



Norfolk County Council

Norfolk Minerals and Waste Local Plan Review

Statement of Consultation

in support of

Norfolk Minerals and Waste Local Plan 2021-2038

May 2022

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Norfolk County Council

Norfolk Minerals and Waste Local Plan Review Statement of Consultation May 2022

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1. Introduction

- 1.1. This Regulation 22 statement, also known as the Statement of Consultation, has been prepared to satisfy Regulation 22 within Part 5 (Local Plans) for producing local development documents, as set out in the Town and Country Planning (Local Plan) (England) Regulations 2012.
- 1.2. Norfolk County Council, as the County Planning Authority (CPA), is responsible for planning for the provision of a steady and adequate supply of minerals and the management of waste. It has a statutory duty to produce and maintain an up-to-date Minerals and Waste Local Plan which forms the basis for determining any relevant planning applications that are lodged with the authority. The Norfolk Minerals and Waste Local Plan (NM&WLP) also forms part of the Development Plan for Norfolk which means it is a consideration in the determination of planning applications lodged with Local Planning Authorities (LPA's) within the district councils, where there is the potential for those proposals to impact safeguarded mineral resources, safeguarded mineral sites or waste management facilities.
- 1.3. The existing Norfolk Minerals and Waste Development Plan Documents (DPD's) cover the period to 2026 and consist of the following adopted documents:
 - The Norfolk Core Strategy and Minerals and Waste Development Management Policies Development Plan Document (DPD) (the 'Core Strategy') (adopted in 2011).
 - The Norfolk Waste Site Specific Allocations DPD (adopted 2013).
 - The Norfolk Minerals Site Specific Allocations DPD (adopted 2013, amended in 2017 following adoption of the Single Issue Silica Sand Review).
- 1.4. As these DPD's were adopted over five years ago, the NM&WLP review process is being carried out to ensure that the Local Plan policies remain up to date, to extend the Plan period to 2038 and to consolidate the three DPDs into one Norfolk Minerals and Waste Local Plan (NM&WLP).
- 1.5. The first stage in the NM&WLP process was a 'call for mineral extraction sites', which took place in July 2017. The sites submitted, together with the existing allocated mineral extraction sites which have yet to obtain planning permission, were assessed for their suitability for future mineral extraction. In January 2019 a 'call for waste management sites' took place for proposed permanent waste treatment facilities of over 1 hectare in size with an estimated annual throughput of over 50,000 tonnes per annum to be considered for inclusion in the NM&WLP, although no waste management facilities are allocated in the Publication version of the NM&WLP.
- 1.6. There have been two public consultations on the NM&WLP, the first was the Initial Consultation which took place in summer 2018 and the second was the Preferred Options consultation which took place in autumn 2019. Both of these consultations formed part of the plan preparation stage. The next stage in the local plan process will be the Regulation 20 formal representations period on the Publication version of the NM&WLP before it is submitted to the Secretary of State for independent examination.
- 1.7. This Statement of Consultation will help demonstrate to the examiner how the NM&WLP has been shaped by early, proportionate and effective engagement with communities, local organisations, businesses, infrastructure providers and operators and statutory consultees, through the previous consultation stages. It will also assist in ensuring a transparent and expeditious examination through the identification of main issues affecting the soundness of the draft Norfolk Minerals and Waste Local Plan (NM&WLP).
- 1.8. Regulation 22 within Part 5 (Local Plans) sets out the documents and information that must be submitted to the Secretary of State as part of the Examination process. This Statement of Consultation contains as required by the regulations:

- which bodies and persons the local planning authority invited to make representations under regulation 18
 - how those bodies and persons were invited to make representations under regulation 18
 - a summary of the main issues raised by the representations made pursuant to regulation 18,
 - how any representations made pursuant to regulation 18 have been taken into account;
- 1.9. During the next stage of the Local Plan review process, the Regulation 19 Pre-submission representations period will commence between 28 September 2022 and Friday 11 November at 5pm. This will allow consultees and the public to submit further representations which would be included within the final version of the Regulation 22 Statement of Consultation, and the number of representations made and a summary of the main issues raised in those representations will be included.
- 1.10. The Statement of Consultation comprises the following sections:
- 1) Section 1 is an introduction.
 - 2) Section 2 sets out the timeline which has been followed in preparing the Local Plan in accordance with the Local Development Scheme.
 - 3) Section 3 summarises the Regulation 18 Initial Consultation, who was invited to make comments, a summary of responses and how they were invited to make representations.
 - 4) Section 4 summarises the Regulation 18 Preferred Options Consultation, who was invited to make comments, a summary of responses and how they were invited.
 - 5) Section 5 sets out the responses received at the two Regulation 18 (Initial Consultation and Preferred Options) stages and includes a summary of the main issues raised by respondents and how they have been taken into account in the Pre-Submission Publication document

2. Minerals and Waste Development Scheme

- 2.1. The creation of a new Local Plan requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to the needs of the County in terms of strategy for minerals extraction and associated development and for waste management facilities and the policies required.
- 2.2. The below timetable outlines the main consultation stages of the emerging Norfolk Minerals and Waste Local Plan. This timeline may be subject to change and is detailed and updated as required in the [Minerals and Waste Development Scheme](#).

2.3. Key Local Plan Stages Undertaken

1: Identify issues and collect evidence: 2017/18

The Council reviewed existing policies and identified any current gaps in policies or evidence bases. Began undertaking further research to inform the Local Plan including a 'call for mineral extraction sites' and assessment of the sites submitted for consideration.

2: Preparation of Local Plan consultations (Regulation 18):

Initial Consultation: July / August 2018

Preferred Options: September/October 2019

3: Plan amendments: 2018 / 2022

The Council took on board comments received during the draft Local Plan consultations. Further evidence base documents were updated to inform the Local Plan ready for formal consultation and submission. Various impacts affected the development scheme timeframe, including the Covid pandemic.

Scheduled Local Plan Stages to Come

4: Publish the Plan (Pre-Submission Consultation Reg 19): September / October 2022

A submission ready version of the plan will be made available for stakeholders and the public to comment on for a minimum of 6 weeks. In accordance with the Local Plan Regulations, this consultation was formal and statutory seeking specifically the Plan's soundness and legal compliance for Examination in Public.

5: Submission to the Secretary of State (Regulation 22): December 2022

6: Hearing (Regulation 24): April 2023

7: Inspector's Report: October 2023

8: Adoption (Regulation 26): December 2023

3. Initial Consultation (2018)

- 3.1. The Initial Consultation (Regulation 18) was the first (statutory) stage in the process of preparing the plan and represents the scoping stage for the Local Plan preparation process. The purpose of this stage is to support early engagement with local communities, businesses, voluntary groups, public organisations and landowners on future Minerals and Waste development and change in Norfolk.
- 3.2. The Initial Consultation document can be found at <https://norfolk.oc2.uk/document/46>. The background documents relevant to the Initial Consultation on the Minerals and Waste Local Plan Review are listed below and can be accessed at <https://norfolk.oc2.uk/document/47>:
- Draft Habitats Regulations Assessment - Test of Likely Significant Effects
 - Waste Management Capacity Assessment
 - Sustainability Appraisal Report - Part A - Scoping
 - Initial Sustainability Appraisal Report
- 3.3. The consultation ran for six weeks from 29 June until 13 August 2018. This consultation used the following methods of engagement:
- A letter/email was sent to the consultees (a copy of the letter and the list of consultees can be found in this document)
 - The documents were made available on the County Council's website
 - An e-consultation portal on the County Council's website enabled direct online responses to be made;
 - Copies of the documents were available for public viewing at 47 libraries and nine Local Planning Authority offices (including County Hall)
 - A public notice was published in the Eastern Daily Press.

3.4. List of Consultees

The following organisations were consulted in the Initial Consultation period.

3.4.1. Specific consultation bodies

Part 1 section 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 defines organisations which comprise specific consultation bodies. The following organisations were therefore consulted as required by the Regulations.

3.4.1.1. Local Planning Authorities in Norfolk

- Breckland District Council
- Broadland District Council
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- The Broads Authority

3.4.1.2. Local Planning Authorities Adjoining Norfolk

- Waveney District Council
- Mid Suffolk District Council
- Forest Heath & St Edmundsbury Council (West Suffolk)
- East Cambridgeshire District Council
- Fenland District Council
- South East Lincolnshire Planning Authority (South Holland & Boston Borough)
- Suffolk County Council
- Cambridgeshire County Council
- Lincolnshire County Council

3.4.1.3. Other relevant Minerals and Waste Planning Authorities

- Bedfordshire Authorities
- Birmingham City Council
- Derbyshire County Council
- Devon County Council
- Doncaster Council
- Dorset County Council
- Hammersmith and Fulham Council
- Harrow Council Essex CC
- Kent County Council
- Knowsley Council
- Leicestershire County Council
- Northamptonshire County Council
- Nottingham City Council
- Sheffield City Council
- North London Waste Plan
- Peterborough UA
- Hertfordshire County Council
- Thurrock UA
- Southend UA
- North Lincolnshire Council
- North Yorkshire County Council
- Nottinghamshire County Council
- Staffordshire County Council
- Surrey County Council
- Cheshire East Council
- West Sussex CC
- South Downs National Park Authority
- Hampshire CC
- Worcestershire County Council

3.4.1.4. Parish and town councils in Norfolk

All parish and town councils in Norfolk were consulted.

3.4.1.5. Parish and town councils adjoining Norfolk

In Suffolk

- Barnby Parish Council
- Barnham Parish Council
- Barsham & Shipmeadow Parish Council
- Beccles Town Council
- Blundeston & Flixton Parish Council
- Brandon Town Council
- Brome & Oakley Parish Council
- Bungay Town Council
- Carleton Colville Parish Council
- Elveden Parish Council
- Euston Parish Council
- Flixton, St Cross, St Margaret & South Elmham Parish Council
- Hinderclay Parish Council
- Hopton cum Knettishall
- Hoxne Parish Council
- Lakenheath Parish Council
- Mendham Parish Council
- Mettingham Parish Council
- North Cove Parish Council
- Oulton Parish Council
- Palgrave Parish Council
- Redgrave Parish Council
- Santon Downham Parish Council
- Somerleyton, Ashby & Herringfleet Parish Council
- Stuston Parish Council
- Syleham Parish Council
- Thelnetham Parish Council
- Weybread Parish Council
- Worlingham Parish Council
- Wortham and Burgate Parish Council

In Cambridgeshire

- Christchurch Parish Council
- Elm Parish Council
- Leverington Parish Council
- Little Downham Parish Council
- Littleport Parish Council
- Manea Parish Council
- Newton parish Council
- Tydd St Giles Parish Council
- Wisbech St Mary Parish Council

In Lincolnshire

- Sutton Bridge and Wingland Parish Council

3.4.2. Other specific consultation bodies

- Anglian Water Services Ltd
- Amec Foster Wheeler E & I UK for National Grid Plc
- Cadent Plant Protection (gas distribution)
- BT Group plc
- Defence Infrastructure Organisation
- Department for Transport
- East of England Local Government Association
- Historic England
- Environment Agency
- Essex and Suffolk Water
- Natural England
- Highways England
- NCC Highway Authority
- NCC Lead Local Flood Authority
- Homes and Communities Agency
- Marine Management Organisation
- Public Health Norfolk
- West Norfolk Clinical Commissioning Group
- NHS South Norfolk Clinical Commissioning Group
- NHS Norwich Clinical Commissioning Group
- NHS North Norfolk Clinical Commissioning Group
- Health East (Great Yarmouth and Lowestoft Clinical Commissioning Group)
- Vodafone Ltd
- Hutchinson 3G UK Limited
- Virginmedia Ltd
- National Grid plc
- Police and Crime Commissioner for Norfolk
- The Coal Authority
- UK Power Networks
- Norfolk Community Health and Care (NHS Trust)
- NHS England Midlands and East
- Network Rail Infrastructure Ltd
- Office of the rail regulator
- NCC ecology
- NCC Historic Environment Service
- NCC Waste Disposal Authority

3.4.3. General consultation bodies:

Part 1 section 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 defines organisations which comprise general consultation bodies. The following organisations were therefore consulted as required by the Regulations. General consultation bodies which comprise residents or other persons carrying on business in Norfolk.

- Water Management Alliance IDB
- Waveney, Lower Yare and Lothingland IDB
- East Harling IDB
- Downham Market Group of IDBs
- Ely group of Internal Drainage Boards
- Middle Level Commissioners
- Woodland Trust
- Norfolk Wildlife Trust
- RSPB
- Ramblers Association

- Upper Waveney Valley project (now part of Discover Suffolk)
- National Trust
- Sustrans
- New Anglia LEP
- Greater Cambridgeshire and Greater Peterborough Enterprise Partnership
- Wild Anglia (Local Nature Partnership)
- Community Action Norfolk (was Norfolk Rural Community Council)
- Norfolk Geodiversity Partnership
- Norfolk Fire and Rescue Service
- Norfolk Local Access Forum (NCC)
- Norfolk Coast Partnership
- Norfolk Chamber of Commerce
- National Farmers Union
- National Federation of Gypsy Liaison Groups
- Marinet Ltd
- King's Lynn Civic Society
- Health and Safety Executive
- Forestry Commission
- Federation of Small Businesses
- Country Land and Business Association
- British Aggregates Association
- Breaking New Ground (was The Brecks Partnership was the Brecks Countryside Project originally)
- CAA: Norwich International Airport
- Norfolk Association of Local Councils
- Equality and Human Rights Commission
- Freight Transport Association Ltd
- Greenpeace
- Grimston Fen & Allotment Trust
- Norfolk and Norwich Archaeological Society
- Norfolk Farming and Wildlife Advisory Group (FWAG)
- CPRE Norfolk
- Norwich Friends of the Earth
- The Gardens Trust (was the Garden History Society)
- Norfolk Gardens Trust
- Norfolk Rivers Trust
- Grimston, Congham & Roydon Residents Association
- East of England Faiths Agency
- Norfolk and Norwich Asian Society
- Age UK Norfolk
- King's Lynn and West Norfolk Youth Advisory Board
- Norfolk Secular and Humanist Group
- Norfolk Philippines Support Group
- Church of England
- Equal Lives
- West Norfolk Islamic Association
- West Norfolk and District Chinese Association
- Greater Anglia (rail)
- Environmental Services Association

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

3.4.4.1. Mineral Operators

- British Aggregates Association
- Breedon Aggregates Ltd
- Brett Group
- Cemex UK
- Carter Concrete Ltd
- Earsham Gravels Ltd
- East Anglian Stone Ltd
- Frimstone Ltd
- Folkes Plant and Aggregate
- Four Leaf Enterprises Ltd
- Longwater Gravel Co Ltd
- Lignacite Ltd
- Middleton Aggregates Ltd
- Mineral Products Association
- Mineral Services Ltd
- Sibelco UK Ltd
- Tharros Ltd
- Silverton Aggregates Ltd
- West Norfolk Super Lime Co Ltd
- William George Recycling Ltd
- John Brown (Gazeley) Ltd
- Tarmac
- Mcleod Aggregates Ltd
- Lyndon Pallett Group Ltd

- Gresham Gravel Ltd
- The Silica and Moulding Sands Association
- Bathgate Silica Sand Limited
- Garside Sands
- Mansfield Sand Company Ltd.
- Hanson Aggregates

3.4.4.2. Land agents/consultants

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

3.4.4.3. Local Residents

We also wrote to 642 residential addresses that were located within 250 metres of the boundary of any of the proposed mineral extraction sites or areas of search.

3.4.4.4. County Councillors

The County Councillors who were elected (all 84) and served during the consultation period were consulted.

3.5. How Consultees were consulted

The Initial consultation (Regulation 18) used the following methods of engagement:

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

A Public notice of consultation was published in the Eastern Daily Press on 29 June 2018. The advert wording is detailed below.

Norfolk County Council
Town and Country Planning (Local Planning) (England) Regulations 2012
Norfolk Minerals and Waste Local Plan Review (DPD): Initial Consultation
Statement of Community Involvement consultation

Norfolk County Council is carrying out a Minerals and Waste Local Plan Review. The review will plan for Norfolk's minerals and waste management requirements up to the end of 2036. This is an Initial Consultation stage and follows a 'call for mineral extraction sites' in 2017. The Initial Consultation document contains assessments of all potential mineral extraction sites submitted as part of the 'call for sites'. The consultation document also contains draft Strategic Policies and Development Management Policies for minerals development and waste management facilities in Norfolk that will be used in the future to decide planning applications for minerals and waste developments. The next stage of the review process will be a public consultation on the Preferred Options in winter 2018/19.

The Initial Consultation documents will be published along with an Initial Sustainability Appraisal Report (Parts A and B) and a Habitats Regulations Assessment (Task 1). **The consultation period will be for six weeks from 29 June 2018 until 5pm on 13 August 2018.**

Norfolk County Council is also consulting on a review of the Statement of Community involvement. The Statement of Community Involvement explains how Norfolk County Council intends to involve the community in the preparation of Minerals and Waste planning policy documents and the consideration of planning applications.

The consultation period will also be for six weeks from 29 June 2018 until 5pm on 13 August 2018.

The above documents can be viewed on the Norfolk County Council website at www.norfolk.gov.uk/nmwdp on the 'Minerals and Waste Local Plan Review' page. Direct online comments are the preferred method of response. Representations can also be sent by email or post to the following address:

Post: Planning Services, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH

E-mail: LDF@norfolk.gov.uk

If you have any queries please call 0344 800 8020

The consultation documents will be made available for public inspection, free of charge, within normal opening hours during the consultation period, at all the public libraries in Norfolk and at:
Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH

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

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

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

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

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

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

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

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

A letter was emailed or sent via Royal Mail to specific and general consultation bodies. The wording of letter / email to consultees inviting comments is detailed below.

Norfolk Minerals and Waste Local Plan Review: Initial Public Consultation Statement of Community Involvement Consultation

I am writing to inform you that the Initial Consultation on the Minerals and Waste Local Plan Review (M&WLPR) and a consultation on a review of the Statement of Community Involvement will take place over a six week period from **29 June to 13 August 2018** (inclusive), and I would welcome your comments.

The Statement of Community Involvement sets out how Norfolk County Council intends to involve the community in the preparation of minerals and waste planning policy documents and the consideration of planning applications determined by the County Council (consisting of minerals and waste and the County Council's own developments).

The Minerals and Waste Local Plan will contain policies used to determine planning applications for minerals developments and waste management facilities in Norfolk.

The current Norfolk Minerals and Waste Local Plan consists of three documents: the Norfolk Core Strategy and Minerals and Waste Development Management Policies DPD, the Minerals Site Specific Allocations DPD and the Waste Site Specific Allocations DPD. These adopted Plans cover the period to 2026.

As the Core Strategy was adopted over five years ago, a joint review of the three adopted DPDs is being carried out to ensure that the policies within them remain up-to-date, to extend the Plan period to 2036 and to consolidate them into one Norfolk Minerals and Waste Local Plan (M&WLP). This process is the Minerals and Waste Local Plan Review.

The M&WLPR includes a forecast of the quantities of waste that need to be planned for over the Plan period to 2036 and criteria based policies to determine planning applications for waste management facilities. The Initial Consultation proposes that the M&WLPR will not allocate specific sites for waste management facilities.

The M&WLPR includes the forecast quantities of sand and gravel (1,980,000 tonnes per annum), carstone (126,500 tpa) and silica sand (750,000 tpa) that need to be planned for during the period to 2036, in order to provide a steady and adequate supply of minerals, and the proposed policies to be used to determine planning applications for mineral extraction and associated development.

The Initial Consultation document also includes all the sites that were proposed for mineral extraction in response to a 'call for mineral extraction sites' carried out for the purpose of the M&WLPR: 41 sites for sand and gravel extraction, one site for carstone extraction and 3 sites for silica sand extraction, and an initial conclusion on the suitability of each site. The Initial Consultation also includes four areas of search for future silica sand extraction.

In addition to the Initial Consultation document, the following documents which provide information to support the M&WLPR have also been published:

- Sustainability Appraisal Report (Parts A and B) (shows social, environmental and economic impacts of the M&WLPR)
- Habitats Regulations Assessment Task 1 (of impacts on European-designated nature conservation sites)
- Waste Management Capacity Assessment (contains data on current waste management capacity, waste movements, existing and forecast waste arising in Norfolk)

All documents are available on Norfolk County Council's website at www.norfolk.gov.uk/nmwdf on the 'Minerals and Waste Local Plan Review' page.

These documents are available for public inspection, free of charge, within normal opening hours up to and including **13 August 2018**, at all public libraries in Norfolk, and at:

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

Where possible the County Council would prefer comments to be made directly to <https://norfolk.jdi-consult.net/localplan/>; however responses by post and email will also be accepted. Any comments that you send will be published on Norfolk County Council's website.

All comments, using whatever method, must be made by 5pm on 13 August 2018.

Following the end of the consultation period, the Preferred Options version of the M&WLP Review, will be prepared, taking into account the comments made during the Initial Consultation. The Preferred Options will be the subject of future public consultation.

Following the end of the consultation period, the Preferred Options version of the M&WLP Review, will be prepared, taking into account the comments made during the Initial Consultation. The Preferred Options will be the subject of future public consultation.

The final stages in the M&WLPR process are a formal representations period prior to submission for examination by a Planning Inspector on behalf of the Secretary of State.

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

3.6. Inspection points

Physical copies of the documents were available for public viewing at 47 libraries and nine Local Planning Authority offices (including County Hall). A list of the inspection points are set out below.

3.6.1. Norfolk libraries

Acle	Downham Market	Hunstanton
Attleborough	Earlham, Norwich	King's Lynn
Aylsham	Fakenham	Loddon
Blofield	Gaywood, King's Lynn	Long Stratton
Brundall	Gorleston	Martham
Caister	Great Yarmouth	Mile Cross, Norwich
Costessey	Harleston	Mundesley
Cromer	Hellesdon	North Walsham
Dereham	Hethersett	Norwich – Millennium Library
Dersingham	Hingham	Plumstead Road,
Diss	Holt	Norwich

3.6.2. Local Planning Authority inspection venues

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

3.7. Summary of the number of Initial Consultation responses

There were 856 respondents to the Initial Consultation and two petitions signed by 132 local residents. The majority of the responses were from individuals, 47 respondents were from organisations.

The responses received can be viewed online at: <https://norfolk.oc2.uk/readdoc/46>

The Initial Consultation Feedback Report can be viewed on the [Norfolk County Council website](#)

The following specific consultation bodies responded to the consultation:

3.7.1. Internal consultation bodies

- 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

3.7.2. Parish and Town Council

- 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

3.7.3. Local Planning Authorities/County Planning Authorities

- 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)

3.7.4. Other specific consultation bodies

- Environment Agency
- Natural England
- Historic England
- Anglian Water Services Ltd
- Essex and Suffolk Water
- National Grid
- Ministry of Defence (Defence Infrastructure Organisation)

3.7.5. 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

3.7.6. Background Documents

We received one response from to the Sustainability Appraisal Report; the response was from Natural England.

We received one response to the Habitats Regulations Assessment (Task 1); the response was from Natural England.

We received one response to the Waste Management Capacity Assessment; the response was from Norfolk County Council as the Waste Disposal Authority.

Table 1: Initial Consultation 2018: summary of consultation responses

Table 1 below sets out a summary of initial consultation responses. It sets out the number of respondents per section of the consultation document, and whether the representation objected, supported or commented. Where respondents have made more than one representation, this figure is reflected in the 'total representations' column.

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
Minerals and Waste Local Plan Vision	11	1	4	1	6	11
Waste management strategic objectives	3	0	3	0	0	3
Minerals strategic objectives	9	1	3	1	5	9
General policies	N/A	N/A	N/A	N/A	N/A	N/A
Policy MW1 Presumption in favour of sustainable development	8	1	3	1	4	8
Policy MW2 Development management criteria	18	2	4	2	15	21
Policy MW3 Transport	7	0	0	0	7	7
Policy MW4 Climate change mitigation and adaption	10	0	1	0	9	10
Policy MW5 The Brecks protected habitats and species	4	0	3	0	1	4
Policy MW6 Agricultural soils	8	1	2	1	5	8
Waste management policies	N/A	N/A	N/A	N/A	N/A	N/A
Policy WP1 Waste management capacity to be provided	4	0	0	0	4	4
Alternative growth scenario for LACW	1	0	0	0	1	1
Alternative growth scenario for C&I waste	1	0	0	0	1	1
Policy WP2 spatial strategy for waste management facilities	9	1	2	1	6	9
Alternative spatial strategy options	1	0	0	0	1	1
Policy WP3 land uses potentially suitable for waste management facilities	11	0	1	0	10	11
Should specific sites be allocated for waste management facilities?	2	0	1	0	1	2

Section Name	Respondents	Objectors	Support	Object	Comment	Total Representations
Policy WP4 Recycling or transfer of inert and CD&E waste	4	0	0	0	4	4
Policy WP5 Waste transfer stations, MRFs, ELV and WEEE facilities	3	0	0	0	3	3
Policy WP6 transfer and treatment of hazardous waste	1	0	1	0	0	1
Policy WP7 household waste recycling centres	4	0	1	0	5	6
Policy WP8 Composting	1	0	1	0	0	1
Policy WP9 Anaerobic digestion	1	0	1	0	0	1
Policy WP10 Residual waste treatment facilities	2	0	0	0	2	2
Policy WP11 Disposal of inert waste by landfill	3	0	2	0	1	3
Policy WP12 Non-hazardous and hazardous landfill sites	1	0	1	0	0	1
Policy WP13 Landfill mining and reclamation	2	0	1	0	1	2
Policy WP14 Water Recycling Centres	2	0	0	0	2	2
Policy WP15 Whitlingham WRC	5	0	0	0	5	5
Policy WP16 Design of waste management facilities	6	0	2	0	4	6
Policy WP17 Safeguarding waste management facilities	2	0	0	0	2	2
Minerals specific policies	N/A	N/A	N/A	N/A	N/A	N/A
Policy MP1 Provision of minerals extraction	10	6	4	6	1	11
Policy MP2 Spatial strategy for minerals extraction	13	4	5	4	4	13
Policy MP3 Borrow pits	2	0	0	0	2	2
Policy MP4 Agricultural and potable water reservoirs	3	0	2	0	1	3
Policy MP5 Core River Valleys	5	0	1	0	4	5
Policy MP6 Cumulative impacts and phasing of workings	3	0	2	0	1	3
Policy MP7 Progressive working, restoration and afteruse	11	1	3	1	7	11
Policy MP8 aftercare	4	0	2	0	3	5
Policy MP9 concrete batching and asphalt plants	2	0	0	0	2	2
Policy MP10 safeguarding port and rail facilities; concrete, asphalt and recycled aggregate facilities.	5	0	1	0	4	5
Policy MP11 Mineral Safeguarding Areas and Mineral Consultation Areas	4	0	1	0	3	4

Section Name	Respondents	Objectors	Support	Object	Comment	Total Representations
Policy MP12 Energy minerals	0	0	0	0	0	0
Implementation, monitoring and review	1	0	0	0	1	1
Appendices	N/A	N/A	N/A	N/A	N/A	N/A
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
Proposed mineral sites	N/A	N/A	N/A	N/A	N/A	N/A
Site MIN 12 Beetley	12	3	0	3	9	12
Site MIN 51 & 13 Beetley	12	3	2	3	7	12
Site MIN 08 Beetley	8	4	0	4	4	8
Site MIN 23 Beeston with Bittering	13	9	0	9	4	13
Site MIN 200 Carbrooke	6	0	0	0	7	7
Site MIN 116 Cranworth	8	5	0	5	3	8
Site MIN 35 Quidenham	25	19	1	19	6	26
Site MIN 102 Snetterton	6	3	0	3	5	8
Site MIN 201 Snetterton & Quidenham	7	3	0	3	5	8
Site MIN 55 Attlebridge	3	0	0	0	3	3
Site MIN 202 Attlebridge	8	1	1	1	6	8
Site MIN 48 Felthorpe	13	9	0	9	4	13
Site MIN 37 Frettenham & Buxton with Lammas	7	1	0	1	6	7
Site MIN 64 Horstead with Stanninghall	8	2	2	2	4	8
Site MIN 65 Horstead with Stanninghall	9	2	1	2	6	9
Site MIN 96 Spixworth, Horsham St Faith & Newton St Faith	6	1	0	1	5	6
Site MIN 203 Burgh Castle	7	2	1	2	4	7
Site MIN 38 Fritton and St Olaves	335	327	2	348	6	356
Site MIN 06 Middleton	5	0	0	0	6	6

Section Name	Respondents	Objectors	Support	Object	Comment	Total Representations
Site MIN 45 East Rudham	10	1	2	1	9	12
Site MIN 204 Feltwell	11	1	0	1	11	12
Site MIN 19 & MIN 205 Pentney	11	2	1	2	9	12
Site MIN 74 Tottenhill	7	3	0	3	4	7
Site MIN 76 Tottenhill	7	1	0	1	7	8
Site MIN 77 Tottenhill	8	1	0	1	7	8
Site MIN 206 Tottenhill	9	1	1	1	7	9
Site MIN 32 West Dereham	6	2	0	2	4	6
Site MIN 40 East Winch	10	2	0	2	10	12
Site SIL 01 Bawsey	7	0	2	0	6	8
Area of Search AOS E Wormegay, Shouldham, Marham, Shouldham Thorpe	51	43	1	44	8	53
Area of Search AOS F Runcton Holme & Stow Bardolph	3	0	0	0	3	3
Area of Search AOS I Runcton Holme	4	0	0	0	4	4
Area of Search AOS J Tottenhill and Wormegay	5	0	0	0	6	6
Policy MP13 Areas of search for silica sand extraction	6	2	2	2	2	6
Site SIL 02 Marham and Shouldham	386	374	1	386	12	399
Site MIN 69 Aylmerton	11	3	1	3	7	11
Site MIN 71 Holt	23	14	1	17	8	26
Site MIN 115 North Walsham	9	0	0	0	9	9
Site MIN 207 Edgefield	6	0	2	0	4	6
Site MIN 208 East Beckham	5	1	0	1	4	5
Site MIN 209 Earsham	26	17	2	18	7	27
Site MIN 210 Earsham	25	16	2	17	7	26
Site MIN 211 Earsham	25	17	2	18	6	26
Site MIN 25 Haddiscoe	29	20	2	20	7	29
Site MIN 92 Heckingham	9	2	0	2	8	10
Site MIN 212 Mundham	5	0	0	0	5	5
Site MIN 79 Swardeston, Swainsthorpe & Stoke Holy Cross	6	1	0	1	5	6
Site MIN 80 Swardeston	5	1	0	1	4	5
TOTAL	856	810	91	977	450	1518

Table 2: Initial Consultation 2018: summary of consultation responses from background documents

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

4. Preferred Options Consultation 2019

- 4.1. The Preferred Options (Regulation 18) Consultation was the second (statutory) stage in the process of preparing the plan and presents the initial assessments for the Local Plan preparation process. The Preferred Options version of the NM&WLP took into account the consultation responses received at the Initial consultation stage. It contained a vision and strategic objectives for minerals development and waste management facilities in Norfolk. It also contained proposed wording for policies to be used when determining planning applications for minerals extraction and associated development and waste management facilities. This document also contained an assessment of the sites and areas that have been proposed for mineral extraction in Norfolk over the Plan period and draft policy wording for those sites considered suitable to allocate.
- 4.2. The Preferred Options Consultation document was accompanied by a Sustainability Appraisal Report (SA) (Part A and B) Habitats Regulations Assessment (HRA) Task 1 and a Waste Management Capacity Assessment 2017. The SA assesses the social, environmental, and economic issues relevant to the local plan and the HRA assesses the impacts on the UK National Site Network. The Waste Management Capacity Assessment contains data on current waste management capacity, waste movements, existing and forecast waste arising in Norfolk.
- 4.3. The consultation ran for six weeks from 18 September until 30 October 2019. This consultation used the following methods of engagement.
- A letter/email was sent to the consultees (a copy of the letter and the list of consultees can be found in this document)
 - The documents were made available on the County Council's website
 - An e-consultation portal on the County Council's website enabled direct online responses to be made;
 - Copies of the documents were available for public viewing at nine Local Planning Authority offices (including County Hall).

4.4. List of consultees

4.4.1. Specific consultation bodies

4.4.1.1. Local Planning Authorities in Norfolk

- Breckland District Council
- Broadland District Council
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- The Broads Authority

4.4.1.2. Local Planning Authorities adjoining Norfolk:

- Waveney District Council
- Mid Suffolk District Council
- Forest Heath & St Edmundsbury Council (West Suffolk)
- East Cambridgeshire District Council
- Fenland District Council
- South East Lincolnshire Planning Authority (South Holland & Boston Borough)
- Suffolk County Council
- Cambridgeshire County Council
- Lincolnshire County Council

4.4.1.3. Other relevant Minerals and Waste Planning Authorities:

- Barking and Dagenham Council
- Birmingham City Council
- Bedfordshire Authorities
- Bristol City
- Cheshire East
- County Durham UA
- Cumbria County Council
- Derbyshire County Council
- Devon County Council
- Doncaster Council
- Dorset County Council
- East Sussex
- East Riding of Yorkshire UA
- Essex County Council
- Flintshire Council
- Hammersmith & Fulham
- Hampshire County Council
- Harrow
- Hertfordshire County Council
- Kent County Council
- Lancashire County Council
- Leeds
- Leicester City Council
- Leicestershire County Council
- Liverpool
- Manchester
- North Lincolnshire
- North Yorkshire County Council
- North Somerset
- Northamptonshire County Council
- Nottinghamshire County Council
- Nottingham City Council
- Peterborough UA
- Rotherham
- Rutland
- Sheffield City Council
- Southend Council
- South Downs National Park Authority
- Staffordshire County Council
- Surrey County Council
- Telford and Wrekin
- Thurrock Council
- Walsall
- West Sussex County Council
- Worcestershire County Council
- North London Waste Plan

4.4.1.4. All Parish and Town Councils in Norfolk

All parish and town councils in Norfolk were consulted.

4.4.1.5. All Parish and Town Councils adjoining Norfolk

In Suffolk

- Barnby PC
- Barnham PC
- Barsham and Shipmeadow PC
- Beccles TC
- Blundeston and Flixton PC
- Brandon TC
- Brome and Oakley OC
- Bungay TC
- Carlton Colville PC
- Elvedon PC
- Euston PC
- Flixton, St Cross & St Margaret South Elmham PC
- Hinderclay PC
- Hopton Cum Knettishall PC
- Hoxne PC
- Lakenheath PC
- Mendham PC
- Mettingham PC
- North Cove PC
- Oulton PC
- Palgrave PC
- Redgrave PC
- Santon Downham OPC
- Somerleyton, Ashby & Herringfleet PC
- Stuston PC
- Syleham PC

- Thelnetham PC
- Weybread PC
- Worlingham PC
- Wortham & Burgate PC

In Cambridgeshire (Fenland & east cambs):

- Christchurch PC
- Elm PC
- Leverington PC

4.4.2. Other specific consultation bodies

- Anglian Water Services Ltd
- Amec Foster Wheeler E & I UK for National Grid Plc
- Cadent Plant Protection (gas distribution)
- BT Group plc
- Defence Infrastructure Organisation
- Department for Transport
- East of England Local Government Association
- Historic England
- Environment Agency
- Essex and Suffolk Water
- Natural England
- Highways England
- NCC Highway Authority
- NCC Lead Local Flood Authority
- Homes and Communities Agency
- Marine Management Organisation
- Public Health Norfolk
- West Norfolk Clinical Commissioning Group
- NHS South Norfolk Clinical Commissioning Group

4.4.3. General consultation bodies:

- Water Management Alliance IDBs
- East Harling IDB
- Downham Market Group of IDBs
- Ely group of Internal Drainage Boards+
- Middle Level Commissioners
- Woodland Trust
- Norfolk Wildlife Trust
- RSPB
- Ramblers Association

- Little Downham PC
- Littleport PC
- Manea PC
- Newton-in-the-Isle PC
- Tydd St Giles PC
- Wisbech Town Council

In Lincolnshire:

- Sutton Bridge and Wingland PC

- NHS Norwich Clinical Commissioning Group
- NHS North Norfolk Clinical Commissioning Group
- HealthEast (GY and Lowestoft Clinical Commissioning Group)
- Vodafone Ltd
- Hutchinson 3G UK Limited
- Virginmedia Ltd
- National Grid plc
- Police and Crime Commissioner for Norfolk
- The Coal Authority
- UK Power Networks
- Norfolk Community Health and Care (NHS Trust)
- NHS England Midlands and East
- Network Rail Infrastructure Ltd
- Office of the rail regulator
- NCC ecology
- NCC Historic Environment Service
- NCC Waste Disposal Authority

- Upper Waveney Valley project (now part of Discover Suffolk)
- National Trust
- Sustrans
- New Anglia LEP
- Greater Cambridgeshire and Greater Peterborough Enterprise Partnership
- Wild Anglia (Local Nature Partnership)
- Community Action Norfolk
- Norfolk Geodiversity Partnership

- Norfolk Fire and Rescue Service
- Norfolk Local Access Forum (NCC)
- Norfolk Coast Partnership
- Norfolk Chamber of Commerce
- National Farmers Union
- National Federation of Gypsy Liaison Groups
- Marinet Ltd
- King's Lynn Civic Society
- Health and Safety Executive
- Forestry Commission
- Federation of Small Businesses
- Country Land and Business Association
- British Aggregates Association
- Breaking New Ground
- CAA: Norwich International Airport
- Norfolk Association of Local Councils
- Equality and Human Rights Commission
- Freight Transport Association Ltd
- Greenpeace
- Grimston Fen & Allotment Trust
- Norfolk and Norwich Archaeological Society
- Norfolk Farming and Wildlife Advisory Group (FWAG)
- CPRE Norfolk
- Norwich Friends of the Earth
- The Gardens Trust
- Norfolk Gardens Trust
- Norfolk Rivers Trust
- Grimston, Congham & Roydon Residents Association
- East of England Faiths Agency
- Norfolk and Norwich Asian Society
- Age UK Norfolk
- King's Lynn and West Norfolk Youth Advisory Board
- Norfolk Secular and Humanist Group
- Norfolk Philippines Support Group
- Church of England
- Equal Lives
- West Norfolk Islamic Association
- West Norfolk and District Chinese Association
- Greater Anglia (rail)
- Environmental Services Association

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

4.4.4.1. Mineral operators

- British Aggregates Association
- Breedon Aggregates Ltd
- Brett Group
- Cemex UK
- Carter Concrete Ltd
- Earsham Gravels Ltd
- East Anglian Stone Ltd
- Frimstone Ltd
- Folkes Plant and Aggregate
- Four Leaf Enterprises Ltd
- Longwater Gravel Co Ltd
- Lignacite Ltd
- Middleton Aggregates Ltd
- Mineral Products Association (consultant)
- Mineral Services Ltd
- Sibelco UK Ltd
- Tharros Ltd (dormant site)
- Silverton Aggregates Ltd
- West Norfolk Lime Co Ltd
- William George Recycling Ltd
- John Brown (Gazeley) Ltd
- Tarmac
- Mcleod Aggregates Ltd
- Lyndon Pallett Group Ltd
- Gresham Gravel Ltd
- The Silica and Moulding Sands Association
- Bathgate Silica Sand Limited
- Garside Sands
- Hanson Aggregates
- Mansfield Sand Company Ltd

4.4.4.2. Waste Operators

- A C Environmental Services Ltd
- A R Kent and Son
- Abbey Pets
- Alpheus Environmental Ltd
- Animal Funeral Services Ltd
- Asbestrip Ltd
- ASCO UK Ltd
- Aylsham Plant Hire Ltd
- Biffa Waste Services Ltd
- Mr I Leonard
- British Sugar plc
- C&L Waste Oil Collection
- Carl Bird Limited
- Crane & Sons Farms Limited
- D & J Metals
- Doubleday's Waste Recycling & Disposal Contractor
- Drury's Environmental Limited
- E E Green & Son Ltd
- East Coast Insulations
- East Coast Waste Ltd
- European Metal Recycling Limited
- FCC Environment (UK) Ltd
- Freedom Recycling Ltd
- Gamble Plant (Norfolk) Ltd
- Glazewing Ltd
- M & M Services
- M Gaze and Co. Ltd.
- M W White Limited
- Morrissey Builders
- NEWS Ltd
- Norman Wenn Skip Hire
- ORM North Norfolk Ltd
- Parkers Skip Hire Ltd
- Fibrephos Ltd
- Peaceful Pets
- PHS Group
- Philip Hendry & Sons
- Pips Skips
- PHS Recyclite Ltd
- Rentokil Initial Limited
- T Farrow Construction
- Anglian Fallen Stock Co.
- Mr R Cubbitt
- TMA Bark Supplies
- W C Baldwin & Son
- Mr R Childerhouse
- Greenworld Sales
- Mr R Richmond
- Viridor Waste Management
- MRE UK

4.4.4.3. Land agents/consultants

- Stephen M Daw Limited
- Simon Westaway Associates
- D K Symes Associates
- Martin Smith Partnership
- Pike Partnership
- Clover Planning
- PDE Consulting Ltd
- Bidwells
- WYG UK
- David L Walker Ltd
- Mills and Reeve
- David Lock Associates
- M Falcon Property Solutions
- TW Gaze
- Case & Dewing
- Irelands
- Barry L Hawkins
- Strutt & Parker
- Atkins
- Durrants
- Brown & Co
- Birketts LLP
- Wardell Armstrong LLP
- Watsons
- Knight Benjamin & Co
- Howards Commercial

- Golder Associates
- The Landscape Partnership Ltd
- RPS Planning, Transport & Environment
- Terence O'Rourke Ltd
- KEW Environment & Training Consultancy Ltd
- Lanpro Services
- Leathes Prior (Solicitors)
- Pegasus Group
- David Jarvis Associates Ltd
- Cruso & Wilkin
- Heaton Planning Ltd
- Colliers International (was Colliers CRE)
- Savills (UK) Ltd
- Shakespeare Martineau
- Shiels Flynn Limited
- Martin Robeson Planning Practice
- SLR Consulting Limited
- BNP Paribas Real Estate
- Historic Landscape Management Ltd
- Small Fish
- Fenn Wright
- La Ronde Wright
- Arcus Consultancy Services Ltd
- J Cheetham Forestry R G Carter Farms
- Sentry Ltd
- Crestwood Environmental
- Wiser Environment
- Heaton Planning Ltd

4.4.4.4. Local residents

We also wrote to 1,177 individuals. These people were contacted either because they had responded to the Initial Consultation in 2018 or because their address was within 250m of the boundary of a proposed site or area of search

4.4.4.5. County Councillors

All 84 County Councillors were consulted at the time of the Preferred Options Consultation in 2019

4.5. How Consultees were consulted

The Preferred Options Consultation (Regulation 18) used the following methods of engagement:

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

Public notice of consultation in the EDP on 18 September 2019

Norfolk County Council

Town and Country Planning (Local Planning) (England) Regulations 2012

Norfolk Minerals and Waste Local Plan (DPD):

Preferred Options Consultation

Norfolk County Council is carrying out a Minerals and Waste Local Plan Review. The review will plan for Norfolk's minerals and waste management requirements up to the end of 2036.

In 2018 we carried out the first public consultation stage, called the Initial Consultation. We are now consulting on the Preferred Options version of the Minerals and Waste Local Plan Review. **The consultation period will be for six weeks from 18 September 2019 until 5pm on 30 October 2019.**

As part of the Minerals and Waste Local Plan Review process, Norfolk County Council carried out a 'call for mineral extraction sites' in 2017 and a 'call for waste management sites' in 2019. The Preferred Options consultation document contains assessments of all potential mineral extraction sites and waste management sites submitted as part of the 'call for sites'. The consultation document also contains draft Strategic Policies and Development Management Policies for minerals development and waste management facilities in Norfolk that will be used in the future to decide planning applications for minerals and waste developments.

The Preferred Options consultation document will be published along with a Draft Sustainability Appraisal Report (Parts A and B), a Draft Habitats Regulations Assessment (Task 1), a Waste Management Capacity Assessment and a Historic Environment Impact Assessment.

The above documents can be viewed on the Norfolk County Council website at **www.norfolk.gov.uk/nmwd** on the 'Minerals and Waste Local Plan Review' page. Direct online comments are the preferred method of response.

Representations can also be sent by email or post to the following address:

Post: Planning Services, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH

E-mail: LDF@norfolk.gov.uk

Any representations received will be retained and published on the consultation website.

If you have any queries please call 0344 800 8020

The consultation documents will be made available for public inspection, free of charge, within normal opening hours during the consultation period, at:

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

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

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

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

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

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

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

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

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

The next stage of the Minerals and Waste Local Plan Review process will be a formal representations period on the Pre-Submission version of the Local Plan in summer 2020.

