p>Noted. However, the site has been withdrawn from the M&amp;WLPR process by the mineral operator and landowner who were promoting the site for mineral extraction. Therefore the site will no longer be considered in the M&amp;WLPR process.</p>
<p><b>(Comment)</b> Representation ID: 92531  Agent: Wood E&amp;I Solutions Ltd (Ms H L Bevins) [18003] Respondent: <b>National Grid [611]</b>  Electricity Transmission  * MIN 79 &amp; 80 (our reference ET225)</p>	<p>Noted. However, the site has been withdrawn from the M&amp;WLPR process by the mineral operator and landowner who were promoting the site for mineral extraction. Therefore the site will no longer be considered in the M&amp;WLPR process.</p>

<b>Representations received about site MIN 79</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Please see enclosed plan referenced ET225 at Appendix 1. The proposed Minerals sites are crossed by a National Grid high voltage electricity transmission overhead line.</p> <p>National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.</p> <p>National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.</p> <p>Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>'A Sense of Place' is available from National Grid and can be viewed at:  <a href="http://www.nationalgrid.com/uk/Senseofplace/Download/">http://www.nationalgrid.com/uk/Senseofplace/Download/</a>  Further information regarding development near overhead lines and substations is available</p>	



Representations received about site MIN 79	Norfolk County Council Planning Officer's response
<p>here:  <a href="http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm">http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm</a></p>	
<p><b>(Comment)</b> Representation ID: 92392  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p> <p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes . Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p> <p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 207, MIN 208, MIN 209, MIN 210, MIN 211, MIN 212, MIN 79, MIN 80</p> <p>We support the Council's recommendations for restoration to nature conservation after use on these sites.</p> <p>Additionally, sites MIN 79 and MIN 80 being close to the Norwich growth area may support restoration that includes specifically includes green infrastructure provision.</p>	<p>Noted. However, the site has been withdrawn from the M&amp;WLPR process by the mineral operator and landowner who were promoting the site for mineral extraction. Therefore the site will no longer be considered in the M&amp;WLPR process.</p>

**MIN 80**                      **land south of Mangreen Hall Farm, Swardeston**

<b>Representations received about site MIN 80</b>	<b>Norfolk County Council Planning Officer's response</b>
<p><b>(Comment)</b> Representation ID: 93203  Respondent: <b>Norfolk County Council Historic Environment Service (Dr James Albone) [8137]</b>  We agree with the initial conclusion for this site.</p>	<p>Noted</p>
<p><b>(Comment)</b> Representation ID: 93155  Respondent: <b>Norfolk County Council - Highway Authority (Ms H Grimes) [18346]</b>  The Highway Authority considers the site is acceptable subject to the use of the existing access and continued routing arrangements.</p>	<p>Noted</p>
<p><b>(Object)</b> Representation ID: 92995  Respondent: <b>Historic England (Dr Natalie Gates) [17465]</b>  MIN 79 and MIN 80 have to be looked a cumulatively and with the proposed location for a sub-station for the Hornsea off-shore wind farm. Owing to the landscape, all these impact negatively on grade II* Mangreen Hall in particular. However, we would note the close proximity of grade II* Gowthorpe Manor and scheduled Venta Icenorum among a number of designated heritage assets in the vicinity. We expect a heritage impact assessment to ascertain whether and how much of the area could be allocated for minerals extraction and set out what mitigation measures would be appropriate. We would expect these to be incorporated into policy should the site come forward as an allocation.</p>	<p>Noted. However, the site has been withdrawn from the M&amp;WLPR process by the mineral operator and landowner who were promoting the site for mineral extraction. Therefore the site will no longer be considered in the M&amp;WLPR process.</p>
<p><b>(Comment)</b> Representation ID: 92352  Agent: Wood E&amp;I Solutions Ltd (Ms H L Bevins) [18003] Respondent: <b>National Grid [611]</b>  Electricity Transmission  * MIN 79 &amp; 80 (our reference ET225)  Please see enclosed plan referenced ET225 at Appendix 1. The proposed Minerals sites are crossed by a National Grid high voltage electricity transmission overhead line.  National Grid prefers that buildings are not built directly beneath its overhead lines.  This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and</p>	<p>Noted. However, the site has been withdrawn from the M&amp;WLPR process by the mineral operator and landowner who were promoting the site for mineral extraction. Therefore the site will no longer be considered in the M&amp;WLPR process.</p>