Wording of letter/email to consultees inviting comments

I am writing to inform you that the Preferred Options Consultation on the Norfolk Minerals and Waste Local Plan (M&WLP) will take place over a six-week period from **18 September to 30 October 2019** (inclusive), and I would welcome your comments.

I am writing to you because either you submitted a response to the Initial Consultation on the M&WLP in 2018 or you registered an interest in the M&WLP consultations.

The Minerals and Waste Local Plan will contain policies used to determine planning applications for minerals developments and waste management facilities in Norfolk and will cover the period up to 2036. When adopted, it will replace the existing M&WLP documents.

The M&WLP includes a forecast of the quantities of waste that need to be planned for over the Plan period to 2036 and criteria-based policies to determine planning applications for waste management facilities. The Preferred Options document does not allocate specific sites for waste management facilities.

The M&WLP includes the forecast quantities of sand and gravel (1,868,000 tonnes per annum), carstone (121,400 tpa) and silica sand (750,000 tpa) that need to be planned for during the period to 2036, in order to provide a steady and adequate supply of minerals, and the policies to be used to determine planning applications for mineral extraction and associated development.

The Preferred Options document also includes all the sites that were proposed for mineral extraction in response to a 'call for mineral extraction sites' carried out for the purpose of the M&WLP: 40 sites for sand and gravel extraction, one site for carstone extraction and 3 sites for silica sand extraction, and a conclusion on the suitability of each site. The Preferred Options document also includes four areas of search for future silica sand extraction.

Full details of the proposed sites, site assessments and policies are contained within the Preferred Options document, which is available on Norfolk County Council's website at www.norfolk.gov.uk/nmwdf on the 'Norfolk Minerals and Waste Local Plan Review' page.

In addition to the Preferred Options Consultation document, the following documents which provide information to support the M&WLP have also been published:

- Sustainability Appraisal Report (Parts A and B) (shows social, environmental and economic impacts of the M&WLP)
- Habitats Regulations Assessment Task 1 (of impacts on European-designated nature conservation sites)
- Waste Management Capacity Assessment (contains data on current waste management capacity, waste movements, existing and forecast waste arising in Norfolk)
- Silica Sand AOS E and SIL 02 - Historic Environment Impact Assessment - Designated Heritage Assets

All documents are available on Norfolk County Council's website at www.norfolk.gov.uk/nmwdf on the 'Norfolk Minerals and Waste Local Plan Review' page.

These documents are available for public inspection, free of charge, within normal opening hours during the consultation period, at:

(See overleaf)

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

Where possible the County Council would prefer comments to be made directly to <https://norfolk.jdi-consult.net/localplan/> however, responses by post and email will also be accepted. Any comments that you send will be published on Norfolk County Council's website.

All comments, using whatever method, must be made by 5pm on 30 October 2019.

Following the end of the consultation period, the Submission version of the M&WLP will be prepared, taking into account the comments made during the Preferred Options Consultation. The Submission version of the M&WLP will be subject to a formal representations period prior to submission for examination by a Planning Inspector on behalf of the Secretary of State.

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

Email provides a quicker and more efficient way to communicate information about the M&WLPR to you. Therefore, if you have an email address that we could use to contact you, please provide it to: LDF@norfolk.gov.uk.

4.6. Inspection Points

List of Inspection Points for the Preferred Options Consultation

Local Planning Authority Inspection Venues (see 3.5.6)

4.7. Summary of the Preferred Options responses

There were 3525 respondents to the Preferred Options and one petition signed by 104 local residents. The majority of the responses were from individuals, 77 respondents were from organisations.

The responses can viewed online at: <https://norfolk.oc2.uk/readdoc/49>

The following specific consultation bodies responded to the consultation:

4.7.1. Internal consultation bodies

- Norfolk County Council - Highway Authority
- Norfolk County Council - Lead Local Flood Authority
- Norfolk County Council - Natural Environment Team
- Norfolk County Council - Waste Disposal Authority

4.7.2. Parish and Town Councils

- Beeston with Bittering Parish Council
- Beetley Parish Council
- Clenchwarton Parish Council
- Cranworth Parish Council
- Earsham Parish Council
- Fritton and St Olaves Parish Council
- Great Witchingham Parish Council
- Gressenhall Parish Council
- Haddiscoe Parish Council
- Hainford Parish Council
- Hingham Town council
- Horsham St Faith & Newton St Faith Parish Council
- Marham Parish Council
- North Walsham Town Council
- Shipdham Parish Council
- Shouldham Parish Council
- Sprowston Town Council
- Stratton Strawless Parish Council
- Tasburgh Parish Council
- Tottenhill Parish Council
- West Winch Parish Council
- Weston Longville Parish Council
- Wormegay Parish Council

4.7.3. Local Planning Authorities/County Planning Authorities

- Suffolk County Council
- East Suffolk Council
- Broadland District Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council Planning Policy Team
- Borough Council of King's Lynn and West Norfolk
- South Norfolk District Council
- Cumbria County Council
- Broads Authority
- Essex County Council
- Great Yarmouth Borough Council

4.7.4. Other specific consultation bodies

- Anglian Water Services Ltd
- Environment Agency
- Historic England
- Marine Management Organisation
- Ministry Of Defence (Defence Infrastructure Organisation)
- National Grid
- Natural England
- Norfolk Coast Partnership

4.7.5. General consultation bodies:

- Mineral Products Association
- Middle Level Commissioners
- CPRE Norfolk
- Forestry Commission England
- Open Spaces Society
- Norfolk Coast Partnership
- Norfolk Wildlife Trust
- East of Ouse, Polver & Nar Internal Drainage Board
- UK Onshore Oil and Gas (UKOOG)

4.7.6. Background Documents

We received responses on the Sustainability Appraisal Report (Part A) from the following

- Broads Authority
- Campaigners Against Two Silica Sand Sites (CATTS)

We received responses on the Draft Sustainability Appraisal Report (Part B) from the following two organisations and two individuals:

- Broads Authority
- Natural England

We received responses on the Habitats Regulations Assessment from the following one organisation and one individual:

- Natural England

We received responses on the Waste Management Capacity Assessment from the following one organisation and no individuals.

- Norfolk County Council – Waste Disposal Authority

Table 3: Preferred Options Consultation: summary of consultation responses

Section name	Respondents	Objectors	Support	Object	Comments	Total representations
1. Introduction / whole document	15	4	0	7	12	19
2. The consultation process	2	2	0	2	0	2
3. The process so far	4	1	0	1	3	4
4. What happens next	1	0	0	0	1	1
5. Norfolk Spatial Portrait	3	1	0	1	2	3
6. The Strategy – Vision and Strategic Objectives	15	4	8	9	10	27
General Policies	N/A	N/A	N/A	N/A	N/A	N/A
Presumption in favour of sustainable development	6	3	1	4	2	7
MW2 Development Management Criteria (Policy MW2)	19	6	3	12	24	39
MW3 Transport (Policy MW3)	11	2	0	2	9	11
MW4 Climate change adoption and mitigation (Policy MW4)	15	5	2	6	8	16
MW5 The Brecks Protected Habitats and Species (Policy MW5)	4	3	1	3	0	4
MW6 Agricultural Soils (Policy MW6)	9	3	2	3	4	9
Waste Management Specific Policies	N/A	N/A	N/A	N/A	N/A	N/A
W1. Waste management capacity to be provided (Policy WP1)	9	4	0	5	6	11
W2. Spatial strategy for waste management facilities (Policy WP2)	12	4	2	4	6	12
W3. Land potentially suitable for waste management facilities (Policy WP3)	11	3	1	3	7	11
W4. Recycling or transfer of inert CD&E waste (Policy WP4)	6	3	0	3	3	6
W5. Waste transfer stations, materials recycling facilities, ELV facilities and WEEE recovery facilities (Policy WP5)	2	1	0	1	1	2
W6. Transfer, storage, processing and treatment of hazardous waste (Policy WP6)	4	1	0	1	3	4
W7. Household Waste Recycling Centres (Policy WP7)	4	0	0	0	4	4
W8. Composting (Policy WP8)	0	0	0	0	0	0

Section name	Respondents	Objectors	Support	Object	Comments	Total representations
W9. Anaerobic digestion (Policy WP9)	1	0	0	0	1	1
W10. Residual waste treatment facilities (Policy WP10)	43	39	2	39	2	43
W11. Disposal of inert waste by landfill (Policy WP11)	2	1	1	1	0	2
W12. Non-hazardous and hazardous waste landfill (Policy WP12)	3	2	0	2	1	3
W13. Landfill mining and reclamation (Policy WP13)	2	0	0	0	2	2
W14. Water Recycling Centres (Policy WP14)	1	0	0	0	1	1
W15. Whittingham Water Recycling Centre (Policy WP15)	5	3	0	3	2	5
W16. Design of waste management facilities (Policy WP16)	2	0	1	0	1	2
W17. Safeguarding of waste management facilities (Policy WP17)	4	0	0	0	4	4
Minerals Specific Policies	N/A	N/A	N/A	N/A	N/A	N/A
MP1. Provision for minerals extraction (Policy MP1)	14	9	3	13	5	21
MP2. Spatial strategy for mineral extraction (Policy MP2)	16	8	0	8	8	16
MP3. Borrow Pits (Policy MP3)	1	0	0	0	1	1
MP4. Agricultural or potable water reservoirs (Policy MP4)	2	1	0	1	1	2
MP5. Core River Valleys (Policy MP5)	8	4	1	4	3	8
MP6. Cumulative impact and phasing of workings (Policy MP6)	5	3	1	1	3	5
MP7. Progressive working, restoration and afteruse (Policy MP7)	9	4	1	4	4	9
MP8. Aftercare (Policy MP8)	4	0	1	0	3	4
MP9. Concrete Batching and asphalt plants (Policy MP9)	2	0	0	0	2	2
MP10. Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials (Policy MP10)	5	0	0	0	5	5

Section name	Respondents	Objectors	Support	Object	Comments	Total representations
MP11. Minerals Safeguarding Areas and Minerals Consultation Areas (Policy MP11)	8	3	0	3	5	8
MP12. Energy minerals (Policy MP12)	37	33	0	33	4	37
Appendices to the policies	N/A	N/A	N/A	N/A	N/A	N/A
Appendix 1 – Existing Core Strategy and Development Management Policies	0	0	0	0	0	0
Appendix 2 – Existing Minerals Site Specific Allocations and Areas of Search Policies	0	0	0	0	0	0
Appendix 3 - Existing Waste Site Specific Allocations Policies	4	1	0	1	3	4
Appendix 4 - Development excluded from safeguarding provisions	1	0	0	0	1	1
Appendix 5 – Safeguarded mineral infrastructure	0	0	0	0	0	0
Appendix 6 – Safeguarded mineral extraction sites	0	0	0	0	0	0
Appendix 7 – Safeguarded waste management facilities	0	0	0	0	0	0
Appendix 8 – Safeguarded Water Recycling Centres	0	0	0	0	0	0
Appendix 9 – Forecast waste arisings	1	0	0	0	1	1
Appendix 10 – Proposed waste management sites	2	0	0	0	2	2
WS1. Land at Summer Lane, Carbrooke	0	0	0	0	0	0
WS2. Former mineral working at Heath Road, Snetterton	1	0	1	0	0	1
WS3. Land at Atlas Works, Norwich Road, Lenwade	5	4	1	4	0	5
WS4. Land off Long Lane, Ludham	0	0	0	0	0	0
WS5. Land east of Mill Drove at Blackborough End landfill site	2	0	0	0	2	2
WS6. Land north of Main Road, Crimplesham	2	1	0	1	1	2
Appendix 11 – Glossary	1	1	0	1	0	1
Proposed mineral extraction sites in Breckland	N/A	N/A	N/A	N/A	N/A	N/A
MIN 12. land north of Chapel Lane, Beetley	13	6	5	6	2	13
MIN 51 & MIN 13. land west of Bilney Road, Beetley	7	4	4	4	2	10
MIN 08. land north of Stoney Lane, Beetley	6	4	0	4	2	6

Section name	Respondents	Objectors	Support	Object	Comments	Total representations
MIN 23. land north of Back Lane, Beeston	4	3	0	3	1	4
MIN 200. land west of Cuckoo Lane, Carbrooke	5	1	2	1	3	6
MIN 116. land at Woodrising Road, Cranworth	39	39	0	39	0	39
MIN 35. land at Heath Road, Eccles, Quidenham	5	3	1	3	1	5
MIN 102. land at North Farm, south of the River Thet, Snetterton	2	1	0	1	1	2
MIN 201. land at Swangey Farm, north of North Road, Snetterton	4	1	1	1	2	4
Proposed mineral extraction sites in Broadland	N/A	N/A	N/A	N/A	N/A	N/A
MIN 55. land at Keeper's Cottage, Attlebridge	2	0	1	0	1	2
MIN 202. land south of Reepham Road, Attlebridge	5	0	1	0	4	5
MIN 48. land at Swannington Bottom Plantation, Felthorpe	1	1	0	1	0	1
MIN 37. land at Mayton Wood, Coltishall Road, Buxton	7	2	0	2	5	7
MIN 64. land at Grange Farm, Buxton Road, Horstead	4	1	0	1	3	4
MIN 65. land north of Stanninghall Quarry	6	4	0	4	2	6
MIN 96. land at Grange Farm, (between Spixworth Road and Coltishall Lane) Spixworth.	8	4	0	4	4	8
MIN 213. land at Mansom Plantation, Stratton Strawless	64	55	1	57	8	66
Proposed mineral extraction sites in Great Yarmouth	N/A	N/A	N/A	N/A	N/A	N/A
MIN 203. land north of Welcome Pit, Burgh Castle	2	0	1	0	1	2
MIN 38. land at Waveney Forest, Fritton	42	38	1	41	3	45
Proposed mineral extraction sites in King's Lynn and West Norfolk	N/A	N/A	N/A	N/A	N/A	N/A
MIN 6. Land off East Winch Road, Mill Drove, Middleton	9	3	2	3	5	10
MIN 45. Land north of Coxford Abbey Quarry, East Rudham	4	2	0	2	2	4
MIN 204. Land north of Lodge Road, Feltwell	5	1	0	1	4	5
MIN 19 & MIN 205. Land north of the River Nar, Pentney	5	2	1	2	2	5

Section name	Respondents	Objectors	Support	Object	Comments	Total representations
MIN 74. Land at Turf Field, Watlington Road, Tottenhill	47	44	1	44	2	47
MIN 77. Land at Runns Wood, south of Whin Common Road, Tottenhill	43	40	4	40	2	43
MIN 206. Land at Oak Field, West of Lynn Road, Tottenhill	47	42	0	42	5	47
MIN 32. Land west of Lime Kiln Road, West Dereham	10	6	2	6	2	10
Proposed silica sand extraction sites and areas of search	N/A	N/A	N/A	N/A	N/A	N/A
MIN 40. land east of Grandcourt Farm, East Winch	10	3	2	4	5	11
SIL 01. Land at Mintlyn South, Bawsey	14	4	2	4	8	14
AOS E. land to the north of Shoudlham	3229	3222	2	3343	5	3350
AOS F. land to the north of Stow Bardolph	14	7	1	7	6	14
AOS I. land to the east of South Runcton	53	45	2	45	6	53
AOS J. land to the east of Tottenhill	64	55	2	55	7	64
Policy MP13: Areas of search for silica sand extraction	6	2	2	2	2	6
SIL 02. land at Shouldham and Marham	1262	1255	2	1273	5	1280
Proposed mineral extraction sites in North Norfolk	N/A	N/A	N/A	N/A	N/A	N/A
MIN 69. land north of Holt Road, Aylmerton	8	1	1	1	6	8
MIN 71. land west of Norwich Road, Holt	5	2	1	2	2	5
MIN 115. land at Lord Anson's Wood, near North Walsham	11	5	0	5	6	11
MIN 207. land at Pinkney Field, Briston	4	1	0	1	3	4
MIN 208. land south of Holt Road, East Beckham	4	1	1	1	2	4
Proposed mineral extraction sites in South Norfolk	N/A	N/A	N/A	N/A	N/A	N/A
MIN 209. land adjacent to the A143, Earsham	7	2	4	2	1	7
MIN 210. land adjacent to the A143, Earsham	6	1	4	1	1	6
MIN 211. land west of Bath Hills Road, Earsham	7	1	4	1	2	7
Specific Site Allocation Policy MIN 209/ MIN 210 /MIN 211 (Earsham sites)	3	1	1	1	1	3

Section name	Respondents	Objectors	Support	Object	Comments	Total representations
MIN 25. land at Manor Farm (between Loddon Road and Thorpe Road) Haddiscoe	23	18	2	18	3	23
MIN 92. land east of Ferry Lane, Heckingham	3	3	0	3	0	3
MIN 212. land south of Mundham Road, Mundham	5	2	2	2	2	6
MIN 79. land north of Hickling Lane, Swardeston	1	1	0	1	0	1
Implementation, Monitoring and Review	1	0	0	0	1	1
TOTALS	3525	3478	93	5267	314	5674

Table 4: Supporting documents: summary of consultation responses

Document	Respondents	Objectors	Support	Object	Comments	Total representations
Waste Management Capacity Assessment 2017	1	0	0	0	1	1
Sustainability Appraisal Report (Parts A and B)	7	3	1	3	3	7
Habitats Regulations Assessment	2	1	1	1	0	2

5. Main Issues Raised in Regulation 18 (Initial Consultation and Preferred Options) Consultations

The following is a summary of the responses raised by the Regulation 18 consultations, which have been amalgamated to save duplication of issues, where they have been raised in both consultations, and where several respondents may have raised the same issue. This is organised by Local Plan chapter and policy including comments on key evidence where relevant (eg SA/SEA/HRA).

Please note the following sites are no longer included in the NM&WLP process and the comments received regarding those sites are therefore not included in this document. The sites removed from the NM&WLP process are:

- **MIN 76 land at West Field, Watlington Road, Tottenhill** - planning permission was granted for 285,000 tonnes of sand and gravel extraction at this site on 18/04/2019.
- **MIN 209/ MIN 210/ MIN 211 Land adjacent to the A143, Earsham** - planning permission (ref: FUL/2019/0062) was granted for mineral extraction at these sites in November 2020 and has now been implemented.
- **MIN 80 land south of Mangreen Hall Farm, Swardeston** - The site was withdrawn from the NM&WLP process in December 2018 by Tarmac and the landowners.

When individuals have made representations only the Representation ID (Rep ID) has been provided. However, where a large number of responses have been received, Rep ID's may not have been included, but original response and Rep ID's can be retrieved at <https://norfolk.oc2.uk/> using the search function. Regardless, the assessment of sites, and responses made, are based on the issues raised, not on the number of respondents.

Only comments or objections have been included as representations supporting the Local Plan do not need to be addressed. Therefore, where a section has been omitted, it is because there were no comments or objections. Each issue and the response made is summarised in this document. Original responses can be searched and accessed on Opus Consult online at: <https://norfolk.oc2.uk/>.

Prior to submission of the Local Plan to the Secretary of State, a further Statement of Consultation document will be produced, to explain which bodies and persons were invited to make representations under Regulation 19, and how, in accordance with the plan-making Regulations and the Council's SCI. This will further set out the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations, in order for the Council to meet the requirements of Regulation 22(1)(c) (v).

Following the removal of Policy MW1: Presumption in favour of sustainable development after the Initial Consultation stage, the policy numbers remained the same in the Preferred options consultation, to avoid confusion. Please note however, policies MW2 to MW6 have been re-numbered in the publication version of the Local Plan, as set out in Table 5 below:

Table 5: Renumbered policies after the Preferred Options stage

Initial Consultation and Preferred Options (Regulation 18 stage)	Publication version (Regulation 19 stage)
Policy MW1 Presumption in favour of Sustainable Development	N/A deleted from Plan at Preferred Options stage
Policy MW2: Development Management Criteria	Policy MW1: Development Management Criteria
Policy MW3: Transport	Policy MW2: Transport
Policy MW4: Climate change mitigation and adaption	Policy MW3: Climate change mitigation and adaption
Policy MW5: The Brecks Protected Habitats and Species	Policy MW4: The Brecks Protected Habitats and Species
Policy MW6: Agricultural soils	Policy MW5: Agricultural soils

Table 6: Main issues raised during the Consultation stages about the Introduction and the document as a whole

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to the Introduction and the document as a whole'	NCC Planning Officer's Response
Natural England (93219)	Initial Consultation: The consultation documents need to be revised to reflect changes made to the National Planning Policy Framework (NPPF) and recent case law which clarified the use of mitigation measures in Habitats Regulations Assessments (HRAs).	No Action required: The Preferred Options document took these changes (revised NPPF and recent HRA judgements) into account.
Natural England (93219)	Initial Consultation: Several allocations are either within protected landscapes or lie close to their boundaries or 'settings' - the highest sensitivity must be afforded to the landscape. A specific policy for protected landscapes (Norfolk Coast AONB and The Broads) that may be impacted by minerals development should be included, and subject to a Landscape and Visual Impact Assessment (LVIA) for all stages of the operation at application stage. The requirement for an LVIA/mitigation measures should be identified in the Plan for each relevant allocation.	No Action Required: 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 Policy MW1 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 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.
Natural England (93219)	Initial Consultation: The requirement to include an assessment of a proposal on nearby nationally and internationally Designated Sites on impacts to hydrology/ sensitive species (noise/lighting/dust/screening etc)/attracting birds) will be required at application stage, and should be made clear in each relevant allocation.	No Action Required: The site allocation assessments have included an assessment of a proposal on nearby Designated Sites. Policy MW1 states that mineral proposals must demonstrate that the development would not have an unacceptable impact on the natural environment. The NCC 'Local List for the Validation of Planning Applications' specifies the circumstances when a Biodiversity Survey/Report and Hydrological Risk Assessment are required to be submitted with a planning application.
Natural England (93219)	Initial Consultation: Pre-existing Agri-environment schemes on minerals site pre and post extraction/restoration – advise early contact by agreement holders with Nat England to discuss individual cases and payments.	No Action Required: Noted. Not relevant to planning process.
Natural England (93219)	Initial Consultation: We trust consultation is being undertaken with relevant parties in relation to Local Sites of geodiversity and biodiversity interest.	No Action Required: The Norfolk Geodiversity Partnership, Norfolk Wildlife Trust and Norfolk County Council's Natural Environment Team have been consulted on the Local Plan.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to the Introduction and the document as a whole'	NCC Planning Officer's Response
Natural England (93219)	Initial Consultation: Where alternative after-uses (such as forestry and some forms of amenity, including nature conservation) are proposed on the best and most versatile (Grades 1, 2 and 3a) 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.	No Action Required: The Plan includes a specific policy on soils (MW6) which we consider covers the issues raised.
The Broads Authority (93170)	Initial Consultation: The Broads is an area with exceptional potential for waterlogged archaeology. Any excavation within or close to the executive area requires archaeological evaluation prior to consenting and not rely on a brief desk-based evaluation and conditions.	No Action Required: In the Preferred Options document, the site allocation policies state that an archaeological assessment may initially be desk based 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.
The Broads Authority (93170)	Initial Consultation: Explain how: <ul style="list-style-type: none"> • it fits with our Local Plans • how Authorities are consulted if application is in or near to the BA area • how BA special qualities which could be of relevance would be considered in decision making 	Action Required: The relevant LPA is a statutory consultee on planning applications for minerals or waste development. Planning applications are assessed against relevant policies in the LPA's Local Plan as well as policies in the NM&WLP because together they form the Development Plan for the area. The NM&WLP contains reference to special qualities within an area in relevant policies.
The Broads Authority (93170)	Initial Consultation: Whilst extraction is not supported in the NPPF, 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. How will this be used in determining applications in the Broads?	No Action Required: Any peat extraction would be incidental to primary extraction because national policy states that planning authorities should not grant planning permission for peat extraction. Planning applications are assessed against relevant policies in the LPA's Local Plan as well as policies in the NM&WLP because together they form the Development Plan for the area.
The Broads Authority (93170)	Initial Consultation: Are there any areas in Norfolk that could be investigated for unconventional hydrocarbons?	Action Required: Licence blocks in Norfolk have been offered for tender for Petroleum Exploration and Development Licences (PEDL) by BEIS but no PEDL licences have been applied for in Norfolk. PEDL are required before any exploration for hydrocarbons can take place. As there are no Petroleum licence areas in Norfolk (as at May 2022) there is no requirement within

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to the Introduction and the document as a whole'	NCC Planning Officer's Response
		the NPPF to include a policy on hydrocarbon extraction. The British Geological Survey (BGS) has carried out <u>extensive work to identify areas of feasible shale gas deposits in the UK</u> . Norfolk does not contain any of the four areas which have been identified as potentially viable for the commercial extraction of shale gas. Therefore, it is very unlikely that 'fracking' will take place in Norfolk.
NCC Natural Environment Team (93120)	Initial Consultation. Trees could have been referred to separately under an arboriculture heading. No reference has been made with regards to Arboricultural Impact Assessments (AIA) in the initial conclusions. 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.	No Action Required: Where specific comments have been made advising that an Arboricultural Impact Assessment would be required at the planning application stage, this requirement has been included in the draft site policy for those sites concluded suitable to be allocated for mineral extraction. 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.
NCC Natural Environment Team (93104)	Initial Consultation: Landscape has been considered in an accurate and suitable manner. Where Private Rights of Way are adjacent or within the site, consideration should be given to ensure that impacts are minimal. A suitable temporary diversion and subsequent reinstatement need to be agreed.	No Action Required: Noted.
Historic England (93003/98822)	Initial Consultation: All sensitive sites should be assessed (via a Heritage Impact Assessment) 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. The following sites are not considered suitable for allocation: MIN 79 and 80, SIL 02, MIN 40, MIN 32, MIN 19 and 205, MIN 48 and MIN 116.	No Action Required: The Initial Consultation document includes all of the sites proposed by mineral operators, landowners and agents so that they can be consulted on, and an 'initial conclusion' on each proposed site was made regarding its suitability for future mineral extraction. Specific issues raised about individual proposed sites are covered in the section of this report on each particular site. If a site is concluded to be unsuitable to allocate then it is not included in the Publication version of the NM&WLP. Of the specific sites listed in the initial consultation response only MIN 40 is allocated in the Publication version of the NM&WLP.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to the Introduction and the document as a whole'	NCC Planning Officer's Response
	<p>Preferred Options: MIN65, MIN96, MIN213, MIN 209/10/11, MIN25 AND MIN40. For these sites we recommend a HIA is prepared now in advance of the next draft of the Plan. MIN 207 should be deleted due to impact on historic environment. AOSE and SIL2 HIA is insufficient.</p>	<p>No Action Required: Whilst Heritage Impact Assessments have not been carried out specifically for the NM&WLP we consider that a proportionate level of assessment of sites has taken place as part of the M&WLPR process and informed the site conclusions and site allocation policies. Of particular relevance, as at May 2022, site MIN 65 at Stanninghall, sites MIN 209/210/211 at Earsham and MIN 207 at Edgefield have all been granted planning permission for mineral extraction. AOS E, SIL 02 at Shouldham and Marham and MIN 213 at Stratton Strawless are not allocated in the Publication version of the NM&WLP. MIN 96 at Spixworth and MIN 40 at East Winch are already allocated in the existing adopted Minerals Site Specific Allocations DPD.</p>
Historic England (92939/98822)	<p>Initial Consultation and Preferred Options: Lack of specific local historic environment policy protection: policy MW1 (DM Criteria) is too generic to provide specific local criteria and/or requirements against which planning applications will be assessed. Plus, [Page 8, 4th para] The M&WLPR does not include policies covering the historic environment with the exception of MP13 on areas of search for silica sand extraction.</p> <p>Preferred Options: Under paragraph 35 of the NPPF some aspects of this Plan are unsound as they have not been positively prepared, are not justified, effective, or consistent with national policy. Specifically insufficient policy provision for the historic environment, shortcomings within the HIA for AoS E and SIL02, and other allocations requiring further assessment.</p>	<p>Action Required: Policy MW1 (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 archaeological assets and their settings. It is considered that this policy contains sufficient detail.</p> <p>It is considered that the Publication version of the NM&WLP is sound. The relevant site allocations and Development Management policies contain requirements for future planning applications to be supported by assessments with proportionate evidence. AOS E and SIL 02 are not allocated within the Publication version of the NM&WLP.</p>
Historic England (98822)	<p>Preferred Options: Need to address non-designated heritage assets and the wider historic environment. We suggest that the HIA is revised accordingly to provide a robust evidence base for the Plan. We also suggest that the Plan should not simply mark areas with purple hatching that have been identified by the HIA as</p>	<p>No Action Required: this comment is specifically about the Historic Environment Impact Assessment that was produced at the Preferred Options stage for AOS E and SIL 02. AOS E and SIL 02 are not allocated in the Publication version of the NM&WLP.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to the Introduction and the document as a whole'	NCC Planning Officer's Response
	unsuitable for extraction, but actually delete those areas from the areas of search and site allocation in the Plan altogether.	
Historic England (98822)	Preferred Options: Allocations policies could be improved by numbering the bullet points (this applies to all policies).	Action required: In the Publication version of the NM&WLP all site allocation policies have bullet points referenced with letters (a, b, c etc).
Anglian Water Services Ltd (92492)	Initial Consultation: Where Anglian Water (AW) assets are located within a site boundary, policy wording for these sites should exclude any existing assets from the proposed working area for mineral extraction to ensure that AW can continue to operate and maintain these assets for our customers.	No Action Required: Where appropriate, policy 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".
Peterborough City Council (92369)	The NPPF requires 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.	Action Required: 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.
South Norfolk District Council (98885)	Preferred Options: Some 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.	Action Required: Comments made have been responded to in the sections of this report regarding the policies that the comments relate to.
Marine Management Organisation (98758)	Preferred Options: Listed suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to the Minerals and Waste Local Plan. Page 17: 5.32. Marine aggregate dredging is licenced by the MMO. We would also recommend you mention the East Inshore and East Offshore Marine Plans and the UK Marine Policy Statement (MPS) as well as the National Planning Policy Framework (NPPF).	No action required: Noted. Paragraph 3.32 of the Publication version of the NM&WLP (was 5.32 in the Preferred Options) has been amended as requested.
National Grid (98933)	Preferred Options: Site WS5 is crossed or in close proximity to National Grid infrastructure. Land beneath and adjacent to the overhead line route should be used	No Action Required: This site (Blackborough End landfill) is not allocated in the Minerals and Waste Local Plan, but it is part of an

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to the Introduction and the document as a whole'	NCC Planning Officer's Response
	<p>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. Reciting existing high voltage overhead lines only for projects of national importance which has been identified as such by central government. National Grid High-Pressure Gas Pipelines should be taken into account when site options are developed in more detail.</p>	<p>existing site with planning permission for mineral extraction and restoration by inert landfill.</p>
<p>NCC Waste Disposal Authority (94667)</p>	<p>Preferred Options: It should be noted that there is a distinction between waste capacity that is permitted and that which is realistically commercially available to the serve the needs of the Waste Disposal Authority. Much residual waste is exported after pre-treatment. Paragraph 1.12 clearly recognises the contract driven nature of the waste management industry and that any planning application would be assessed against the M&WLPR criteria-based policies.</p>	<p>No Action Required: Noted.</p>
<p>Campaigners Against Two Silica Sites (94356, 94712) Individuals (94376)</p>	<p>Preferred Options: The M&WLP (particularly NCC's M&WLP Vision plus Policies WP1 and WP2, Objectives WSO1,2,4,6 and 8 and MSO2,3,8 and 1) is not sound because it does not make any mention or plan for the recycling of glass before extracting raw materials (as required by para 204.b NPPF). Issues with the statement that extraction of silica sand, is for the economic development of the county, when it is exported out of the county and used elsewhere, plus what is an adequate supply given the disparity between Sibelco and NCC's supply averages.</p>	<p>No Action Required: Issues raised about the vision and objectives, and policies WP1 and WP2 are responded to in the sections of these report which specifically cover those parts of the Plan.</p> <p>Norfolk already has a well-developed and effective collection process for glass recycling at the kerbside, through Household Waste Recycling Centres, and bring banks. The glass collected through these methods in Norfolk is sent to existing glass recycling facilities located elsewhere in the UK.</p> <p>The NPPF states Silica sand is a mineral of 'national importance', and we are required to plan for reserves for at least 10 years for individual silica sand sites. Need is assessed annually. The Local Plan would fail the test of soundness and compliance with national policies if it did not plan for silica sand extraction. Minerals can only be extracted where they are found. Therefore the silica sand is extracted in Norfolk and sent to the existing glass manufacturing facilities located elsewhere in the country.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to the Introduction and the document as a whole'	NCC Planning Officer's Response
		The forecast need for an adequate supply of industrial minerals is discussed in the section of this report for Policy MP1 'Provision for minerals extraction'.
Individuals (94929, 94711)	<p>Preferred Options: This plan is unsound, particularly relating to SIL02 overlap in AOSE. There is no justification for the area of SIL02, 390 hectares and AOSE nearly 1000 hectares. The Bird hazards are a risk to RAF Marham. Quarrying does not meet requirements of Climate Change Act. If we fail to import silica sand, we destroy our own agricultural, forest/landscape and the historic environment, and the health and wealth of the nation for future generations. This plan is not compliant with DEFRA's 25 Year Plan, with BEIS Clean Growth Strategy, or NPPG Refs : 27- 012,013,017 and 045-20140306 , or NPPF guidance to look to recycle before extraction of raw materials.</p> <p>NCC has a duty of care to the taxpayers of Norfolk to ensure that our homes and lives are not affected to our detriment.</p>	<p>No Action Required: AOS E and SIL02 are not allocated in the Publication version of the NM&WLP. SIL 02 is concluded to be unsuitable to allocate 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>The response from the Defence Infrastructure Organisation continued to raise concerns about bird strike risks to aircraft from the creation of large areas of open water following mineral extraction, whilst Shouldham Warren is Open Access Land and forms a significant part of the higher land within Area of Search E, which means that the AOS E could no longer be considered to be a deliverable method to use to plan for future silica sand provision in Norfolk.</p> <p>NCC as the Mineral Planning Authority for Norfolk is required to plan for a steady and adequate supply of industrial minerals. NCC is unable to fulfil its statutory responsibility for minerals land use planning for indigenous materials by buying minerals on the open market from another country. See response above regarding glass recycling.</p> <p>Policy MW1 (Development Management Criteria) and Policy MPSS1 (silica sand extraction sites) contain requirements to ensure that potential impacts to health and amenity are assessed and where necessary suitable mitigation measures proposed.</p>
Individuals (94376)	<p>Preferred Options: NCC is failing to recycle before extracting raw materials and therefore the plan is not sound and NCC fails their own sustainability objectives SA1, SA3, SA4, SA5. SA6, SA8, SA9, SA11 and SA13 on page 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pages 15-16 of Part B (Jun 2019).</p>	<p>No Action Required: NCC's Local Aggregate Assessment includes a section on secondary and recycled aggregates and concludes that we do not propose to make any adjustments to the forecast mineral requirement figures based on recycled and secondary aggregate provision due to the quality of the data. The forecast need for aggregate and industrial minerals (including the sustainability appraisal assessment) is discussed in the section of this report for Policy MP1 'Provision for minerals extraction'.</p>

Table 7: Main issues raised during the Consultation stages about ‘The consultation process’

Respondents' name	Main Issues raised / Feedback Stage to ‘The consultation process’	NCC Planning Officer's Response
Individuals (98584)	<p>Preferred Options: A public consultation process not fit for purpose with no scrutinising its efficiency; exacerbated by a steady stream of false or misleading information both directly from NCC, and District/County Councillors (regarding SIL 02 and AOSE). It is a coordinated effort to dissuade members of the public from participating in this process. All four "key principles" (accountability, accessibility, inclusivity and efficiency) set out in NCC's adopted Statement of Community Involvement have been violated. NCC continues to use ineffective methods of engagement with the residents of Norfolk. NCC only does the bare minimum in order to meet what it perceives as its legal obligations, and there is no interest in ensuring genuine, meaningful public participation, nor any evidence of taking the feedback and public concerns into account.</p>	<p>No Action Required: NCC's Planning Officers are unable to comment on what advice was provided to residents from County or Borough Councillors. However, we are able to advise that there is not a maximum number of residents that can object from a single address and that no weighting is given to objections on the basis of where the person making the objection lives. The specific issues raised about SIL 02 and AOS E are dealt with in the sections of this report that specifically relate to SIL 02 and AOS E. There has not been a co-ordinated effort to dissuade members of the public from participating in this process. It is considered that the consultations have met or exceeded all the regulatory requirements. See also the response below.</p>
Individuals Campaigners Against Two Silica Sites (98757, 98918)	<p>Initial Consultation and Preferred Options: Object to the consultation process:</p> <ul style="list-style-type: none"> • Not adhered to the principles (Accountability, Accessibility, Inclusivity and Efficiency) laid out in NCC SCI. • Using just the prescribed media no longer is fit for purpose • The consultation system needs a complete overhaul to become meaningful. • Information needs to be easier to understand to be able to respond in time. • Insufficient consultation process, not long enough for residents to be informed and to respond. • Not enough of the public notified, which means only low-level responses received in past consultations. • Objections, issues and concerns raised have been ignored. 	<p>No Action Required: The consultation process used for the Preferred Options Consultation either met or exceeded that required by national guidance, regulations and the SCI. National guidance indicates that as part of the consultation process an appropriate method to signpost consultations is to supply Parish councils (as the lowest tier of Local Government) with the details of consultations, so that they can cascade the information to parishioners in the way in which they consider most suitable. The Consultation documents were published online and hardcopies were available at locations within each district area, and letters signposting methods by which the documents could be accessed and NCC notified individuals who had responded previously, those within 250m of the boundary of a site, Parish councils and Statutory and general consultees of the consultation. The consultation system used (OpusConsult) meets the Planning Inspectorate requirements and is used by many other Local</p>

Respondents' name	Main Issues raised / Feedback Stage to 'The consultation process'	NCC Planning Officer's Response
	<ul style="list-style-type: none"> • The advertised deadline was 4 days later (17/08/18) than the actual deadline of 13/08/18. • the current web based response system does not allow for evidence to be attached. • lack of transparency also raises questions around the fairness and trustworthiness of the process, and therefore the site assessment document, and should be investigated. • Guidance on the rights of the community to determine how they can shape decision making has not been provided. • 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. • Should not require people needing action groups for MP involvement. 	<p>Authorities in the preparation of Local Plans. It does allow evidence to be attached to responses.</p> <p>All responses made to the initial consultation were read by the Minerals and Waste Policy team and the issues raised investigated. They have been summarised in this Statement of Consultation document and set out in full Feedback Reports for each stage. A number of issues raised would be addressed at the planning application stage (e.g., detail of working operations and restoration plans) rather than at site allocation stage.</p> <p>The original deadline was 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.</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 Preferred Options Consultations and the comments received have been taken into account in the drafting of the Preferred Options and Publication version of the NM&WLP.</p> <p>Consultation documents are not legally binding and will be subject to variation because it is part of a review process, taking into account issues and feedback submitted during the consultation process, by statutory and non-statutory consultees, and the local community.</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 NM&WLP, 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</p>

Respondents' name	Main Issues raised / Feedback Stage to 'The consultation process'	NCC Planning Officer's Response
		procedural requirements and if it meets the 'tests of soundness' set out in the NPPF. Following receipt of the Inspector's report, the County Council will then decide whether to adopt the Plan.

Table 8: Main issues raised during the Consultation stages about 'The Process so far'

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to 'The Process so far'	NCC Planning Officer's Response
Environment Agency (98704)	Preferred Options: Make reference to whether working beneath the water table is required and whether dewatering is required. This could potentially pose a challenge to sites moving forward so it should have a stronger mention in this section.	No Action Required: The assessment of proposed mineral extraction sites has included whether working beneath the water table is required and whether dewatering is required where this information is known.
Historic England (92940)	Initial Consultation: 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.	No Action Required: An 'initial conclusion' was made on each proposed site regarding its suitability for future mineral extraction. For example, sites MIN 32, MIN 116, MIN 48, MIN 19 & MIN 205 were concluded to be unsuitable to allocate. Specific issues raised about individual proposed sites are covered in the section of this report on that particular site. 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.
Historic England (98773)	Preferred Options: Suggested change: Amend bullet point one to make it clear if this includes both designated and non-designated or just designated heritage assets.	No Action Required: This has been amended to make it clear that the assessment of proposed sites only includes designated heritage assets, as well as archaeology and the historic landscape character.
Historic England (98773)	Preferred Options: Paragraph on Sustainability Appraisal - suggest changing heritage assets to historic environment. Also needs to include non-designated heritage assets.	No Action Required: The reference to heritage assets has been amended to historic environment. The Sustainability Appraisal could not assess the impact of proposed sites on undesignated heritage assets because they are not mapped.
Broads Authority (98949)	Preferred Options: Page 12 - Sustainability Appraisal section - bullet point list does not mention landscape impact or biodiversity.	No Action Required: Biodiversity and landscape have not been mentioned in the bullet point list (paragraph 2.14) because it is a list of additional areas of assessment through the SA that have

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to 'The Process so far'	NCC Planning Officer's Response
		not been mentioned already in the section on how the sites were assessed. Paragraph 2.4 is regarding landscape and paragraph 2.5 is regarding ecology.
Heaton Planning Ltd / Brett Group (93031/99028)	<p>Initial Consultation & Preferred Options: 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, in relation to Para 32 of NPPF.</p> <p>Preferred options: Methodology not clear on Para 8 of NPPF on balance applied to the impacts alongside the economic and social benefits (three pillars of sustainable development). Whilst there is an individual scoring on each sustainability appraisal objective for every site put forward, there is not a clear process for illustrating how a judgement has been reached on whether to allocate a site or not and how sites with similar scoring on certain objectives have been taken forward or discounted.</p>	<p>No Action Required: No examples have been provided of the sites referred to in this comment. The economic benefit of mineral extraction has also been taken into account. The conclusion for each site has been reached by taking all of these factors into account and therefore considers potential cumulative impacts. The Sustainability Appraisal Report accompanying the Publication version of the NM&WLP contains a specific section on the assessment of the cumulative impacts of the allocated sites.</p> <p>No Action Required: The SA indicators used are intended to provide an assessment of all three pillars of sustainable development. It is important to note that some of the potential impacts from sites could be acceptably mitigated, whilst other impacts cannot. In some cases, sites have been found unsuitable to allocate due to issues that do not fit within the SA criteria, such as birdstrike objections from the MOD Defence Infrastructure Organisation, or objections about the highway access from the Highway Authority. The deliverability of sites has been taken into account when determining whether to allocate sites in the NM&WLP. Only sites with a mineral company supporting the submission of the site to the NM&WLP have been allocated. In addition, some of the allocated sites have already been granted planning permission.</p>

Table 9: Main issues raised during the Consultation stages about the ‘Norfolk Spatial Portrait’

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to ‘Norfolk Spatial Portrait’	NCC Planning Officer’s Response
Historic England (98774)	Preferred Options: Ensure policy/provision is made for the use of Carstone in repairs of historic buildings and for new build in the traditional vernacular materials.	No Action Required: The landbank for Carstone in Norfolk at the end of 2020 was over 20 years and the plan allocates an additional site of 1.4 million tonnes.
Heaton Planning Ltd / Brett Group (99029)	Preferred Options: Whilst the landbank calculations exceed the requirements of the NPPF for at least 7 years, the latest LAA (December 2018) is indicating that there were no planning applications or planning permissions for new sand and gravel extraction in 2017. This needs to be kept under review to ensure that replenishment rates do not affect long term supply of sand and gravel.	No Action Required: The landbank in Norfolk for sand and gravel at the end of 2020 was 14.511 million tonnes, which equates to over 9 years of permitted reserves based on the forecast need for 1.506 Mt per year set out in Policy MP1 of the NM&WLP. The representation refers to the planning application situation in 2017. Since that date planning permission for one site for an additional 0.1Mt was granted in 2018, planning permission was granted for an additional 0.903 Mt in four sites in 2019, planning permission was granted for an additional 2.67Mt in two sites in 2020 and planning permission was granted for an additional 5.849 Mt at three sites in 2021.

Table 10: Main issues raised during the Consultation stages about ‘The Strategy – Vision and Strategic Objectives

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to The Strategy – Vision and Strategic Objectives	NCC Planning Officer’s Response
Heaton Planning Ltd / Brett Group (93017/99030)	Initial Consultation and Preferred Options: The 3 rd paragraph 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.	No Action Required: The 3 rd 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.
Heaton Planning Ltd / Brett Group (93017) Mineral Services Ltd (91955)	Initial Consultation & Preferred Options: Paragraph 7 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).	Action Required: The text has been amended to refer to unacceptable adverse impacts in accordance with the NPPF.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to The Strategy – Vision and Strategic Objectives	NCC Planning Officer's Response
	We recommend the wording is amended to be in accordance with NPPF.	
Lichfields / Bourne Leisure Ltd (92546)	Initial Consultation: Bourne Leisure considers that 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 and suggested amended text.	No Action Required: 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 (which would include tourism accommodation and related visitor facilities) 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.
Mineral Products Association (92496)	Initial Consultation: Proposed changes in bold - "... 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. "	Action Required: The text has been amended as suggested.
Mineral Products Association (92496, 98759) Sibelco UK (92470, 98654)	Initial Consultation & Preferred Options: Add: 'The agent of chance principle will be applied to any new proposed development impacting on safeguarded areas or sites.'	No Action Required: The vision has been amended to include "The 'agent of change' principle will be applied to any new proposed development impacting on safeguarded areas or sites."
Aggregate Industries UK Ltd (92354)	Initial Consultation: NM&WLP 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.	No Action Required: 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.
CPRE Norfolk (92012) Campaigners Against Two Silica Sites (94357)	Initial Consultation and Preferred Options: 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.	No Action Required: It is considered the forecast demand for these minerals will not exceed a realistic county supply within the plan period to 2036, as set out in Policy MP1. The silica sand deposit being worked at Leziate is one of two in England where silica sand of sufficient purity and grade for the

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to The Strategy – Vision and Strategic Objectives	NCC Planning Officer's Response
	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".	manufacture of colourless glass is extracted and therefore is of national importance.
Mineral Services Ltd (91955)	Initial Consultation: Reference to Norfolk's statutory obligation as set out within national policy for the supply of minerals in a sustainable manner should be included. Paragraph 8 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'.	Action Required: The first paragraph has been amended to include the text 'as required by national planning policy'. The use of 'will' instead of 'where possible' is considered appropriate in accordance with the NPPF (para 155).
Carter Concrete Limited (98589)	Preferred Options: Would like to see emphasis placed on the value and significance of minerals and waste development in providing a diverse and affluent rural economy consistent with Paragraph 83 of the NPPF.	Action Required: Noted. Paragraph 6.6 of the Publication version of the Local Plan recognises the contribution of the minerals industry to the economy of Norfolk.
Norfolk Wildlife Trust (98664) Essex County Council (98857)	Preferred Options: The Government have mandated that new development should result in biodiversity net gain, as set out in the Environment Bill and supported by the NPPF. This should be bought out within the Vision and/or the Strategic Objectives, as well as relevant policy.	Action Required: The vision has been amended in the Publication version of the NM&WLP to state that "all developments will provide biodiversity net gains". The waste management strategic objectives also state that all developments will provide biodiversity net gains. The minerals strategic objectives state that "the restoration scheme and aftercare will protect and enhance the environment, including landscape improvements and the provision of biodiversity net gains".
Norfolk Wildlife Trust (98664)	Preferred Options: The Vision's target for minimising the impact of minerals development and waste management on climate change should be made more ambitious, by changing it to at least a target of net zero or net positive where possible (i.e. in line with wildlife and carbon sequestration through appropriate habitat restoration already noted in Minerals Strategic Objective MS08).	Action Required: The vision has been amended in the Publication version of the NM&WLP to States that minerals development and waste management within Norfolk will be undertaken in ways that minimise and mitigate their contribution to climate change, including reducing methane emissions and reducing carbon emissions to contribute to net zero carbon targets..."
Historic England (98778)	Preferred Options: Include heritage designations e.g. conservation areas, registered parks and gardens and scheduled monuments on the map.	No Action Required: Due to the map scale, we will not be including additional heritage designations on the key diagram, however all these historic environment designations are included on the Policies Map accompanying the Publication version of the NM&WLP.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to The Strategy – Vision and Strategic Objectives	NCC Planning Officer's Response
IGas Energy Plc (98900) UK Onshore Oil and Gas (UKOOG) (98902)	Preferred Options: UK Onshore oil and gas development is compatible with the vision that minerals can only be worked where they occur, contributing to a low carbon economy, especially under more stringent regulatory regimes than overseas imports, and provide local jobs.	Action Required: Noted.
Lichen Renewal/David Lock Associates Limited (99048)	Preferred Options: Lichen Renewal could offer a solution to move existing landfill sites from 'disposal' to 'other recovery'. According to the Waste Management Capacity Study (2017), there are two permitted landfill sites in Norfolk with 5.09m tonnes of void space, both of which have been mothballed. We think that one (or perhaps both) of these sites could be an opportunity for our technology, and would like to investigate this further with you.	No Action Required: Noted. The landfill sites with remaining void capacity in Norfolk are both operated by waste management companies and not be Norfolk County Council, therefore we would advise Lichen Renewal to contact the landfill site operators directly. Lichen Renewal is advised to contact Norfolk County Council if they wish to receive pre-application advise about their proposals.
Campaigners Against Two Silica Sites (94357, 94717)	Preferred Options: The National Planning Policy Framework (NPPF) states in (Ch 17, para 204.b) that authorities should 'take account of...recycled materials...before considering extraction of primary materials..'. The draft LP does not adhere or invest in facilities for this. Therefore, NCC is failing in its duty to look to recycle before extracting raw materials and their vision is not sound. Without a sound glass recycling policy/plan NCC fails their own sustainability objectives SA1, SA3, SA4, SA5. SA6, SA8, SA9, SA11 and SA13 on pg 9 of the Sustainability Appraisal Report - Part A-Scoping (Oct 2015) and pgs 15-16 of Part B (Jun 2019); plus Strategic Objectives WSO 1/2/4/6/8, MSO 2/3/8/10.	No Action Required: For aggregate minerals the forecast need has not been adjusted based on recycled or secondary aggregate provision because the data is not comprehensive as many operations (such as on-site recovery and those covered by exemptions from Environmental Permits) are not recorded. The NPPF makes a specific link between silica sand supply and the production of the processing plant that it is supplying, therefore it is considered appropriate to plan for the need for silica sand extraction in Norfolk based on the permitted throughput of the processing plant which is 0.754 million tonnes of raw silica sand per annum. National Planning Practice Guidance states that the required stock of permitted reserves for each silica sand site is based on the average of the previous 10-year sales; it does not take into account any other supply options (such as recycled materials). Norfolk already has a well-developed and effective collection process for glass recycling at the kerbside, through Household Waste Recycling Centres, and bring banks. The glass collected through these methods in Norfolk is sent to existing glass recycling facilities located elsewhere in the UK. Silica sand is a

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to The Strategy – Vision and Strategic Objectives	NCC Planning Officer's Response
		necessary ingredient in the remelt feedstock for recycled glass. The NM&WLP contains criteria-based policies which would be used to determine planning applications for waste management facilities including glass recycling and other inert waste recycling. The plan does not fail the Sustainability Objectives as detailed in the Sustainability Appraisal Report.
Campaigners Against Two Silica Sites (94357)	<p>Preferred Options: Biodiversity will be destroyed for decades by allowing mineral extraction in an already biodiverse area.</p> <p>Past examples and sites show Sibelco's record in the matter of post quarry restoration is appalling/left unfinished sites/wasteland.</p> <p>Restoration of quarries in Norfolk is to man-made water-bodies which is hardly 'high quality, locally distinctive landscape'.</p>	<p>No Action Required: There are previous local silica sand extraction areas which have been restored by Sibelco, under modern restoration conditions, that have been designated as County Wildlife Sites. Some of the restoration at Leziate and Bawsey has specified heathland creation with areas of bare sandy areas for invertebrates, this is a priority habitat for Norfolk, as much of the heathlands were planted with conifer plantations following the First World War. While open water restoration does form part of some restoration schemes' heathland would be likely to achieve net biodiversity gain compared with the coniferous plantation.</p>

Table 11: Main issues raised during the Consultation stages about the Waste Management Strategic Objectives

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Waste Management Strategic Objectives	NCC Planning Officer's Response
Campaigners Against Two Silica Sites (94358) Individuals (94692, 94912)	<p>Preferred Options: The National Planning Policy Framework (NPPF) states in (Ch 17, para 204.b) that authorities should 'take account of...recycled materials...before considering extraction of primary materials.'</p> <p>The draft LP does not adhere or invest in facilities for this. Therefore, NCC is failing in its duty to look to recycle before extracting raw materials and their vision is not sound.</p> <p>Without a sound glass recycling policy/plan NCC fails their own sustainability objectives SA1, SA3, SA4, SA5. SA6, SA8, SA9, SA11 and SA13 on pg 9 of the Sustainability</p>	<p>No Action Required: For aggregate minerals the forecast need has not been adjusted based on recycled or secondary aggregate provision because the data is not comprehensive as many operations (such as on-site recovery and those covered by exemptions from Environmental Permits) are not recorded.</p> <p>The NPPF makes a specific link between silica sand supply and the production of the processing plant that it is supplying, therefore it is considered appropriate to plan for the need for silica sand extraction in Norfolk based on the permitted throughput of the processing plant which is 0.754 million tonnes of raw silica sand per annum. National Planning Practice Guidance states that the required stock of permitted reserves for each silica sand site is based on the average of the previous 10-year sales;</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Waste Management Strategic Objectives	NCC Planning Officer's Response
	Appraisal Report - Part A- Scoping (Oct 2015) and pgs 15-16 of Part B (Jun 2019); plus Strategic Objectives WSO 1/2/4/6/8, MSO 2/3/8/10.	it does not take into account any other supply options (such as recycled materials). Norfolk already has a well-developed and effective collection process for glass recycling at the kerbside, through Household Waste Recycling Centres, and bring banks. The glass collected through these methods in Norfolk is sent to existing glass recycling facilities located elsewhere in the UK. Silica sand is a necessary ingredient in the remelt feedstock for recycled glass. The NM&WLP contains criteria-based policies which would be used to determine planning applications for waste management facilities including glass recycling and other inert waste recycling. The plan does not fail the Sustainability Objectives as detailed in the Sustainability Appraisal Report.

Table 12: Main issues raised during the Consultation stages about the Minerals Strategic Objectives

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Minerals Strategic Objectives	NCC Planning Officer's Response
Mineral Services Ltd (91956) Mineral Products Association (92497, 98760) Cemex UK Materials Ltd (94854) Heaton Planning Ltd / Brett Group (99031)	Initial Consultation & Preferred Options: MSO1. The 'steady and adequate supply of aggregate minerals' could be enhanced by including reference to the need to provide appropriate policies to achieve the objective. Add 'and to provide at least a 7-year land bank for sand and gravel, and 10-year landbank for Carstone.' Or insert 'sufficient to meet the future demand requirements FORECAST WITHIN [delete: of] the Local Aggregate Assessment [delete: and safeguarding existing infrastructure].'	No Action Required: It is not considered necessary to explicitly state in the objectives that planning policies will be included to achieve the objectives as this is the whole purpose of the NM&WLP. We have not amended MSO1 to refer to the 7-year landbank and 10-year landbank as these are already specified in the NPPF and in policy MP1. Objective MSO1 has been amended in the Publication version of the NM&WLP to state "sufficient to meet the forecast need, based on the Local Aggregate Assessment". It is not necessary to include the phrase 'future demand' as the purpose of the NM&WLP is plan for the future forecast need during the Plan period.
Essex County Council (98858)	Preferred Options: MSO1 would benefit from being re-drafted to mirror the drafting of MSO2, and reflect the intention to meet a forecasted need (the LAA could be a supporting reference).	No Action Required: Objective MSO1 has been redrafted in the Publication version of the NM&WLP to be more similar to objective MSO2 and states "sufficient to meet the forecast need, based on the Local Aggregate Assessment".

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Minerals Strategic Objectives	NCC Planning Officer's Response
Campaigners Against Two Silica Sites (94360) Individuals (94693)	Preferred Options: MSO2 - quantify 'adequate' and not rely on the arbitrary past supply figures. Consider better recycling of those raw materials before extraction.	No Action Required: The NPPF states that Mineral Planning Authorities should plan for a 'steady and adequate supply' of aggregate minerals and industrial minerals. Policy MP1 details the quantities to be planned for and the reasoning behind the figures used. Issues raised about Policy MP1 are responded to in the section of this report regarding Policy MP1.
Mineral Products Association (92497, 98760) Sibelco UK (92471, 98653)	Initial Consultation & Preferred Options: The following adjustment is suggested to 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 or at least 15 years where significant new capital required and safeguarding existing infrastructure.	No Action Required: 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.
Campaigners Against Two Silica Sites (94360)	Preferred Options: In terms of silica sand, NCC does not currently consider increased and more efficient recycling of glass, particularly clear glass, in its plan in order to reduce the amount of extraction of raw material required from Norfolk.	No Action Required: Norfolk already has a well-developed and effective collection process for glass recycling at the kerbside, through Household Waste Recycling Centres, and bring banks. The glass collected through these methods in Norfolk is sent to existing glass recycling facilities located elsewhere in the UK. Silica sand is a necessary ingredient in the remelt feedstock for recycled glass. The NPPF makes a specific link between silica sand supply and the production of the processing plant that it is supplying, therefore it is considered appropriate to plan for the need for silica sand extraction in Norfolk based on the permitted throughput of the processing plant which is 0.754 million tonnes of raw silica sand per annum. National Planning Practice Guidance states that the required stock of permitted reserves for each silica sand site is based on the average of the previous 10 year sales; it does not take into account any other supply options (such as recycled materials).
Mineral Products Association (92497, 98760)	Initial Consultation & Preferred Options: Adding the following to MSO4 and MSO5. 'The agent of change'	No Action Required: The wording of objectives MSO4 and MSO5 have been amended as suggested in the Publication version of the NM&WLP.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Minerals Strategic Objectives	NCC Planning Officer's Response
Sibelco UK (92471, 98653)	principle will be applied to any new proposed development impacting on safeguarded areas or sites'	
Mineral Services Ltd (91956)	Initial Consultation: MSO6. The proposed wording refers to 'while protecting people from harm'. The wording should be changed to 'while developing policies to assess the impact upon the environment and human health'.	No Action Required: It is not considered necessary to explicitly state that this objective will be implemented through the use of the policies within the NM&WLP when determining planning applications as this is the case with all of the objectives.
Campaigners Against Two Silica Sites (94360)	Preferred Options: MSO6. Fails in this objective since the areas it plans to excavate silica sand from already have biodiverse natural environments.	No Action Required: Mineral can only be extracted where it exists. Development Management Policy MW1 and Silica sand extraction policy MPSS1 set out requirements for assessment of existing biodiversity, and restoration for biodiversity net gain; for proposed mineral extraction.
Heaton Planning Ltd / Brett Group (93018)	Initial Consultation: MSO6 - the adverse impacts should be amended to unacceptable adverse impacts to conform with NPPF.	Action Required: The text has been amended to refer to unacceptable adverse impacts in accordance with the NPPF.
Heaton Planning Ltd / Brett Group (93018, 99031)	Initial Consultation & Preferred Options: 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, i.e. "mitigated to acceptable levels in accordance with adopted standards".	No Action Required: The objective is considered to be in conformity with the NPPF as even the unavoidable noisy short-term activities should be carried out in a way that minimises and mitigates amenity impacts.
Campaigners Against Two Silica Sites (94360)	Preferred Options: MSO7. NCC cannot fulfil this objective without an unbiased health study data that shows the extraction of minerals, especially silica sand, does not have a health impact on people. The amenity, health and CO ² effects of the development cannot be adequately mitigated against.	No Action Required: 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." Development Management Policy MW1 requires planning applications for mineral and waste developments to assess potential impacts to amenity and suggest appropriate mitigation. Policy MW3: Climate change mitigation and adaption requires proposals for mineral and waste to be planned to minimise greenhouse gas emissions.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Minerals Strategic Objectives	NCC Planning Officer's Response
Heaton Planning Ltd / Brett Group (93018) Sibelco UK (92471)	Initial Consultation: Objective MSO8 is not considered deliverable as the majority of minerals and waste sites in Norfolk are served by Heavy Goods Vehicles.	Action Required: 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'.
Campaigners Against Two Silica Sites (94360)	Preferred Options: MSO8 and MSO9 fail sustainability objective SA1 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 15 of Part B (Jun 2019). MSO8 fails because there should be increased glass recycling in Norfolk to reduce the quantity of silica sand that needs to be extracted. MSO9 fails because the historical record for restoration of silica sand quarries is poor. For MSO9 if the areas for mineral extraction are already biodiverse then they should not be extracted just on the basis there could be a benefit on restoration especially as silica sand quarry restoration has been poor historically.	No Action Required: The consultation responses do not propose changes to the objectives, but consider that the Plan is not in compliance with these objectives. Therefore, these are issues with particular policies or sites within the NM&WLP which will be dealt with in the relevant sections of this report dealing with those policies. Sustainability Objective SA1 is to adapt to and mitigate the effects of climate change by reducing contributions to climate change. Objective MSO8 is specifically regarding climate change and therefore does not fail this SA objective. Objective MSO9 is regarding restoration and does not fail this SA objective. This is set out in the Sustainability Appraisal Report. Restoration of some silica sand quarries was based on historical conditions which were less detailed than the requirements for a modern mineral extraction permission.
Heaton Planning Ltd / Brett Group (93018, 99031) Sibelco UK (92471)	Initial Consultation & Preferred Options: 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.	Action Required: 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'.
Campaigners Against Two Silica Sites (94360) Individuals (94693)	Preferred Options: MSO10. This objective is not in NCC's gift as it does not own the land, and some of these areas are already accessible to the public.	No Action Required: It is correct that NCC does not own the land, but this objective is regarding the decisions that NCC will make about planning applications for mineral extraction and the conditions that will be applied to permissions in terms of the restoration of those sites.
Cemex UK Materials Ltd (93071)	Initial Consultation: Suggests adding the wording 'Where appropriate' to Policy MSO10, to reflect where increasing public access may not be appropriate, for example where the land is best and most versatile agricultural land/ecologically slanted restoration.	Action Required: 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.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Minerals Strategic Objectives	NCC Planning Officer's Response
Heaton Planning Ltd / Brett Group (93018) Sibelco UK (92471)		
Mineral Services Ltd (91956)	Initial Consultation: 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'.	No Action Required: 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.
CPRE Norfolk (92013)	Initial Consultation: CPRE Norfolk are concerned that sustainability could be used as an argument to allocate otherwise unsuitable sites.	No Action Required: The NPPF states that plans and decisions should apply a presumption in favour of sustainable development.

Table 13: Main issues raised during the consultation stages about the Presumption in favour of Sustainable Development

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to the Presumption in favour of Sustainable Development	NCC Planning Officer's Response
Carter Concrete Limited (98590)	Preferred Options: No clear policy for commitment and approach to Sustainable Development, such as adopted Policy SD1 of the Mineral Site Allocations DOD 2017.	No Action Required: This policy unnecessarily duplicates the NPPF. Therefore draft Policy MW1 which was included in the Initial Consultation (2018) has been deleted and replaced with explanatory text.
Heaton Planning Ltd / Brett Group (93019)	Initial Consultation: 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.	Action Required: 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.
Historic England (92945)	Initial Consultation: There is a lack of any policy on the historic environment. NPPF paragraphs 193-195 set a stronger requirement for justifying harm than bullet point 1 in Policy MW1, we are not sure that bullet point two referring to other policies in the Framework applies.	Action Required: 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.
West Winch parish council (92896, 98883)	Initial Consultation: Development presumption must not be 'in favour' when there are obvious reasons to object.	No Action Required: The NPPF states that plans and decisions should apply a presumption in favour of sustainable development and details how that presumption should be applied.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to the Presumption in favour of Sustainable Development	NCC Planning Officer's Response
	<p>The wording gives developers advantage over local issues.</p> <p>Preferred Options: Presumption in favour of sustainable development is likely to breach paragraph 7.1 (b) Communities health.... 'Presumption in favour ...' should be removed.</p>	
Broadland District Council (92100)	<p>Initial Consultation: Duplicates policy contained in the NPPF. It is suggested that it is deleted, and reworded into appropriate supporting explanatory text.</p>	<p>Action Required: The policy will be deleted and replaced with appropriate supporting explanatory text.</p>
Natural England (92062)	<p>Initial Consultation: 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>Action Required: 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>
Individual (91901)	<p>Initial Consultation: 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. Consideration should be given to establishing a formal buffer (say 1,000m, similar to MW5) zone to residential properties in rural areas in order to protect their amenity.</p>	<p>No Action Required: The NPPF states where there are no development plan policies relevant to the application or relevant policies are out-of-date; the LPA will grant planning permission unless any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits.</p> <p>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).</p> <p>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) and protected bird species will not nest within a certain distance of built development, which reduces their breeding success. Other policies in the plan deal with potential amenity impacts, which cannot be unacceptable.</p>
Campaigners Against Two Silica Sites (94713)	<p>Preferred Options: Without a serious glass recycling plan the M&WLP fails the economic and environmental</p>	<p>No Action Required: This objection does not propose any changes to this policy. Norfolk already has a well-developed and effective collection process for glass recycling at the kerbside, through Household Waste Recycling Centres, and bring banks.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to the Presumption in favour of Sustainable Development	NCC Planning Officer's Response
	objectives of the Presumption in favour of sustainable development.	The glass collected through these methods in Norfolk is sent to existing glass recycling facilities located elsewhere in the UK. The NM&WLP contains criteria-based policies which would be used to determine planning applications for waste management facilities including glass recycling.

Table 14: Main issues raised during the Consultation stages about Policy MW1: Development Management Criteria

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW1: Development Management Criteria	NCC Planning Officer's Response
Broads Authority (93168)	Initial Consultation: Include the Broads when stating that some areas are protected by 'District, Borough and City Local Plans.'	Action Required: Applicable sentences have been amended to include the Local Plan for the Broads.
Broads Authority (98952)	Preferred Options: This type of policy usually requires impacts of development will be minimised on the criteria, or schemes will address the criteria, you ask for information only.	No Action Required: Policy states "sufficient information is submitted to demonstrate that the development would not have an unacceptable impact "(emphasis mine)
Heaton Planning Ltd / Brett Group (93020)	Initial Consultation Preferred Options: The policy is supported, in particular that environmental enhancements will be sought on restoration if appropriate, but it is contrary to the earlier Vision and Objectives; these should be changed to seek conformity throughout the plan an NPPF.	No Action Required: The Vision and objectives are consistent with the NPPF. In MW1, 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'.
Broads Authority (98952)	Preferred Options: What about if the soil that is to be excavated or disturbed is peat soils? 'Peat soils have many special qualities, such as are a carbon sink but they are a carbon source if allowed to dry out' Consider protecting Peat Soils through separate policy.	No Action Required: Peat is not a separate agricultural land grade in itself and therefore is not specifically referred to in the Policy. The NPPF states that Mineral Planning Authorities should not grant planning permission for peat extraction from new or extended sites.
South Norfolk District Council (92541) Broadland District Council (92108)	Initial Consultation and Preferred Options: It is not necessary or desirable for policies to cross-reference to general policy MW1. There is a danger that if you just refer to MW1 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.	No Action Required: The Plan needs to be read as a whole, where there are policies for potentially suitable land, it is emphasised that the Development Management Criteria in MW1 would also apply. We recognise that this is not strictly necessary, but we consider it provides clarity for non-planners, and highlights that for proposals of specific development types,

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW1: Development Management Criteria	NCC Planning Officer's Response
		the general DM criteria policy is also relevant, not just the specific policy related to that development type.
Borough Council of King's Lynn and West Norfolk (99025)	Preferred Options: Climate change mitigation should be considered with regards to methane emissions (a greenhouse gas) released from allocated landfill sites.	No Action Required: The Vision of the NM&WLP recognises the need to minimise and mitigate methane emissions from waste management facilities. Policy MW4 in the Preferred Options sets out requirements for mineral and waste development to minimise CO2 and methane emissions. Policy MW3 of the Publication document sets out requirements for mineral and waste development to minimise greenhouse gas emissions. This would include methane.
Broads Authority (93168, 98953) Norfolk Coast AONB Partnership (94818) Environment Agency (98736) Borough Council of King's Lynn and West Norfolk (99024)	Initial Consultation and Preferred Options: Page 26 – MW1 could mention dark skies. Refer to the CPRE Night Blight data as well as our dark skies policy and zones. Page 27 - more detail about lighting: directing lighting downwards and away from properties and only lighting if needed and temporary versus permanent illumination. Norfolk County Council's Environmental Lighting Zones Policy Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Lights which gives guidance for lighting in an AONB Lighting should be assessed to ensure that there is no impact on residents.	Action Required: Dark skies do represent a potential impact from light pollution and supporting text has been added into the Publication version of the Local Plan to highlight it is an aspect of light pollution to be addressed. NCC's Local List for Validation of Planning Applications requires all applications where external lighting is proposed to submit 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.
West Winch parish council (98881)	Initial Consultation and Preferred Options: Human health risks must be a major consideration in waste development, including cumulative impacts. Para 8.9 there should be no impact on human health - densely populated area King's Lynn and proposed massive development at South East King's Lynn (SEKL).	No Action Required: The policy states that planning applications will need to demonstrate that there will not be an unacceptable impact on local amenity and health (i.e. noise levels, odour, air quality, dust, litter, light pollution and vibration). The focus of the planning system is on whether the development itself is an acceptable use of the land, and the impacts of those uses. The control of process, health and safety issues or emissions themselves are subject to approval under relevant pollution control regimes and NCC is required to work on the assumption that the relevant pollution control regime will be properly applied and enforced.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW1: Development Management Criteria	NCC Planning Officer's Response
Environment Agency (98735)	Preferred Options: The policy makes no reference to local air regarding waste developments, be it from gas utilisation units or fugitive emissions from landfilled areas and their perimeter.	No Action Required: Point a of the policy specifically includes air quality, and odour.
Borough Council of King's Lynn and West Norfolk (92337)	Initial Consultation: It should be noted that some mineral activities fall outside of the environmental permitting regime and therefore mitigation under planning system may become necessary.	No Action Required: Paragraph 6.2 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.
Mineral Services Ltd (91957)	Initial Consultation: 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.	No Action Required: The NPPF refers to 'human health' in relation to mineral operations and the NPPW refers to 'human health' in relation to waste management, and therefore the term will remain consistent with that reference.
Borough Council of King's Lynn and West Norfolk (99024)	Preferred Options: Noise/odour assessments, vibrations, air quality/dust assessments, fugitive emissions from haul roads and soil stripping operations should consider and include mitigation measures to deal appropriately with any potential health impacts.	No Action Required: Point a of the policy specifically includes dust, air quality, noise, odour, and vibration. Mitigation measures where required are a standard part of a planning application and the supporting assessments.
West Winch parish council (92897)	Initial Consultation: Norfolk is the driest County in the UK for water resources. Cumulative usage totals must be taken into account in any planning.	No Action Required: 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.
Environment Agency (92548)	Initial Consultation: The potential impacts of waste extraction on aquatic ecology should be addressed. Aquatic ecology assessments should be carried out to determine the potential impacts on fish, invertebrates and aquatic habitat. The need for Water Framework Directive (WFD) assessments should be reiterated here. Preferred Options: Recommend the rewording of the final sentence of paragraph 8.20 to state "Development that may	No Action Required: The WFD is acknowledged and within the supporting text. The policy wording refers to the quality and quantity of water resources and the need to maintain status of waterbodies. A WFD compliance assessment has been carried out for all sites. The Biodiversity Survey and Report required by NCC's 'Local List for Validation of Planning Applications' would need to be carried out where development affects a feature which provides or could provide a habitat for wildlife; this would

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW1: Development Management Criteria	NCC Planning Officer's Response
	affect Water Framework Directive waterbodies e.g. rivers, streams, lakes will require a WFD compliance assessment".	include waterbodies. A WFD compliance assessment would form part of this report for designated waterbodies. Action Required: The final sentence of paragraph 8.20 (now paragraph 6.21 of the Publication version) has been amended to include the additional text requested.
Environment Agency (98738)	Preferred Options: Support the use of pollution prevention measures, to prevent pollution of surface and groundwater. This paragraph should also state that the assessment should determine if there could be a deterioration in WFD status. Minerals and waste management developments should not cause deterioration or prevent a water body from achieving Good Ecological Status/Potential, and whenever possible, help to implement environmental improvement measures to improve waterbodies.	Action Required: Supporting text amended, paragraph 6.43 in the Publication version of the Plan includes the suggested text.
Mineral Products Association (92499) Sibelco UK (92473)	Initial Consultation: Add 'and where practical' to add clarity to MW1(b)	No Action Required: 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.
IGas Energy Plc (98897)	Preferred Options: Air quality, water resources and impacts on groundwater are matters covered by other legislation/regulatory bodies and should not be listed in the policy.	Action Required: Paragraph 6.2 of the Publication version of the NM&WLP 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.
Broads Authority (98952)	Preferred Options: What about the quantity of surface water (as in what to do with it in relation to flooding) and the quality of water bodies?	Action Required: point d of the policy in the Publication version of the Plan has been amended to highlight that Flood risk from all sources will need to be included in a Flood Risk Assessment (in accordance with national policy). The quality of ground and surface waterbodies and the need to prevent deterioration, is included in point b of the policy.
Environment Agency (92549, 98738)	Initial Consultation and Preferred Options: Dewatering for quarrying or mineral extraction purposes now falls under water abstraction licencing legislation. The Environment Agency would normally expect dewatering water to be	Action Required: Additional text has been added and is in paragraph 6.44 of the Publication version of the Plan.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW1: Development Management Criteria	NCC Planning Officer's Response
	<p>returned to the local aquifer within a short time period. Intervening use of this water for activities such as mineral washing and dust suppression which have a consumptive element will not be permitted.</p> <p>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>Environment Agency (92548) Great Yarmouth Borough Council (98628)</p>	<p>Initial Consultation and Preferred Options: Tidal, groundwater and reservoir flooding need to be included/considered. Remove 'Pluvial and Fluvial' and replace with 'All sources of flooding'.</p> <p>Each application should explore the potential for betterment in the site-specific Flood Risk Assessment (FRA), particularly when it comes to restoration. Ideally Minerals and Waste sites should provide flood risk betterment where possible in Policy MW1 and may be most appropriate in the last paragraph, as Minerals and Waste sites have strong potential to offer betterment through reducing the runoff rates, thereby reducing the flow to adjoining watercourses.</p>	<p>Action Required: The text has been revised, in paragraph 6.39 and point d of the Publication version of the Plan, 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.</p>
<p>Environment Agency (92548)</p>	<p>Initial Consultation: The Local Plan should consider 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>No Action required: This would be site specific requirement and the site assessment and site allocation policy would account for any such requirements.</p>
<p>Environment Agency (98735)</p>	<p>Preferred Options: Point (d) enhanced to state "flood risk TO THOSE WORKING on site or an increase in flood risk elsewhere" (addition in CAPITALS). The policy could also be improved by requiring a Flood Response Plan to manage the safety of the people on site.</p>	<p>Action Required: point d of the policy and paragraph 6.41 in the publication version of the Plan, has been amended to include the suggested text.</p>
<p>Lead Local Flood Authority (NCC) (99047)</p>	<p>Initial Consultation and Preferred Options: Suggest that the wording of point d) is changed to include groundwater flooding.</p>	<p>Action Required: The text for Point (d) has been revised to include all sources of flooding and there is no need to list all</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW1: Development Management Criteria	NCC Planning Officer's Response
	<p>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. 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>potential types of flood risk within the policy. The supporting text has been revised to include reference to groundwater.</p> <p>Text regarding the potential for mineral working to remove infiltration media has been added to the supporting text in paragraph 6.40 of the Publication version of the Plan.</p>
Broads Authority (98955)	<p>Preferred Options: There is limited mapping relating to 3a. Consider removing this or just saying '3'.</p>	<p>No Action Required: Agricultural land is divided into grades 1-5 on the map published by Natural England. BMV agricultural land is defined as grades 1, 2 and 3a in the NPPF. It is not known whether grade 3 land is grade 3a or 3b without carrying out a site-specific soil survey, which is required by our Local List when developing on BMV land.</p>
Broads Authority (98955)	<p>Preferred Options: Para 8.32, 12.2 – suggest replacing/clarifying temporary with a 'number of years'.</p>	<p>Action Required: Supporting text amended in paragraph 8.32 (now 6.33 of the Publication version of the Plan).</p>
West Winch parish council (92897, 98876)	<p>Initial Consultation and Preferred Options: Para 8.31 Agricultural Land (grade 1, 2 and 3a land classification), which should include Grazing Common Land, must all be given stronger wording and protected from contamination to protect our food chain for the future of the whole Country.</p>	<p>No Action Required: Policy MW6 regarding agricultural soils gives appropriate protection to grade 1, 2 and 3a agricultural land, in line with the requirements of the NPPG (Paragraph 001 to 003 of the NPPG for the Natural environment). The registered Common Land located in West Winch is classed as grade 2 and grade 3 agricultural land. Proposals for minerals and/or waste development will be permitted where sufficient information is submitted to demonstrate that the development would not have an unacceptable impact on the best and most versatile agricultural land.</p>
Broads Authority (98956)	<p>Preferred Options: Paragraph 8.35 - ask applicants to state how they have considered water and rail and road and thoroughly justify their chosen mode.</p>	<p>Action Required: Paragraph 8.35 (now para. 6.36 of the Publication version) has been amended to include the following additional text "Alternatives to road freight ... will be strongly</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW1: Development Management Criteria	NCC Planning Officer's Response
		<p>encouraged, and must be assessed and considered positively at the planning application stage (as set out in policy MW2), but it is recognised that in Norfolk the majority of bulk materials are likely to continue being transported by road as this is currently the most feasible mode of transport.”</p> <p>Policy MW2 on transport states “All proposals for minerals development or waste management facilities must assess the potential for non-HGV transportation of materials to and from the facilities, principally by rail or water and take up these sustainable transport opportunities where available.</p>
Broads Authority (98954)	<p>Preferred Options: 8.24 first bullet point - weave in wording that refers to the setting of the landscapes.</p>	<p>Action Required: The supporting text has been amended (paragraph 6.24) in the Publication version of the NM&WLP to state that “Development within the setting of the AONB and the Broads should be located and designed to avoid or minimise adverse impacts on the designated areas” (in line with the NPPF)</p>
West Winch parish council (98882)	<p>Preferred Options: King's Lynn has historic buildings. Harmful emissions and fracking would affect these valued buildings which attract visitors and tourists, contributing major finance to the area's economy.</p>	<p>No Action Required: Planning applications for minerals or waste development would be determined in accordance with the relevant policies in the NM&WLP, and any other relevant material planning considerations, and information to demonstrate that the development would not have an unacceptable impact. Policy MW1 states that applications would need to demonstrate the development would not have an unacceptable impact on the historic environment.</p>
Norfolk Coast AONB Partnership (94814)	<p>Preferred Options: Undertake LVIA for sites in the AONB to ascertain whether there will be a visual impact.</p>	<p>No Action Required: The supporting text in paragraph 6.25 of the Publication Version of the Plan states that an LVIA will need to be carried out where a proposal is likely to have an effect on an AONB (this would include sites within the AONB). The NCC's 'Local List for the Validation of Planning Applications' requires an LVIA in specific circumstances, including, but not limited to all proposals involving any mineral extraction.</p>
Broads Authority (98952)	<p>Preferred Options: What are 'outdoor recreation facilities' and do you need to include Local Green Space as well as Open Space?</p>	<p>Action Required: A facility whether publicly or privately owned available for outdoor recreation, as stated in the NPPF. Local</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW1: Development Management Criteria	NCC Planning Officer's Response
		Green Space is included in policy wording of the Publication version of the NM&WLP.
West Winch parish council (92897)	Initial Consultation: Include for information that there is a Public Consultation process on anything which would affect Public Rights of Way (PROWs).	Action Required: The supporting text (paragraph 6.27 of the Publication version of the NM&WLP) has been revised to clarify the PROW process within planning applications.
Environment Agency (92547)	Initial Consultation: Land and Soil Resources – We recommend that the last sentence is expanded to address soil erosion.	Action Required: The word erosion has been added to the supporting text (paragraph 6.33 of the Publication version), so that the potential for this is addressed.
Broads Authority (93168)	Initial Consultation: Confusion over whether text states that a survey would be needed to see if there are biodiversity features on a proposed site to then need a survey. All sites should require baseline ecological survey and assessment of the presence of rare and protected species.	Action Required: The supporting text has been revised to highlight existing NCC 'Local List for the Validation of Planning Applications' requirements 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).
West Winch parish council (98878)	Preferred Options: Para 8.20 mentions Ancient Woodland - This must also apply to historical Grazing Commons, especially in West Winch and North Runcton.	No Action Required: Grazing commons are not included in the list of irreplaceable priority habitats in the definition in the National Planning Policy Framework.
Environment Agency (92549)	Initial Consultation: Additional wording needed to address pollution in relation to environmentally sensitive locations (including suggested text).	Action Required: the text has been amended as requested and is included in paragraph 6.43 of the Publication version of the NM&WLP.
Environment Agency (98735)	Preferred Options: Point (k) in this policy makes reference to the natural and geological environment. This could be enhanced by also making reference to the hydrogeological environment including maintaining groundwater dependent wetlands, surface water flows, groundwater quantity and flow regime.	Action Required: Point l. of the policy in the publication version of the NM&WLP has been amended to include reference to the hydrogeological environment.
Woodland Trust (92428)	Initial Consultation: In the NPPF, the term 'aged' has been replaced with 'ancient'.	Action Required: The term 'aged' has been replaced with 'ancient' in the text as requested.
Norfolk Wildlife Trust (98665) Norfolk Coast AONB Partnership (94825)	Preferred Options: In order to conform with the NPPF, the policy needs to make reference to the requirement for biodiversity net gain and scenic value.	Action Required: Reference to biodiversity net gain is specifically included in Policy MW1 and in the policy regarding restoration requirements (Policy MP7) and a number of the specific site allocations. We assume scenic value equates to Landscape character, point h of the policy references the quality, appearance and character of local landscapes.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW1: Development Management Criteria	NCC Planning Officer's Response
Carter Concrete Limited (98591)	Preferred Options: When considering potential environmental benefits this should state geo-diversity benefits.	Action Required: Policy MW1 in the Publication version of the Plan has been amended to include reference to geodiversity net gains.
Mineral Products Association (98761) Cemex UK Materials Ltd (94859)	Preferred Options: The plan as drafted does not properly distinguish between the hierarchy of international, national and locally designated sites as required by paragraph 171 of the NPPF.	Action Required: Reference in point I of the policy to internationally, nationally and local designated sites.
NCC Historic Environment Service (93174)	Initial Consultation: Rewording is needed to bring policy in line with paragraph 199 of NPPF (2018). Suggestions to add wording/phrases proposed.	Action Required: The proposed mitigation measures are encompassed by the term 'development' and the text does not need to be changed. 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. Paragraph 6.30 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 NCC's 'Local List for Validation of Planning Applications', for any application that includes or is adjacent to an area with known or high potential for archaeological interest.
Historic England (98782)	Initial Consultation: It would be clearer and more consistent if the section was entitled 'historic environment' rather than 'heritage assets', and the phrase should be added to the first paragraph to read that the " ... natural, built and historic environment. .. " are considerations for cumulative impacts for consistency and accuracy. Initial Consultation and Preferred Options: It is worth noting that the NPPF covers designated and non-designated heritage assets although the statutory protection is focused on designated heritage assets. Amend to include reference to NPPF and non-designated heritage assets. Amend undesigned heritage assets to non-designated	Action Required: The section 'heritage assets' has been retitled to 'historic environment' and the first paragraph has been reworded to include reference to the historic environment. The Heritage and Archaeology Statement required by NCC's Local list for Validation of Planning Applications 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. The distinction that there are non-designated and designated heritage assets has been added to the supporting text.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW1: Development Management Criteria	NCC Planning Officer's Response
	heritage assets.	
Historic England (98781)	<p>Initial Consultation and Preferred Options: This policy remains unsound as it does not meet the requirements of paragraph 204(f) of the Framework and provides limited historic environment criteria against which planning applications will be assessed so as to ensure that there are no unacceptable adverse impacts.</p> <p>Include separate policy for the historic environment to more closely reflect the requirements of the NPPF.</p> <p>Recommend that the referenced Historic England documents are referred to in terms of the materials that may be present and how the potential impacts could be investigated, such as changes to the groundwater levels or chemistry in the area.</p>	<p>Action Required: The supporting text in paragraph 6.30 has been revised to highlight the requirements and criteria of the Heritage and Archaeology Statement required by NCC's Local List for Validation of Planning Applications. Additional text has been added to the policy regarding the historic environment requirements in the NPPF.</p> <p>In addition, all mineral extraction sites that are allocated in the NM&WLP have an associated site allocations policy which includes requirements that will need to be met at the planning application stage in relation to protection of the historic environment.</p>
Cemex UK Materials Ltd (94865) Mineral Products Association (98762)	<p>Preferred Options: Paragraph 194 regarding proposals affecting heritage assets needs to be included.</p>	<p>Action Required: Text has been added to paragraph 6.29 of the Publication version of the NM&WLP to reflect that heritage assets should be conserved in an appropriate manner considering their significance.</p>
Mineral Products Association (98762)	<p>Preferred Options: The text could be interpreted that all heritage assets regardless of significance must be preserved.</p>	<p>Action Required: It is not considered that the text states that all heritage assets regardless of significance must be preserved. The sentence "these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance" is a direct quote from the NPPF (2021) paragraph 189 and therefore is in accordance with national policy.</p>

Table 15: Main issues raised during the Consultation stages about Policy MW2: Transport

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW2: Transport	NCC Planning Officer's Response
Broads Authority (93167)	<p>Initial Consultation: Page 33: Possibly require an assessment with consideration to positively assess the potential for non-HGV transportation of materials to and from the facilities, principally by rail or water. Reword sentence regarding satisfactory access.</p>	<p>No Action Required: Proposals must assess non-HGV transportation of minerals which would necessitate submission of details of that assessment in order to provide evidence for the determination of any application. 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>
Cemex UK Materials Ltd (98598) Mineral Products Association (98763) Sibelco UK (98652)	<p>Initial Consultation and Preferred Options: The following revision is proposed: - * "WHERE APPROPRIATE / 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."</p>	<p>Action Required: 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."</p>
West Suffolk Councils (Forest Heath District and St Edmundsbury Borough Councils) (93066)	<p>Initial Consultation: 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. They can provide a framework to manage and monitor the impacts of HGVs on local highways.</p>	<p>No Action Required: DSP's and CLP's are not considered to provide advantages to mineral and waste developments where HGVs tend to carry single loads.</p>
Mineral Services Ltd (91958)	<p>Initial Consultation: Perhaps this might be better included as a section within Policy MW1 (DM Criteria) to ensure that the transport proposals for a site do not have</p>	<p>No Action Required: 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</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW2: Transport	NCC Planning Officer's Response
	an unacceptable impact as opposed to the double negative 'do not generate: unacceptable risks ... etc'.	current adopted Minerals and Waste Core Strategy is worded in a similar way and has been effective.
Sprowston Town Council (98598)	Preferred Options: Vehicle access to all sites use the most appropriate roads; avoiding smaller local roads wherever possible.	No Action Required: Policy MW3 includes the requirement for a Transport Assessment or Statement accompanying a planning application to demonstrate a suitable route to the nearest major road (trunk road or principal road or main distributor road).
Carter Concrete Limited (98592)	Preferred Options: The term "Where appropriate" should replace the word "All".	No Action Required: The policy intention is for all proposals to carry out the assessment, therefore no change will be made to the text.
Essex County Council (98859)	Preferred options: Include a hierarchy of preference for transportation routes to ensure that site promoters are required to expressly consider the most sustainable route to the nearest Principal Road or Main Distributor Road.	No Action Required: Paragraph 7.7 of the Publication version of the NM&WLP provides sufficient detail on the order of appropriateness of roads within the route hierarchy.
IGas Energy Plc (98898)	Preferred Options: Reference to the use of pipelines as an alternative to HGV transport should be included.	Action Required: Noted. This is considered more appropriate to Policy MP2 for silica sand and the wording for Policy MP2 has been amended to include reference to pipelines.