Representations received about site MIN 80	Norfolk County Council Planning Officer's response
<p>disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.</p> <p>National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.</p> <p>Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>'A Sense of Place' is available from National Grid and can be viewed at:  <a href="http://www.nationalgrid.com/uk/Senseofplace/Download/">http://www.nationalgrid.com/uk/Senseofplace/Download/</a>  Further information regarding development near overhead lines and substations is available here:  <a href="http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm">http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm</a></p>	
<p><b>(Comment)</b> Representation ID: 92391  Respondent: <b>Norfolk Wildlife Trust (Mr M Jones) [17979]</b></p>	<p>Noted. However, the site has been withdrawn from the M&amp;WLPR process by the mineral operator and landowner who were promoting the site for mineral</p>

<b>Representations received about site MIN 80</b>	<b>Norfolk County Council Planning Officer's response</b>
<p>Owing to the lack of information that we hold on the ecological value of the wider countryside we have largely restricted our comments to impacts from proposed allocations on County Wildlife Sites and our reserves. In the wider countryside where possible we have made suggestions on restoration proposals based on sites' locations within our Living Landscapes . Our comments below relate specifically to sites in proximity to our reserves, SSSIs, CWSs and ancient woodland sites.</p> <p>Where sites are proposed adjacent to or in close proximity to County Wildlife Sites, we strongly recommend that these are only chosen sequentially after other sites have been selected, that they are only taken forward if it can be demonstrated that they are deliverable whilst providing sufficient stand off from the allocation boundary to account for hydrological and dust impacts, that any planning application will be accompanied by an ecological impact assessment and that restoration will be to habitats in support to those existing nearby, for example expanding existing habitats where adjacent and providing greater connectivity in the wider countryside between existing sites. We note that several proposed allocations are situated close to multiple CWS, and in these locations it would be very beneficial to co-ordinate restoration proposals in order to maximise the gains for wildlife through improving landscape scale connectivity. We would be happy to offer further advice on this in later plan consultations, if that would be helpful.</p> <p>MIN 207, MIN 208, MIN 209, MIN 210, MIN 211, MIN 212, MIN 79, MIN 80</p> <p>We support the Council's recommendations for restoration to nature conservation after use on these sites.</p> <p>Additionally, sites MIN 79 and MIN 80 being close to the Norwich growth area may support restoration that includes specifically includes green infrastructure provision.</p>	<p>extraction. Therefore the site will no longer be considered in the M&amp;WLPR process.</p>

## BACKGROUND DOCUMENTS

### Waste Management Capacity Assessment 2016

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93058</p> <p>Respondent: <b>Norfolk County Council - Waste Disposal Authority (Mr D Beenham) [18338]</b></p> <p>P6 states that the WDA "maintains detailed records of the amounts of Local Authority Collected Waste that is collected by the Waste Collection Authorities (District, Borough and City Councils)."</p> <p>This is correct in itself but it would be more accurate to reflect that the records include waste collected by the WDA (at its HWRCs and through the third party recycling credits payments). A simple re-wording would deal with this and it could read: "...maintains detailed records of the amounts of Local Authority Collected Waste collected by the Waste Collection Authorities (District, Borough and City Councils) and by Waste Disposal Authority (the County Council)."</p>	<p>The next iteration of the Waste Management Capacity Assessment (containing 2017 data) includes the amended text as advised.</p>

## Initial Sustainability Appraisal Report

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93217</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>Natural England is satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations. The future conclusions and recommendations of the revised HRA will need to be incorporated into later revisions of the SA report, and be reflected in the allocations and policies of the Local Plan.</p> <p>The Government expects an 'environmental net gain' principle to be embedded into development including minerals and waste. A good measure of the effectiveness of the M&amp;WPR in delivering this would be to monitor annually the type and area of new habitats created or enhanced post restoration. It may be helpful to include the following definition of GI:</p> <p>Green Infrastructure is the strategic network of multi-functional, linked green and blue spaces, both new and existing, urban and rural, which delivers a range of benefits for people and wildlife. The network is formed by individual green infrastructure components at different scales, from street trees, green roofs, and sustainable drainage, to allotments, nature conservation sites and country parks. These assets may be physically and visually connected to one another by linear features such as hedgerows, public rights of way, cycle routes, rivers and watercourses to form a green infrastructure network.</p> <p>Individual elements of the green infrastructure network can serve a useful purpose at a range of scales without being connected. However, when green infrastructure components are linked together to form green networks, further combined benefits can be achieved at a strategic level. These direct and indirect benefits of green infrastructure have been termed 'ecosystem services' and are derived from physical natural assets known as 'natural capital'. Development can impact on the extent and ability of natural capital to provide ecosystem services. To ensure that these benefits are delivered, green infrastructure must be protected, well planned and managed.</p>	<p>Noted. The SA and M&amp;WLP have been revised where necessary.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