Table 16: Main issues raised during the Consultation stages about Policy MW3: Climate change adaption and mitigation

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW3: Climate change adaption and mitigation	NCC Planning Officer's Response
Broads Authority (98958) Broadland District Council (92101)	Initial Consultation: Uses the word 'should' which is quite weak term and potentially conflicts with other regimes such as Building Regulations. A stronger term similar to that uses in other policies (like will need to, must, is required to) might be better. Alternatively, it is suggested 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. Preferred Options: Does using the term 'endeavour' reduce the strength of criterion c? d) just demonstrate or implement too?	Action Required: We have changed 'should' to 'will be expected to' to reflect that all mineral extraction and waste management operations will result in some level of emissions, in the same way as all other development. 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. No Action Required: In the Publication version of the NM&WLP requirement (d) has been amended to state 'use' instead of 'demonstrate the use of' and requirement (c) no longer says 'endeavour'.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW3: Climate change adaption and mitigation	NCC Planning Officer's Response
Broads Authority (93166)	Initial Consultation: Some aspects repeat the Development Management Criteria Policy - does that matter?	No Action Required: Proposals for mineral and waste development will need to comply with both MW3 and MW1, which are complementary.
Environment Agency (92550) Lead Local Flood Authority (NCC) (91939)	Initial Consultation: Include – 'Site specific FRAs should include an assessment of the impact of climate change on flood risk using appropriate climate change allowances'. However Part F may be better suited in the flooding, water resources and water quality section on page 30.	No Action Required: The flood risk criteria in Policy MW1 (Development Management Criteria) has been revised to take into account climate change.
Mineral Products Association (92501)	Initial Consultation: Change to "g) incorporate proposals for sustainable travel, including travel plans where practical and appropriate."	No Action Required: The term 'appropriate', which means suitable for the purpose or situation, encompasses whether or not it is practical or effective to do so.
Sibelco UK (92475)	Initial Consultation: Suggested amendment - b) be planned so as to reduce carbon dioxide and methane emissions on a site unit basis .	No Action Required: 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 the processing of mineral is a fundamental part of the proposal.
Environment Agency (98705)	Preferred Options: Paragraph 10.2 states the need to minimise demands on potable water resources. The sentence should continue by saying 'and water resources in general'.	No Action Required: Unfortunately, this suggested amendment has not been made to the supporting text in the Publication version of the NM&WLP (paragraph 8.5) but could be included as a minor modification if required.
Environment Agency (98705)	Preferred Options: A possible linkage could be made between point's b and c - on site renewable energy (both electricity and hot water) could be captured from landfill gas emissions. Excess energy could then be fed into the local networks.	No Action Required: Noted. However, the policy is to apply to all minerals and waste management development and therefore it is not considered appropriate to change the policy to refer to a landfill specific example.
Environment Agency (98705)	Preferred Options: Update the wording of point 3 to state "...including rising sea levels, larger river flows , and coastal erosion..."	Action Required: Unfortunately, this suggested amendment has not been made to the policy in the Publication version of the NM&WLP, but could be included as a Main Modification if required.
Sibelco UK (92475)	Initial Consultation: c) endeavour to SOURCE a minimum of 10 per cent of the energy used on site from decentralised and renewable or low-carbon sources. (addition in CAPITALS).	No Action Required: Where mineral workings are sufficiently long term to justify the installation of renewables every effort should be made. The policy wording has been amended in the Publication version of the NM&WLP to state: "Proposals will be expected to set out how the proposal will make use of renewable

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW3: Climate change adaption and mitigation	NCC Planning Officer's Response
		energy, including generating the energy used on site from decentralised and renewable or low-carbon sources. Where on-site renewable or low-carbon energy generation is not practicable, evidence must be provided to the County Planning Authority, and the applicant should source the electricity required from renewables through an energy supplier".
Sibelco UK (98651)	Initial Consultation and Preferred Options: Add 'where practical [and/or] relevant' to points d, e and g.	No Action Required: the term 'appropriate', which means suitable for the purpose or situation, encompasses whether or not it is practical or effective to do so. SUDS is a key part of ensuring that flood risk is not increased elsewhere, and should form part of a proposal in the same way as other development.
D K Symes Associates (92364) Aggregate Industries UK Ltd (92355) Mineral Services Ltd (91959) IGas Energy Plc (98899) Brett Group (99033)	Initial Consultation and Preferred options: 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/removed from the policy.	No Action Required: Where mineral workings are sufficiently long term to justify the installation of renewables every effort should be made. The policy wording has been amended in the Publication version of the NM&WLP to state: "Proposals will be expected to set out how the proposal will make use of renewable energy, including generating the energy used on site from decentralised and renewable or low-carbon sources. Where on-site renewable or low-carbon energy generation is not practicable, evidence must be provided to the County Planning Authority, and the applicant should source the electricity required from renewables through an energy supplier".
D K Symes Associates (92364)	Initial Consultation: Policy MW1 (DM Criteria) does not refer to demonstrating that 'renewable' energy use is a development management criteria, suggesting that Policy MW4 should have greater flexibility.	No Action Required: Proposals for mineral and waste development will need to comply with both Policies MW3 and MW1, these policies are complementary, as are many other of the policies within the Plan.
Cemex UK Materials Ltd (94869) Sibelco UK (98651) Mineral Products Association (98764)	Preferred Options: Due to the often-remote location of its facilities, lack of public transport and the geographical distribution of its employees point (f) can be difficult to achieve. To reflect this, it is felt that the last bullet point of this policy should be caveated by the phrase "where practicable...".	No Action Required: We consider that the existing term 'appropriate', which means suitable for the purpose or situation, encompasses whether or not it is practical or effective to do so.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW3: Climate change adaption and mitigation	NCC Planning Officer's Response
Norfolk Wildlife Trust (98666)	Preferred Options: Expand text to note the role habitat creation and restoration can provide in climate change mitigation.	Action Required: A new paragraph in the supporting text has been added to the Publication version of the NM&WLP which discussed habitat creation. The policy has also been amended to state that proposals will be expected to: "take opportunities to incorporate trees, retain existing trees and include measures to assist habitats and species to adapt to the potential effects of climate change wherever possible".
Anglian Water Services Ltd (98317)	Preferred Options: Suggested additional wording - d) demonstrate the use of sustainable drainage systems, rainwater harvesting, stormwater harvesting including from impermeable surfaces wherever feasible and layouts that accommodate waste water recycling where a connection to the public sewerage network is required;	Action Required: The policy wording has been amended as requested in the Publication version of the NM&WLP.
North Norfolk District Council (98829)	Preferred Options: This figure could be higher and it is not clear as to the source of the evidence that backs up the figure of 10%.	No Action Required: The 10% figure was based on the existing policy in the adopted Minerals and Waste Core Strategy. We recognise that 10% is a low target and therefore we have amended the wording of Policy MW3 in the Publication version of the NM&WLP to state: "Proposals will be expected to set out how the proposal will make use of renewable energy, including generating the energy used on site from decentralised and renewable or low-carbon sources. Where on-site renewable or low-carbon energy generation is not practicable, evidence must be provided to the County Planning Authority, and the applicant should source the electricity required from renewables through an energy supplier".
Lead Local Flood Authority (99046)	Preferred Options: It is assumed 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, any impacts should be considered during a planning application and appropriate measures. These measures may not be	No Action Required: Noted. This is covered by the Development Management Criteria Policy MW1 which states that a planning application will need to demonstrate that there will not be an unacceptable impact on Flood risk from all sources to those working on site or an increase in flood risk elsewhere, as demonstrated by a Flood Risk Assessment (where required by the NPPF) and making an allowance for climate change. Further national information on how to carry out Flood Risk Assessments is contained within the Planning Practice Guidance.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW3: Climate change adaption and mitigation	NCC Planning Officer's Response
	required until reinstatement when post development ground levels are considered in detail.	
Campaigners Against Two Silica Sites (94714, 94364) Individuals (94697) (94917)	Preferred Options: The M&WLP is not serious in its intent to minimise climate change and fails Policy MW3 with regards to failing to radically overhaul glass recycling in Norfolk. There are no plans in place for reducing CO2 emissions from the quarrying of silica sand. It should put in place a plan that increases the quantity and quality of glass recycling; this will reduce the amount of raw material (silica sand) required to be quarried.	No Action Required: Consultation responses about site SIL 02 and AOS E are responded to in the sections of this report specifically covering SIL 02 and AOS E. Policy MW3 would apply to all planning applications for new minerals developments including extensions to existing sites. Norfolk already has a well-developed and effective collection process for glass recycling from householders. The glass collected through these methods in Norfolk is sent to existing glass recycling facilities located elsewhere in the UK. Silica sand is a necessary ingredient in the remelt feedstock for recycled glass. The NM&WLP contains criteria-based policies which would be used to determine planning applications for waste management facilities including glass recycling. In terms of silica sand, National Planning Practice Guidance states that the required stock of permitted reserves for each silica sand site is based on the average of the previous 10 year sales; it does not take into account any other supply options (such as recycled materials).

Table 17: Main issues raised during the Consultation stages about Policy MW4: The Brecks Protected Habitats and Species

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW4: The Brecks Protected Habitats and Species	NCC Planning Officer's Response
Breckland District Council (93067)	Initial Consultation: Additional evidence in relation to Stone Curlew buffer zones - revisions have been required to the buffer zones and policy to reflect areas within 3km of the SPA.	Action Required: The map, policy and supporting text have been updated to take into account these changes.
Environment Agency (92551)	Initial Consultation: If any sites come forward in future then a further policy to address aquatic ecological features in Norfolk, such as The Broads and North Norfolk Coast, would assist in avoiding inappropriate development at these locations.	No Action Required: Policy MW1 (DM Criteria) also contains requirements for proposals to demonstrate that they will not result in unacceptable impacts, including to the natural environment. 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. In addition, The Broads and other Designated Sites are protected by

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW4: The Brecks Protected Habitats and Species	NCC Planning Officer's Response
		Legislation, and any proposals assessed through a Habitats Regulation Assessment if required.
D K Symes Associates (92359)	Initial Consultation: 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).	Action Required: 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 has been revised to make this clear.
Campaigners Against Two Silica Sites (94365) Individual (94918)	Preferred Options: There are breeding pairs of Nightjars within The Warren (AOSE) and possibly Woodlarks too, therefore, the Warren should be afforded a 400m buffer as per MW5.	No Action Required: Shouldham Warren is not a designated SSSI, SPA or SAC and therefore the Conservation of Habitats and Species Regulations 2017 do not apply. Woodlarks are protected under the Wildlife and Countryside Act. 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 on sites which would provide a habitat for wildlife, or where the application site is likely to be populated by a protected species to ensure no unacceptable impacts.
Campaigners Against Two Silica Sites (94365) Individual (94918)	Preferred Options: It is unacceptable birds are afforded a greater buffer zone than that considered acceptable for people close to any proposed or actual mineral development.	No Action Required: A noise assessment and a dust assessment would be required to be submitted for planning applications for all mineral extraction operations. 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). These assessments would be considered by an Environmental Health Officer as part of the process to decide the suitability of the proposed extraction.
Individual (95119)	Preferred Options: 3km buffer zones need to be additionally implemented for Roydon Common and Dersingham Bog Ramsar, SAC, SSSI.	No Action Required: As these sites are of international importance and are designated as SAC and Ramsar sites, a Habitats Regulation Assessment would need to be carried out (in accordance with the Conservation of Habitats and Species Regulations 2017) at the Local Plan stage and at the planning application stage for plans and projects which are considered likely to have a significant effect upon one of these sites, to ensure it does not adversely affect the integrity of the European site.

Table 18: Main issues raised during the Consultation stages about Policy MW5: Agricultural soils

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW5: Agricultural soils	NCC Planning Officer's Response
Broads Authority (93165) (98959)	<p>Initial Consultation: Does this policy repeat MW1 (DM Criteria)?</p> <p>No mention of peat and peat soils in this policy.</p> <p>Where are areas of 3a on Map 3?</p>	<p>No Action Required: Policy MW5 does not repeat MW1, MW5 sets out detailed requirements for development in relation to Agricultural land grade; MW1 sets out overarching considerations. Peat is not a separate Agricultural Land Grade in itself and therefore is not specifically referred to in the policy. It is not known whether grade 3 land is grade 3a or 3b without carrying out a site specific soils survey.</p>
Broads Authority (98959)	<p>Preferred Options: 12.4 unclear – waste management facilities tend to be located there or are suitable to be located there?</p>	<p>Action Required: Text to be amended to make policy consistent with waste land use types policy.</p>
Brett Group / Heaton Planning Ltd (93021, 99034)	<p>Initial Consultation and Preferred Options: Objective MSO9 should be amended to reflect the final bullet point of Policy MW6 (the benefit of restoring the land to another after-use can be shown to outweigh the loss of the agricultural use of the land.') which is in accordance with NPPF.</p>	<p>No Action Required: 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 not necessary to amend MSO9.</p>
Individuals (92539)	<p>Initial Consultation: Should agricultural land be sacrificed for building materials when there is an increasing population and therefore needed for food production?</p>	<p>No Action Required: The NPPF 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. It also recognises that minerals can only be worked where they are found. Policy MW6 requires the site to be restored back to agricultural use once mineral extraction has ceased for land on BMV agricultural land.</p>
South Norfolk District Council (92517, 99057) Broadland District Council (92102)	<p>Initial Consultation and Preferred Options: It would be more effective if it set out a hierarchy that sought development on the lowest grade of agricultural land first, and seek to guide development to the lowest grade of land available, and not lump 3b, 4 and 5 together.</p>	<p>No Action Required: 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. 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</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW5: Agricultural soils	NCC Planning Officer's Response
		a site-specific soil survey. 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.
Mineral Products Association (92502)	<p>Initial Consultation: 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 referenced in supporting text. Adjusted wording is proposed.</p> <p>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>No Action Required: 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>
Sibelco UK (92476, 98650)	<p>Initial Consultation and Preferred Options: 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>No Action Required: 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>
Natural England (92070)	<p>Initial Consultation: The restoration of land following mineral extraction should not automatically default to agricultural after-use.</p>	<p>No Action Required: 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. Restoration to agriculture can also include net gain enhancements as part of a scheme.</p>
Mineral Products Association (98765)	<p>Preferred Options: Delete last bullet and amend policy text with: -</p> <p>'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.' And</p>	<p>No Action Required: The Policy does not refer to grade 5 land because there are only 110 hectares of grade 5 land which are located either within or adjacent to the Breckland SPA.</p> <p>The last bullet point will remain, as there are potentially other afteruses (as detailed in Policy MP7 on progressive restoration</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MW5: Agricultural soils	NCC Planning Officer's Response
	'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:'	etc) which could outweigh the loss of the agricultural land, for example by providing a biodiversity net gain.
Campaigners Against Two Silica Sites (94366) Individuals (94699, 94919)	Preferred Options: This policy fails sustainability objective SA10 on page 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and page 16 of Part B (Jun 2019), and in respect of 1/3 of SIL 02 that is within AOS E.	No Action Required: Objective SA10 is to protect and enhance water and soil quality in Norfolk. Protecting soil quality is the core aim of policy MW6 and therefore it does not fail this SA objective and scores positively in the Sustainability Appraisal Assessment.

Table 19: Main issues raised during the Consultation stages about Policy WP1: Waste management capacity to be provided

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP1: Waste management capacity to be provided	NCC Planning Officer's Response
Breckland District Council (93068) Borough Council of King's Lynn and West Norfolk (92031)	Initial Consultation: 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, and a more robust strategy should be put in place.	No Action Required: The growth rate for Local Authority Collected Waste has been revised in the Publication version of the NM&WLP to be based on the current housing figures in the LPAs Local Plans. A 'call for sites' for waste treatment facilities was carried out and a small number of proposed sites were submitted. These sites were assessed and consulted on as part of the Preferred Options but are not considered suitable to allocate in the document and therefore a criteria-based approach will be used in the NM&WLP.
West Winch parish council (92895)	Initial Consultation: Statistics of how many people are in the UK are taken from out-of-date surveys, and have potential changes in recycling materials for future been taken into account?	No Action Required: 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.
West Winch parish council (92895)	Initial Consultation: Work needs to be done with Suppliers of goods to avoid unnecessary waste in the first place. Education for the Public in clear and simple messages needs to be addressed.	No Action Required: These are not land use planning matters.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP1: Waste management capacity to be provided	NCC Planning Officer's Response
West Winch parish council (92895)	Initial Consultation: 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.	No Action Required: Current government advice is that the shipment of waste would continue after the UK leaves the EU.
West Winch parish council (98880)	Preferred Options: Norfolk County Council needs to keep tight control over hazardous waste received from other Waste Planning Authorities.	No Action Required: The movement of hazardous waste between waste management facilities is subject to contracts between the company producing the waste and the company with the waste management facility. NCC is responsible for determining planning applications for waste management facilities and then monitoring the compliance of the facilities with the planning conditions. These facilities are also regulated by an Environmental Permit granted by the Environment Agency.
Aggregate Industries UK Ltd (92031)	Initial Consultation: 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.	No Action Required: 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.
MJCA/H Ventures Norfolk Ltd (98889)	Preferred Options: The wording should be changed to remove reference to sufficient capacity exists to meet the growth forecast as it is likely this will change during the plan period.	No Action Required: Local Plans are required to be reviewed to assess whether they need updating at least once every five years, which enables a review the existing waste management capacity and forecasts of waste arisings. An Annual Monitoring Report will include changes to permitted waste management capacity. The plan contains flexibility for additional facilities to come forward if required through the criteria-based policies WP4 – WP14 which cover different types of waste management facilities.
Essex County Council (98860)	Preferred Options: W0.5 - Consider replacing reference Article 16 of the Waste Framework Directive with PPG Paragraph: 007 Reference ID: 28-007-20141016 as a secondary or replacement reference as this defines expectations for the same as they relate to waste planning authorities	Action Required: Noted that the PPG provides helpful additional explanation, although this is guidance rather than legislation. It could be included as a minor modification if required.
Essex County Council (98860)	Preferred Options: Waste Management Capacity Assessment 2017 – why has an annual reduction in	Action Required: The forecast figure for hazardous waste arisings over the plan period has been revised for the Publication version of the NM&WLP using more recent data on Norfolk's

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP1: Waste management capacity to be provided	NCC Planning Officer's Response
	hazardous waste arising of 6.6% been selected over any other potential figure.	waste arisings from the Environment Agency's Waste Data Interrogator and is now forecast to remain stable at 90,000 tpa during the plan period.
Environment Agency (98739)	Preferred Options: W0.3 - you should ensure that you plan for sites that will 'Prepare for Re-use' as it has been stated that greater weight is being put to the management methodology at the top of the waste hierarchy.	No Action Required: Noted. The NM&WLP does not allocate any sites for waste management facilities and instead includes criteria-based policies to be used when determining planning applications for waste management facilities. If it was determined that sites 'preparing for reuse' were dealing with waste, then planning applications would be determined by NCC in accordance with the relevant policies in the Plan, including WP2: Spatial strategy for waste management facilities and WP3: land suitable for waste management facilities.
Environment Agency (98739)	Preferred Options: W1.12 - We are unsure where and how this figure of 12.5% has been calculated and why it is so different to DEFRA's estimate.	Action Required: This is a typing error and should be 1.5% in the Preferred Options document. The Waste Management Capacity Assessment explains why 1.5% has been used, based on the East of England Forecasting Model.
NCC Waste Disposal Authority (94674)	Preferred Options: At the time of writing, the economics have proved more challenging for the RDF export market with lower capacity availability, rising gate fees and less favourable foreign exchange rates. An associated increase in landfill disposal in the UK has been observed. It is therefore reasonable to speculate that currently mothballed landfills in Norfolk could be reopened.	No Action Required: Noted. Blackborough End landfill site started taking waste again in 2020. Feltwell landfill site is still not receiving waste in 2022.
Individuals (94700, 94377, 94920, 94715, 94367)	Preferred Options: How can NCC intend to prevent and minimise waste without planning for recycling glass/system of reuse? It would lessen the requirement for quarrying silica sand and destroying the Norfolk landscape, but would also vastly increase the local economy through the number of jobs created. They are also not fulfilling the UK legal obligation to reduce CO2 emissions.	No Action Required: Policy WP1 states that facilities which help to achieve the targets for recycling set out in the Waste Management Plan for England (2013) will be encouraged, this would include glass recycling facilities. The benefits of glass recycling are recognised. This policy does not set out particular methods to be used to manage sub-sets of the waste streams (such as glass, paper, metals, plastics etc.) and it is not considered necessary for it to do so. Norfolk residents are able to segregate their household glass for recycling in their kerbside collections, at bottle banks and at the County Council's 20

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP1: Waste management capacity to be provided	NCC Planning Officer's Response
		Recycling Centres. Businesses enter into their own contracts for the collection of their waste.
Individuals (94377, 94700, 94920, 94715)	Preferred Options: SA1-13 - NCC states that 'new facilities.... which help to achieve the targets for recycling.....will be encouraged' but also says, 'initiatives to reduce waste and improve recycling are largely outside the scope of this Plan'. This makes the plan unsound as you cannot have it both ways; if you want to encourage recycling then new initiatives cannot be outside the scope of the plan.	No Action Required: It is possible to have net self-sufficiency whilst exporting waste from Norfolk to outside the County boundary. This is explained in paragraph W1.12 of the Preferred Options document: "Planning for net self-sufficiency in waste management recognises that there will be some cross-boundary movement of waste the premise is to provide for the equivalent of waste forecast to arise within Norfolk, irrespective of where it actually arises."
Campaigners Against Two Silica Sites (94367)	Preferred Options: This is a policy that NCC should be pursuing itself and not relying on the private recycling companies to come forward with solutions.	No Action Required: Local Plans set out a framework for future development in an area. The NM&WLP contains policies to be used when NCC determines planning applications for waste management developments. Initiatives to reduce waste and improve recycling are largely outside the scope of the Plan, however are aligned with the aims of the Waste Collection and Waste Disposal Authorities. NCC does not ignore the benefits of glass recycling.
Campaigners Against Two Silica Sites (94367)	Preferred Options: WP1 fails sustainability objective SA1, SA11 and SA13 on page 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pgs 15-16 of Part B (Jun 2019).	No Action Required: Policy WP1 does not fail Sustainability Objectives, as explained in the Sustainability Appraisal Report under each policy.
Individual (94173)	Preferred Options: This is not sustainable and we need to find other non-invasive ways of providing for human needs or learn to live differently.	No Action Required: NCC is required to produce a Waste Local Plan containing the planning policies which are used to decide whether planning applications are approved or refused, taking into account up to date national planning policies, guidance and legislation.
NCC Waste Disposal Authority (93037)	Initial Consultation: The Norfolk Strategic Housing Market Assessment (SHMA) takes a reasonable and realistic view of the local picture on household growth. Linking waste growth to growth in households is appropriate.	No Action Required: Noted.

Table 20: Main issues raised during the Consultation stages about Policy WP2: Spatial strategy for waste management facilities

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP2: Spatial strategy for waste management facilities	NCC Planning Officer's Response
Broads Authority (93164)	Initial Consultation: what is 'appropriate transport infrastructure'? Is the five mile requirement as the crow flies or by road/path etc?	No Action Required: Appropriate transport infrastructure is as set out in W2.1 point b. 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. This is illustrated on the map accompanying Policy WP2
NCC Waste Disposal Authority (93039)	Initial Consultation: 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 further and drawn from a wider area than the immediate locality. We would therefore caution against the policy creating an unintended constraint on the development of waste treatment capacity at a larger scale.	No Action Required: The policy provides sufficient flexibility to ensure that the waste management industry has a wide enough range of options when considering sites suitable for a large- scale facility (see map accompanying policy WP2).
Historic England (92948, 98784)	Initial Consultation: 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. Preferred Options: Suggested change - Amend text and map to include historic environment designations. Make it clear whether the designated areas are specifically excluded or not as potential locations for facilities.	No Action Required: 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 MW1 to ensure that the historic environment is appropriately protected. Action Required: Policy WP2 has been amended in the Publication version of the NM&WLP to exclude waste development from a list of designated areas. This list includes designated heritage assets. Policy WP2 also states that waste management facilities must comply with the development management criteria set out in Policy MW1. Due to the map scale, we will not be including additional constraints on the map accompanying Policy WP2, however the historic environment designations are included on the Policies Map accompanying the Publication version of the NM&WLP.
West Winch parish council (92899, 98875)	Initial Consultation and Preferred Options: The conflicting effects of sites located within 5 miles are the major risks to human health being closer to populated areas and the distance should be considerably	No Action Required: People and businesses generate waste and therefore placing waste management facilities within reasonable proximity to centres of population is appropriate. Urban areas and towns also benefit from the greatest level of connectivity to the Strategic Highway Network, and other

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP2: Spatial strategy for waste management facilities	NCC Planning Officer's Response
	increased. It must be strongly stressed that impact on communities in unsuitable waste site locations for transport links (using HGV vehicles) should definitely be avoided.	infrastructure. WP2 contains a requirement for new or enhanced waste management facilities to be accessible via appropriate transport infrastructure.
South Norfolk District Council (92516, 99056) Borough Council of King's Lynn and West Norfolk (92030, 98998) Essex County Council (98861) Suffolk County Council (95062)	<p>Initial Consultation and Preferred Options: It is not clear if the policy is seeking sustainable locations within easy reach of centres of population (particularly those that the proposed facilities are serving). It would seem possible to local waste management facilities away from the broad location that generated the waste. 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, not an arbitrary distance of within 3/5 miles.</p> <p>The stated distance from Norfolk's urban areas and towns seems very restrictive and could lead to acceptable proposals being contrary to policy.</p>	<p>No Action Required: The purpose of the requirement for waste management facilities to be located within 5 miles of one of Norfolk's urban areas or three miles of one of the main towns is so that facilities are located in proximity to the areas producing the majority of Norfolk's waste. Planning permissions do not often restrict the location of the source of the waste and therefore the policy approach is considered to be appropriate.</p> <p>We do not consider that the policy is overly restrictive. If the distances were increased (for example to 5 miles from all the listed settlements) then this would cover virtually all of Norfolk and therefore would not be a spatial approach to planning for waste management facilities.</p> <p>The rural areas of Norfolk that are not included within the specified distances (particularly parts of North Norfolk, Breckland SPA/SAC and the Broads) are either not suitable or less suitable for waste management facilities and therefore the aim of the policy is to direct waste management facilities towards more suitable locations. The more rural areas of Norfolk also have less appropriate transport infrastructure whilst the urban areas and towns benefit from the greatest level of connectivity to the Strategic Highway Network and other infrastructure.</p>
Anglian Water Services Ltd (92487)	Initial Consultation: It needs to be made clear that 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.	Action Required: The text has been revised to address this.
Broadland District Council (92103)	Initial Consultation: 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	Action Required: The policy has been amended to remove the words 'at least'.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP2: Spatial strategy for waste management facilities	NCC Planning Officer's Response
	being given to serving more than one area which could put the focus on a mid-point that poorly serves all areas.	
Natural England (92077)	Initial Consultation: 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 MW1. Currently, it could be read that only the bulleted list of facilities needs to do this.	Action Required: The policy wording has been amended to make it clearer that this requirement applies to all applications for waste management facilities.
Howes Percival LLP/ Serruys Property Company Limited (98906)	Preferred Options: This policy should be amended by referring specifically to the plan on the following page so it is clear as to how the 3 and 5 mile distances are to be applied.	Action Required: Noted. The intention of the policy is that the three- and five-mile distance will be measured 'as the crow flies'.
MJCA/ F H Ventures Norfolk Ltd (98890)	Preferred Options: Add text to policy 'or other sites demonstrated as suitable for the facility proposed' to ensure where a need is demonstrated, waste management sites are bought forward.	No Action Required: This would undermine Policy WP3. It is considered there are sufficient locations in Norfolk that would comply with Policies WP2 and WP3 to provide flexibility to ensure waste management sites are brought forward where there is a need.
Essex County Council (98861)	Preferred Options: Add to supporting text: <ul style="list-style-type: none"> • A number of waste management facilities can be co-located to offer synergistic benefits. • Particular waste management facilities will have locational requirements which restrict where they can be effectively located. 	No Action Required: We do not consider that it needs to be repeated for Policy WP2 or section W2 as this section is regarding the spatial location of waste management facilities in relation to settlements, not specific types of land required for particular types of facility (such as employment land) which is covered by Policy WP3.
Environment Agency (98706)	Preferred Options: It should be noted the location of Water Recycling Centres remains with Anglian Water Services.	No Action Required: Planning applications for Water Recycling Centres in Norfolk are submitted by Anglian Water Services Ltd, NCC is the Waste Planning Authority for Norfolk. Therefore, NCC is responsible for determining the planning applications and makes the decision on whether they are approved or refused.
Anglian Water Services Ltd (98325)	Preferred Options: Policy WP2 should be positively phrased in relation to Water Recycling Centres for consistency with the NPPF	Action Required: The policy wording will be amended as requested to state "Water recycling centres can normally only be located on or adjacent to watercourses, so they are acceptable in such locations."

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP2: Spatial strategy for waste management facilities	NCC Planning Officer's Response
Individuals (94378)	Preferred Options: How can NCC intend to prevent and minimise waste without planning for recycling glass/system of reuse? It would lessen the requirement for quarrying silica sand and destroying the Norfolk landscape, but would also vastly increase the local economy through the number of jobs created. They are also not fulfilling the UK legal obligation to reduce CO2 emissions.	No Action Required: Whilst this objection was submitted regarding Policy WP2 'Spatial strategy for waste management facilities', it does not propose any changes to this section of the Plan. This policy is regarding the spatial locations suitable for waste management facilities which would apply to glass recycling facilities as well as other waste management facilities.
Individual (94173)	Preferred Options: This is not sustainable and we need to find other non-invasive ways of providing for human needs or learn to live differently.	No Action Required: NCC is required to produce a Waste Local Plan containing the planning policies which are used to decide whether planning applications are approved or refused, taking into account up to date national planning policies, guidance and legislation.
NCC Waste Disposal Authority (93057)	Initial Consultation: 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. 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.	No Action Required: 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.

Table 21: Main issues raised during the Consultation stages about Policy WP3: Land suitable for waste management facilities

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP3: Land suitable for waste management facilities	NCC Planning Officer's Response
NCC Historic Environment Service (93175)	Initial Consultation: Not all former airfields will necessarily be suitable for open air composting, especially those with high heritage value.	No Action Required: The policy also states that 'proposals must also comply with the development management criteria set out in Policy MW1. Development must not have an unacceptable impact on the historic environment.
Broads Authority (93163)	Initial Consultation: The title of the policy is not ideal – the policy seems to list areas which such facilities are directed towards. Do criteria d, e, f apply even if the proposal is not within 5 miles of a town as talked about in	Action Required: The word 'uses' will be removed to avoid any potential confusion with 'land uses' in the sense of land use classes. Waste developments should be located in accordance

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP3: Land suitable for waste management facilities	NCC Planning Officer's Response
	the previous policy? How do WP2 and WP3 work together?	with the distances in Policy WP2 and the types of land contained in WP3.
Breckland District Council (93069)	Initial Consultation: 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, and 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.	No Action Required: 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....".
NCC Waste Disposal Authority (93040) Heaton Planning Ltd (93022)	Initial Consultation: Why can a landfill site 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)?	No Action Required: Landfill sites 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.
West Winch parish council (92898, 98879)	Initial Consultation: 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.	No Action Required: The policy is in accordance with the NPPW 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 MW1, which requires that development would not have an unacceptable impact on local amenity and health.
South Norfolk District Council (92515, 99055) Broadland District Council (92104)	Initial Consultation and Preferred Options: In the list of potentially suitable land uses, it includes 'within or adjacent to agriculture and forestry buildings'. 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'?	Action Required: The 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 MW1 (Development Management Criteria) and Policy MW2 (Transport) in particular, would ensure that the sites were appropriately located to avoid unacceptable adverse effects.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP3: Land suitable for waste management facilities	NCC Planning Officer's Response
Anglian Water Services Ltd (92488, 98327)	<p>Initial Consultation and Preferred Options: No justification 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>Preferred Options: It is therefore proposed that criterion f of Policy WP3 be amended as follows: 'f) waste recycling centres [delete: (composting and anaerobic digestion only)]</p>	<p>No Action Required: Water Recycling Centres (WRCs) have historically been located within the open countryside close to watercourses. Generally waste management facilities (other than landfill or WRCs) would not be suitable in the open countryside. 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>
Norwich City Council (92147)	<p>Initial Consultation: Add clarification into the policy wording, to require that waste management activities should take place within purpose designed facilities where appropriate.</p>	<p>No Action Required: Paragraph W3.1 states that modern waste management facilities 'can' require purpose designed buildings, and 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>1) Heaton Planning Ltd/Brett Group (99035)</p> <p>2) MJCA/ F H Ventures Norfolk Ltd (98891)</p>	<p>Preferred Options: 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, supporting strategic objective WSO1.</p>	<p>No Action Required: Minerals can only be worked where they occur, which is normally within the open countryside, this is not the case with waste management operations. Ancillary development, such as recycling of inert CD&E waste would not normally be allowed in the open countryside and are only allowed temporarily 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>
Howes Percival LLP/Serruys Property Company Limited (98907)	<p>Preferred Options: This policy should be amended so that criteria (b) includes land with an existing or lawful general industrial B2 use or storage and distribution use under B8, or on sites that were previously consented for waste management facilities.</p>	<p>No Action Required: This policy will not be amended. A planning policy assessment of the suitability of a site for the use has not been undertaken and therefore it would not be appropriate to consider that a site with a certificate of lawful use or development is acceptable in principle as a location for a waste management facility.</p>
MJCA/ F H Ventures Norfolk Ltd (98891)	<p>Preferred Options: The need to allocate sites for waste management development should be reconsidered as part of the examination process.</p>	<p>No Action Required: The findings of the Waste Capacity Assessment were that additional sites did not need to be allocated during the plan period, based on the information available at the current time. If circumstances change in the future it is considered</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP3: Land suitable for waste management facilities	NCC Planning Officer's Response
		that there is sufficient land within general industrial areas for additional waste management capacity to come forward in the future.
West Winch parish council (98891)	Preferred Options: Incineration must be deleted.	No Action Required: Policies WP1, WP2 and WP3 do not specifically refer to incineration, although these policies would be relevant to the determination of a planning application for an incinerator. Policy WP10 on residual waste treatment facilities would also be relevant to the determination of a planning application for an incinerator, if one was submitted.
Essex County Council (98862)	Preferred Options: Para 3.3 - Distinction could be made between strategic / permanent aggregate recycling facilities and those temporary aggregate recycling facilities which are commonly co-located with active mineral workings.	No Action Required: We do not consider that the supporting text needs to repeat the policy as this is adequately covered by Policy WP4 which refers to both temporary and permanent inert CD&E facilities.
Essex County Council (98862)	Preferred Options: To replace intentions set out in the inappropriate Policy WP7 to establish caveats only for Council operated sites, insert text into Policy WP3: "Where sufficient information is submitted to demonstrate that no suitable sites consistent with Policy WP3 are available within the area to be served by the waste management facility, the development of a waste management facility may be acceptable on other sites provided there is an established need for the facility and the proposal is consistent with the development management criteria set out in Policy MW1 and the wider Development Plan."	No Action Required: The concerns raised about Policy WP7 have been responded to in the part of this report covering Policy WP7. Furthermore, we consider that any departure from the plan policy would be dealt with on a case by case basis at the planning application stage and that adding the flexibility suggested would undermine the purpose of the policy.
Environment Agency (98707)	Preferred Options: This policy should state that waste management facilities (aggregate recycling) also need to consider consumptive water use and where this water will come from.	No Action Required: The policy contains a cross-reference to the Development Management Criteria Policy MW1 which requires planning applications to demonstrate that the development would not have an unacceptable impact on the quantity of water for resource purposes within water bodies.
Great Yarmouth Borough Council (98630)	Preferred Options: The council has significant concerns with respect to two strategic employment areas and Enterprise Zones within the Borough (Beacon Park and	No Action Required: The policy wording will not be amended. The criteria-based approach is in accordance with the National Planning Policy for Waste which specifically refers to locating

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP3: Land suitable for waste management facilities	NCC Planning Officer's Response
	Beacon Park extension). It is requested that an exception is made to this policy for the above employment areas. The Council recognises that there may be some waste operations which can be associated with port and offshore energy/engineering activities which could be more compatible in principle (for example, some kinds of decommissioning). The Council would welcome the opportunity to discuss how the policy could be redrafted to best support the strategic aims of these employment areas within the Borough.	waste management facilities on employment land. This is a general policy covering the whole of Norfolk and it is not considered appropriate for specific employment sites or industrial sites to be excluded from the Policy where they have existing permission for B2 or B8 uses. It would be determined at the planning application stage on a case by case basis, and the council will be consulted as a statutory consultee.
Individuals (94176)	Preferred Options: This is not sustainable and we need to find other non-invasive ways of providing for human needs or learn to live differently.	No Action Required: NCC is required to produce a Waste Local Plan containing the planning policies which are used to decide whether planning applications are approved or refused, taking into account up to date national planning policies, guidance and legislation.
NCC Waste Disposal Authority (93041)	Initial Consultation: With 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.	No Action Required: Noted
Chedgrave Parish Council (91987)	Initial Consultation: Specific sites should continue to be allocated.	No Action Required: After a call for waste management sites (of over 1 hectare and an estimated throughput of at least 50,000 tpa) a number of 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. 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.

Table 22: Main issues raised during the Consultation stages about Policy WP4: Recycling or transfer of inert and CD&E waste

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP4: Recycling or transfer of inert and CD&E waste	NCC Planning Officer's Response
Heaton Planning Ltd (93023, 99036)	Initial Consultation and Preferred Options: We do not consider that it is always necessary or appropriate to restrict waste management operations to the life of the mineral operation.	No Action Required: Minerals can only be worked where they occur, which is normally within the open countryside; this is not the case with waste management operations. Ancillary development, such as recycling of inert CD&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 and will therefore be restricted to no later than the cessation date of the planning permission for the mineral extraction.
Heaton Planning Ltd (99036)	Preferred Options: The second part of the policy, repeats the requirements of the first and it is not clear why it is necessary as it serves the same purpose. Delete restriction on extending recycling operations on mineral workings.	No Action Required: The key difference between the first and second part of the policy is that applications for extensions of time will only be acceptable where there are exceptional circumstances to justify why the timely restoration of the mineral workings set out in the extant planning permission could not be completed. This requirement is to ensure that the restoration of the site is not unnecessarily or repeatedly delayed due to the continued use of the site for inert waste recycling.
South Norfolk District Council (92518, 99058) Broadland District Council (92105)	Initial Consultation and Preferred Options: The Policy could be more effective as 'will not be acceptable outside of land identified in'.	Action Required: The policy wording has been amended for the relevant policies to state "will only be acceptable on the types of land identified within Policy WP3".
Broads Authority (98960)	Preferred Options: a) when compared to another option that takes longer?	No Action Required: The alternative methods of restoration are either for suitable restoration material to be sourced and brought in from off-site, or for a low-level restoration scheme that does not require the importation of material at all. The purpose of this policy requirement is for the recycling operation to provide material for the restoration. The existence of the recycling operation must not slow down the site restoration; this can happen where the focus moves from restoration to a stand-alone recycling operation.
Essex County Council (98863)	Preferred Options: Paragraph W4.1 - The following text could be inserted to qualify that recycled aggregate cannot always be used as a direct substitute for primary	Action Required: The text in the Publication version of the NM&WLP has been amended as suggested.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP4: Recycling or transfer of inert and CD&E waste	NCC Planning Officer's Response
	<p>aggregate - 'Whilst the resultant material is typically lower grade, recycled inert material can still often act as a substitute for freshly excavated material.' It could be noted in a relevant part of the Plan that marine-won aggregate cannot always be used as a direct substitute for land-won aggregate.</p>	
<p>Campaigners Against Two Silica Sites (94368)</p>	<p>Preferred Options: NCC should also be planning to recover the glass from construction sites for recycling to improve the quality of cullet available for the manufacture of new flat glass and the sustainable benefits it creates. NCC should also remind itself of the bullet points in para W0.8 about ensuring residents and businesses understand the importance of recycling, reuse etc, and its objective to increase the availability of waste reduction, reuse, repair and recycling centres</p> <p>WP4 fails sustainability objective SA1, SA11 and SA13 on page 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pages 15-16 of Part B (Jun 2019).</p>	<p>No Action Required: Policy WP4 is for planning applications for the recycling or transfer of inert CD&E waste, this would include flat glass. Whilst this objection was submitted regarding Policy WP4, it does not propose any changes to this section of the Plan. The benefits of glass recycling are recognised. The use of cullet in glass making reduces the level of energy required to achieve melt, and so is actively pursued by glassmakers to reduce energy costs. However, a satisfactory product still requires a proportion of the feedstock to be glass sand because it balances the higher level of impurities found in recycled glass so that glass of acceptable quality can be made.</p> <p>The majority of planning applications that involve construction are determined by the district councils. Construction companies enter into their own contracts for the recycling and disposal of the waste from construction sites.</p> <p>Policy WP4 does not fail sustainability appraisal objectives SA1, SA11 and SA13 as explained in the Sustainability Report.</p>
<p>Individual (94177)</p>	<p>Preferred Options: This is not sustainable and we need to find other non-invasive ways of providing for human needs or learn to live differently.</p>	<p>No Action Required: The waste that is produced by households, commercial and industrial premises, construction and demolition operations, and other sources all needs to be managed. NCC is responsible for determining the planning applications submitted for waste management facilities in Norfolk and is required to produce a Waste Local Plan.</p>

Table 23: Main issues raised during the Consultation stages about Policy WP5: Waste transfer stations, materials recycling facilities, ELV facilities and WEEE recovery facilities,

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP5: Waste transfer stations, materials recycling facilities, ELV facilities and WEEE recovery facilities	NCC Planning Officer's Response
NCC - Waste Disposal Authority (93043)	<p>Initial Consultation: 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. MRFs, again, if they are particularly large in scale then we would reiterate our comments from question 12. Waste transfer stations are less of a concern because transfer stations, by their nature, ought to be located close to where concentrations of households are found.</p>	<p>No Action Required: It is considered that the list of suitable land is sufficiently inclusive as to not unreasonably constrain development locations for the facilities in policy WP5.</p>
South Norfolk District Council (99036, 99059) Broadland District Council (92106)	<p>Initial Consultation and Preferred Options: The Policy could be more effective as 'will not be acceptable outside of land identified in'.</p>	<p>Action Required: 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>
Individual (94178)	<p>Preferred Options: This is not sustainable and we need to find other non-invasive ways of providing for human needs or learn to live differently.</p>	<p>No Action Required: The waste that is produced by households, commercial and industrial premises, construction and demolition operations, and other sources all needs to be managed. NCC is responsible for determining the planning applications submitted for waste management facilities in Norfolk and is required to produce a Waste Local Plan.</p>

Table 24: Main issues raised during the Consultation stages about Policy WP6: Transfer, storage, processing and treatment of hazardous waste

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP6: Transfer, storage, processing and treatment of hazardous waste	NCC Planning Officer's Response
Howes Percival LLP/ Serruys Property Company Limited (98908)	Preferred Options: This policy should be amended so that criteria (b) includes land with an existing or lawful general industrial B2 use or storage and distribution use under B8, or on sites that were previously consented for waste management facilities.	No Action Required: A site previously consented for waste management facilities but not development could have received consent many years ago and may no longer be in accordance with current planning policy or legislation.
Great Yarmouth Borough Council (98631)	Preferred Options: The council has significant concerns with respect to two strategic employment areas and Enterprise Zones within the Borough (Beacon Park and Beacon Park extension) and strongly objects to the policy. It is requested that an exception is made to this policy for the above employment areas. New generic waste development would not be suitable within the identified Great Yarmouth port and harbour area. The Council recognises that there may be some waste operations which can be associated with port and offshore energy/engineering activities which could be more compatible in principle (for example, some kinds of decommissioning). The Council would welcome the opportunity to discuss how the policy could be redrafted to best support the strategic aims of these employment areas within the Borough.	No Action Required: The policy wording will not be amended. The criteria-based approach is in accordance with the National Planning Policy for Waste which specifically refers to locating waste management facilities on employment land. This is a general policy covering the whole of Norfolk and it is not considered appropriate for specific employment sites or industrial sites to be excluded from the Policy where they have existing permission for B2 or B8 uses. It would be determined at the planning application stage on a case by case basis, and the Borough Council will be consulted as a statutory consultee.
Individual (94179)	Preferred Options: This is not sustainable. We need to protect the earth from exploitation and find other non invasive ways of providing for human needs or learn to live differently.	Action Required: The waste that is produced by households, commercial and industrial premises, construction and demolition operations, and other sources all needs to be managed. NCC is responsible for determining the planning applications submitted for waste management facilities in Norfolk and is required to produce a Waste Local Plan.

Table 25: Main issues raised during the Consultation stages about Policy WP7: Household waste recycling centres

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP7: Household waste recycling centres	NCC Planning Officer's Response
Broads Authority (93162)	Initial Consultation: The location 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)?	No Action Required: WP2 which sets out the Spatial Strategy for waste management facilities and has a preference for locations within five miles of urban areas.
Broads Authority (98961)	Preferred Options: Paragraph W7.1 - do you mean 2018?	No Action Required: This position was correct in 2018 and is still correct in 2020. The text has been updated.
South Norfolk District Council (92520, 99060) Broadland District Council (92107) Essex County Council (98864) Howes Percival LLP/ Serruys Property Company Limited (98909)	Initial Consultation and Preferred Options: The Policy could be more effective as 'will not be acceptable outside of land identified in'. It is not considered appropriate to establish caveats for Council operated sites that do not apply to the full range of potential waste management facilities that the county may require.	No Action Required: 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. No waste management companies have objected to this policy. A very similar policy to this has been found sound and legally compliant in the Suffolk Minerals and Waste Local Plan in 2020.
South Norfolk District Council (92514) Broadland District Council (92098)	Initial Consultation: 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	Action Required: The text regarding developer contributions has been removed from the policy wording.

Table 26: Main issues raised during the Consultation stages about Policy WP9: Anaerobic Digestion

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP9: Anaerobic Digestion	NCC Planning Officer's Response
Environment Agency (98709)	Preferred Options: Make reference to Emergency Planning. Includes nearby watercourses, overlying geology, depth to water table, detailed site drainage plan for example. If possible, an emergency plan should be provided for the Environment Agency to review.	No Action Required: This is a matter for the Environmental Permit as it is regarding how the site will be operated, rather than whether the proposed development is an acceptable use of land. The proposed site drainage will form part of the planning application and controlled by planning conditions if required. It forms part of Policy MW1.

Table 27: Main issues raised during the Consultation stages about Policy WP10: Residual waste treatment facilities

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP10: Residual waste treatment facilities	NCC Planning Officer's Response
West Winch parish council (92900)	Initial Consultation: 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.	No Action Required: Policy WP10 states that residual waste treatment facilities need to meet the development management criteria in Policy MW1, which itself requires 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).
Borough Council of King's Lynn and West Norfolk (98999)	Preferred Options: Add text to explain the position whereby the County Council will not seek to procure incinerators within Norfolk.	No Action Required: Additional text will be included in the Publication version of the NM&WLP to state that Norfolk County Council, as the Waste Disposal Authority for Norfolk, has adopted a procurement policy which states that "any proposed waste treatment facility in Norfolk will reduce dependency on landfill and must be further up the waste hierarchy than incineration." The procurement policy applies to contracts for the management of Norfolk's Local Authority Collected Waste and it is not a landuse planning policy
West Winch parish council (98874) Individuals (98635, 98625, 98617, 98550, 98893, 98549, 98541, 98537, 98534, 98495, 98492, 98323, 98322, 98321, 98320, 98316, 98199, 98197, 98195, 98193, 98193, 98190, 98181, 98179, 98177, 98175, 98172, 98165, 98170,	Preferred Options: Amend to state " in West Norfolk, where 65,000 people voted against incineration in the Borough Poll, applications for incinerators will not be permitted".	No Action Required: Policy WP10 on 'Residual waste treatment facilities' will be used by NCC to determine planning applications that are submitted to Norfolk County Council for residual waste treatment of any type, in any area of Norfolk. The Government's Resources and Waste Strategy (2018) recognises that energy from waste is generally the best management option for waste that cannot be reused or recycled in terms of environmental impact and getting value from the waste as a resource. It plays an important role in diverting waste from landfill. Energy from waste is the thermal treatment of waste to create energy via technologies such as incineration, anaerobic digestion, gasification and pyrolysis. Policy WP10 is technology neutral and there are no sound planning reasons to exclude incineration. In response to the specific site referred to in King's Lynn, Norfolk County Council is the landowner of the site at the Willows Industrial Estate, King's Lynn, and is no longer promoting the site for incineration of waste. The site will not be allocated in the

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP10: Residual waste treatment facilities	NCC Planning Officer's Response
98168, 98162, 98157)		NM&WLP. This is in line with the findings of the KL&WN Borough Council Poll from 2011.
Individual (98162, 98160)	Preferred Options: Norfolk County Council adopted a No incineration in Norfolk policy in December 2014 and yet nowhere is this stated in above mentioned plan. WHY NOT?	Action Required: Additional text has been included in the Publication version of the NM&WLP to state that Norfolk County Council, as the Waste Disposal Authority for Norfolk, has adopted a procurement policy which states that "any proposed waste treatment facility in Norfolk will reduce dependency on landfill and must be further up the waste hierarchy than incineration." The procurement policy applies to contracts for the management of Norfolk's Local Authority Collected Waste and it is not a landuse planning policy.
West Winch parish council (98874) Individuals (98322, 98177)	Preferred Options: The Wash is protected by an SSSI, SPA and more importantly is also a RAMSAR site. This area should be protected at all cost.	No Action Required: All planning applications for waste management facilities are assessed in accordance with the Conservation of Habitats and Species Regulations 2017, with regard to whether the proposal would have a significant impact on sites which are designated as Special Protection Areas or Special Areas of Conservation. Development can only be permitted if it will not adversely impact the integrity of a designated European site (SPA or SAC).
Kings Lynn Without Incineration (KLWIN) (98319) Individuals (94130)	Preferred Options: KLWIN oppose the inclusion in the Minerals and Waste Preferred Options Document of any thermal residual waste treatment approaches that include a stack or stacks in the facilities design and operation. Such treatments pose unacceptable risks to human and environmental health and wellbeing and can compete with recycling.	No Action Required: Objection noted. Policy WP10 is technology neutral and there are no sound planning reasons to exclude incineration from the NM&WLP. All planning applications for minerals and waste development would also need to comply with Development Management Criteria policy MW1 which requires proposals to demonstrate that there would not be an unacceptable impact on local amenity and health (including air quality) or on the landscape. In order to operate, an incinerator would also need to apply for and be granted an Environmental Permit by the Environment Agency which would control the emissions to air. The NPPF states that "The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP10: Residual waste treatment facilities	NCC Planning Officer's Response
		<p>pollution control regimes). Planning decisions should assume that these regimes will operate effectively.”</p> <p>Policy WP10 states: “The treatment of waste that could practicably be recycled or composted will not be acceptable. Conditions will be placed on planning permissions to ensure that only residual source-separated or pre-sorted waste is treated.”</p>
Individuals (98893, 94130)	<p>Preferred Options: The main objections to incineration are increased traffic volume and air pollution created by traffic exhaust fumes. The incineration residue is also highly toxic requiring careful and expensive disposal.</p>	<p>No Action Required: Policy WP10 is technology neutral and there are no sound planning reasons to exclude incineration from the NM&WLP. All planning applications for minerals and waste development would also need to comply with Development Management Criteria policy MW1 and Transport Policy MW2. Policy MW1 requires proposals to demonstrate that there would not be an unacceptable impact on local amenity and health (including air quality) whilst Policy MW2 requires HGV movements to not cause unacceptable impacts on air quality, unacceptable impacts to the capacity of the road network or unacceptable risks to the safety of road users. As well as using the bottom ash from incinerators to manufacture construction products, new technologies have enabled the air pollution control residues to also be reused in the manufacture of construction products in substitution for primary aggregate resources.</p>
Individuals (98559)	<p>Preferred Options: NCC should consider Eco generation plant that burns waste in an effective low carbon system, with removal of toxins with Johnson Matthey technology. Make Norfolk a leader in Climate Change, by pioneering waste management to electric generation.</p>	<p>No Action Required: Policy WP10 is technology neutral and would be used by NCC to determine planning applications that are submitted to Norfolk County Council for residual waste treatment of any type of technology.</p>
Individuals (98541)	<p>Preferred Options: As a houseowner, we would never be able to sell our house nobody would want to buy it.</p>	<p>No Action Required: Property values are not a material planning consideration.</p>
Cllr Alexandra Kemp (98197)	<p>Preferred Options: The National Planning Policy for Waste accepts that incineration can be excluded from a local plan at Page 6, where it says that "proposals such as incinerators that cut across up-to-date Local Plans reflecting the vision and aspiration of local communities</p>	<p>No Action Required: This text from the NPPW does not accept that incineration can be excluded from a local plan purely on the basis that they are controversial. Policy WP10 is technology neutral and there are no sound planning reasons to exclude incineration from the NM&WLP. All Parish and Town Councils in</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP10: Residual waste treatment facilities	NCC Planning Officer's Response
	<p>can give rise to justifiable frustration". The National Planning Policy for Waste says, at page 4, that there should be "early and meaningful engagement with local communities and plans should reflect a collective vision and agreed set of priorities, recognising that proposals for... incinerators can be controversial".</p>	<p>and adjacent to Norfolk have been consulted on the Minerals and Waste Local Plan, as have all Local Planning Authorities within and adjacent to Norfolk and all residential addresses within 250m of a proposed minerals or waste site in the Plan. The Plan must also be found sound and legally compliant at an examination in public by an independent Planning Inspector before it can be adopted by NCC.</p>
Individual (98192)	<p>Preferred Options: The collective voice of local residents must be respected when it relates what is happening in their locality. Local communities have a democratic right to be consulted prior to any Plans being considered and certainly before any start to be are implemented.</p>	<p>No Action Required: All Parish and Town Councils in and adjacent to Norfolk have been consulted on the Minerals and Waste Local Plan, as have all Local Planning Authorities within and adjacent to Norfolk and all residential addresses within 250m of a proposed minerals or waste site in the Plan. The Plan must also be found sound and legally compliant at an examination in public by an independent Planning Inspector before it can be adopted by NCC.</p>
Individual (98188)	<p>Preferred Options: It is unacceptable for county council to say that incineration has to be in the plan due to national policies. This makes a nonsense of the concept of a 'local' plan which should consider the views of the local community.</p>	<p>No Action Required: The NM&WLP does not allocate any sites for incineration. Policy WP10 is technology neutral and there are no sound planning reasons to exclude incineration from the NM&WLP. Policy WP10 sets out how NCC would determine any planning applications that are received for the treatment of residual waste, of any type of technology. All Parish and Town Councils in and adjacent to Norfolk have been consulted on the Minerals and Waste Local Plan, as have all Local Planning Authorities within and adjacent to Norfolk and all residential addresses within 250m of a proposed minerals or waste site in the Plan. The Plan must also be found sound and legally compliant at an examination in public by an independent Planning Inspector before it can be adopted by NCC. To be sound the plan must be positively prepared, justified, effective and consistent with national policy.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP10: Residual waste treatment facilities	NCC Planning Officer's Response
Individual (95120)	<p>Preferred Options: Thermal treatment typically creates prodigious quantities of carbon dioxide and must be removed from the policy as it is incompatible with climate change and greenhouse gas minimisation commitments made in MW3 (climate change).</p> <p>The UK already has sufficient thermal treatment capacity to meet its residual waste treatment needs; further capacity will harm recycling due to long-term and inflexible contracts required to make these facilities commercially viable.</p>	<p>No Action Required: The NM&WLP does not allocate any sites for incineration. Policy WP10 is technology neutral and there are no sound planning reasons to exclude incineration from the NM&WLP. Policy WP10 sets out how NCC would determine any planning applications that are received for the treatment of residual waste, of any type of technology. All planning application would also need to comply with policy MW3 on climate change. Policy WP10 states: "The treatment of waste that could practicably be recycled or composted will not be acceptable. Conditions will be placed on planning permissions to ensure that only residual source-separated or pre-sorted waste is treated. Facilities that include thermal treatment of waste must provide for the recovery of energy and, where practicable, heat; and the use of combined heat and power will be encouraged."</p>
Individuals (99071)	<p>Preferred Options: World Health Organisations that air pollution is deadly for young and even unborn babies and yet local pollution by incinerators is conveniently ignored.</p>	<p>No Action Required: The NM&WLP does not allocate any sites for incineration. Policy WP10 is technology neutral and there are no sound planning reasons to exclude incineration from the NM&WLP. Policy WP10 sets out how NCC would determine any planning applications that are received for the treatment of residual waste, of any type of technology. Any planning application for incineration would need to comply with policy MW1 (Development Management Criteria) which states that proposals must demonstrate that there will not be an unacceptable impact on local amenity and health (including air quality). In order to operate, an incinerator would also need to be granted an Environmental Permit by the Environment Agency which would control the emissions to air. The NPPF states that "The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively."</p>

Table 28: Main issues raised during the Consultation stages about Policy WP11: Disposal of inert waste by landfill

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP11: Disposal of inert waste by landfill	NCC Planning Officer's Response
Heaton Planning Ltd (93024, 99037) Mineral Services Ltd (91960)	Initial Consultation and Preferred Options: Could be extended by including the importation of inert waste where it is necessary for agricultural improvement.	No Action Required: 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.
Historic England (98785)	Preferred Options: Criterion d - add historic environment. Add more text in relation to restoration and the historic environment.	Action Required: The supporting text and policy will be amended in the Publication version of the Minerals and Waste Local Plan to include reference to restoration and the historic environment.

Table 29: Main issues raised during the Consultation stages about Policy WP12: Non-hazardous and hazardous waste landfill

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP12: Non-hazardous and hazardous waste landfill	NCC Planning Officer's Response
Historic England (98786)	Preferred Options: Criterion e - add historic environment Add more text in relation to restoration and the historic environment.	Action Required: The supporting text and policy will be to include reference to restoration and the historic environment.
Environment Agency (98734)	Preferred Options: Reducing the county's non-hazardous landfill waste capacity to just 1.53 million cubic metre is insufficient. It is unclear what the options for residual waste disposal will actually be, except reliance on Refuse Derived Fuel (RDF) and its export.	No Action Required: We recognise that this significantly reduces the non-hazardous landfill capacity in Norfolk. Whilst the Blackborough End landfill site has been receiving waste since 2020, prior to this the site had not taken waste since April 2016 and Feltwell landfill site has been inactive since 2012. Therefore, there does not appear to be a market for landfill disposal of non-hazardous waste in Norfolk at the current time. Waste management is contract driven by private companies and therefore the criteria-based policies within the NM&WLP provide sufficient flexibility for new waste management facilities and technologies to come forward during the Plan period.
Individuals (94181)	Preferred Options: We need to find other non-invasive ways of providing for human needs or learn to live differently.	No Action Required: NCC is required to produce a Waste Local Plan containing the planning policies which are used to decide whether planning applications are approved or refused, taking into account national planning policies, guidance and legislation.

Table 30: Main issues raised during the Consultation stages about Policy WP13: landfill mining and reclamation

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP13: landfill mining and reclamation	NCC Planning Officer's Response
Broads Authority (93161)	Initial Consultation: Are the areas of these landfills identified and are any in the Broads?	No Action Required: The Environment Agency maps shows that there are some historic landfill sites located within the Broads Authority Executive Area.
Broads Authority (98962)	Preferred Options: a, b, c are 'or' and d, e, f are 'and'. It might be easier to separate them out and say something like 'in all cases d, e, f will apply'.	Action Required: The format of the policy has been amended.
Environment Agency (98710)	Preferred Options: Such a proposal will require detailed input and agreement from the Environment Agency.	No Action Required: Noted.

Table 31: Main issues raised during the Consultation stages about Policy WP14: Water Recycling Centres

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP14: Water Recycling Centres	NCC Planning Officer's Response
Anglian Water Services Ltd (92489)	Initial Consultation: Comments 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 statutory obligations under the Water Industry Act 1991.	No Action Required: 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.
Anglian Water Services Ltd (98330)	Preferred Options: The final paragraph seems to suggest that the applicant would be required to demonstrate the need for the proposed location. As there is no further explanation of how this would be demonstrated it suggested that it should be removed.	No Action Required: The following sentence will be deleted: "The applicant will be required to demonstrate that the proposal can be located without giving rise to unacceptable environmental impacts" because this duplicates the requirements of Policy MW1 which are already cross-referenced in this policy. Water Recycling Centres may be in locations which are necessary for the efficient treatment of waste water but may not be appropriate locations for other operations. The policy wording has been amended to include 'and supporting infrastructure' but not specifically to refer to renewable energy because proposals for other infrastructure at Water Recycling Centres need to be determined on a case by case basis. The wording 'will only be

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP14: Water Recycling Centres	NCC Planning Officer's Response
		acceptable where...' has not been changed as it is in line with the wording of the other waste management policies in the Minerals and Waste Local Plan.

Table 32: Main issues raised during the Consultation stages about Policy WP15: Whitlingham water recycling centre

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP15: Whitlingham water recycling centre	NCC Planning Officer's Response
Anglian Water Services Ltd (92490)	Initial Consultation: The NM&WLP should have regard to the WRLTP in relation to the planned investment within Norfolk County as part of next business and future business plans. 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.	Action Required: The supporting text to this policy has been revised to refer to Anglian Water's 'Water Recycling Long Term Plan'. 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.
South Norfolk District Council (92513) Broadland District Council (92097) Pegasus Group/ Crown Point Estate (95064) Anglian Water (98331)	Initial Consultation: Strengthen the policy to say: Any proposals for the improvement of WWRC must to be accompanied by a longer-term vision, produced in collaboration with ...' Perhaps invite other nearby Parish Councils in addition to the ones listed (eg Postwick and Thorpe St Andrew). Preferred Options: The [Crown Point Estate] should be named as one of the parties forming the expanded Local Liaison Group. Preferred Options: [Anglian Water] commented this group focussed on operational issues only and was not intended to consider wider issues. We would welcome further discussions with Norfolk County Council about the	Action Required: The wording to the policy has been revised to as requested. Action Required: The information regarding the Local Liaison Group will be removed from the policy in the Publication version of the NM&WLP and moved to the supporting text. In paragraph W15.4 The list of parish councils in the Local Liaison Group includes Trowse, Kirby Bedon, Postwick and Thorpe St Andrew. Crown Point Estate is also listed in this paragraph.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP15: Whitlingham water recycling centre	NCC Planning Officer's Response
	<p>issues identified and the appropriate forum(s) for the issues identified to be discussed with Anglian Water. However, we don't consider it is necessary to specify the purpose and membership of a liaison group in the wording of a Local Plan policy.</p>	
<p>Anglian Water Services Ltd (98331)</p>	<p>Preferred Options: Amend the wording in the plan to reflect:-</p> <p>Anglian Water have submitted our business plan for AMP 7 (2020 to 2025) to Ofwat and expect to receive final determination in December 2019. However Anglian Water has committed investment at Whitlingham Water Recycling Centre of £17million to accommodate further growth to 2031.</p> <p>The investment at Whitlingham Water Recycling Centre is not reliant upon the determination of the business plan for AMP 7 as it forms part of our approved business plan for AMP 6 (2015 to 2020).</p> <p>We are aware that the Greater Norwich Local Plan is currently being reviewed. The expectation is that Anglian Water would review the need for additional investment at Whitlingham Water Recycling Centre through the preparation of the Drainage and Wastewater Management Plan, without the need for a site-specific masterplan.</p>	<p>Action Required: Noted. The supporting text will be amended in the Publication version of the Minerals & Waste Local Plan. However, we do not consider that this document would replace the requirement for a masterplan for Whitlingham WWRC. A Drainage and Wastewater Management Plan may not contain the level of detail that would be expected in a masterplan.</p>
<p>Anglian Water Services Ltd (98331)</p>	<p>Preferred Options: The wording of policy WLP15 should be reviewed to consider in what circumstances it would be applied. Amended text suggested.</p>	<p>Action Required: WWTC will be replaced by WWRC in the policy. The policy wording will be amended as requested to include the wording 'where relevant to the submitted application'.</p>
<p>Environment Agency (98711)</p>	<p>Preferred Options: W15.2 mentions the sites location is close to the Broads and the associated 'landscape and flood risk concerns'. The location also means there are concerns for water quality due to the close proximity of sensitive protected sites of conservation importance. A statement to acknowledge that water quality needs to be</p>	<p>No Action Required: The NPPF states that Waste Planning Authorities should not concern themselves with the control of processes which are a matter for the pollution control authorities and that WPAs should work on the assumption that the relevant pollution control regime will be properly applied and enforced. However, Policy MW1 'Development Management Criteria'</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP15: Whitlingham water recycling centre	NCC Planning Officer's Response
	protected should therefore be added to the plan here or in this policy.	requires planning applications to demonstrate that the development would not have an unacceptable impact on the quality of surface water bodies and groundwater. Policy WP15 therefore does not need to duplicate Policy MW1.
Historic England (98787)	Preferred Options: Suggested change: Include reference to the historic environment in the policy. Refer to Crown Point RPG.	Action Required: The supporting text will be amended in the Publication version of the Minerals and Waste Local Plan to include information on Crown Point Registered Park and Garden, and include a reference and to conserve and enhance the historic environment including heritage assets and their settings.
Broads Authority (98963)	Preferred Options: Suggest the Broad Authority be involved in the organisations listed in para 3.	Action Required: The Broads Authority will also be listed in the policy paragraph regarding the masterplan.
Broads Authority (98963)	Preferred Options: WP15 - first para seems reasoned justification rather than policy text.	Action Required: The first paragraph of the policy will be amended in the Publication version of the Minerals and Waste Local Plan and part of it moved to the supporting text.

Table 33: Main issues raised during the Consultation stages about Policy WP16: Design of waste management facilities

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP16: Design of waste management facilities	NCC Planning Officer's Response
Broads Authority (93160)	Initial Consultation: Should this include reference to MW1 (DM criteria)?	No Action Required: Policies have only been cross-referenced where they are mutually supportive and should be viewed together.
South Norfolk District Council (92512, 99052) Broadland District Council (92096)	Initial Consultation and Preferred Options: Overlaps with MW1 (DM Criteria). Therefore, this policy might be better placed in the General Policies part of the Plan, and used to cover waste and minerals proposals.	No Action Required: Mineral extraction is a temporary use of land as are buildings related to such operations, it is appropriate therefore for waste developments which are often permanent, to have a specific design related policy.

Table 34: Main issues raised during the Consultation stages about Policy WP17: Safeguarding waste management facilities

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP17: Safeguarding waste management facilities	NCC Planning Officer's Response
Anglian Water Services Ltd (92491)	Initial Consultation: 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, and refer to 'sewerage company' as opposed to wastewater management company.	Action Required: The policy has been amended as requested.
Essex County Council (98865)	Preferred Options: Extend the safeguarding provisions to sites allocated for a waste use.	No Action Required: There are no waste management sites allocated in the NM&WLP. We consider that it is appropriate to safeguard existing and permitted waste management facilities, but not necessary to safeguard sites allocated for a waste management use.
Essex County Council (98865)	Preferred Options: Amend policy to include in an appendix the nature of evidence that would be required to be submitted alongside a non-waste application such that the County Council could be satisfied that the proposed development would not impact on the operation of the current or future waste management facility.	Action Required: The Publication version of the NM&WLP includes an appendix of the scheduled of requirements for a waste management facilities impact assessment. As stated in the NM&WLP supporting text, decisions on whether a proposed development would prevent or prejudice the continued use of a safeguarded facility and would therefore raise an objection from the Waste Planning Authority, will be made on a case-by-case basis. Each decision will take into account the particular use of the safeguarded site, the nature of the proposed development, their compatibility and, where appropriate, any mitigation which could address any adverse impacts.
Anglian Water Services Ltd (98332)	Preferred Options: Anglian Water's existing Asset Encroachment Policy is currently being reviewed. We would suggest the policy be amended to provide flexibility to allow for any changes to the currently fixed distance for individual WRCs.	Action Required: The policy text has been amended as requested to include "or a distance specified by Anglian Water in any successor document".
Anglian Water Services Ltd (98332)	Preferred Options: In relation to sewage pumping stations we would expect to be consulted on proposals for occupied land and buildings within 15m of an existing pumping station consistent with the requirements of Sewers for Adoption.	Action Required: The policy text has been amended.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy WP17: Safeguarding waste management facilities	NCC Planning Officer's Response
Suffolk County Council (95065)	Preferred Options: The lower limit of 20,000tpa should be removed. Some small hazardous waste sites for example could not be safeguarded with this limit.	No Action Required: The purpose of the policy is to safeguard larger waste management facilities. Waste management facilities can be located on land in existing employment use, land permitted or allocated for employment use, previously development land and land within or adjacent to redundant agricultural and forestry buildings. As a range of locations are potentially suitable it is not considered necessary to safeguard the smallest waste management facilities.

Table 35: Main issues raised during the Consultation stages about Policy MP1: Provision for minerals extraction

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP1: Provision for minerals extraction	NCC Planning Officer's Response
Cemex UK Materials Ltd (93073) Heaton Planning Ltd (93025) SLR Consulting Ltd / Tarmac Trading Limited (92529) Mineral Products Association (92503) Sibelco UK (92477)	Initial Consultation: Amended wording proposed to better reflect guidance contained with paragraph 207f of the revised NPPF and be considered sound.	Action Required: 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...".
Mr R Carter (92912)	Initial Consultation: Object to the initial conclusion on MIN 71 on the grounds this policy is unable to demonstrate a need for extra resources of sand and gravel aggregates in Norfolk. There is clear evidence that the 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.	No Action Required: Response to MIN 71 covered under MIN 71 section. The forecast need for aggregates in the NM&WLP does not include any additional provision to meet the needs of other MPAs. Data from 2019 shows that 80-90% of the sand and gravel produced in Norfolk was used in Norfolk. Norfolk produced 1.329 MT of sand and gravel and consumed 1.396Mt in 2019 and therefore was a net importer of sand and gravel in that year. The NPPF states that MPAs should 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

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP1: Provision for minerals extraction	NCC Planning Officer's Response
		<p>extraction must be considered on its own merits regardless of the length of the landbank”.</p> <p>In the publication version of the NM&WLP the 10-year average sales plus 10% are being used to forecast the need for sand and gravel during the Plan period to 2038. The reasoning for this is explained in paragraphs MP1.2 – MP1.9 of the Publication version of the NM&WLP.</p>
Mineral Products Association (92503)	<p>Initial Consultation: With less than 4 years "stocks of permitted reserves" of silica sand, the supply issues are clearly critical and therefore clarification on the forecasting is sought.</p>	<p>No Action Required: The period covered by the NM&WLP is until the end of 2038. 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. The Local Plan is also required 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 2038 ended. There has been no evidence submitted to justify reference to a 15 year landbank in policy MP1. Historically, for silica sand the landbank has been below 10 years because planning applications for new sites have not been submitted. There are no sub-national guidelines produced by Government for silica sand. The NPPF makes a specific link between silica sand supply and the production of the plant that it is supplying, therefore it is considered appropriate to plan for the need for silica sand extraction in Norfolk based on the permitted throughput of the processing plant which is 0.754 million tonnes of raw silica sand per annum.</p>
Aggregate Industries UK Ltd (92357)	<p>Initial Consultation: Production capacity should be captured within this policy to ensure deliverability of a steady supply of mineral.</p>	<p>No Action Required: 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. We have also 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.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP1: Provision for minerals extraction	NCC Planning Officer's Response
CPRE Norfolk (92014)	Initial Consultation: We would prefer to see realistic maxima added for each of the materials as well as the included "at least" figures.	No Action Required: The policy refers to an 'at least' quantity to reflect the requirement for Local Plans to be positively prepared in line with the requirements of the NPPF. It would also be difficult to specify a maximum quantity to be allocated due to the varying sizes of the sites proposed for allocation.
Mineral Services Ltd (91961)	Initial Consultation: 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.	No Action Required: 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. The Local Plan is 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 2038 ended.
Historic England (98789)	Preferred Options: Consider site allocation for Carstone as building material.	No Action Required: There is an existing site in Snettisham providing building quality carstone. The Carstone landbank is approximately 20 years and it is not necessary to allocate any additional sites in the plan. Throughout this Local Plan process, only one site has been submitted for Carstone extraction, which has been allocated in the Plan. We do not consider that a further call for sites would find a new site for building stone.
Essex County Council (98866, 98868) Frimstone Ltd (98743)	Preferred Options: The argument of basing sand and gravel provision on a 20-year sale average is questioned. The Norfolk LAA 2017/18 states (Section 6.2) that 'modern methods of construction use considerably less aggregate than methods used in previous decades, and this decline in the intensity of aggregate use has been a continuing trend over a number of years.' This brings into question the appropriateness of using 20-year-old figures and appears to contradict the appropriateness of doing so as advocated by the Norfolk MWLP Paragraph MP1.6. This figure needs to be more robustly justified in the context of a comparison of current and future need.	Action Required: In the publication version of the NM&WLP the 10-year average sales plus 10% are being used to forecast the need for sand and gravel during the Plan period to 2038. The reasoning for this is explained in paragraphs MP1.2 – MP1.9 of the Publication version of the NM&WLP.
Frimstone Ltd (98743)	Preferred Options: What is the justification for using a 20-year average annual production figure, rather than a 25-year average or likewise 18-year to cover the remainder of the plan period, for example?	Action Required: In the Publication version of the NM&WLP the 10-year average sales plus 10% are being used to forecast the need for sand and gravel during the Plan period to 2038. The reasoning for this is explained in paragraphs MP1.2 – MP1.9 of the Publication version of the NM&WLP.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP1: Provision for minerals extraction	NCC Planning Officer's Response
Frimstone Ltd (98743)	Preferred Options: In relation to MIN 35, it was considered as suitable for allocation based on the proposed 20-year average annual production figure in August 2018. However, the current proposed allocation figure less than 18 months later is greatly reduced and is the only reason it is now unsuitable for allocation.	No Action Required: Consultation responses about MIN 35 are responded to in the section of the Feedback Report specifically covering site MIN 35. In the publication version of the NM&WLP the 10-year average sales plus 10% are being used to forecast the need for sand and gravel during the Plan period to 2038. The reasoning for this is explained in paragraphs MP1.2 – MP1.9 of the Publication version of the NM&WLP.
Essex County Council (98866)	Preferred Options: This assessment should also consider demand from significant projects such as the relatively proximate Sizewell C nuclear facility.	No Action Required: The majority of the concrete required for construction will need to be high strength concrete which is produced using crushed rock, typically limestone. Therefore, this infrastructure project is not expected to source mineral from Norfolk.
Essex County Council (98867, 98868)	Preferred Options: Paragraph MP1.10 - The appropriateness of basing silica sand supply on an annual production figure of 750,000 is not understood on the basis of this figure failing to meet the three-year sales average since 2013.	No Action Required: There are no sub-national guidelines produced by Government for silica sand. The NPPF makes a specific link between silica sand supply and the production of the plant that it is supplying, therefore it is considered appropriate to plan for the need for silica sand extraction in Norfolk based on the permitted throughput of the processing plant which is 0.754 million tonnes of raw silica sand per annum.
Brett Group/Heaton Planning Ltd (99038)	Preferred Options: Careful consideration needs to be given to the replenishment rates of sand and gravel sites, their location as well as production capacity to meet the annual production requirement. It is not considered that the annual monitoring/Local Aggregate Assessment captures this adequately.	No Action Required: The replenishment rate of sand and gravel sites is reliant on suitable planning applications being submitted to Norfolk County Council. The submission of applications is determined by the mineral industry. The LAA details how many of the allocated sites have received permission. Planning applications for sand and gravel extraction sites continue to be submitted and determined in Norfolk. Mineral extraction is on a County-wide basis and therefore there is not a sub-county apportionment for minerals.
Brett Group/Heaton Planning Ltd (99039)	Preferred Options: The second part of the policy should be amended to read [new text in Strong/Bold], Mineral extraction for sand and gravel outside of allocated sites will be [delete: resisted] SUPPORTED by the Mineral Planning Authority [delete: unless] WHERE the applicant can demonstrate: a) There is an overriding justification and/or overriding benefit for the proposed extraction,	No Action Required: Experience over the period since the Mineral Site Specific Allocations DPD was adopted shows that planning applications have been submitted and approved for allocated sites (as recorded in the Local Aggregate Assessments). Furthermore, to ensure that the planning system is genuinely plan-led, proposals for sand and gravel extraction outside of the areas identified for mineral extraction will normally

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP1: Provision for minerals extraction	NCC Planning Officer's Response
	INCLUDING MAINTAINING A CONTINUITY IN SUPPLY AND OVERALL PRODUCTIVE CAPACITY, and b) The proposal is consistent with all other relevant policies set out in the Development Plan.	be resisted by the MPA. Therefore, the policy wording will not be amended.
Cemex UK Materials Ltd (94878) Sibelco UK Limited (98655) Mineral Products Association (98766)	Preferred Options: Add wording to make clear that this policy is committed to maintaining a sufficient sand and gravel landbank for the entire Plan period.	No Action Required: 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 if calculated from the extant planning permissions for mineral extraction (not from sites allocated in the plan). The plan is also required to be reviewed every 5 years, which would ensure a new 15-year plan period before the current plan period to 2038 ended.
Sibelco UK Limited (98655) Mineral Products Association (98766)	Preferred Options: Amend policy text to:- The landbank STOCKS OF PERMITTED RESERVES FOR SILICA SAND WILL BE MAINTAINED AT A LEVEL OF AT LEAST 10 YEARS' SUPPLY PRODUCTION FOR EACH INDIVIDUAL SILICA SAND SITE OR AT LEAST 15 YEARS WHERE SIGNIFICANT NEW CAPITAL IS REQUIRED [delete: Where practicable].	No Action required: For silica sand, a landbank is a stock of permitted reserves, therefore the suggested change to the policy wording is not necessary. No information has been put forward by Sibelco UK Ltd that significant capital investment is required at their Leziate 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 individual 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. Policy MP1 states that the landbank for silica sand will be maintained at least 10 years' supply were 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.
Campaigners Against Two Silica Sites (94369, 94370)	Preferred Options: The M&WLP needs to address the lack of any plan and the assumption that clear glass recycling will not improve, to increase the amount of clear and flat glass collected and recycled to glass cullet for use in the glass manufacturing industry to reduce the	No Action required: The NPPF makes a specific link between silica sand supply and the production of the processing plant that it is supplying, therefore it is considered appropriate to plan for the need for silica sand extraction in Norfolk based on the permitted throughput of the processing plant which is 0.754 million tonnes of raw silica sand per annum.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP1: Provision for minerals extraction	NCC Planning Officer's Response
Individuals (94704, 94921, 94705, 94922)	need for raw silica sand in glassmaking and reduce the amount of CO2 emitted and the energy used.	Norfolk already has a well-developed and effective collection process for glass recycling at the kerbside, through Household Waste Recycling Centres, and bring banks. The glass collected through these methods in Norfolk is sent to existing glass recycling facilities located elsewhere in the UK. Silica sand is a necessary ingredient in the remelt feedstock for recycled glass. National Planning Practice Guidance states that the required stock of permitted reserves for each silica sand site is based on the average of the previous 10 year sales; it does not take into account any other supply options (such as recycled materials).
Campaigners Against Two Silica Sites (94716)	Preferred Options: The planned extraction figures quoted here are flawed as they are only based on figures supplied by the mineral extraction companies as their 'required need'; there is no other independent oversight of the figures to confirm them.	No Action required: It is standard practice with Mineral Planning Authorities that the sales data is provided by the mineral company that has sold the mineral. This representation is about the quantities of silica sand to be planned for. There are no sub-national guidelines produced by Government for silica sand. The NPPF makes a specific link between silica sand supply and the production of the plant that it is supplying, therefore it is considered appropriate to plan for the need for silica sand extraction in Norfolk based on the permitted throughput of the processing plant which is 0.754 million tonnes of raw silica sand per annum.
Individual (98558)	Preferred Options: Your "Preferred Option" should be to purchase the minerals on the international open market at best price secure supplies on forward purchase.	No Action required: NCC is unable to fulfil its statutory responsibility for minerals land use planning for indigenous materials by buying minerals on the open market from another country. If a construction business needs to purchase minerals then they can choose to buy them from anywhere.

Table 36: Main issues raised during the Consultation stages about Policy MP2: Spatial strategy for minerals extraction

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP2: Spatial strategy for minerals extraction	NCC Planning Officer's Response
Environment Agency (92553)	Initial Consultation: Proposed developments will need to be assessed to determine their potential impacts on the features for which each SSSI is designated. Appropriate mitigation should be applied to reduce potential impacts.	No Action Required: 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 and mitigation measures and policy requirements proposed where appropriate. At the planning application stage, it would need to be demonstrated that the development would not have an unacceptable adverse impact on SSSIs.
Lichfields / Bourne Leisure Ltd (92543)	Initial Consultation: The policy should be amended so that tourism development is considered as a sensitive receptor to amenity impacts.	No Action Required: Policy MP2 has been amended since the Initial Consultation stage and as Areas of Search are not included in the Publication version of the NM&WLP, policy MP2 no longer sets out the method used to define areas of search for silica sand.
Sibelco UK (92478)	Initial Consultation: The Policy 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 discussed highway routes from Areas of Search to the Leziate processing site.	No Action Required: The policy requirement is for specific sites for silica sand should be located where they are able to access the existing processing plant and railhead at Leziate via conveyor, pipeline or off-public haul route. Policy MPSS1 sets out details regarding highway access if this is not possible.
Sibelco UK (92478)	Initial Consultation: Agricultural land grades 1 and 2 should not be excluded. This contradicts Policy MW6 which should in all circumstances be adopted and applied flexibly.	No Action Required: Policy MP2 has been amended since the Initial Consultation stage and as Areas of Search are not included in the Publication version of the NM&WLP, policy MP2 no longer sets out the method used to define areas of search for silica sand. However, 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.
Broads Authority (91850)	Initial Consultation: The Broads, which has a status equivalent to a national park, may need to be listed as a planning constraint.	No Action Required: Policy MP2 has been amended since the Initial Consultation stage. In the Publication version of the NM&WLP it states that the spatial strategy for mineral extraction sites is subject to

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP2: Spatial strategy for minerals extraction	NCC Planning Officer's Response
		the proposed development not being located within the Broads Authority Executive Area other than in exceptional circumstances and where the development is in the public interest.
Historic England (92950, 98790)	<p>Initial Consultation and Preferred Options: Ensure that Historic environment is given due consideration in spatial strategy.</p> <p>We have concerns about a standard distance-based approach of 250 metres as issues of setting of heritage assets are more nuanced than this and vary on a case-by-case basis.</p>	<p>No Action Required: Policy MP2 has been amended since the Preferred Options stage and as Areas of Search are not included in the Publication version of the NM&WLP, Policy MP2 no longer sets out the method used to define areas of search for silica sand. In the Publication version of the NM&WLP it states that the spatial strategy for mineral extraction sites is subject to the proposed development not being located within a designated heritage asset, including listed buildings, registered parks and gardens and scheduled monuments, or their settings if the proposed development would cause substantial harm to or the loss of the heritage asset.</p>
Campaigners Against Two Silica Sites (94371) Individuals (94923, 94923, 16559)	<p>Initial Consultation and Preferred Options: The area of 250m around sensitive receptors, etc is completely arbitrary and has no basis and no studies produced in the UK, to support this assumption.</p> <p>Any mineral extraction should be conducted well away from houses, areas of proposed housing development, and places of natural beauty.</p>	<p>No Action Required: Policy MP2 has been amended since the Preferred Options stage and as Areas of Search are not included in the Publication version of the NM&WLP, Policy MP2 no longer sets out the method used to define areas of search for silica sand.</p> <p>However, the Institute of Air Quality Management 'Guidance on the Assessment of Mineral Dust Impacts for Planning' document states "adverse dust impacts from sand and gravel sites are uncommon beyond 250 m and beyond 400 m from hard rock quarries measured from the nearest dust generating activities." Therefore, 250m is considered to be an appropriate distance to use as silica sand is not a hard rock.</p>
Environment Agency (98712) Borough Council of King's Lynn and West Norfolk (99006)	<p>Preferred Options: Silica sand - it should be added the hydrological and hydrogeological catchment around Roydon Common and Dersingham bog which should be avoided/buffer area introduced.</p>	<p>No Action Required: Policy MP2 has been amended since the Preferred Options stage and as Areas of Search are not included in the Publication version of the NM&WLP, Policy MP2 no longer sets out the method used to define areas of search for silica sand. Criteria-based policy MPSS1 requires the submission of a hydrogeological impact assessment at the planning application stage for any proposals for silica sand sites that are not allocated in the plan.</p>
Carter Concrete Limited (98596)	<p>Preferred Options: Sheringham not included in the definition of a Main Town.</p>	<p>No Action Required: For North Norfolk, the Main Towns listed in Policy MP2 are those defined as 'principal settlements' in the adopted North Norfolk Core Strategy and Development Management Policies</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP2: Spatial strategy for minerals extraction	NCC Planning Officer's Response
		DPD. The 'principal settlements' are Cromer, Fakenham, Holt and North Walsham. Sheringham is a 'secondary settlement' along with Hoveton, Stalham and Wells-next-the-sea and therefore has not been included in Policy MP2.
Mineral Products Association (92504, 98767) Sibelco UK Limited (92478, 98649)	Initial Consultation and Preferred Options: There should be no buffers applied to the so-called planning constraints, this should be left to the EIA and development management process. 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.	No Action Required: Policy MP2 has been amended since the Preferred Options stage and as Areas of Search are not included in the Publication version of the NM&WLP, Policy MP2 no longer sets out the method used to define areas of search for silica sand. Criteria-based policy MPSS1 sets out the requirements that would need to be met at the planning application stage for proposals for silica sand extraction on sites that are not allocated in the plan.
Norfolk Wildlife Trust (98667) Broads Authority (98966) CPRE Norfolk (92015)	Initial Consultation and Preferred Options: County Wildlife Sites, The Broads and undesignated heritage assets should also be excluded from the Areas of Search for silica sand extraction.	No Action Required: Undesignated heritage assets are not mapped and therefore it was not possible to exclude them from the Areas of Search. However, Policy MP2 has been amended since the Preferred Options stage and as Areas of Search are not included in the Publication version of the NM&WLP, Policy MP2 no longer sets out the method used to define areas of search for silica sand. Criteria-based policy MPSS1 sets out the requirements that would need to be met at the planning application stage for proposals for silica sand extraction on sites that are not allocated in the plan.
Norfolk Wildlife Trust (98667) CPRE Norfolk (94289)	Preferred Options: We are concerned at the overlap between some proposed minerals sites and the County Wildlife Site network and we do not believe that allocating minerals extraction on CWSs is compatible with the plan's Vision to enhance Norfolk's biodiversity and paragraphs 170 and 171 of the NPPF.	No Action Required: This response is regarding the allocation of specific sites for mineral extraction. Issues raised about specific sites will be responded to in the relevant section of this report regarding those sites. In terms of Silica sand sites, this is recognised as a nationally important industrial mineral. Comparatively, county wildlife sites are of county ecological importance. Therefore, it is not considered appropriate to automatically exclude county wildlife sites.
Suffolk County Council (95068) Essex County Council (98869) Broads Authority (98966)	Preferred Options: The inclusion of stating a distance from Norfolk's Urban areas and main towns seems very restrictive/arbitrary.	No Action Required: It is considered the stated distance is appropriate. The policy includes the flexibility for sites to be located outside the stated distance but well-related via appropriate transport infrastructure.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP2: Spatial strategy for minerals extraction	NCC Planning Officer's Response
Essex County Council (98869)	Preferred Options: It is considered that Areas of Search should be re-defined to include all relevant land where mineral extraction could theoretically be permitted.	No Action Required: Policy MP2 has been amended since the Preferred Options stage and as Areas of Search are not included in the Publication version of the NM&WLP, Policy MP2 no longer sets out the method used to define areas of search for silica sand. Policy MP2 therefore refers to sites for silica sand being located within the resource area identified on the key diagram. Criteria-based policy MPSS1 sets out the requirements that would need to be met at the planning application stage for proposals for silica sand extraction on sites that are not allocated in the plan.
Heaton Planning Ltd / Brett Group (93026) Brett Group (99042)	Initial Consultation and Preferred Options: The assumption that demand will be supplied from somewhere within the County does not meet the spatial strategy approach advocated in Policy MP2 to locate sites close to the anticipated demand - i.e major growth areas. 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 could be secured through the allocation of land at MIN38 - Waveney Forest, Fritton.	No Action Required: 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. Representations regarding the suitability of proposed site MIN 38 at Waveney Forest, Fritton are responded to in the section of the Feedback Report specifically regarding MIN 38.
Borough Council of King's Lynn and West Norfolk (99006)	Preferred Options: In light of the NCC Environment Policy to plant 1 million trees over the next 5 years to mitigate for the effects of climate change, it would be appropriate to delete the word 'ancient', leaving an enhanced level of protection to woodland generally.	No Action Required: Policy MP2 has been amended since the Preferred Options stage and as Areas of Search are not included in the Publication version of the NM&WLP, Policy MP2 no longer sets out the method used to define areas of search for silica sand. Criteria-based policy MPSS1 sets out the requirements that would need to be met at the planning application stage for proposals for silica sand extraction on sites that are not allocated in the plan. Provision (f) in the strategic climate change Policy MW3 expects both minerals and waste developments to take opportunities to incorporate trees, retain existing trees and include measures to assist habitats and species to adapt to the potential effects of climate change wherever possible.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP2: Spatial strategy for minerals extraction	NCC Planning Officer's Response
<p>Campaigners Against Two Silica Sites (94371)</p> <p>Individuals (94923, 94923)</p>	<p>Preferred Options: The 250m area around sensitive receptors to mitigate respiratory impacts of dust is arbitrary and has no basis in research. MP2 fails sustainability objective SA2 and SA9 on pg. 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015).</p> <p>In policy MW5 a buffer of 1500m from a mineral site is mandated for areas supporting a bird (Stone Curlew) yet a buffer of merely 250m, or less, is deemed acceptable for humans. This also makes the M&WLP unsound.</p>	<p>No Action Required: The Institute of Air Quality Management 'Guidance on the Assessment of Mineral Dust Impacts for Planning' document states "adverse dust impacts from sand and gravel sites are uncommon beyond 250 m and beyond 400 m from hard rock quarries measured from the nearest dust generating activities." Therefore, 250m is considered to be an appropriate distance to use as silica sand is not a hard rock. However, Policy MP2 has been amended since the Preferred Options stage and as Areas of Search are not included in the Publication version of the NM&WLP, Policy MP2 no longer sets out the method used to define areas of search for silica sand (such as the 250m distance from sensitive receptors). Criteria-based policy MPSS1 sets out the requirements that would need to be met at the planning application stage for proposals for silica sand extraction on sites that are not allocated in the plan. MP2 does not fail sustainability appraisal objectives SA2 and SA9 as set out in the Sustainability Appraisal Report Appendix A.</p> <p>In accordance with the Conservation of Habitats and Species Regulations 2017, Policy MW5 is specifically regarding the designated Breckland SPA and SAC for proposed development located with the buffer zones.</p>

Table 37: Main issues raised during the Consultation stages about Policy MP3: Borrow pits

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP3: Borrow pits, Question 29	NCC Planning Officer's Response
Natural England (92080)	Initial Consultation: The policy could include a reference to MP2 to make it clear that damage must be avoided to any of the features on the list of planning constraints listed under MP2.	No Action Required: This would not be appropriate for applications for borrow pits.
Broads Authority (91849)	Initial Consultation: There is no mention of the requirement for restoration, and there is no cross reference to a more detailed policy.	Action Required: The policy on borrow pits includes the requirement that the site will be restored by the completion of the related construction project. The policy on borrow pits has been amended to include reference to Development Management Policy MW1.
Essex County Council (98870)	Preferred Options: It may be more appropriate to request that a restoration scheme is agreed as part of the construction project in order to potentially increase the scope for beneficial after-uses.	No Action Required: The purpose of a borrow pit is to supply material for a specific construction project. Therefore, we consider that if the borrow pit cannot be accessed either directly from the construction project or via a short length of suitable highway then it would not be geographically well-related to that project and it would not be any different from a traditional mineral working in this regard.
Essex County Council (98870)	Preferred Options: Remove requirement for a borrow pit to be capable of being accessed from the construction project site either directly or via a short length of suitable highway, as is unduly restrictive.	No Action Required: We will not be making the suggested changes because we consider that they would remove the link between the borrow pit and the construction project that it is designed to supply, which would make the proposed development a traditional mineral working instead of a borrow pit.