## Draft Habitats Regulations Assessment – Test of Likely Significant Effects

Representations received	Norfolk County Council Planning Officer's response
<p><b>(Comment)</b> Representation ID: 93218</p> <p>Respondent: <b>Natural England (Ms Louise Oliver) [1874]</b></p> <p>A recent judgment from the Court of Justice of the European Union (Case C-323/17 People Over Wind v Coillte Teoranta) has provided authoritative interpretation relating to the use of mitigation measures at the screening stage of a Habitats Regulations Assessment (HRA). The judgment concluded that it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site. However, when determining whether the plan or project will have an adverse effect on the integrity of the European site at appropriate assessment, a competent authority may take account of those avoidance and mitigation measures.</p> <p>The Local Planning Authority, as competent authority for the Minerals and Waste Local Plan , should consider this judgment when undertaking the HRA screening under the Conservation of Habitats and Species Regulations 2017 and may wish to take its own legal advice on the implications of the judgment.</p> <p>This means that for any sites where avoidance and mitigation measures have been identified to protect designated Natura 2000 sites such as Special Areas of Conservation (SACs), Special Areas of Protection (SPAs) or Ramsar sites, the sites should not be screened out for likely significant effect but carried forward to Appropriate Assessment, at which point any mitigation measures, eg not de-watering, conditions to control dust or lighting etc, can be assessed in detail and taken into account.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. There are six sites concluded to be suitable to allocate at the Preferred Options stage where we had previously referred to mitigation measures in terms of planning conditions to control noise and dust. These sites are: MIN 96, MIN 25, MIN 69, MIN 207, MIN 202 and MIN 65. These sites have been reassessed in the HRA and it is concluded that they are all sufficiently distant from the relevant designated sites that there would not be adverse noise or dust impacts anyway and therefore specific mitigation measures are not required. They have therefore all been screened out at the Task 1 TOLS stage both in the 2018 HRA and this revised 2019 HRA.</p>

Our specific comments on various individual allocations included in the initial consultation are intended to reflect this ruling. That is, where measures have been identified specifically to protect a Natura 2000 site, then these allocations should be screened in to Appropriate Assessment. At this stage the effectiveness of any proposed avoidance and mitigation measures and all the evidence should be examined to reach a conclusion of likely significant effect, either alone or in combination with other plans or projects, and to ascertain whether an adverse effect on the integrity of the site can be ruled out.

Note that any proposal which may affect a Natura 2000 designated site must go through a project-level HRA in addition to this strategic plan-level HRA. This should be identified for each relevant allocation and reflected in the policy wording, including what avoidance and mitigation measures would be necessary. This can be at a 'high' level, e.g. work would take place outside the bird breeding season to avoid disturbance to nesting birds. However, more detail would be expected in the HRA at planning application stage.

The future conclusions and recommendations of the HRA will need to be incorporated into later revisions of the Sustainability Appraisal (SA) report, and be reflected in the allocations and policies of the M&WLPR.

Noted. The comments made by Natural England regarding specific sites have been included in the main Feedback Report on the Initial Consultation. However, of particular relevance to the HRA are the following sites where specific comments were made by Natural England:

MIN 71 at Holt is concluded to be not suitable to allocate in the Preferred Options document.

MIN 204 at Feltwell is concluded to be not suitable to allocate in the Preferred Options document.

MIN 65 at Stanninghall is located in a different hydrological catchment to Crostwick Marsh SSSI and therefore would not adversely affect the hydrology of the SSSI. Due to the distance of the site from the SSSI (1.43km), there would be no adverse effects from dust deposition.

MIN 40 at East Winch is outside the Impact Risk Zone for the Norfolk Valley Fens SAC and therefore the conclusion of the 2018 HRA was correct and the site assessment in the Preferred Options has been corrected.

Noted. We do not consider that there are any sites concluded to be suitable in the Preferred Options document where a project level HRA would be required.

Noted. The Sustainability Appraisal and M&WLP have been revised where necessary.