Table 38: Main issues raised during the Consultation stages about Policy MP4: Agricultural or potable water reservoirs

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP4: Agricultural or potable water reservoirs	NCC Planning Officer's Response
D K Symes Associates (92360)	Initial Consultation: For clarity, it should be made clear that 'proven need' is for the reservoir, not the mineral extracted.	Action Required: The policy has been amended to provide clarity that the proven need is for the reservoir, not the mineral extracted.
Mineral Services Ltd (91963)	Initial Consultation: The policy wording could be extended to cover flood alleviation schemes that include the extraction of sand and gravel.	No Action Required: 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.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP4: Agricultural or potable water reservoirs	NCC Planning Officer's Response
Broads Authority (98967)	Preferred Options: What if the reservoir is not associated with mineral abstraction?	No Action Required: This would not be a County Matter.
Anglian Water Services Ltd (98333)	Preferred Options: The timing of any required reservoirs for potable water for public supply would be determined through the Water Resource Management Plan process which is approved by Defra following consultation with the Environment Agency and other interested parties. Is it appropriate to include any proposed timing as part of the planning application process.	Action Required: The policy reference to the timely delivery of water resources is to ensure that the mineral extraction required to form the reservoir is undertaken in a timely manner to ensure that the reservoir is created at the earliest opportunity as the mineral extraction should be only for the purpose of creating the reservoir. The supporting text will be amended to ensure this is clear.
Anglian Water Services Ltd (98333)	Preferred Options: What is the intended purpose of limiting the scale of any reservoir and how would this be considered as part of any application?	Action Required: The purpose of the policy is not to limit the scale of the reservoir, but to limit the scale of the mineral extraction to no more than is required for the creation of the reservoir. The supporting text will be amended to ensure this is clear.

Table 39: Main issues raised during the Consultation stages about Policy MP5: Core river valleys

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP5: Core river valleys	NCC Planning Officer's Response
Heaton Planning Ltd / Brett Group (93028, 99040)	<p>Initial Consultation: 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>Preferred Options: The policy should not preclude all development, but it is accepted it is appropriate to caveat with the requirement to assess any impact.</p>	<p>No Action Required: The purpose of Local Plans is to provide policies tailored to the specific characteristics of the Plan area. River Valleys form a key and valued element of the Norfolk landscape and have formed part of the Development Plan since the 1990s. 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>Policy MP5 does not preclude all mineral development within the Core River Valleys as it sets out the circumstances under which a development would be permitted.</p> <p>The NPPF is a material planning consideration and paragraph 211 states that 'great weight should be given to the benefits of mineral</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP5: Core river valleys	NCC Planning Officer's Response
		extraction, including to the economy'. Therefore, these policies do not need to be repeated within Policy MP5. The policy specifically states that mitigation and compensatory measures will be included in the assessment.
Environment Agency (98713)	Initial Consultation: Developments should be restricted to higher ground avoiding river valleys where possible to reduce the risk of mineral extraction impinging on groundwater. MIN 55, MIN 202 and MIN 48 are 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.	No Action Required: MIN 55, MIN 202, and MIN 48 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 opportunities may exist for some of the measures suggested.
Environment Agency (98713)	Preferred Options: This policy should also include "the impact of mineral development on groundwater and the potential to need to work beneath the water table".	No Action Required: The Development Management Criteria Policy MW1 requires planning applications to demonstrate that the development would not have an unacceptable impact on "The quality and quantity of surface waterbodies and groundwater" Therefore, we do not consider it necessary to repeat this within the Core River Valley policy. In addition, because the Core River Valley policy is a landscape designation it does not include all of Norfolk's rivers.
Broads Authority (91848, 98968)	Initial Consultation: Why is the Broads not included in the core river valleys?	No Action Required: 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 (BAEA) has equivalent protection to a National Park this was specifically excluded from the Survey. The BAEA also has specific protection from mineral development in National Policy, a specific policy is not required. This has been clarified in the supporting text.
Broads Authority (91848)	Initial Consultation: In other policies you cross refer to a more detailed policy, but not in this policy. Presumably policy MW1 (Development Management	No Action Required: Noted. Policy MW1 (Development Management Criteria) would be relevant to all applications. We have not considered it necessary to cross refer to in this particular policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP5: Core river valleys	NCC Planning Officer's Response
	Criteria) is of relevance and could be cross referred to?	
Broads Authority (91848)	<p>Initial Consultation: Who does the assessment and at what stage in the planning process?</p> <p>How will you liaise with the Broads Authority if proposals come forward in the river valleys in the Broads rather than just consult?</p>	<p>No Action Required: The assessment would form part of the determination of any future planning application. NCC'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>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>
Campaigners Against Two Silica Sites (94372) Individuals (94707, 94924)	<p>Preferred Options: There needs to be a specific time scale added to this statement as to destroy biodiversity for profit under the guise of enhancing it later (20-30+ years hence) through restoration is an illogical step and unacceptable.</p>	<p>No Action Required: It is not reasonable for a specific timescale to be added to this policy statement because the timescales for mineral extraction operations vary considerably depending on the mineral type and market. Progressive working and restoration is specifically covered by Policy MP7 and therefore does not need to be repeated in Policy MP5.</p> <p>Policy MP1: DM Criteria requires planning applications to demonstrate that the development would not have an unacceptable impact on the natural environment; so mineral extraction should not be permitted if it would destroy biodiversity.</p>
Historic England (98792)	<p>Preferred Options: Paragraph MP5.4 - Add in reference to historic environment.</p>	<p>Action Required: Noted.</p>
Campaigners Against Two Silica Sites (94372)	<p>Preferred Options: MP5 fails sustainability objective SA5 on page 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) for the amount of time it is a visual intrusion; fails SA8 because of the excessive time-scale involved and the after use proposed; and SA9 due to the time-scale involved.</p>	<p>No Action Required: Policy MP5 does not fail the Sustainability Appraisal as explained in the Sustainability Appraisal Report.</p>

Table 40: Main issues raised during the Consultation stages about Policy MP6: Cumulative impacts and phasing of workings

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP6: Cumulative impacts and phasing of workings	NCC Planning Officer's Response
Broads Authority (91847)	Initial Consultation: What are the criteria or is there a checklist that helps ascertain if cumulative impacts are unacceptable?	Action Required: 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 MW1 – Development Management Criteria) 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 MW1 has been included within this policy for clarity.
Broads Authority (98969)	Preferred Options: The first part says acceptable, unacceptable and acceptable. A check might be needed.	Action required: The Suffolk Minerals and Waste Local Plan was found sound and adopted in 2020 with very similar policy wording. However, the policy wording will be simplified.
Campaigners Against Two Silica Sites (94373) Individuals (94708, 94925)	Preferred Options: It fails to address the other potential cumulative impacts in an area, e.g. a close military airbase, amenity, the economy, the natural and built environment, the local road network and the period of time for working an area if it is to be prolonged.	No Action Required: This policy only deals with adverse cumulative impacts from other mineral extraction operations. Policy MW1 states that development will be permitted where it is demonstrated that the development would not have an unacceptable impact (including cumulative impacts in combination with other existing development), which include road network, amenity (including noise levels), the natural environment, the historic environment and landscape. With regards to the specific issue raised about extending the time for mineral working, Policy MP7 covers 'Progressive working, restoration and afteruse'.
Campaigners Against Two Silica Sites (94373)	Preferred Options: MP6 fails sustainability objective SA3 [to minimise noise, vibration and visual intrusion], SA4 [to improve accessibility to jobs, services and facilities and reduce social exclusion] and SA9 [to contribute to improved health and amenity of local communities in Norfolk] for AOS E and the overlap of SIL 02.	No Action Required: This policy does not fail the Sustainability Appraisal objectives suggested, as explained in the Sustainability Appraisal Report. Consultation responses about site SIL 02 and AOS E are responded to in the sections of the Feedback Report specifically covering SIL 02 and AOS E.

Table 41: Main issues raised during the Consultation stages about Policy MP7: Progressive working, restoration and after-use

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP7: Progressive working, restoration and after-use	NCC Planning Officer's Response
Cemex UK Materials Ltd (93074) Mineral Products Association (92505) Sibelco UK (92479) Aggregate Industries UK Ltd (92358)	Initial Consultation: There may be circumstances, such as high quarry faces or face instability where retention would not be appropriate, due to health and safety considerations.	Action Required: 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".
Historic England (92951)	Initial Consultation: 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 MW1, we cannot support the policy as currently drafted.	Action Required: The policy wording has been amended to state that a restoration proposal must demonstrate that: "The scheme has been informed by the historic environment and historic landscape character assessments and the restoration enhances the historic environment." In addition, Policy MW1 provides criteria for taking into account potential impacts on the historic environment. 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.
Environment Agency (92554)	Initial Consultation: 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.	Action Required: 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.
Environment Agency (98714)	Preferred Options: The first bullet point in policy MP7 refers to BAP habitat. Please note that this has been superseded by Priority Habitat (S41 NERC Act, 2006).	Action Required: The policy text has been amended as requested.
Mineral Products Association (92505)	Initial Consultation: Insert text 'Restoration to Agricultural land'	Action Required: Policy MP7 has been amended to include restoration that "reinstates best and most versatile agricultural land".

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP7: Progressive working, restoration and after-use	NCC Planning Officer's Response
Sibelco UK (92479)		
Sibelco UK (92479)	Initial Consultation: After use is noted several times in the policy but after use is not a matter for mineral planning.	No Action Required: It is recognised that some after-uses will require separate planning permission from the district planning authority; however 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 and is dealt with by the MPA.
Norfolk Wildlife Trust (92377)	Initial Consultation: We 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.	No Action Required: The supporting text has been amended to provide a link to the Norfolk biodiversity list of habitats and species.
Mineral Services Ltd (91965)	Initial Consultation: Opportunities to improve public access is currently included within Minerals Strategic Objective MSO10 and unnecessarily duplicated in MP7.	No Action Required: MSO10 is a strategic objective of the NM&WLP 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.
Broads Authority (91846)	Initial Consultation: There is ecological network work underway for the entire county, and a Norfolk-wide habitats map which could be of relevance. Which strategy is the 'The Green infrastructure Strategy?'	Action Required: The policy wording has been amended to refer to "identified strategic green infrastructure corridors and known ecological networks". A link has been provided in the supporting text to the ecological networks which have been mapped for each district by the Norfolk Biodiversity Partnership.
Natural England (93219)	Initial Consultation: 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. A restoration scheme should contain contextual landscape restoration objectives and achieve a net gain for biodiversity/geodiversity; links to existing habitats/Green Infrastructure networks/Public Rights of Way etc.	Action required: Restoration Policy MP7 states that preference will be given to restoration that contributes positively to identified strategic green infrastructure corridors and known ecological networks, enhances Norfolk's biodiversity and enables access links to PROW and national trails where appropriate. The policy also states that restoration proposals must demonstrate that "the scheme provides for a biodiversity net gain, primarily through the creation or enhancement or priority habitats and linkages to local ecological networks and green infrastructure corridors"
Historic England (98791)	Preferred Options: Include greater reference to historic environment and using the historic environment and historic landscape characterisation and landscape character assessments to inform restoration and to	Action Required: The policy wording has been amended to state that the restoration proposal must demonstrate that "The scheme has been informed by the historic environment and historic landscape character assessments and the restoration enhances

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP7: Progressive working, restoration and after-use	NCC Planning Officer's Response
	enhance and plan positively for the historic environment in the policy.	the historic environment". The supporting text has also been amended as requested (paragraph MP7.8 in the Publication version of the NM&WLP).
Carter Concrete Limited/ David L Walker Ltd (98593)	Preferred Options: It is suggested that a high-resolution copy of the map provided is either included as an appendix or a weblink.	Action Required: A weblink will be provided to the Norfolk Biodiversity Partnership.
Carter Concrete Limited/ David L Walker Ltd (98593)	Preferred Options: Policy MP7 should apply equally to extensions as well as new sites.	Action Required: The policy has been amended to refer to extension areas as suggested.
Norfolk Wildlife Trust (98669)	Preferred Options: Insert additional wording as requested on priority habitats.	Action Required: The supporting text and policy have been amended as requested.
Borough Council of King's Lynn and West Norfolk (98997)	Preferred Options: Whilst not necessarily appropriate in all circumstances, tree planting on restored sites would be a useful additional boost to mitigate for climate change.	Action Required: The policy has been amended to include the requirement that the restoration proposal must demonstrate that "the restoration scheme and afteruse has taken opportunities to incorporate trees, retain existing trees and incorporate additional features consistent with climate change mitigation and adaption wherever possible."
Campaigners Against Two Silica Sites (94374) Individuals (94926, 94709)	Preferred Options: MP7 does not account for the landowner denying opportunities for greater public access after gleaning the financial benefits from the mineral extraction whilst the local community suffer the losses of amenity involved with a mineral extraction site for many years or indefinitely if the after use is not for the benefit of the local community.	No Action Required: Planning permission is granted for a particular area of land and therefore the restoration and aftercare requirements of the permission must be complied with regardless of whether the operator or landowner change after the permission is granted. Public Rights of way are a material consideration and there is a specific process to deal with temporary and permanent diversions of PRow if that is relevant to the site. If a private company wanted to develop a mineral site for private use after the restoration and aftercare period is complete for the mineral working, then a separate planning application is likely to be required to be made to the Local Planning Authority which will be determined in accordance with the development plan policies and other material considerations.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP7: Progressive working, restoration and after-use	NCC Planning Officer's Response
Campaigners Against Two Silica Sites (94374) Individual (94926)	Preferred Options: The statement "that worked land is reclaimed at the earliest opportunity" is open to interpretation in favour of the quarrying company and the disadvantage of the local residents. That makes the policy flawed, unacceptable and unsound.	No Action Required: This is in line with NPPF (2021) paragraph 210h and 211e. At the planning application stage the timescale for mineral working and restoration is assessed and the timescale for restoration is controlled by planning conditions. If the operator needs to extend the timescale for extraction and restoration they would need to apply to change the planning condition. Mineral extraction sites in Norfolk vary significantly in size, as well as the type of mineral being extracted and its use. Therefore, a standard timescale for all mineral workings would not be appropriate.
Campaigners Against Two Silica Sites (94374) Individual (94926)	Preferred Options: MP7 fails sustainability objective SA4, SA8 and SA9 on pg. 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015).	No Action Required: This policy does not fail the Sustainability Appraisal objectives suggested, as explained in the Sustainability Appraisal Report.
Individual (98638)	Preferred Options: Silica Sand extraction sites as currently monitored and controlled has led to: Unrestored lakes Bawsey Lake has had a history of anti-social and inappropriate behaviour and dumping rubbish. Two drownings have occurred here. The sailing club next to a lake is no longer a community asset since the club closed and was destroyed by fire. One lake created after extraction has been used for water ski-ing causing noise nuisance. In conclusion the Silica Sand extraction sites as currently monitored and controlled has led to: generation of waste land/lakes, inappropriate behaviour, some criminal activity, dumping of waste and obstructive road side parking. Thus a new strategy and controls are required before any further extraction should be permitted.	No Action Required: The representation does not propose any changes to Policy MP7. These sites received planning permission in the 1970s and 1980s and therefore did not have the benefit of modern planning conditions and controls regarding restoration and aftercare. We do not consider that this can be compared to how planning applications and permissions for mineral extractions sites are permitted and controlled now. The Local Plan process and planning application process are separate to enforcement and cannot anticipate or assume non-compliance. Most after uses require a separate planning application to be made to the Local Planning Authority (in this example, the Borough Council of King's Lynn and West Norfolk) which will be determined in accordance with the development plan policies and other material considerations. The responsibility for compliance and enforcement of the anti-social and criminal issues raised here are for the Police and the Borough Council and are not within the remit of the NM&WLP.

Table 42: Main issues raised during the Consultation stages about Policy MP8: Aftercare

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP8: Aftercare	NCC Planning Officer's Response
Natural England (92086, 95036)	Initial Consultation and Preferred Options: Add 'Geological' to the possible list of after-uses.	No Action Required: A geological exposure is not considered an after-use. Provision of geological exposures for study, where safe and practical to do so are included in the Policy MP7, as part of restoration proposals.
Mineral Services Ltd (91966)	Initial Consultation: For clarity amend second paragraph to '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'.	Action Required: 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."
Broads Authority (91845)	Initial Consultation: Outline aftercare strategy should be for a minimum of ten years, rather than five years.	Action Required: 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 years could be required for restoration schemes that are not to agriculture.
Individuals (98247)	Preferred Options: Silica Sand extraction sites as currently monitored and controlled has led to: Unrestored lakes Bawsey Lake has had a history of anti-social and inappropriate behaviour and dumping rubbish. Two drownings have occurred here. The sailing club next to a lake is no longer a community asset since the club closed and was destroyed by fire. One lake created after extraction has been used for water ski-ing causing noise nuisance. In conclusion the Silica Sand extraction sites as currently monitored and controlled has led to: generation of waste land/lakes, inappropriate behaviour, some criminal activity, dumping of waste and obstructive road side parking. Thus a new strategy and controls are required before any further extraction should be permitted.	No Action Required: The representation does not propose any changes to Policy MP8: Aftercare. These sites received planning permission in the 1970s and 1980s and therefore did not have the benefit of modern planning conditions and controls regarding restoration and aftercare. We do not consider that this can be compared to how planning applications and permissions for mineral extractions sites are permitted and controlled now. The Local Plan process and planning application process are separate to enforcement and cannot anticipate or assume non-compliance. Most after uses require a separate planning application to be made to the Local Planning Authority (in this example, the Borough Council of King's Lynn and West Norfolk) which will be determined in accordance with the development plan policies and other material considerations. The responsibility for compliance and enforcement of the anti-social and criminal issues raised here are for the Police and the Borough Council and are not within the remit of the NM&WLP.

Table 43: Main issues raised during the Consultation stages about Policy MP9: Concrete batching and asphalt plants

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP9: Concrete batching and asphalt plants	NCC Planning Officer's Response
Heaton Planning Ltd/ Brett Group (93030, 99041)	Initial Consultation and Preferred Options: 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.	No Action Required: 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.
Broads Authority (91844)	Initial Consultation: It is not clear if works then need to be removed and form part of the restoration works or are moth-balled.	No Action Required: The removal of the plant and restoration of the site would form an integral part of the temporary planning permission and does not need to be within the policy.
Carter Concrete Limited/David L Walker Ltd (98594)	Preferred Options: Could be expanded to include reference to precast blockworks to use indigenous materials and aggregate bagging plants.	Action Required: Policy MP10 includes the safeguarding of sites for the manufacture of concrete products, which would include blockworks. We do not consider it necessary to include aggregate bagging plants in Policy MP9 because they are unlikely to be operational without an associated mineral working. We have amended the wording of Policy MP9 as suggested to also include the manufacture of concrete products (which would include blockworks) which will ensure that where these developments are permitted on sand and gravel workings planning permission will be limited to the end date of the quarry permission, or to when the indigenous material no longer forms the majority of the feedstock being used, whichever is the sooner.

Table 44: Main issues raised during the Consultation stages about Policy MP10: Safeguarding of port and rail facilities, and facilities for the manufacture of concrete asphalt and recycled materials

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP10: Safeguarding of port and rail facilities, and facilities for the manufacture of concrete asphalt and recycled materials	NCC Planning Officer's Response
Cemex UK Materials Ltd (93075, 94882) Mineral Products Association (98768)	Initial Consultation and Preferred Options: The policy does not specifically refer to facilities for the handling of primary won aggregate.	No Action Required: Paragraph a) of Policy MP10 deals with the distribution of primary mineral. 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, we will not be making the proposed change to Policy MP10.
Mineral Products Association (92506) Sibelco UK (92480)	Initial Consultation and Preferred Options: The policy wording should be adjusted to include the agent of change principle.	Action Required: The supporting text and policy has been revised to refer to the 'agent of change' principle.
Norwich City Council (92149, 95081)	Initial Consultation and Preferred Options: The Local Plan should acknowledge its proximity to sensitive residential users and allocated sites in other Local Plans with major regeneration potential including Carrow Works. This could be acknowledged in the explanatory text for MW2 and/or MP10, or more specific reference to the policy context for the safeguarded Trowse railhead site could be noted in appendix 5.	No Action Required: Any future development of these allocated 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.
Essex County Council (98872)	Preferred Options: Add an appendix to delineate the nature of evidence that would be required to be submitted alongside a non-mineral application such that the County Council could be satisfied that the proposed development would not have a detrimental impact on existing or allocated sites for mineral development. It is suggested that the plan makers consider the provisions of the POS/MPA Minerals Safeguarding Practice Guidance as a basis for the type of information that should inform the relevant assessments.	Action Required: An appendix detailing the evidence required to comply with policy will be added as suggested.

Table 45: Main issues raised during the Consultation stages about Policy MP11: Mineral Safeguarding Areas and Mineral Consultation Areas

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage Policy MP11: Mineral Safeguarding Areas and Mineral Consultation Areas	NCC Planning Officer's Response
North Norfolk District Council (98830)	The Council has no objection to the splitting up of Policy CS 16 in the way suggested. As Policy MP 11 tightens up the wording set out within existing Policy CS 16 this may have implications for comments made on future iterations of the North Norfolk Local Plan should the Norfolk County Council Minerals and Waste Local Plan be formally adopted first. North Norfolk would welcome the opportunity to include any revised policy wording in our emerging Local Plan to ensure mineral deposits are appropriately safeguarded.	No action required: Norfolk County Council, as Mineral Planning Authority, will continue to provide consultation responses to the draft North Norfolk Local Plan to ensure mineral deposits are appropriately safeguarded.
Mineral Products Association (92507, 98769) Sibelco UK (92481, 98648)	Initial Consultation and Preferred Options: Wording of the policy should be altered to incorporate the 'agent of change' principle.	Action Required: The supporting text and policy has been revised to refer to the 'agent of change' principle.
Mineral Services Ltd (91967)	Initial Consultation: 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.	No Action Required: 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.
Essex County Council (98871)	Preferred Options: What is now considered 'most likely to be commercially viable' may well change in the future. On that basis, it is considered more appropriate to safeguard the whole sand and gravel resource and apply a threshold above which planning applications within an MSA will be subject to safeguarding policy. It is suggested that the plan makers consider the provisions of the POS/MPA Minerals Safeguarding Practice Guidance in relation to this issue.	No Action Required: We consider that the BGS superficial geology types that we are safeguarding are the most appropriate to safeguard Norfolk's sand and gravel deposits. The table of superficial geology types included in the NM&WLP shows that those that have been excluded are those with excessive quantities of fines that are therefore unlikely to be commercially viable. The safeguarded geology types include those that have been extracted for sand and gravel in the recent past. The Mineral Products Association have not raised any objections to the exclusion of some superficial geology types from this policy. Appendix 4 of the NM&WLP includes the thresholds above which planning applications within an MSA will be subject to safeguarding.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage Policy MP11: Mineral Safeguarding Areas and Mineral Consultation Areas	NCC Planning Officer's Response
Campaigners Against Two Silica Sites (94375) Individuals (94710, 94927)	Preferred Options: As minerals are a finite natural resource, NCC's M&WLP is flawed without plans to extend the life of the silica sand resources in Norfolk through an advanced glass recycling policy and plan. MP11 fails sustainability objective SA11 on page 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015).	No Action Required: Any need for increased glass recycling would not affect or be affected by this policy. Policy MP11 is in accordance with paragraph 204 c) of the NPPF which states that planning policies should safeguard mineral resources by defining Mineral Safeguarding Areas. It does not fail SA11 as set out in the Sustainability Report.

Table 46: Main issues raised during the Consultation stages about Policy MP12: Conventional and unconventional oil and gas development (formally Policy MP12: Energy Minerals)

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage Policy MP12: Conventional and unconventional oil and gas development (formally Policy MP12: Energy Minerals)	NCC Planning Officer's Response
Environment Agency (98715)	Preferred Options: It is likely the process will require an abstraction licence. In addition, much of this water ends up as wastewater so the appropriate storage, treatment and disposal methods will be required. Discharge to any surface waters or groundwater will likely require a discharge permit and an application will need to be submitted.	Action Required: Chapter MP12: Energy Minerals and Policy MP12 will now not be included in the Publication version of the NM&WLP and the plan will not include a policy on conventional and unconventional oil and gas development. There are no prospective shale gas areas in Norfolk. There are no Petroleum licence areas in Norfolk (as at May 2022) and therefore there is no requirement within the NPPF to include a policy on hydrocarbon extraction.
Historic England (98794)	Preferred Options: Amend bullet point b to include built, natural and historic before the word environment.	Action Required: Noted, however see response to Rep ID 98715 above, as Chapter MP12: Energy Minerals and Policy MP12 will not be included in the Publication version of the NM&WLP.
Borough Council of King's Lynn and West Norfolk (99000)	Preferred Options: Reference could be made to latest Government announcements about the potential restrictions / banning on this subject.	Action Required: See response to Rep ID 98715 above, as Chapter MP12: Energy Minerals and Policy MP12 will not be included in the Publication version of the NM&WLP.
IGas Energy Plc (98895)	Preferred Options: IGas notes the geology of the Plan area and the fact that it is unlikely to support the presence of hydrocarbons. IGas also notes that whilst historically wells for hydrocarbons have been drilled and	Action Required: Noted. See response to Rep ID 98715 above, as Chapter MP12: Energy Minerals and Policy MP12 will not be included in the Publication version of the M&W Local Plan.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage Policy MP12: Conventional and unconventional oil and gas development (formally Policy MP12: Energy Minerals)	NCC Planning Officer's Response
	<p>more recently seismic surveys carried out, there are no current PEDLs covering the Plan area and therefore no hydrocarbon development proposals could be brought forward at this moment in time. Whilst there may be a further round of onshore licences, which could include Norfolk, there is no timetable for such. It is therefore questionable whether it is necessary for a policy and supporting text for hydrocarbons to be included in the Plan.</p>	
<p>IGas Energy Plc (98895) UK Onshore Oil and Gas (UKOOG) (98901)</p>	<p>Preferred Options: Clarifications and additional/amended content suggested for text in this chapter, including reference to the responsibilities of the Oil and Gas Authority, Environment Agency and HSE. Importance of referring to national guidance, planning policy guidance and Written Ministerial Statements as well as the development plan when considering planning applications. Consider there to be very little difference in the exploration and appraisal stages and the production stages of conventional and unconventional oil and gas developments, and therefore the policy could just refer to 'oil and gas development'. Requirements e and f of the policy are for the OGA and not material to a planning application. Requirement C is a matter for the OGA and the Environment Agency.</p>	<p>Action Required: Noted, however see response to Rep ID 98715 above, as Chapter MP12: Energy Minerals and Policy MP12 will not be included in the Publication version of the M&W Local Plan.</p>
<p>West Winch parish council (98873) Clenchwarton Parish Council (98153) Individuals (94129, 98155, 98158, 98161, 98169, 98171, 98164,</p>	<p>Preferred Options: Objections raised include: Fracking already taking place in the Country has caused several tremors, causing fear and distress to residents and to new residential development. This is a material effect on human health and well-being and against objective WS07 and Policy MW1 Development Management Criteria. Designated sites should be protected from these processes.</p>	<p>Action Required: Chapter MP12: Energy Minerals and Policy MP12 is not included in the Publication version of the NM&WLP and the plan will not include a policy on conventional and unconventional oil and gas development. There are no prospective shale gas areas in Norfolk. There are no Petroleum licence areas in Norfolk (as at May 2022) and therefore there is no requirement within the NPPF to include a policy on hydrocarbon extraction in the NM&WLP.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage Policy MP12: Conventional and unconventional oil and gas development (formally Policy MP12: Energy Minerals)	NCC Planning Officer's Response
98167, 98176, 98310, 98315, 98636, 98174, 98178, 98180, 98187, 98189, 98191, 98626, 98194, 98198, 98491, 98496, 98533, 98536, 98540, 98618, 98894, 98946)	<p>Impact of fracking on air pollution, the environment, landscape, greenhouse gas emissions, climate change, earth tremors, damage to homes, tourism and visitor economy in Norfolk. Fracking would be detrimental to The Wash and the West Winch Growth Area. Fracking is unsustainable.</p> <p>The Plan should therefore state 'fracking, and prospecting for fracking, will not be permitted in West Norfolk or around the Wash, as prospecting causes earthquakes and tremors.'</p>	

Table 47: Main issues raised during the Consultation stages about Implementation, Monitoring and Review

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage regarding Implementation, Monitoring and Review	NCC Planning Officer's Response
Mineral Products Association (92508, 98770)	Initial Consultation and Preferred Options: The Targets/trigger levels do not conform with land bank policy requirements or those for stocks of permitted reserves, either in the proposed Policy MP1 or the NPPF.	Action Required: The landbank indicators for sand and gravel and Carstone will be amended in the Publication version of the Minerals and Waste Local Plan to be based on the previous 10 years' sales average plus 10% in line with Policy MP1.

Table 48: Main issues raised during the Consultation stages about Appendix 3 - Existing Waste Site Specific Allocations Policies

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Appendix 3 - Existing Waste Site Specific Allocations Policies	NCC Planning Officer's Response
F H Ventures Norfolk Ltd/MJCA (98892)	Preferred Options: It is considered that site allocations provide certainty regarding the type and location of waste management sites that may come forward during the plan period. In the event that the allocated sites are reviewed as part of the Examination it is requested that the promoters are provided the opportunity to make representation on the assessment of previously allocated sites.	No Action Required: Noted. Proposers of currently allocated and future sites will have the opportunity to make written representations on the whether the Publication version of the M&W Local Plan is sound and legally compliant.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Appendix 3 - Existing Waste Site Specific Allocations Policies	NCC Planning Officer's Response
Serruys Property Company Limited (98904)	Preferred Options: The Waste Capacity Assessment has reached the conclusion that sufficient capacity may exist for waste facilities over the plan period, taking into account the anticipated capacity from the Site allocated already under WAS 78 and permitted under the Existing Consents. [Waste Capacity Assessment, paragraph 2.4 and Appendix 2]. It is therefore crucial to ensure that this part of the Site remains allocated for up to 300,000 tonnes per annum for those specific uses detailed in policy WAS 78.	No Action Required: The Waste Management Capacity Assessment has been reviewed and concludes that there is sufficient existing waste management capacity to enable Norfolk to be net-self-sufficient in waste management during the Plan period to 2038. The assessment of existing capacity was based on the quantities of waste that had been received at existing operational sites during 2017 – 2020 plus additional capacity that has been permitted and implemented since 2020. As the planning permission for an RDF facility at the Atlas Works site for 150,000tpa referred to in this comment was not implemented and has lapsed it has not been included in the existing capacity in the revised Waste Management Capacity Assessment.
Serruys Property Company Limited (98904)	Preferred Options: An allocation for thermal treatment would be of substantial benefit to provide sufficient facilities to properly convert RDF into energy, following Brexit and the uncertainties over continuation of the export of RDF.	No Action Required: The Waste Capacity Assessment concludes that there is sufficient existing waste management capacity to enable Norfolk to be net-self sufficient in waste management during the Plan period to 2038. If a planning application was to be submitted for thermal treatment then it would be determined in accordance with the relevant criteria-based policies in the Plan.

Table 49: Main issues raised during the Consultation stages about Appendix 4 - Development excluded from safeguarding provisions

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Appendix 4 - Development excluded from safeguarding provisions	NCC Planning Officer's Response
Anglian Water Services Ltd (98336)	Preferred Options: Anglian Water wish to be consulted on all residential development proposals which could be affected by the normal operation of a WRC.	No Action Required: We consider that the exclusions from consultation with the Waste Planning Authority contained within Appendix 4 are appropriate to safeguard Water Recycling Centres.
Broads Authority (93169) Lichfields /Bourne Leisure Ltd (92542)	Initial Consultation: What about other such applications that do not occur elsewhere, such as within the Broads Authority, or caravans, chalets and touring pitches?	No Action Required: It would be appropriate for any application to consider this if above stated parameters and will therefore not be excluded from safeguarding provisions, and decided on a case by case basis.

Table 50: Main issues raised during the Consultation stages about Appendix 5 - Safeguarded Mineral Infrastructure

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Appendix 5 - Safeguarded Mineral Infrastructure	NCC Planning Officer's Response
Cemex UK Materials Ltd (93076)	Initial Consultation: Norwich (Broadsman Close) or Brandon (Mundford Road) railheads appear not to have been identified within this appendix as safeguarded facilities.	No Action Required: These are not safeguarded under the Norfolk Minerals and Waste Local Plan as they have the benefit of a Local Planning Authority planning permission.

Table 51: Main issues raised during the Consultation stages about Appendix 7 - Safeguarded Waste Management Facilities

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Appendix 7 - Safeguarded Waste Management Facilities	NCC Planning Officer's Response
Cemex UK Materials Ltd (93077)	Initial Consultation: Request that Costessey recycling facility and the adjacent landfill are added as safeguarded waste management facilities.	No Action Required: The former is not safeguarded under the Norfolk Minerals and Waste Local Plan as it has the benefit of a Local Planning Authority planning permission. The latter is safeguarded as a mineral working and not a landfill site.

Table 52: Main issues raised during the Consultation stages about Proposed waste management Site WS2 Former mineral working at Heath Road, Snetterton

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Site WS2 Former mineral working at Heath Road, Snetterton	NCC Planning Officer's Response
F H Ventures Norfolk Ltd/ MJCA (98888)	Preferred Options: The conclusions that the site is unsuitable to allocate are disputed. The site is a former mineral extraction with an approved unachievable restoration scheme hence an alternative restoration or use for the site should be encouraged.	No Action Required: The site is not allocated in the Publication version of the NM&WLP because the site is a former mineral working with an approved restoration scheme and once restored the site will be classified as open countryside, which is not an appropriate location for permanent waste management operations. Whilst the site may not be able to achieve the contours of the currently approved restoration scheme, the site should still be restored to open countryside.

Table 53: Main issues raised during the Consultation stages about Proposed waste management Site WS3 Land at Atlas Works, Norwich Road, Lenwade

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Site WS3 Land at Atlas Works, Norwich Road, Lenwade	NCC Planning Officer's Response
Serruys Property Company Limited (98905)	<p>Preferred Options: The Waste Capacity Assessment has reached the conclusion that sufficient capacity may exist for waste facilities over the plan period, taking into account the anticipated capacity from the Site allocated already under WAS 78 and permitted under the Existing Consents. [Waste Capacity Assessment, paragraph 2.4 and Appendix 2]. It is therefore crucial to ensure that this part of the Site remains allocated for up to 300,000 tonnes per annum for those specific uses detailed in policy WAS 78 - 150,000 tonnes of which has already been permitted through the Existing Consents and 50,000 of which is already deemed acceptable through the current WAS 76 allocation. An increase of only 100,000 tonnes per annum is therefore proposed, which may appropriately be accommodated on the Site.</p>	<p>No Action Required: The site is not allocated in the Publication version of the NM&WLP. The Waste Management Capacity Assessment has been reviewed and concludes that there is sufficient existing waste management capacity to enable Norfolk to be net-self-sufficient in waste management during the Plan period to 2038. The assessment of existing capacity was based on the quantities of waste that had been received at existing operational sites during 2017 – 2020 plus additional capacity that has been permitted and implemented since 2020. As the planning permission for an RDF facility at the Atlas Works site for 150,000tpa referred to in this comment was not implemented and has lapsed it has not been included in the existing capacity in the revised Waste Management Capacity Assessment. . If a planning application was to be submitted for waste management development at this site then it would be determined in accordance with the relevant criteria-based policies in the Plan.</p>
Serruys Property Company Limited (98905)	<p>Preferred Options: An allocation for thermal treatment would be of substantial benefit to provide sufficient facilities to properly convert RDF into energy, following Brexit and the uncertainties over continuation of the export of RDF.</p>	<p>No Action Required: The site is not allocated in the Publication version of the Minerals and Waste Local Plan. The Waste Capacity Assessment concludes that there is sufficient existing waste management capacity to enable Norfolk to be net-self sufficient in waste management during the Plan period to 2038. If a planning application was to be submitted for thermal treatment then it would be determined in accordance with the relevant criteria-based policies in the Plan.</p>
Great Witchingham Parish Council (98552) Weston Longville parish council (98285) Individuals (94788, 94755)	<p>Preferred Options: The 'Atlas Works' site is an inappropriate/sensitive area to be added to the M&WLP. Concerns and complaints over existing operations and future impacts if allocated regarding traffic, noise, air pollution, pollution of the River Wensum, adverse impact on nearby businesses. There is no requirement for this facility.</p>	<p>No Action Required: Complaints over current operations are dealt with by NCC planning enforcement officer or the Environment Agency and are a separate matter to the processes and material considerations of the Local Plan process.</p> <p>The site is not allocated in the Publication version of the NM&WLP.</p>

Table 54: Main issues raised during the Consultation stages about Proposed waste management Site WS5 Land east of Mill Drove, at Blackborough End landfill site

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Site WS5 Land east of Mill Drove, at Blackborough End landfill site	NCC Planning Officer's Response
Borough Council of King's Lynn and West Norfolk (99007)	Preferred Options: The site has the potential to cause emissions of PM10 and PM2.5 which can affect the health and amenity of local residents. A planning application with assessments of cumulative effects from nearby allocations MIN 06 and MIN 40, transport assessment, noise, air quality, odour, and lighting assessments, along with details of appropriate mitigation measures to reduce both amenity and health impacts on nearby receptors would be required.	No Action Required: Noted. The site is not allocated in the Publication version of the NM&WLP because the site is a mineral working with an approved restoration scheme. Once restored the site will be classified as open countryside, which is not an appropriate location for permanent waste management operations.
Wood E&I Solutions UK Ltd (98934)	Preferred Options: The proposed sites are crossed by a National Grid underground high-pressure gas pipeline. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.	No Action Required: Noted. The site is not allocated for in the Publication version of the Minerals and Waste Local Plan because the site is a mineral working with an approved restoration scheme. Once restored the site will be classified as open countryside, which is not an appropriate location for permanent waste management operations.

Table 55: Main issues raised during the Consultation stages about Proposed waste management Site WS6 Land north of Main Road, Crimplesham

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Site WS6 Land north of Main Road, Crimplesham	NCC Planning Officer's Response
Borough Council of King's Lynn and West Norfolk (99008)	Preferred Options: The site has the potential to cause emissions of PM10 and PM2.5 which can affect the health and amenity of local residents. A planning application with assessments of cumulative effects from nearby allocations MIN 32, transport assessment, noise, air quality, odour, and lighting assessments, along with details of appropriate mitigation measures to reduce both amenity and health impacts on nearby receptors would be required.	No Action Required: Noted. The site is not allocated in the Publication version of the NM&WLP because the site is a mineral working with an approved restoration scheme. Once restored the site will be classified as open countryside, which is not an appropriate location for permanent waste management operations.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Site WS6 Land north of Main Road, Crimplesham	NCC Planning Officer's Response
Wood E&I Solutions UK Ltd (98934)	Preferred Options: The proposed sites are crossed by a National Grid underground high-pressure gas pipeline. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.	No Action Required: Noted. The site is not allocated for in the Publication version of the NM&WLP because the site is a mineral working with an approved restoration scheme. Once restored the site will be classified as open countryside, which is not an appropriate location for permanent waste management operations.
Individuals (98231)	Preferred Options: Impacts inappropriate for the countryside location.	No Action Required: Noted. The site is not allocated for in the Publication version of the NM&WLP because the site is a mineral working with an approved restoration scheme. Once restored the site will be classified as open countryside, which is not an appropriate location for permanent waste management operations.

Table 56: Main issues raised during the Consultation stages about the Glossary

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Appendix 11 – Glossary	NCC Planning Officer's Response
Historic England (98821)	Preferred Options: Give a clearer distinction between designated and non-designated heritage assets. Use the term non-designated rather than undesignated in accordance with the NPPF.	No Action Required: The glossary has been amended as requested in the Publication version of the NM&WLP.

Table 57: Main issues raised during the Consultation stages about site MIN 12, land north of Chapel Lane, Beetley

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 12, land north of Chapel Lane, Beetley	NCC Planning Officer's Response
Highway Authority (93121/ 98831) Cllr M Kiddle-Morris (92414, 95013) Beetley Parish Council (92142)	Initial Consultation and Preferred Options: The site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site.	No Action Required: This is reflected in the site allocation policy in the Publication version of the NM&WLP.
Historic England (92953, 98795)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy. Preferred Options: Include specific reference to the nearest heritage assets to read 'heritage assets and their settings (including the grade I listed Church of Mary Magdalene and grade II listed Old Hall and Beetley Hall) ...'	No Action Required: The 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. Action Required: The policy wording has been amended as requested in the Publication version of the NM&WLP.
Environment Agency (92928)	Initial Consultation: The excavated void is to be utilised for waste disposal or recovery, so a robust risk assessment will be required.	No Action Required: There is no proposal for the site to be utilised for waste disposal or recovery. It is to be restored to a lower level.
Lead Local Flood Authority (91940)	Initial Consultation and Preferred Options: There are reports of external flooding (2017) in the village on Fakenham Road. 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.	No Action Required: Policy MW1 Development Management Criteria requires development to not have an unacceptable impact on flood risk. MIN 12 is over 1 hectare in size, therefore a site-specific Flood Risk Assessment would be required at the planning application stage.
Individuals (92536, 92130, 92010, 98267, 98264, 98239)	Initial Consultation and Preferred Options: Issues raised included: Concerns over noise pollution; loss of productive agricultural land; impact on residential amenity (noise, dust, human rights); character/landscape impact,	No Action Required: There would not be a permanent loss of agricultural land, as the site would be restored back to arable agriculture. Mitigation measures are required to ensure the development would not have an unacceptable impact or cumulative impact with other quarries on local amenity, health

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 12, land north of Chapel Lane, Beetley	NCC Planning Officer's Response
Beetley Methodist Church (98502)	<p>historic environment, ecology/protected species, cumulative impacts from other quarries and traffic movements.</p> <p>Failure to consult Historic England Council/company representatives should meet with residents of the affected properties and local parish councils so that proper discussion could take place.</p> <p>Concerns over the impact on the near-150 year old chapel structure from HGV's, which turn directly opposite the front door.</p>	<p>and the landscape. The site allocation 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 landscape and screening scheme must also be submitted at the planning application stage and the site is required to be phased with the adjacent permitted site so that only one site will be worked for extraction at a time. As an extension to an existing mineral working, the number of vehicle movements is to remain at the level of the existing operations but continue for a longer period of time (additional 15 years). Article 2, Article 8 and Protocol 1 of the European Convention on Human Rights are known as 'qualified rights' in that a legal framework (the planning system) exists to consider these rights against the needs of society as a whole.</p> <p>Historic England have been consulted at both the Initial Consultation stage and the Preferred Options stage of the NM&WLP process and they have responded to both consultations.</p> <p>There will be opportunity for further formal representations stage at the Pre-Submission stage of this Local Plan. The operator/applicant is also encouraged to undertake pre-application consultation and is required to provide a statement of community involvement in the NCC Local List as part of the planning application stage. There is then further public consultation at the planning application stage.</p> <p>There will be no additional traffic, it is an extension to existing site. Material would be transported by conveyor to the plant site, so there will be no HGV access near the church.</p>
Frimstone Limited (98752)	<p>Preferred Options: It is considered that the MIN 35 site should be considered suitable for allocation due to the similarities it shares in landscape terms with MIN12 (and others in this area) that themselves have been considered suitable for allocation.</p>	<p>No Action Required: Comments about site MIN35 will be dealt with in the relevant section of the feedback report.</p>

Table 58: Main issues raised during the Consultation stages about sites MIN 51 & MIN 13 land west of Bilney Road, Beetley

The site is **allocated** in the Publication version of the Minerals and Waste Local Plan (M&WLP) because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to sites MIN 51 & MIN 13 land west of Bilney Road, Beetley	NCC Planning Officer's Response
NCC Highway Authority (93122, 98796)	<p>Initial Consultation: 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>Preferred Options: MIN 51 to be accessed via MIN 13.</p>	<p>No Action Required: The same access route is proposed as the Middleton Aggregates processing plant site which is approximately 100m away, 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, and the access to the B1146 would be virtually identical to the Middleton Aggregate sites.</p>
NCC Natural Environment Team (93081)	<p>Initial Consultation: Hedgerow oaks and blocks of woodland are significant in the landscape and should be protected during working and used as focal points for restoration.</p>	<p>No Action Required: The site allocation policy states that boundary hedges must be thickened and the small areas of woodland within the site should be safeguarded. A progressive restoration scheme will provide wide field margins, new hedgerows and woodland.</p>
Historic England (92954)	<p>Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.</p> <p>Preferred Options: The policy could be improved by including specific reference to the nearest heritage assets.</p>	<p>No Action Required: The site allocation 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>Action Required: The policy in the Publication version of the Plan has been amended as requested to state: "Submission of a Heritage Statement to identify heritage assets and their settings (including the.....)"</p>
Environment Agency (92935)	<p>Initial Consultation: Proposed low level restoration using inert material to restore the site. Whilst this site does not lie within an SPZ we would expect groundwater to be sufficiently protected.</p>	<p>No Action Required: 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. A future planning application would need to comply with Policy MW1 (Development Management Criteria) in relation to the ensuring the quality of groundwater is not subject to unacceptable adverse impacts.</p>
Gressenhall Parish Council (92695)	<p>Initial Consultation: Application is premature whilst mineral is extracted from the east side of Fakenham</p>	<p>No Action Required: Site MIN 51 and MIN 13 are proposed by a different mineral operator (Longwater Gravel) to site MIN 12 (Middleton Aggregates) and the sites will run concurrently.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to sites MIN 51 & MIN 13 land west of Bilney Road, Beetley	NCC Planning Officer's Response
	Road with a proposed extension to run until 2040 (MIN12).	
Cllr M Kiddle-Morris (92415, 98276) Beetley parish council (92143, 94423)	Initial Consultation and Preferred Options: If MIN12 were to be allocated as well as these 2 sites the cumulative impact on the area would be unacceptable (see start date in 2020).	No Action Required: Policy MW1 (Development Management Criteria) requires a planning application to demonstrate that the development would not have unacceptable cumulative impacts.
Individuals (92537)	Initial Consultation: Concerns over noise pollution; loss of productive agricultural land; noise and dust issues; landscape impact and traffic movements.	No Action Required: There would not be a permanent loss of agricultural land, as the site would be restored to its original use. The site allocation policy requires the submission of a noise and dust assessment at the planning application stage and mitigation measures to deal appropriately with any amenity impacts. The site is fairly flat and would be relatively easy to screen from the views from surrounding roads by planting additional boundary hedges. A Transport Assessment would be required at the planning application stage and HGV movements must not cause unacceptable impacts.
Longwater Gravel Co. Ltd (92024)	Initial Consultation: The proposed quarry, producing 70,000 tonnes per year will support our growing customer base in and around Dereham and in the area to the west of Norwich. Access to the quarry would be via Rawhall Lane through a new entrance located on the north east boundary. The land would be restored to agricultural use at a lower level using a small amount of imported material and will around 16 years from start to finish.	No Action Required: The additional information provided about the proposed operation, access and restoration of the mineral extraction site is noted and in the Preferred Options consultation document.
Gressenhall parish council (98587) Individuals (98276)	Preferred Options: Issues raised included that there is no justification for third operator in this location. NPPG supports extensions so MIN 12 should be preferred.	No Action Required: Planning permission goes with the land and not with the operator because sites can change hands. It is not about competition between operators, but providing for sufficient mineral to meet the forecast need over the plan period, and mineral can only be dug from where it exists. The PPG has been revised to state that all applications should be determined on their own merits. We intend to allocate both sites to meet the forecast requirement.

Table 59: Main issues raised during the Consultation stages about site MIN 08 land north of Stoney Lane, Beetley

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The site will be worked as part of a larger phased site with MIN 51 and MIN 13.. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage for site MIN 08 land north of Stoney Lane, Beetley	NCC Planning Officer's Response
Highway Authority (93123)	Initial Consultation: Site only acceptable if access would need to be through the existing access via MIN 13 and MIN 51.	Action Required: The site allocation policy requires highway access to be from the north-eastern corner of the site onto Rawhall Lane just before it joins the C225 Bilney Road and then join the B1146 Fakenham Road.
Cllr M Kiddle-Morris (95015)	Preferred Options: Access from the site would be on to Bilney Road which is not currently suitable for long term HGV use. Access to the B1146 would be at Rawhall Lane, again the preferred access point for the other mineral sites	No Action Required: The site is now intended to be allocated as part of one phased site along with MIN 51 and MIN 13 with access to the B1146 at Rawhall Lane. There would be no additional access point and there would be phased working.
Environment Agency (92929)	Initial Consultation: Proposed low level restoration using inert material to restore the site. Whilst this site does not lie within an SPZ we would expect groundwater to be sufficiently protected.	No Action Required: Noted. A future planning application would need to comply with Development Management Criteria Policy MW1 in relation to the ensuring the quality of groundwater is not subject to unacceptable adverse impacts.
Historic England (92955)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.	No Action Required: The site allocation policy in the Publication version of the NM&WLP 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.
Cllr M Kiddle-Morris (92416, 95015) Beetley parish council (92144) Gressenhall Parish Council (92696) Gressenhall Poor Relief Charitable Trust (94910) Individual (98275)	Initial Consultation and Preferred Options: If MIN12 were to be allocated it would be premature and the cumulative impact of 3 operational sites within a small area (MIN13/MIN51 and MIN12) would be unacceptable.	No Action Required: Site MIN 51 and MIN 13 are proposed by a different mineral operator (Longwater Gravel) to site MIN 12 (Middleton Aggregates) and the sites will run concurrently. Policy MW1 (Development Management Policies) requires a planning application to demonstrate that the development would not have unacceptable cumulative impacts.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage for site MIN 08 land north of Stoney Lane, Beetley	NCC Planning Officer's Response
Individuals (92011, 92538) Beetley parish council (94428)	Initial Consultation: Concerns over noise pollution; loss of productive agricultural land; noise and dust issues; landscape impact and traffic movements.	No Action Required: There would not be a permanent loss of agricultural land, as the site would be restored to agriculture after extraction. The site allocation policy requires: The submission of acceptable noise and dust assessments and a programme of mitigation measures to deal appropriately with any amenity impacts; and The submission of a high-quality working scheme with site screening to include the planting of new boundary hedges and the thickening of existing boundary hedges. Mitigation measures are therefore required to ensure the development would not have an unacceptable impact on local amenity, health and the landscape. A planning application will need to be supported by a Transport Assessment, and mitigation measures to ensure no unacceptable impacts.
Gressenhall Parish Council (98586) Individuals (98275) Gressenhall Poor Relief Charitable Trust (94910)	Preferred Options: This site includes land owned by the Gressenhall Poors Charity (enclosed), and they have made no representation.	Action Required: The boundary of the site has been amended to remove the land owned by the Gressenhall Poors Charity. Gressenhall Poors Charity responded to the Preferred Options consultation.
Gressenhall Parish Council (98586) Individuals (98275)	Preferred Options: Issues raised included: Question whether there is sufficient mineral within the field to justify extraction. Far too close to the village of Gressenhall to be appropriate	No Action Required: Geological information been submitted with the site proposal, and a mineral operator considers it to be viable as part of a larger site with MIN 13 and MIN 51. The nearest dwellings at Gressenhall are sufficiently far from the site, at over 500 metres from the southern boundary of MIN 08.
Longwater Gravel Co. Ltd (94614)	Preferred Options: Due to MIN 45 not being allocated, it is likely that MIN 51/MIN 13 will be worked at a higher annual output than previously stated. Therefore reserves in MIN 51/MIN 13 could be exhausted by 2032 and extraction in MIN 08 could be commence as early as 2033. We therefore request that MIN 08 is allocated.	No Action Required: Noted. The Publication version of the Plan proposes to allocate the site to be worked as part of a phased site with MIN 51 and MIN 13.

Table 60 Main issues raised during consultation stages about site MIN 23 land north of Back Lane, Beeston

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction on this site would cause unacceptable landscape impacts, particularly in relation to views from Beeston, and the highway access onto Mileham Road would be unacceptable as the road is sub-standard with poor visibility at the junction.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 23 land north of Back Lane, Beeston	NCC Planning Officer's Response
Highway Authority (93159)	Initial Consultation: The Highway Authority considers the site is not acceptable due to the proposed access.	No Action Required: 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 and the highway access would be unacceptable
NCC Natural Environment Team (93082)	Initial Consultation: 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.	No Action Required: 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 and the highway access would be unacceptable
Environment Agency (92925)	Initial Consultation: If waste disposal or recovery are undertaken a robust risk assessment will be required.	No Action Required: 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 and the highway access would be unacceptable.
Beeston with Bittering parish council (91935, 95020) Cllr M Kiddle-Morris (92407, 95016) Individuals (92132, 92034, 91931, 91895, 91892, 91800, 92538, 93795)	Initial Consultation and Preferred Options: Issues raised include: Agree with the conclusion that the site is not suitable to allocate, as site is in the open countryside, very close to residential properties, highly visible in the village, too close to equine livestock and residents would be exposed to air and noise pollution and road is unsuitable for any volume of HGV's. Cumulative effects of mineral extraction on the northern boundary of the proposed site. Loss of productive agricultural land and landscape impacts cannot be mitigated.	No Action Required: The site is unsuitable to allocate because mineral extraction at this site would have unacceptable landscape impacts, particularly in relation to views from Beeston and the highway access would be unacceptable.
Individuals (91895), (91696), (98947)	Initial Consultation: Additional issues raised in consultation were: Need for an archaeology study, length of time for extraction, proximity of residential properties to the site, negative effect on	No Action Required: NCC'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. Property values are not a material planning consideration. In response to a

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 23 land north of Back Lane, Beeston	NCC Planning Officer's Response
	property value, and that proposals for mineral extraction on the site be permanently excluded.	'call for mineral extraction sites', NCC is required to assess and consult on all alternative sites that are proposed for inclusion in the Plan. 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 and the highway access would be unacceptable.

Table 61: Main issues raised during the Consultation stages about site MIN 200 land west of Cuckoo Lane, Carbrooke

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 200 land west of Cuckoo Lane	NCC Planning Officer's Response
Highway Authority (93124, 98833)	Initial Consultation and Preferred Options: The Highway Authority considers use of the existing access and continued routing arrangements; improvements to Mill Lane are also required.	No Action Required: Noted. The site allocation policy in the Publication version of the NM&WLP requires: "The existing haul route and Mill Lane crossing to the existing processing plant to be used, or provision of an appropriate alternative. An application will need to assess potential impacts on the highway network of any crossing of Mill Lane for unprocessed material to the existing plant site; The existing highway access from the processing plant site to the B1108 to be used, subject to the provision of passing places between the site and the B1108. A routing agreement along with a weight limit will be required to protect Carbrooke settlement north of the site;
NCC Natural Environment Team (93082)	Initial Consultation: Screening is important for this site so as to minimise views and retain the setting of nearby listed buildings.	No Action Required: The site allocation policy requires a detailed landscaping and screening scheme to be submitted at the planning application stage.
Historic England (92957)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy. Preferred Options: Concerns that extraction at the site will impact upon the settings of nearby assets and	No Action Required: The site allocation policy in the Publication version of the NM&WLP 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.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 200 land west of Cuckoo Lane	NCC Planning Officer's Response
	Carbrooke Conservation Area. Include in policy specific reference to the nearest heritage assets to read 'heritage assets and their settings (including...).	Action Required: The policy in the Publication version of the Plan has been amended as requested to state: "Submission of a Heritage Statement to identify heritage assets and their settings (including the.....)"
Environment Agency (92938, 92564, 98718)	Initial Consultation: The site proposes low level restoration using inert material to restore the site, which requires a robust waste acceptance criteria. Non-inert wastes should not be accepted at this site. If deposition will be sub-water table, the applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water'. Preferred Options: It must be included within the policy on page 124 for the site to be worked dry above the water table.	No Action Required: The site is expected to be worked dry (above the water table) and dewatering is not proposed at the site. The site allocation policy states that a hydrogeological impact assessment will be required at the planning application stage. 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. Action Required: The site allocation policy has been amended to include a requirement that the site must be worked dry (above the water table).
Four Leaf Enterprises Limited/Stephen M Daw Limited (93287)	Preferred Options: Remove penultimate bullet that extraction on this site is prevented by extraction on other sites in the area. This requirement duplicates the third bullet and is, overly restrictive.	Action Required: The penultimate bullet point has been removed due to repetition.

Table 62: Main issues raised during consultation stages about site MIN 116 land at Woodrising Road, Cranworth

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction on this site would cause unacceptable landscape, visual and amenity impacts, and the local road network is sub-standard and narrow. The site is also considered to be less deliverable than other proposed mineral extraction sites.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 116 land at Woodrising Road, Cranworth	NCC Planning Officer's Response
Highway Authority (93156)	Initial Consultation: The site is not acceptable because Wood Rising Road is sub-standard and narrow and this road is also not on a lorry route.	No Action Required: Noted. One of the reasons that the site is considered unsuitable for allocation is because the local road network is sub-standard and narrow.
Individuals (98026, 95481, 95623, 98053)	Preferred Options: Issues of potential traffic impacts from HGVs on unsuitable roads, and the difficulty of improvements to those roads were raised.	No Action Required: Noted. The site is considered unsuitable for allocation because mineral extraction on this site would cause unacceptable landscape, visual and amenity impacts, and the local road network is sub-standard and narrow.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 116 land at Woodrising Road, Cranworth	NCC Planning Officer's Response
Historic England (92958)	Initial Consultation: A brief heritage impact assessment should be undertaken for this site to assess its suitability.	No Action Required: Noted. However, the site is considered unsuitable for allocation because mineral extraction on this site would cause unacceptable landscape, visual and amenity impacts, and the local road network is sub-standard and narrow.
Environment Agency (92926)	Initial Consultation: It is not clear whether the site will be utilised for waste disposal or recovery. If so, a robust risk assessment will be required to protect groundwater.	No Action Required: Noted. The site is considered unsuitable for allocation because mineral extraction on this site would cause unacceptable landscape, visual and amenity impacts, and the local road network is sub-standard and narrow.
Individuals (see footnote ¹) Cranworth parish council (93243) Shipdham parish council (98038) Hingham Town council (98032) NCC Natural Environment Team (93084) Cllr Edward Connolly (98042)	Initial Consultation and Preferred Options: Objections raised included: Negative health impacts from dust, light, vibration and noise pollution. Unsuitable narrow roads, levels of traffic, poor infrastructure links, loss of Public Right of Way, increasing damage to roads and hedgerows, increased risk to riders, pedestrians and animals, and loss of mature oak trees and hedging due to road widening. Pollution from site wastewater to water resources Putting protected species at risk. Impacts on nearby dwellings, Public Rights of Way, the local landscape and wildlife impacts would be unacceptable and cannot be mitigated sufficiently.	No Action Required: The site is considered unsuitable for allocation because mineral extraction on this site would cause unacceptable landscape, visual and amenity impacts, and the local road network is sub-standard and narrow.
Hingham Town council (98032) Individuals (98026, 98046, 98049, 98053, 98040)	Preferred Options: Issues raised regarding potential impact on groundwater levels and water quality due to need to abstract water.	No Action Required: The site is considered unsuitable for allocation because mineral extraction on this site would cause unacceptable landscape, visual and amenity impacts and the local road network is sub-standard and narrow. Notwithstanding this, potential impacts on hydrogeology form part of the determination of planning applications and if water abstraction was needed than an abstraction licence would be required from the Environment Agency.
Individuals (98026,98046,	Preferred Options: Objections raised included:	No Action Required: Noted, in addition to all properties within 250m, all Parish councils in Norfolk were also informed of the

¹ Rep ID's 91905,91699, 91692, 91691, 98046, 98026, 98937, 93286, 93536, 98053, 93644, 93722, 93814, 93858, 93859, 93930, 93941, 94355, 94690, 95475, 95481, 95482, 95483, 95484, 95485, 95618, 98028, 95623, 98020, 98023, 98030, 98034, 98036, 98040, 98044, 98049, 98051, 98229, 98133

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 116 land at Woodrising Road, Cranworth	NCC Planning Officer's Response
98053, 98023, 93722, 98028, 98040, 93859, 98030, 98133, 94690)	250m consultation area and use of site notice insufficient, loss of agricultural land, heritage impacts (listed church closer than recorded in proposal, negative effect on property value, concern that site would become a landfill, lack of mineral operator affecting deliverability, and proximity of additional dwelling	consultations in 2018 and 2019. Woodrising Church is approximately 600 metres from the proposed site boundary. Property values are not a material planning consideration. The proposal is that the site be restored to agriculture and woodland. The site was submitted by the landowner, and Norfolk County council is required to assess all sites submitted. Notwithstanding these issues, the site is considered unsuitable for allocation

Table 63: Main issues raised during the Consultation stages about site MIN 35 land at Heath Road, Eccles, Quidenham.

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction at the site would have unacceptable local landscape impacts and screening and bunding would be intrusive in its own right. There are more acceptable sites for sand and gravel extraction proposed in the Plan.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 35 land at Heath Road, Eccles, Quidenham	NCC Planning Officer's Response
Highway Authority (93127)	Initial Consultation: The site is acceptable subject to road improvements and access onto Heath Road.	No Action Required: Noted.
Quidenham Parish Council (92261)	Preferred Options: The work required to improve the site access is considerable, is it viable?	No Action Required: The proposed highway access is considered to be suitable by the Highway Authority, subject to appropriate road improvements. The need for highway improvements is a common requirement for mineral extraction sites, as the site has been submitted by a mineral operator, it is considered that they consider the costs required are acceptable. However, the site is considered unsuitable for allocation due to unacceptable local landscape impacts, and screening and bunding would be intrusive in its own right; there are more acceptable alternative sites.
Individuals (92272, 92032, 92026, 92112, 92110, 91999, 91980, 91981, 91884, 94354, 98240, 98244)	Initial Consultation and Preferred Options: Highway access at the top of Heath Road is unsuitable and road is too narrow. Increased vehicle movements of up to 32 lorries a day put additional strain on our narrow road system. The movement of lorries will mean that Heath Road will be blocked during operational hours. Emergency Vehicle access would be hampered.	No Action Required: 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. However, the site is considered unsuitable for allocation due to unacceptable local landscape impacts, and screening and bunding would be intrusive in its own right; there are more acceptable alternative sites.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 35 land at Heath Road, Eccles, Quidenham	NCC Planning Officer's Response
Breckland District Council (93070)	Initial Consultation: Insert reference to the proximity of the site to the Snetterton General Employment Area.	Action Required: The amenity section of the assessment was revised at the Preferred Options stage to include reference to the proximity of Oakwood Industrial Estate to MIN 35 as the nearest employment area to the site.
Breckland District Council (93070)	Initial Consultation: The transport statement should make reference to visitor traffic to Snetterton Racetrack and traffic through the General Employment Area.	No Action Required: Noted.
Environment Agency (92934, 92565)	Initial Consultation: We would expect groundwater to be sufficiently protected, including a robust waste acceptance criteria (no non-inert waste). The applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water' if depositing sub-water table. The site is considered suitable provided there is no working below the water table.	No Action Required: 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). However, the site considered unsuitable for allocation, due to unacceptable local landscape impacts, and screening and bunding would be intrusive in its own right; there are more acceptable alternative sites.
Quidenham Parish Council (92261) Individuals (92540, 92272, 92032, 92026, 92262, 92193, 92112, 92110, 91993, 91990, 91902)	Initial Consultation: This proposed operation must maintain the rural character. The site acts as a buffer between industrial units and the village. This proposed site overlooks and is too close to the village and sits above the village. Any mitigation would be visually intrusive.	No Action Required: The site has no formal designation as a 'buffer'. However, the site is considered unsuitable for allocation due to unacceptable local landscape impacts, and screening and bunding would be intrusive in its own right; there are more acceptable alternative sites.
Quidenham Parish Council (92261) Individuals (91981, 91980, 98240, 98244, 92262, 92262, 92193, 92112, 91980, 91981, 92540, 92272, 92032, 92026, 92193, 92112, 92136, 92110, 91993,	Initial Consultation: Issues raised included: <ul style="list-style-type: none"> • the potential depth of the working, especially following a reduction in the potential tonnage of the mineral resource, • impact on wildlife and the potential presence of Protected species (bats) in proximity to the site, • queries regarding the basemap used that properties may have been missed from the site assessment, • negative effect on property values, • potential impacts from HGV movements on existing local businesses, • insufficient notification of consultation, 	No Action Required: 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. A requirement for planning applications are assessments of biodiversity including for Protected Species where the potential exists for impacts. The basemap used for the consultation plan was intended to give a general indication of the location of the site at an appropriate scale, however, the site assessments used up to date maps at a far greater level of detail. Property values are not a material planning consideration.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 35 land at Heath Road, Eccles, Quidenham	NCC Planning Officer's Response
91990, 91884, 94354, 92261, 91902)	<ul style="list-style-type: none"> • comments that the Parish Council weren't informed, • potential historic environment impacts relating to buildings on Heath Road, • concern for contamination of water supply from the adjacent landfill site, • concerns that the site would become an extension to the existing landfill on restoration, • suggestion of MIN 102 and MIN 201 as alternative sites with less impacts. • Belief that the SSSI and protected species given greater emphasis in the site assessment than residents. 	<p>The estimated number of HGV movements would be 32 per day, as the access would be onto a designated lorry route which already serves other businesses within the General Employment Area it is not considered that this increase would be likely to result in unacceptable adverse impacts to existing businesses.</p> <p>All Parish councils in Norfolk were informed of the consultation, and all residential properties within 250m were also written to. There are no listed buildings on Heath Road, the potential for impacts on the historic environment was assessed in principle as part of the site assessment.</p> <p>The potential for extraction to affect the integrity of areas of contamination risk would be assessed as part of any future planning application. There are no proposals for restoration to include use as a non-hazardous landfill, the proposal submitted for the site was for low level restoration back to agriculture. Proposed sites MIN 102 and MIN 201 were considered unsuitable for allocation due to the precautionary principle as it relates to internationally designated habitats.</p> <p>Site assessments included among other things potential impacts on protected species and habitats, as well amenity impacts. Notwithstanding all of the above, the site is considered unsuitable for allocation due to unacceptable local landscape impacts, and screening and bunding would be intrusive in its own right; there are more acceptable alternative sites.</p>
Frimstone Limited/Stephen Daw (91886)	<p>Initial Consultation: Under the heading 'Amenity' the buffer 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>No Action Required: This section has been amended in the Preferred Options document.</p>
Quidenham Parish Council (92261) Individuals (see footnote ²)	<p>Initial Consultation and Preferred Options: The site is too close to nearby houses. Operations and traffic will be detrimental to health and daily lives of nearby residents, negative amenity impacts of dust, noise and light</p>	<p>No Action Required: The proximity of dwellings to the site boundary has been recognised and proposed extraction area reduced accordingly. The closest point of extraction would be 155m from the nearest dwelling. A noise and dust assessment would be submitted at planning application stage, along with</p>

² Rep ID's: 94354,98240, 98244, 92540, 92272, 92032, 92026, 92262, 92193, 92136, 92112, 92110, 91999, 91993, 91990, 91902, 91884, 91758

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 35 land at Heath Road, Eccles, Quidenham	NCC Planning Officer's Response
	pollution. Cumulative noise impact of the racing circuit, which may also put them at risk.	mitigation measures to deal appropriately with any amenity impacts. The existing background noise would be taken into account in those assessments. Notwithstanding this, the site is considered unsuitable for allocation due to unacceptable local landscape impacts, and screening and bunding would be intrusive in its own right; there are more acceptable alternative sites.
Historic England (92959)	Initial Consultation: 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.	No Action Required: 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.
Frimstone Limited (98748)	Preferred Options: Object to the conclusions reached in terms of considering MIN 35 unsuitable for allocation in landscape terms. It is considered the application site and wider landscape is able to accommodate the proposal for mineral extraction, in landscape and visual terms, without having an unacceptable effect or loss of landscape character or visual amenity. Any loss of landscape character would be temporary and upon restoration, character would be reinforced and enhanced. On a logical comparative basis MIN 35 sits within the top three of the proposed sites with the least number of sensitive receptors. Therefore preference should not be given to any of these sites over and above MIN 35 and should be concluded as once again suitable for allocation as at the 'Initial Consultation' stage of the Norfolk M&WLP.	No Action Required: Noted. While impacts from screening and bunding are temporary, they are long term; and the change to the landscape from extraction is permanent. Impacts are not assessed purely as a numerical issue, and the qualitative assessment of sites by planning officers concluded that there were other sites which were more acceptable for allocation. Some of the alternative sites that MIN 35 was compared with in the full representation from Frimstone have since applied for and been granted planning permission for mineral extraction.

Table 64: Main issues raised during the Consultation stages about site MIN 102 land at North Farm, south of the River Thet, Snetterton

The site is **not allocated** in the Publication version of the NM&WLP due to the proximity of the site to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC) and the potential for unacceptable adverse effects on the SSSI from the proposed mineral extraction. The site is also considered to be less deliverable than other sites that have been proposed for extraction.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 102 land at North Farm, south of the River Thet, Snetterton	NCC Planning Officer's Response
Natural England (92089, 95047) Environment Agency (98721) Norfolk Wildlife Trust (92407) CPRE Norfolk (92017)	Initial Consultation and Preferred Options: Agree this allocation should be rejected for the reasons provided in the conclusion under M102.13 in relation to designated sites.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC), there is a potential for unacceptable adverse effects on the SSSI from the proposed extraction.
Highway Authority (93125)	Initial Consultation: The site is acceptable subject to a suitable access onto Hargham Road not North Road.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC), there is a potential for unacceptable adverse effects on the SSSI from the proposed extraction.
Historic England (92960)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy due to proximity of nearby historic assets.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC), there is a potential for unacceptable adverse effects on the SSSI from the proposed extraction.
Environment Agency (92937, 92921, 92566)	Initial Consultation: If allocated, an FRA would be needed to demonstrate the risk of flooding to those working onsite and to ensure that flood risk is not increased. The applicant should refer to the EA technical guidance note 30_18 'Compliance with the Landfill Directive when depositing inert waste into water'. 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	No Action Required: Noted. The site assessment states that the site would need to be worked dry above the water table. It is recognised that restoration to arable is likely to require the use of imported inert material to provide a suitable profile. The site is considered unsuitable for allocation due to its proximity to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC), there is a potential for unacceptable adverse effects on the SSSI from the proposed extraction.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 102 land at North Farm, south of the River Thet, Snetterton	NCC Planning Officer's Response
	we would request strict planning conditions. The excavated void is to be utilised for waste disposal or recovery. It will not be possible to accept reduced liner thickness or design at this site, due to the sensitivity of the groundwater.	

Table 65: Main issues raised during the Consultation stages about site MIN 201 land at Swangey Farm, north of North Road, Snetterton

The site is **not allocated** in the Publication version of the NM&WLP due to the proximity of the site to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC) and the potential for unacceptable adverse effects on the SSSI, and the location of the site within the setting of the scheduled Wayside Cross which is 20 metres from the site boundary.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 201 land at Swangey Farm, north of North Road, Snetterton	NCC Planning Officer's Response
Natural England (92090) CPRE Norfolk (92090) Forestry Commission England (98273) Norfolk Wildlife Trust (92408, 98680) Environment Agency (98722) Breedon Group (94970)	Initial Consultation and Preferred Options: The site is next to Swangey Fen Site of Special Scientific Interest (SSSI), which includes within the boundary of the SSSI Fox Covert wet woodland. While a buffer strip may be enough to protect the SSSI we suggest that you refer to Natural England with regard to the protection of the fen and woodland. Natural England, Environment Agency, CPRE and NWT all considered that the site is not suitable to allocated due to the proximity of the site to Swangey Fen SSSI. Breedon Group - Comments that nearby SSSI's will be adversely impacted by dust is untrue and unfounded.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC); there is a potential for unacceptable adverse effects on the SSSI from the proposed extraction, and the potential impacts on the setting of the scheduled monument adjacent to the site.
NCC Historic Environment Service (93126)	Initial Consultation: The barrow mentioned has already been partly excavated, therefore the impact on it could be mitigated (full excavation). The scheduled cross is a significant constraint.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC); there is a potential for unacceptable adverse effects on the SSSI from the proposed

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 201 land at Swangey Farm, north of North Road, Snetterton	NCC Planning Officer's Response
		extraction, and the potential impacts on the setting of the scheduled monument adjacent to the site.
Historic England (92961)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy due to nearby historic assets.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC); there is a potential for unacceptable adverse effects on the SSSI from the proposed extraction, and the potential impacts on the setting of the scheduled monument adjacent to the site.
Breedon Group (94970)	Preferred Options: Heritage impacts on nearby assets can be identified and mitigated through an appropriate restoration scheme.	No Action Required: The site is considered unsuitable for allocation due to its proximity to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC); there is a potential for unacceptable adverse effects on the SSSI from the proposed extraction, and the potential impacts on the setting of the scheduled monument adjacent to the site. It is noted that the proposed plant site location is in the south-eastern corner of the site which would also be in proximity to the Wayside Cross.
Environment Agency (92933)	Initial Consultation: 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.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC); there is a potential for unacceptable adverse effects on the SSSI from the proposed extraction, and the potential impacts on the setting of the scheduled monument adjacent to the site.
Environment Agency (92567)	Initial Consultation: The proposal is for low level restoration using inert material to restore the site. Whilst these sites do not lie within an SPZ groundwater should be sufficiently protected using a robust waste acceptance criteria.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to Swangey Fen SSSI (part of the Norfolk Valley Fens SAC); there is a potential for unacceptable adverse effects on the SSSI from the proposed extraction, and the potential impacts on the setting of the scheduled monument adjacent to the site.

Table 66: Main issues raised during the Consultation stages about site MIN 55 land at Keepers Cottage, Attlebridge

The site is **not allocated** in the Publication version of the NM&WLP because the proposed very deep extraction on this small site is not considered to be practicable to extract and would be very difficult to restore to a suitable landform. At a more reasonable extraction depth the mineral resource is unlikely to be viable as a new site. The site is also surrounded on three sides by a restored landfill sites which would make engineering a mineral extraction site problematic. There is also not a mineral operator promoting the site, and therefore it is less deliverable than other proposed sites.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 55 land at Keepers Cottage, Attlebridge	NCC Planning Officer's Response
Highway Authority (93128)	Initial Consultation: The site is acceptable subject to the use of the existing access onto the Reepham Road.	No Action Required: Noted. The proposed access to the C261 Reepham Road is in a third-party ownership and they would need to give permission for this access to be used. The site is considered unsuitable for allocation due to deliverability.
NCC Natural Environment Team (93085)	Initial Consultation: 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.	No Action Required: Noted. The site is considered unsuitable for allocation due to deliverability.
Monk Plant Hire Limited (93885)	Preferred Options: Further information on the proposal supplied. Infill the void formed back to near original ground levels using imported inert waste materials. Mineral will be extracted at an annual rate of 50,000 tonnes over a period of 11 years. No processing will take place at the site itself as all mineral will be transported to the MPH processing facility at Stone Road, Hockering. Formal Routing agreement for 10 HGV's per day.	No Action Required: Details noted. The company does not have previous experience of mineral extraction and therefore the site is still considered to be less deliverable than other proposed sites. The site is surrounded on three sides by a restored landfill site, and it would be problematic to engineer a mineral extraction site of this size in this location. The estimated mineral resource of 527,000 tonnes is not practicable to extract in a site of this size (less than 2 hectares). The proposed access to the C261 Reepham Road is in a third-party ownership and they would need to give permission for this access to be used.

Table 67: Main issues raised during the Consultation stages about site MIN 202 land south of Reepham Road, Attlebridge

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 202 land south of Reepham Road, Attlebridge	NCC Planning Officer's Response
Highway Authority (93129, 98834)	Initial Consultation and Preferred Options: The site is acceptable subject to the use of the existing access onto the Reepham Road.	No Action Required: Noted. This is required in the specific site allocation policy
NCC Natural Environment Team (93086)	Initial Consultation: 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. A shallower depth of extraction would be more suitable.	No Action Required: Noted. The site has been assessed and allocated on the basis of 545,000 tonnes of mineral resource.
Environment Agency (92560) Woodland Trust (92426) Weston Longville Parish Council (98286)	Initial Consultation and Preferred Options: The proximity to ancient woodland and county wildlife sites could cause habitat fragmentation. Woodland Trust say any future application should be subject to a substantial planted buffer of 50m to ensure the integrity of the ancient woodland.	Action Required: The site assessment has been revised in relation to the potential impact of mineral extraction on the Plantation on Ancient Woodland Site (PAWS). An Arboricultural Impact Assessment would need to be submitted at the planning application stage. The policy 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, as per Standing advice from Natural England and the Forestry Commission.
Norfolk Wildlife Trust (92380, 98681)	Initial Consultation and Preferred Options: The allocation boundary needs to be redrawn to avoid the County Wildlife Site (CWS), or the site policy includes a requirement for a stand-off area around the edge that includes that part that overlaps the CWS. The site to be worked dry to avoid any impacts on hydrogeology.	Action Required: The site would be worked dry. The site assessment has been revised to recognise mineral extraction within the proposed site boundary would lead to a loss of part of the CWS. The specific site policy requires restoration to heathland to provide biodiversity net gains. See comments above regarding Ancient Woodland.

Table 68: Main issues raised during the Consultation stages about site MIN 48 land at Swannington Bottom Plantation, Felthorpe

The site is **not allocated** in the Publication version of the NM&WLP due to the close proximity of the site to Swannington Ugate Common SSSI which may lead to an unacceptable adverse impact on the SSSI. There is also not a mineral operator promoting the site. Therefore the site is considered less deliverable than other sites that have been proposed for extraction.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 48 land at Swannington Bottom Plantation, Felthorpe	NCC Planning Officer's Response
NCC Historic Environment Service (93205) Historic England (92962)	Initial Consultation: Include in the reasons why the site is unsuitable that MIN 48 could not be allocated if the scheduled barrow was within its extent, as would be contrary to the requirements of the NPPF. If an allocation is brought forward in this location it requires a heritage impact assessment.	Action Required: Text amended. The site is considered unsuitable for allocation due to deliverability issues rising from the proximity to Swannington Ugate Common SSSI, and the lack of a mineral operator promoting the site.
Highway Authority (93130)	Initial Consultation: The site is not acceptable due to concerns with the road network which is sub-standard and narrow.	No Action Required: Noted. The site is considered unsuitable for allocation due to deliverability issues rising from the proximity to Swannington Ugate Common SSSI, and the lack of a mineral operator promoting the site.
Felthorpe Parish Council (91920)	Initial Consultation: FPC is pursuing an HGV restriction along the C260 The Street from the C245 Reepham Road with Highways England. It would render this proposed site almost unworkable. Routing agreements are hard to implement.	No Action Required: 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. The site is considered unsuitable for allocation due to deliverability issues rising from the proximity to Swannington Ugate Common SSSI, and the lack of a mineral operator promoting the site.
Environment Agency Norfolk Wildlife Trust (92409, 98686) Natural England (92094) CPRE Norfolk (92019) Felthorpe Parish Council (91920) Swannington with Alderford and Little	Initial Consultation and Preferred Options: The proximity of the site to Swannington Ugate Common SSSI. Potential impacts on features of interest and Swannington beck, a chalk stream with associated priority habitat and protected species.	No Action Required: The assessment states the site would need to be set back from Swannington Beck with screening bunds to mitigate the risk of silt ingress. The site is considered unsuitable for allocation due to deliverability issues rising from the proximity to Swannington Ugate Common SSSI, and the lack of a mineral operator promoting the site.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 48 land at Swannington Bottom Plantation, Felthorpe	NCC Planning Officer's Response
Witchingham Parish Council (91761) Individuals (91698)		
Individuals (92129, 91698) Wood Farm Liveries (92128) Felthorpe Parish Council (91920)	<p>Initial Consultation: Insufficient information to ascertain the effects on the community/effects would be unacceptable (noise, dust, odour, light, contamination, water, boreholes, increase in traffic). Loss of existing habitat. Information needed on protection of surrounding footpaths for safety of animals and people using the paths.</p>	<p>No Action Required: There is a Public Right of Way adjacent to the site, but non within the site. 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, or any other impacts from the proposed development, alongside suitable mitigation measures, if appropriate. It should be noted the proposed working is likely to be dry (above the water table), and therefore will not affect water sources. There are no proposals for the site to become a landfill site following mineral extraction. The site is considered unsuitable for allocation due to deliverability issues rising from the proximity to Swannington Upgate Common SSSI, and the lack of a mineral operator promoting the site.</p>
Felthorpe Airfield (92127) Felthorpe Parish Council (91920)	<p>Initial Consultation: It would create an unacceptable risk to the safe operation of light aircraft from Felthorpe Airfield.</p>	<p>No Action Required: A planning application for mineral extraction would need to demonstrate that there would not be an unacceptable adverse impact from the proposed development (such as dust), alongside suitable mitigation measures, if appropriate. Mineral extraction of itself would not be expected to attract birds, and there is no landfill proposed. The use of inert waste in restoration would not increase the risk of bird strike or sources of pollution, but it may lead to increased traffic movements. The site is considered unsuitable for allocation due to deliverability issues rising from the proximity to Swannington Upgate Common SSSI, and the lack of a mineral operator promoting the site.</p>

Table 69: Main issues raised during the Consultation stages about site MIN 37 land at Mayton Wood, Coltishall Road, Buxton

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy. A planning application was submitted in November 2019 and planning permission was granted in June 2021. Therefore, extraction could start on the site before the Local Plan is adopted.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 37 land at Mayton Wood, Coltishall Road, Buxton	NCC Planning Officer's Response
Norfolk Wildlife Trust (92381, 98682)	Initial Consultation: Restoration proposals should match the existing County Wildlife Site habitats. Preferred Options: Support restoration of acid grassland/ heathland on this site.	No Action Required: Noted. The restoration is proposed to be a mix of agricultural land, grassland and some woodland. Planning permission was granted for mineral extraction at this site in June 2021.
Highway Authority (93131, 98835)	Initial Consultation and Preferred Options: The site is acceptable subject to a new access onto Coltishall Road. Preferred Options: Local highway improvements including widening required, to be delivered via S278 agreement. Temporary access to be removed on restoration of site. Routing agreement required.	No Action Required: Noted. The site allocation policy requires a new temporary access to be provided onto Coltishall Road. Planning permission was granted for mineral extraction at this site in June 2021.
NCC Natural Environment Team (93087)	Initial Consultation: Native species screening and advance planting to mitigate views.	No Action Required: The information is included within the landscape section of the site assessment.
Historic England (92969)	Initial Consultation: MIN 37 and MIN 64 need to be seen cumulatively with MIN 65.	No Action Required: Noted. Planning permission was granted for mineral extraction at this site in June 2021. Planning permission has also been granted for sites MIN 64 and MIN 65.
Historic England (92969)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy, to take into account the nearby heritage assets.	No Action Required: The site allocation 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. Planning permission was granted for mineral extraction at this site in June 2021
Lead Local Flood Authority (NCC) (91942)	Initial Consultation and Preferred Options: Reports of flooding internally and externally adjacent the site boundary (2015 and 2016). Impacts and potential improvements need to be assessed.	No Action Required: Noted. A sites specific flood risk assessment would be required at the planning application stages in accordance with the NPPF and NPPG. Planning permission was granted for mineral extraction at this site in June 2021.
Individuals (92291)	Initial Consultation: Quarry is not needed. It is most probable the 96m minimum distance from the nearest property would be revised upon permission being	No Action Required: The allocated sites are required to meet the forecast need for sand and gravel extraction in Norfolk over the plan period to 2038. A planning application for mineral extraction

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 37 land at Mayton Wood, Coltishall Road, Buxton	NCC Planning Officer's Response
	<p>granted and it will be excavated to the outline of the site. Noise and dust would affect nearby residents.</p>	<p>would need to demonstrate that there would not be unacceptable adverse impacts from the proposed development (such as dust), alongside suitable mitigation measures, if appropriate. Planning permission was granted for mineral extraction at this site in June 2021</p>
<p>Individuals (98293, 98261)</p>	<p>Preferred Options: Issues raised included: Concerns over water contamination from inert backfill to boreholes and associated brewery operations. Discrepancy between the planning application and the location plan in the size of the area to be quarried and also the number of lorry movements, which is confusing and misleading for the public. Different start dates provided between the planning application and the local plan. Residents at The Heath have not been contacted about this and are within 250m of the site boundary. Is there any possibility of having a speed restriction on this section of road to improve safety?</p>	<p>No Action Required: The groundwater flow from the site is away and up-gradient from the brewery borehole. The site would be worked dry, as required by the site policy, which also requires a Hydrogeological Impact Assessment to be provided at the planning application stage. Inert materials should not contain pollutants at quantities that pose a risk to groundwater. There are 40 in-and-out movements proposed which is equivalent to 80 individual movements (40 into the site and 40 leaving the site). The site allocation does not include all of the land included in the planning application (ref: FUL/2019/0043), which proposes to extract mineral closer to the boundaries of the site than were proposed for the site allocation. A planning application was submitted in November 2019 and planning permission was granted in June 2021. Therefore, extraction could start on the site before the Local Plan is adopted. Letters were sent to residents at The Heath that were within 250m of the proposed site boundary. The Highway Authority consider that localised highway improvements are required to the B1354, including formal passing places and haunching (edge of carriageway strengthening) at pinch points on the road.</p>

Table 70: Main issues raised during the Consultation stages about site MIN 64 land at Grange Farm, Buxton Road, Horstead

The site is **allocated** in the Publication version of the Minerals and Waste Local Plan (M&WLP) because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy. Planning permission was granted for mineral extraction at this site in May 2021 but has not been implemented as at December 2021.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 64 land at Grange Farm, Buxton Road, Horstead	NCC Planning Officer's Response
Highway Authority (93132, 98836)	Initial Consultation: The site is acceptable subject to the use of the existing access. Preferred Options: Local highway improvements including widening required, to be delivered via S278 agreement. Temporary access to be removed on restoration of site. Routing agreement required.	No Action Required: Noted and within the site allocation policy in the Publication version of the NM&WLP. Planning permission for mineral extraction was granted in May 2021.
NCC Natural Environment Team (93088)	Initial Consultation: Retain and enhance field boundary hedgerows and trees	No Action Required: Noted. The site allocation policy in the Publication version of the NM&WLP requires screen planting to be retained as part of the site restoration. Planning permission for mineral extraction was granted in May 2021.
Historic England (92963)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy to protect nearby heritage assets.	No Action Required: The site allocation policy in the Publication version of the NM&WLP 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. Planning permission for mineral extraction was granted in May 2021
Horstead with Stanninghall Parish Council (92146) Individual (91693)	Initial Consultation: Concerns raised about the proximity of the development to houses, changing the rural character of the area, negative impact on health and amenity of residents due to dust and noise, increased traffic along B1354, and concerns over the nature of the land use post restoration (i.e. landfill). It will have a negative impact on property prices and the ability to sell properties.	No Action Required: Minerals are extracted where they are found, which are by nature, predominantly rural areas. 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. The Highway Authority have no objections. The land is proposed to be restored to agricultural use at a lower level, no landfill is proposed. Property values are not a material planning consideration. Planning permission for mineral extraction was granted in May 2021.
Longwater Gravel Co. Ltd. (92067,92004)	Initial Consultation: MIN 64 would form an extension to the quarry and would provide sand and gravel reserves of around 650,000 tonnes. The Section 106 agreement	Action Required: The information on the proposed start date, the annual extraction rate, proposed site operations and restoration

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 64 land at Grange Farm, Buxton Road, Horstead	NCC Planning Officer's Response
	<p>restricts extraction to 50,000 tonnes/year. It is anticipated that existing permitted reserves at Horstead Quarry will be exhausted within the next 2-3 years extraction could commence by the end of 2020. Appropriate screening and phasing of works. The washing plant, weighbridge and access would be retained in the existing quarry with using an internal haul road.</p> <p>The land would be restored to agricultural use. There are no plans to import any waste to restore the site. The overall timescale to extract and restore would be around 13 years. All of the information required is to be submitted at the planning application stage.</p>	<p>proposals is included in the site assessment. Planning permission for mineral extraction was granted in May 2021.</p>
Norfolk Wildlife Trust (98683)	<p>Preferred Options: Restoration proposals should be targeted to match wherever possible the habitats present in the nearby County Wildlife Site (CWS) in order to maximize ecological connectivity.</p>	<p>No Action Required: Planning permission was granted in May 2021 for restoration to arable agricultural land and retention of boundary hedges and woodland planting in the north-eastern part. The nearby CWS includes some acid grassland and some broadleaf woodland.</p>
Broadland District Council (98800)	<p>Preferred Options: Should have due regard to emerging Neighbourhood Plans within the district.</p>	<p>No Action Required: Planning permission was granted for mineral extraction at this site in May 2021 and there was no relevant adopted Neighbourhood Plan at this time.</p>
Historic England (98800)	<p>Preferred Options: Include specific reference to the nearest heritage assets to read 'heritage assets and their settings (including...)</p>	<p>Action Required: Policy wording in the Publication version of the NM&WLP has been amended as requested. Planning permission was granted for mineral extraction at this site in May 2021.</p>

Table 71: Main issues raised during the Consultation stages about site MIN 65 land north of Stanninghall Quarry

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. Planning permission for mineral extraction was granted for this site in August 2021.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 65 land north of Stanninghall Quarry	NCC Planning Officer's Response
Highway Authority (92964, 98837)	Initial Consultation and Preferred Options: The site is acceptable subject to the use of the existing access and routing agreement.	No Action Required: Noted and this is reflected in the site allocation policy contained within Publication version of the Plan.
Historic England (92527, 98801)	<p>Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy to protect nearby heritage assets.</p> <p>Preferred options: There are a number of designated heritage assets nearby. Therefore a Heritage Impact Assessment is needed at this stage of allocation process to assess suitability and inform its extent and any potential heritage mitigation in advance of the next draft of the Plan. The findings of the HIA would then need to inform the policy and supporting text.</p>	No Action Required: The site allocation policy in the Publication version of the NM&WLP 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. Planning permission for mineral extraction was granted for this site in August 2021.
Tarmac Trading Limited/SLR Consulting Ltd (92527)	Initial Consultation: 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. The northern extension area would be phased as part of a comprehensive working and restoration scheme for the existing quarry and extension area. 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.	Action Required: The draft site policy will state that “the site [MIN 65] will need to be phased with the adjacent permitted site so that only one site is worked for extraction at a time.”
Horstead with Stanninghall Parish Council (92145)	Initial Consultation: Concerns and questions over current monitoring of existing quarry, over deteriorating/unacceptable access, lorries using inappropriate country lanes, plus accidents and insufficient mini roundabout and the bridge over to Coltishall. Vegetation not screening the site sufficiently. Light pollution from floodlighting left on overnight.	No Action Required: The current site is monitored by Norfolk County Council officers on a regular basis to ensure compliance with the planning permission. Action is taken as appropriate, and liaison meetings take place to highlight issues at the existing site. Matters highlighted have been addressed. A planning application and appropriate evidence and assessments would need to demonstrate that there would not be

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 65 land north of Stanninghall Quarry	NCC Planning Officer's Response
	<p>Planning permission was previously rejected back in 2006.</p>	<p>an unacceptable adverse impact on factors such as (but not limited to) transport, health, visual/landscape and local amenity (including noise, air quality and dust). The Highway Authority considers that the site is acceptable subject to the use of the existing site access. The number of vehicle movements is expected to remain the same as existing, but continue for a longer time period. Planning permission for mineral extraction was granted for this site in August 2021.</p>
<p>Natural England (92095)</p>	<p>Initial Consultation: Please refer to our separate comments regarding the Habitats Regulations Assessment (HRA).</p>	<p>No Action Required: Due to the distance (1.43km) of site MIN 65 from Crostwick Marsh SSSI, it would not be affected by dust deposition. The birds would not be disturbed by noise or lighting from mineral extraction operations. The proposed extraction site is in a different hydrological catchment to the SSSI and therefore would not adversely affect the hydrology.</p>
<p>Individuals (91922, 95005, 98255)</p>	<p>Initial Consultation: The site is too close to nearby houses. Operations and traffic will be detrimental to health and the life of residents, possibly causing accidents onto B1150 Negative amenity impacts of dust and noise pollution. Why have only 13 sensitive receptors within 250m of the site boundary been contacted? Dust common over 250m. Negative effect on property values</p>	<p>No Action Required: The additional site area would be phased and therefore the extraction rate and associated lorry movements per day are not proposed to increase. 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, or amenity impacts, with mitigation where required. 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. All parish councils were informed of the consultation. A site notice was erected outside the proposed site. Notwithstanding this, planning permission for mineral extraction was granted for this site in August 2021.</p>
<p>Broads Authority (98971)</p>	<p>Preferred Options: M65.6 - starts off saying 'The site is not located within...'. Being within is one issue, but affecting the setting of is another. Such assessments</p>	<p>Action Required: Paragraph M65.6 will be amended to state that the northern site boundary is 670m from the Broads Authority Executive Area.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 65 land north of Stanninghall Quarry	NCC Planning Officer's Response
	should state whether the site is near to those designations.	
Frimstone Limited (98753)	Preferred Options: Object to the inclusion of this site, when MIN 35 is considered unsuitable solely on landscape grounds. It has been demonstrated from submitted evidence that preference should not be given to any of these sites over and above MIN 35.	No Action Required: See feedback in Min 35 section of the report. Planning permission for mineral extraction was granted for site MIN 65 in August 2021.

Table 72: Main issues raised during the Consultation stages about site MIN 96 land at Grange Farm, Spixworth

The site is **allocated** in the Publication version of the Minerals and Waste Local Plan (M&WLP) because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to MIN 96 land at Grange Farm, Spixworth	NCC Planning Officer's Response
Highway Authority (93134, 98838)	Initial Consultation: The site is acceptable subject to existing access and routing arrangements.	Action Required: The site allocation policy and supporting text amended in the Publication version of the NM&WLP to require: "Highway access to be via A1270 Broadland Northway roundabout at Norwich Airport; improvements will be required at the roundabout to formalise access to the site; and the removal of the HGV access at Buxton Road and relocation of the processing plant to south of C250 Church Lane."
Hainford Parish Council (98230) Cllr Dan Roper (94403)	Preferred Options: The site is acceptable subject to the use of enlarged access via A1270 Broadland Northway roundabout at Norwich Airport and routing agreement. Relocation of processing plant to south of C250 Church Lane required. Removal of HGV access at Buxton Road also required.	
Historic England (92965)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy due to nearby historic assets. Preferred options: There are a number of designated heritage assets nearby. Therefore Heritage Impact Assessment needed at this stage of allocation process to assess suitability and inform its extent and any potential heritage mitigation in advance of the next draft of the Plan. The findings of the HIA would then need to inform the policy and supporting text.	No Action Required: Noted and contained in site policy within the Publication version of the NM&WLP. No Action Required: The site policy of the Publication version of the Plan contains a requirement for a Heritage Statement to identify heritage assets and their settings, to support any future planning application. It is considered that this is proportionate method for dealing with heritage assets particularly as this site is already allocated in the adopted Minerals Site Specific Allocations DPD.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to MIN 96 land at Grange Farm, Spixworth	NCC Planning Officer's Response
Individual (91904)	Initial Consultation: The development will negatively affect property values.	No Action Required: Property values are not a material planning consideration.
Individuals (91904, 95121) Horsham St Faith & Newton St Faith parish council (98237)	Initial Consultation and Preferred Options: The site is too close to nearby houses. Operations and traffic will be detrimental to health and the life of residents, negative amenity impacts of dust and noise pollution, close to SSSI's, has underground water pipes and is in close proximity to the local airport and Market Field Lane, a popular walking route.	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations, through a screening scheme, as well as noise and dust assessments which would propose appropriate mitigation measures. The site policy in the Publication version of the Plan contains requirements for the extraction area of the site to be set back from the site boundary and screen planting and bunding would be required in order to mitigate potential amenity impacts on the closest properties and suggests standoff areas and screening for nearby properties. No adverse effects are expected on the SSSI (2.2km away). The site policy contains a requirement for a standoff to safeguard the sewer that crosses the site. A Bird Hazard Assessment is also a requirement of the site policy, with a Bird Hazard Management Plan if this is deemed necessary.
Broadland District Council (98281)	Preferred Options: Should have due regard to emerging Neighbourhood Plans within the district.	No Action Required: As December 2021 Horsham St Faith and Newton St Faith is not a designated area for a Neighbourhood Plan. Spixworth Neighbourhood Plan was adopted in June 2021 and the Minerals and Waste Local Plan has had due regard to the Neighbourhood Plan for Spixworth.
Hainford Parish Council (98230)	Preferred Options: The shortest route for lorry traffic is to construct a suitable road within the applicant's site to join Broadland Northway (NDR) at the Empire Way roundabout north of Norwich Airport.	Action Required: The response from the Highway Authority requires access to the site to be via A1270 Broadland Northway roundabout at Norwich Airport. This requirement is included in the site allocation policy wording in the Publication version of the NM&WLP.

Table 73: Main issues raised during the Consultation stages about site MIN 213 land at Mansom Plantation, Stratton Strawless

The site is **not allocated** in the Publication version of the NM&WLP because it is considered that the high-water table would render the proposed restoration unfeasible. The proposed restoration would include a holiday lodge development which already benefits from an implemented planning permission. It is considered that there are other more acceptable sites within the Plan.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 213 land at Mansom Plantation, Stratton Strawless	NCC Planning Officer's Response
Highway Authority (98839)	Preferred Options: Acceptable subject to acceptable access at Shortthorn Road and routing agreement via A140.	No Action Required: Noted. The site is considered unsuitable for allocation in the Plan.
Historic England (98803)	Preferred Options: Prepare an HIA now to consider the suitability of the site, and inform its extent and any potential heritage mitigation in advance of the next draft of the Plan. The findings of the HIA would then need to inform the policy and supporting text.	No Action Required: Noted. The site is considered unsuitable for allocation in the Plan.
Broadland District Council (98279)	Preferred Options: The site is adjacent to Hevingham Park Project 8 in West Broadland GI Project Plan. If this project is carried out then there may prove to be a conflict in relation to increased traffic and activity in this area.	No Action Required: Noted. The site is considered unsuitable for allocation in the Plan.
NCC Natural Environment Team (98978, 98981, 98985)	Preferred Options: This site is surrounded by coniferous woodland and would therefore require an AIA at the planning application stage to ensure sufficient standoff and screening from the adjacent trees. It is also within a Core Sustainance Zone for a barbastelle bat maternity colony in the area, and this, together with its role providing habitat connectivity for wildlife, should be taken into consideration.	No Action Required: Noted. The site is considered unsuitable for allocation in the Plan.
Norfolk Wildlife Trust (98685) Stratton Strawless Parish Council (98476)	Preferred Options: This allocation is adjacent to CWS 2204, Hevingham Park, a replanted ancient woodland with pingos and rich ground flora in places, protected species, as well as an additional area of ancient woodland outside the CWS. These habitats will be vulnerable to typical impacts from minerals operations, including the suggestion of wet working, and any application will need to be supported with appropriate assessments.	No Action Required: Noted. The site is considered unsuitable for allocation in the Plan.
Norfolk Wildlife Trust (98685)	Preferred Options: Given the proximity of pingos to the north, the potential for this site to include pingos should also be investigated.	No Action Required: Noted. The site is considered unsuitable for allocation in the Plan.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 213 land at Mansom Plantation, Stratton Strawless	NCC Planning Officer's Response
Frimstone (98747)	Preferred Options: Object to the inclusion of the site as being considered suitable for allocation, whereas MIN 35 is considered unsuitable solely on landscape grounds. MIN 35 should be reconsidered in light of the additional supporting landscape and visual statement and be concluded as once again suitable for allocation as at the 'Initial Consultation' stage of the Norfolk Minerals and Waste Local Plan Review.	No Action Required: Noted. The site is considered unsuitable for allocation in the Plan. The comments raised regarding the suitability of site MIN 35 are responded to in the section of the Feedback Report specifically covering proposed site MIN 35.
Stratton Strawless Parish Council (98476)	Preferred Options: Point 15 - There is no mention of chalk as a principle aquifer in connection with crag and gravels. Wroxham Crag is a mixture of sand, clay, silts and stones resting on a base of chalk.	No Action Required: Noted. The site is not allocated in the Publication version of the Minerals and Waste Local Plan.
Stratton Strawless Parish Council (98476) Individuals (98037, 98055, 98470, 98471, 98547, 94128, 94204, 95613, 95614, 95620, 95622, 98018, 98019, 98022, 98024, 98025, 98027, 98029, 98031, 98033, 98039, 98041, 98035, 98043, 98045, 98054, 98047, 98057, 98050, 98058, 98059, 98060, 98062, 98065, 98073, 98075, 98232, 98078, 98467, 98103, 98469,	Preferred Options: Issues raised included: <ul style="list-style-type: none"> • Existing planning permission for holiday lodges with tree protection orders on the site • Impact on amenity (including noise and dust from mineral extraction and HGVs) and impact on physical and mental health • dangerous junction (A140/Shortthorn Road) and extra HGVs will lead to more accidents • Shortthorn Road is unsuitable road for lorries. Increased traffic on a residential street and using the junction with the A140 • risk to pedestrians as there are no pavements on Shortthorn Road. • inappropriate location in a village and proximity to residences, businesses, holiday park, a Council Facility for children with special needs • impact on the character of the parish • impact on the historic environment, • destruction of habitats, woodland, impacts on wildlife and protected species (including great crested newts and bats), • pollution, concerns over wet working on groundwater, geology and watercourses due to the high water table, 	No Action Required: Noted. The Highway Authority considers that subject to a routing agreement a suitable highway access exists. The proposed site access is approximately 310 metres along Shortthorn Road from the junction with the A140. Norfolk County Council's 'Local List for the Validation of Planning Applications' requires a Transport Statement or 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 safety and capacity of the road network and road users including pedestrians. Any future planning application would need to provide assessments on issues including noise, dust, biodiversity, protected species, archaeology, the historic environment and hydrogeology in accordance with the requirements of the NCC Local List for the validation of planning applications. Property values are not a material planning consideration. The site is not proposed as a landfill site, and due to the highwater table it is unlikely to be suitable as a non-hazardous landfill. Human rights are a material planning consideration. The rights have to be balanced against all other material considerations and this will be a planning judgment.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 213 land at Mansom Plantation, Stratton Strawless	NCC Planning Officer's Response
98466, 98938, 98940, 98468, 98472, 98473, 98474, 98071, 98048, 98475, 94400) Cllr Julie Neesam, Broadland District Councillor (98052)	<ul style="list-style-type: none"> • contribute to climate change due to removal of existing trees, • Unacceptable potential use for landfill/unknown restoration. • Insufficient screening of the site • Better extracted from the seabed and using recycled aggregates. • possibility of Roman remains in the area. • Other more suitable sites for mineral extraction in Norfolk • Impact on human rights. • Negative effect on property values • Anglian Water pumping station in corner of site • No benefit to local villages 	Policy MW1 sets out the quantity of aggregates to be planned for in Norfolk and how this has been calculated. The proposal includes restoration to incorporate the holiday lodge development which is subject to an implemented planning permission, however, this is not considered to be feasible given the proposed wet working of the site. Therefore, the site is considered unsuitable for allocation in the Plan.

Table 74: Main issues raised during the Consultation stages about site MIN 203 land north of Welcome Pit, Burgh Castle

The site is **not allocated** in the Publication version of the NM&WLP because the site is considered unsuitable due to the sub-standard and narrow road network, and there are more acceptable sites in the Plan. As of May 2022, the NCC Planning Regulatory Committee resolved to grant planning permission for mineral extraction at this site.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 203 land north of Welcome Pit, Burgh Castle	NCC Planning Officer's Response
Highway Authority (93135) Burgh Castle parish council (91747) Great Yarmouth Borough Council (91721)	Initial Consultation: This is not a preferred site due to concerns with the road network which is sub-standard and narrow with little opportunity for improvement.	No Action Required: Noted. The site is considered unsuitable for allocation due to the sub-standard highway access, and more acceptable sites have been proposed in the Plan.
NCC Historic Environment Service (93206)	Initial Consultation: No further archaeological work will be required at this site.	Action Required: Noted. The site is considered unsuitable for allocation due to the sub-standard highway access, and more acceptable sites have been proposed in the Plan.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 203 land north of Welcome Pit, Burgh Castle	NCC Planning Officer's Response
Historic England (92966)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy due to nearby historic assets.	No Action Required: Noted. The site is considered unsuitable for allocation due to the sub-standard highway access, and more acceptable sites have been proposed in the Plan.
Folkes Plant & Aggregates Limited/Stephen M Daw Limited (91780)	Initial Consultation: Pre-application contact with the County Highways Authority which concluded the CHA 'would not be able to substantiate a highways related objection to the continuation of the quarry (extraction) operations.' The initial conclusion should therefore be altered to be consistent.	No Action Required: Noted. At the planning application stage the Highway Authority considers the site on its own merits and does not consider whether better sites may be available elsewhere. For allocation, 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. The site is considered unsuitable for allocation due to the sub-standard highway access, and more acceptable sites have been proposed in the Plan.
Folkes Plant & Aggregates Limited/Stephen M Daw Limited (93242)	Preferred Options: The site should be allocated because it is an extension to an existing quarry, which operates successfully within the local community, is in close proximity to Great Yarmouth, will provide biodiversity and geological benefits. Improvements to the highways and reduction in activity are proposed. The Highways Authority would not object to a planning application for this proposed development.	No Action Required: The site is considered unsuitable for allocation due to the sub-standard highway access, and that more acceptable sites have been proposed in the Plan.
Great Yarmouth Borough Council (98633)	Preferred Options: The description of Belton and Burgh Castle is incorrect in the amenity paragraph. The settlement of Burgh Castle is to the west, south and north of the site.	No Action Required: Noted. The site is considered unsuitable for allocation due to the sub-standard highway access, and more acceptable sites have been proposed in the Plan.

Table 75: Main issues raised during the Consultation stages about site MIN 38 land at Waveney Forest, Fritton

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction on this site would cause unacceptable harm to the significance of Waveney Forest as an example of a WW2 training area and could not be appropriately mitigated. It is also within the Broads Authority Area, and there are not exceptional circumstances for mineral extraction. There are sufficient and more acceptable alternative sites for sand and gravel proposed to fulfil the need for allocated sites.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 38 land at Waveney Forest, Fritton	NCC Planning Officer's Response
Great Yarmouth Borough Council (91722, 98634) Broads Authority (91843, 98972) Woodland Trust (92427) CPRE Norfolk (92020) Norfolk Wildlife Trust (98692) Environment Agency (98717) Individuals (see Footnote 4)	Initial Consultation and Preferred Options: Agrees with conclusion the site is unsuitable for allocation. Continue liaising regarding this site in the future.	No Action Required: Noted. The Mineral Planning Authority attends regular meetings with the Broads Authority where the Mineral and Waste Local Plan are discussed. The site is considered unsuitable for allocation, due to unacceptable harm to archaeology within WW2 training area, and there being no exceptional circumstances for mineral extraction within the Norfolk Broads.
Highway Authority (93187) Fritton with St Olaves Parish Council (91972) Individuals (see Footnote ³)	Initial Consultation and Preferred Options: The site is not acceptable with the proposed priority junction; a suitable right hand turn lane onto the A143 will be required.	No Action Required: Noted and within draft policy. The site is considered unsuitable for allocation, due to unacceptable harm to archaeology within WW2 training area, and there being no exceptional circumstances for mineral extraction within the Norfolk Broads.
Historic England (92967)	Initial Consultation: We are concerned about the size and location of this site and its proximity to St Olave's Priory. The recommendations in the Sustainability	No Action Required: No unacceptable impacts to nearby heritage assets due to existing significant tree screen which would be retained, also more modern buildings including agricultural

³ 332 responses were received from individuals for this site allocation. For Rep ID's see Pages G22-G27 of [the Initial Consultation Feedback Report](#). Please note the 332 responses received were summarised together within the report, and cannot be individually identified. They have been further summarised for the purposes of this document as required, the Statement of Consultation.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 38 land at Waveney Forest, Fritton	NCC Planning Officer's Response
	Appraisal Appendix B should be incorporated in policy due to nearby historic assets.	buildings are located immediately to the northeast of the Priory remains between it and MIN 38, which would limit intervisibility and possible impacts. The site is considered unsuitable for allocation, due to unacceptable harm to archaeology within WW2 training area, and there being no exceptional circumstances for mineral extraction within the Norfolk Broads.
NCC Natural Environment Team (93090) Individuals (see Footnote 4)	Initial Consultation: The small loss of woodland in this area would not cause a large impact on the wider landscape, however the immediate effects from within the woodland would be noticeable.	No Action Required: 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. The site is considered unsuitable for allocation, due to unacceptable harm to archaeology within WW2 training area, and there being no exceptional circumstances for mineral extraction within the Norfolk Broads.
Environment Agency (92916, 92556) Fritton with St Olaves Parish Council (91972) Essex and Suffolk Water plc (92340) Individuals (see Footnote 4)	Initial Consultation and Preferred Options: Concerns over impact of poor water quality, as a result of runoff and dust from the site, entering the adjacent wetland habitat, and effect of mineral extraction on protected species. Dewatering due to extraction of mineral below the water table would affect the water table and nearby abstractors. Impact on public water supply abstraction from Fritton Lake. Mitigation may be insufficient.	No Action Required: No dewatering would take place, and 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. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment. The site is considered unsuitable for allocation, due to unacceptable harm to archaeology within WW2 training area, and there being no exceptional circumstances for mineral extraction within the Norfolk Broads
Woodland Trust (92427)	Initial Consultation: 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.	No Action Required: 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. The site is not considered suitable for allocation, due to unacceptable harm to archaeology within WW2 training area, and there being no exceptional circumstances for mineral extraction within the Norfolk Broads.
Fritton with St Olaves Parish Council (91972) The Broads Society (91833)	Initial Consultation and Preferred Options: Issues raised included: The site is too close to the residential area, negative amenity impacts of light, dust and noise pollution Negative effect on property values	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations, a screening scheme, lighting, noise and dust assessments would be part of the mitigation provided and conditioned in a planning permission.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 38 land at Waveney Forest, Fritton	NCC Planning Officer's Response
<p>GYB Services (91852) The Broads Society (91833) Individuals (see Footnote 4)</p>	<p>Negative affect on tourism and other businesses. Highway impacts from increased traffic, loss of trees/ impact on carbon footprint, Negative impact on the landscape no need for additional mineral, alternative mineral sites are available, large number of people objecting, loss of amenity woodland for dog walking/ horse riding etc, diversion of electricity pylons across the site, danger from unexploded ordnance within the site, increased flood risk from extracted areas, increase in mosquitos from stagnant wetlands, adverse impacts on water quality and reduction in water levels in Fritton Lake and boreholes Risk of forest fires impacts on biodiversity and loss of protected species impact on WWII archaeology inappropriate location within the Broads Authority National Park. Proposed tree screens will not work as a way to reduce dust emissions from the site</p>	<p>Property values and potential effects on local businesses are not material planning considerations. Mineral forecasts have been made subject to national planning policy and guidance and indicate an additional requirement up to 2038; this has taken into account existing sites. Highway Authority considers that in principle a suitable highway access could be formed, and A roads such as the A143 are the preferred route for HGVs, a Transport Statement would be required to support any future planning application. Site is commercial plantation, so felling forms part of the management of such sites, proposed restoration would include replanting and creations which would capture carbon. The assessment of sites proposed for allocation is not based on numbers of objectors but on assessment of the issues raised and whether these render the site unsuitable. The plantation is private property and access is limited to the PROWs which would not be affected by the proposal. The existing pylons are not within the proposed extraction areas and would not require diversion. Planning applications on sites where Unexploded Ordnance possible are subject to assessment and mitigation measures if required. There is no reason for extracted areas to increase flood risk, as the water table will not be increased, and mosquitos no more likely to breed on wetland formed by restoration than in surrounding areas. The vast majority of the site is within Flood Zone 1 and sand and gravel extraction is classified as 'water-compatible' and a site specific Flood Risk Assessment would be required at the planning application stage. It is unlikely to affect water levels as no dewatering proposed, and water quality unlikely to be affected as extraction is of existing ground with no infilling proposed, assessments would be required to support any future planning application. Mineral extraction sites do not represent a fire hazard, as the topsoil is normally stripped as each extraction phase progresses, and sites securely managed.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 38 land at Waveney Forest, Fritton	NCC Planning Officer's Response
		<p>Site consists only of formerly commercial coniferous plantation with relatively low biodiversity value. Restoration will result in biodiversity gains (wet woodland, heathland and water bodies). A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment.</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>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>Notwithstanding the comments above, the site is not considered suitable for allocation, due to unacceptable harm to archaeology within WW2 training area, and there being no exceptional circumstances for mineral extraction within the Norfolk Broads.</p>
Fritton with St Olaves Parish Council (91972)	Initial Consultation and Preferred Options: Breach of human rights.	No Action Required: Article 8 rights are a material planning consideration. The rights have to be balanced against all other material considerations and this will be a planning judgment.
Broads Authority (91843)	Initial Consultation: Page 169 – the Broads Landscape Character Assessment 2016 is also relevant.	No Action Required: Noted. The site is not considered suitable for allocation, due to unacceptable harm to archaeology within WW2 training area, and there being no exceptional circumstances for mineral extraction within the Norfolk Broads.
Brett Group/ Heaton Planning Ltd (93016, 99027)	Initial Consultation and Preferred Options: 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, which the cycle of forestry planting and felling will likely destroy or significantly affect these remains. Also concerns with the Sustainability Appraisal scoring (SA1, SA5, SA8, SA11).	No Action Required: 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. The site is partly located within the Norfolk Broads and there are no exceptional circumstances for mineral extraction to take place within the Norfolk Broads. No revisions are considered necessary to the Sustainability Appraisal.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 38 land at Waveney Forest, Fritton	NCC Planning Officer's Response
Great Yarmouth Borough Council (98634)	Preferred Options: Saved policy REC11 identifies an area of recreation space to the east of the site which is not mentioned in the assessment. Therefore, the recreational value of the site should be given greater weight in the assessment.	Action Required: Noted. Policy REC11 was superceded by Policy E3 of the Great Yarmouth Local Plan part 2. Policy E3 relates to protection against the loss of open space such as play area. There is a play area adjacent to New Road, this is not with the site boundary of MIN 38, and the proposal for mineral extraction would not result in its loss. Notwithstanding this, the site is not considered suitable for allocation, due to unacceptable harm to archaeology within WW2 training area, and there being no exceptional circumstances for mineral extraction within the Norfolk Broads.

Table 76: Main issues raised during the Consultation stages about site MIN 06 land off East Winch Road, Mill Drove, Middleton

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 06 land off East Winch Road, Mill Drove, Middleton	NCC Planning Officer's Response
Highway Authority (98850)	Initial Consultation: Acceptable subject to use of internal haul route, existing processing facilities, acceptable visibility at access and routing agreement. The allocation would result in a continuation of turning movements at the A47.	No Action Required: Noted and within the site allocation policy in the Publication version of the NM&WLP.
Middleton Aggregates/ Stephen M Daw Limited (93239)	Initial Consultation: The Quarry has operated for a considerable number of years without significant complaint and provides valuable Carstone. It is requested the 8 th bullet point be deleted. A contribution for capacity on A47, can still be sought through the wording of the ninth bullet.	No Action Required: Bullet point 8 (now point g.) relates to the access which is the responsibility of the Highway Authority, and bullet point 9 (now point h.), Highways England.
Environment Agency (98723)	Initial Consultation: A hydrogeological impact assessment (not risk assessment) would be required to establish the depth of working.	Action Required: Noted. Policy amended to require hydrogeological impact assessment instead of risk assessment.
Historic England (98812)	Initial Consultation: Consider if an alternative site for building quality Carstone is needed.	No Action Required: There is an existing site in Snettisham providing building quality carstone. The Carstone landbank is approximately 20 years and it is not necessary to allocate any

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 06 land off East Winch Road, Mill Drove, Middleton	NCC Planning Officer's Response
		additional sites in the plan. Throughout this Local Plan process, only one site has been submitted for Carstone extraction, which has been allocated in the Plan. We do not consider that a further call for sites would find a new site for building stone.
Borough Council of King's Lynn and West Norfolk (99009)	Initial Consultation and Preferred Options: Amenity and health impacts on residents regarding air pollution, dust and noise will need to be assessed and mitigated. A flood risk, surface water drainage and hydrogeological assessment will need to be provided.	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission.
Individual (94154)	Initial Consultation: must find other non-invasive ways of providing human needs.	No Action Required: The NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance.

Table 77: Main issues raised during the Consultation stages about site MIN 45 land north of Coxford Abbey Quarry, East Rudham

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction on this site would cause unacceptable harm to the Plantation, which is on an Ancient Woodland Site. There are not wholly exceptional reasons for the development. Therefore, it is unlikely that sand and gravel extraction on this site would meet the benefit/loss test set out in the NPPF.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to MIN 45 land north of Coxford Abbey Quarry, East Rudham	NCC Planning Officer's Response
Highway Authority (93136)	Initial Consultation: The site is acceptable subject to the use of the existing access.	No Action Required: Noted.
NCC Natural Environment Team (93118, 93106, 93091) Environment Agency (92559) Woodland Trust (92425) Norfolk Wildlife Trust (92411, 98688)	Initial Consultation and Preferred Options: Agree with assessment. The site is unsuitable for allocation in accordance with Section 15 of the NPPF. 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.	No Action Required: Noted. The site is considered unsuitable for allocation as it would result in the loss of an ancient woodland site, and there are not wholly exceptional circumstances that would meet the benefit/loss test in the NPPF.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to MIN 45 land north of Coxford Abbey Quarry, East Rudham	NCC Planning Officer's Response
<p>Longwater Gravel Co. Ltd/SLR Consulting (92535) Longwater Gravel Co. Ltd (92027) Longwater Gravel Co. Ltd/Small Fish (92005)</p>	<p>Initial Consultation: In biodiversity terms, PAWS at Coxford Abbey Quarry is considered to be of low biodiversity value and its low residual impacts of loss to quarrying and the restoration of the site to a native woodland is considered not significant when compared to the "do nothing" scenario. Actual habitat studies noted a complete absence of any definitive ancient woodland indicators. 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>No Action Required: As stated above, Coxford Wood is in the ancient woodland inventory and therefore the NPPF (2021) paragraph 180.c) applies. The seed bank is an irreplaceable habitat, and you cannot move an ancient woodland ecosystem. Consequently the Natural England and Forestry Commission standing advice on ancient woodland states that proposed compensation measures therefore should not be considered. The site is considered unsuitable for allocation as it would result in the loss of an ancient woodland site, and there are not wholly exceptional circumstances that would meet the benefit/loss test in the NPPF.</p>
<p>Longwater Gravel Co. Ltd/Small Fish (92005)</p>	<p>Initial Consultation: 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 (2019), 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. 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>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.</p>	<p>No Action Required: In this case, 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, an ecosystem that cannot be moved.</p> <p>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. Furthermore, the Natural England and Forestry Commission standing advice on ancient woodland states that proposed compensation measures should not be considered. The site is considered unsuitable for allocation as it would result in the loss of an ancient woodland site, and there are not wholly exceptional circumstances that would meet the benefit/loss test in the NPPF.</p>
<p>Longwater Gravel Co. Ltd/Small Fish (92005)</p>	<p>Initial Consultation: MIN 45 also offers environmental, social and economic benefits.</p>	<p>No Action Required: Listed benefits are noted and stated in consultation documents, including the Sustainability Appraisal, as appropriate. There is potential for impacts on Syderstone Common SSSI. The site is considered unsuitable for allocation as it would result in the loss of an ancient woodland site, and there</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to MIN 45 land north of Coxford Abbey Quarry, East Rudham	NCC Planning Officer's Response
		are not wholly exceptional circumstances that would meet the benefit/loss test in the NPPF.
Longwater Gravel Co. Ltd (92027)	Initial Consultation: If MIN 45 is removed from the Mineral and Waste Local Plan, then proposals for the north extension cannot even be submitted for consideration. 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.	No Action Required: Not allocating site MIN 45 within the NM&WLP would mean that any planning application for mineral extraction, unless it meets specific criteria set out in Policy MP1, within site MIN 45 after adoption of the M&WLP would be a departure from the Development Plan. It is not considered there are 'wholly exceptional reasons' for the development as there are other locations available and deliverable in Norfolk for the extraction of sand and gravel. Norfolk County Council would still be legally required to determine the application in accordance with the Development Plan, unless material considerations indicate otherwise.
Environment Agency (92930)	Initial Consultation: Robust risk assessment and best practice, with adequate liner thickness is required for waste disposal to protect aquifers/groundwater from contamination.	No Action Required: Noted. The site is considered unsuitable for allocation as it would result in the loss of an ancient woodland site, and there are not wholly exceptional circumstances that would meet the benefit/loss test in the NPPF.
Forestry Commission England (98272)	Preferred Options: It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 175 amended July 2018). If quarrying at that site were approved it should be noted that it is the woodland top soil and it's seed bank that is a priority to save. That can be done by stripping off the top soil, storing on site and spreading back as a top soil on completion of quarrying. The replaced soil becomes the substrate for replanting with native broad leaved trees thereby completing restoration back to woodland. This technique of 'Habitat Translocation' is included in Houses of Parliament POSTNOTE 465.	No Action Required: Noted. The site is considered unsuitable for allocation as it would result in the loss of an ancient woodland site, and there are not wholly exceptional circumstances that would meet the benefit/loss test in the NPPF.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to MIN 45 land north of Coxford Abbey Quarry, East Rudham	NCC Planning Officer's Response
Borough Council of King's Lynn and West Norfolk (99010)	Preferred Options: Amenity and health impacts on residents regarding air pollution, dust and noise will need to be assessed and mitigated.	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations, including lighting, noise and dust assessments. Any mitigation provided would be conditioned in a planning permission. However, the site is considered unsuitable for allocation.
Individual (94155)	Preferred Options: Must find other non-invasive ways of providing human needs.	No Action Required: The NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance. However, the site is considered unsuitable for allocation.

Table 78: Main issues raised during the Consultation stages about site MIN 204 land north of Lodge Road, Feltwell

The site is **not allocated** in the Publication version of the NM&WLP due to the proximity of the site to Breckland Forest SSSI (part of the Breckland SPA) and its location within the Protection Zone for Stone Curlews; there is the potential for unacceptable adverse effects on the SSSI and the qualifying features of the SPA from the proposed mineral extraction.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 204 land north of Lodge Road, Feltwell	NCC Planning Officer's Response
NCC- Highway Authority (93215)	Initial Consultation: The site is acceptable subject to the use of the existing access.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to the Breckland Forest SSSI (part of the Breckland SPA), and its location within the Protection Zone for Stone Curlews. There is the potential for unacceptable adverse effects to qualifying features of the SPA.
NCC Historic Environment Service (93215) Norfolk Geodiversity Partnership (91934)	Initial Consultation: Archaeological assessments must consider the impact of any planning application on Palaeolithic/Pleistocene exposures. No mention made of the find of Palaeolithic handaxe on adjacent land.	No Action Required: Noted. Specific finds have not been referred to in the site assessment. The site is considered unsuitable for allocation due to its proximity to the Breckland Forest SSSI (part of the Breckland SPA), and its location within the Protection Zone for Stone Curlews. There is the potential for unacceptable adverse effects to qualifying features of the SPA.
Environment Agency (92917, 98724)	Initial Consultation: Robust risk assessment and best practice is required for waste disposal to protect aquifers/groundwater from contamination. An appropriate	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to the Breckland Forest SSSI (part of the Breckland SPA), and its location within the Protection Zone for Stone Curlews. There is the potential for unacceptable

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 204 land north of Lodge Road, Feltwell	NCC Planning Officer's Response
	hydrogeological risk assessment would be required if de-watering was required. Preferred Options: Previous comments still stand.	adverse effects to qualifying features of the SPA. The site was proposed to be worked dry.
NCC Natural Environment Team (93117, 93092, 98984)	Initial Consultation: An AIA is required to ensure sufficient standoff from the adjacent trees for root protection. A detailed landscaping scheme to mitigate impacts on Feltwell Gate Lodge and surrounding landscape. A Habitats Regulation Assessment is required for this site.	No Action Required: Noted. At the Local Plan stage, a Habitats Regulations Assessment is only required for those sites allocated in the Local Plan. The site is considered unsuitable for allocation due to its proximity to the Breckland Forest SSSI (part of the Breckland SPA), and its location within the Protection Zone for Stone Curlews. There is the potential for unacceptable adverse effects to qualifying features of the SPA.
Natural England (92099)	Initial Consultation: 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). 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.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to the Breckland Forest SSSI (part of the Breckland SPA), and its location within the Protection Zone for Stone Curlews. There is the potential for unacceptable adverse effects to qualifying features of the SPA.
Historic England (92973)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.	No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to the Breckland Forest SSSI (part of the Breckland SPA), and its location within the Protection Zone for Stone Curlews. There is the potential for unacceptable adverse effects to qualifying features of the SPA.
Ministry Of Defence (Defence Infrastructure Organisation) (92350)	Initial Consultation: 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.	No Action Required: Noted. The site is proposed to be restored to grass heathland. The site is considered unsuitable for allocation due to its proximity to the Breckland Forest SSSI (part of the Breckland SPA), and its location within the Protection Zone for Stone Curlews. There is the potential for unacceptable adverse effects to qualifying features of the SPA.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 204 land north of Lodge Road, Feltwell	NCC Planning Officer's Response
LP Pallett Quarry (94880)	<p>Preferred Options: The Habitat Regulations Assessment (HRA) Task 1 has found that the two southern parcels are likely to be able to (be) extracted without giving rise to unacceptable impacts if appropriate mitigation is put in place; this conclusion is based on the experience of mineral working to the north which is closer to the SPA. MIN 204 has been amended to exclude the north east field (10.4 hectares/575,000 tonnes). The assessment in the latest consultation only considers the proximity of the site as a whole to the SPA and not the proximity of each individual field as in the previous consultation. It is not surprising therefore that the effects on the SPA of the whole working are judged to be uncertain.</p>	<p>No Action Required: Natural England responded to the Initial Consultation to state that they “do not agree that this site can be screened in as suitable at present”. This was because 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. A Task 2 HRA (Appropriate Assessment) would be required to assess whether there would be likely significant effects from mineral extraction at the site, even with the north-east field removed, at which point mitigation measures can be taken into account. The reduced site is still within the Impact Risk Zone for the Breckland Forest SSSI and the Stone Curlew Buffer Zone. Therefore, Natural England’s response is still relevant to the reduced site area and there is still the potential for unacceptable adverse effects on the SSSI from the proposed mineral extraction. The site is considered unsuitable for allocation due to its proximity to the Breckland Forest SSSI (part of the Breckland SPA), and its location within the Protection Zone for Stone Curlews. There is the potential for unacceptable adverse effects to qualifying features of the SPA.</p>
Borough Council of King's Lynn and West Norfolk Environmental Health (92334, 99011)	<p>Initial Consultation and Preferred Options: Amenity and health impacts on residents regarding air pollution, dust and noise will need to be assessed and mitigated. A flood risk, surface water drainage and hydrogeological assessment will need to be provided.</p>	<p>No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. The site is considered unsuitable for allocation.</p>
Borough Council of King's Lynn and West Norfolk (92028)	<p>Initial Consultation: Better quality geological information needed to prove the estimated mineral resource.</p>	<p>No Action Required: Noted. The site is considered unsuitable for allocation due to its proximity to the Breckland Forest SSSI (part of the Breckland SPA), and its location within the Protection Zone for Stone Curlews. There is the potential for unacceptable adverse effects to qualifying features of the SPA.</p>
Individual (94156)	<p>Preferred Options: Must find other non-invasive ways of providing human needs.</p>	<p>No Action Required: The NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance.</p>

Table 79: Main issues raised during the Consultation stages about sites MIN 19 & MIN 205 land north of the River Nar, Pentney

The sites are **not allocated** in the Publication version of the NM&WLP because they are within a designated Core River Valley and it is not considered that the restoration of the sites would result in a landscape enhancement sufficient to meet the policy requirements and justify mineral extraction in this location.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to sites MIN 19 & MIN 205 land north of the River Nar, Pentney	NCC Planning Officer's Response
NCC Historic Environment Service (93216)	Initial Consultation: We do not consider that the proximity of the Scheduled Monument makes this site unsuitable for allocation.	No Action Required: Noted. The sites are considered unsuitable for allocation as they are in a designated Core River Valley, and the proposed restoration does not provide landscape enhancement sufficient to meet the policy requirements.
Historic England (92974)	Initial Consultation: the potential exists for the mineral extraction to substantially harm the setting of the highly designated heritage assets at Pentney Priory.	No Action Required: Noted. See above response from Norfolk County Council Historic Environment Service. However, the sites are considered unsuitable for allocation as they are in a designated Core River Valley, and the proposed restoration does not provide landscape enhancement sufficient to meet the policy requirements.
NCC Natural Environment Team (93093)	Initial Consultation: With the right restoration these sites could provide other landscape gain.	No Action Required: Noted. The sites are considered unsuitable for allocation as they are in a designated Core River Valley, and the proposed restoration does not provide landscape enhancement sufficient to meet the policy requirements.
Environment Agency (92931)	Initial Consultation: Ensure non-inert wastes are not accepted at this site.	No Action Required: Noted, although it is not proposed for inert materials to be used to restore sites MIN 19 and MIN 205.
Highway Authority (93138)	Initial Consultation: The site is acceptable subject to improvements along the route to the A47.	No Action Required: Noted. The site is considered unsuitable to allocate.
Middleton Aggregates Ltd/ Stephen M Daw Limited (92141)	Initial Consultation: Issues raised included: 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. Existing asphalt plant only has a temporary permission and is to be removed in 2019. MIN 19 also has permitted mineral stockpiles and plant unconnected to the asphalt plant so could not be fully restored on removal of the asphalt plant.	No Action Required: 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. The site assessment was amended in the Preferred Options document to take into account the temporary planning status of the asphalt plant (which has been removed from the site since the 2019 consultation), processing plant, stockpiles, and existing use of MIN 205. The proposed restoration includes areas of open

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to sites MIN 19 & MIN 205 land north of the River Nar, Pentney	NCC Planning Officer's Response
	Disagree with supporting text that restoration will be open water, it is proposed to be a mosaic of wetland/fenland habitats, with MIN 19 to be pools intermixed with wet woodland. This is more appropriate to the Fenland landscape than the permitted restoration to woodland. This is MIN 205 not grazing marsh but has been in arable use for several decades.	water, albeit smaller than existing open lakes and will be screened by wet woodland. The sites are considered unsuitable for allocation as they are a designated Core River Valley, and the proposed restoration does not provide landscape enhancement sufficient to meet the policy requirements.
Middleton Aggregates Ltd/ Stephen M Daw Limited (93241)	Preferred Options: Request MIN 19 to remain as an Allocation and for MIN 205 to be made a new Allocation. The proposed restoration will result in a positive enhancement to the landscape in accordance with the requirements of Core River Valley Policy.	No Action Required: Noted. The sites are considered unsuitable for allocation as they are a designated Core River Valley, and the proposed restoration does not provide landscape enhancement sufficient to meet the policy requirements.
Norfolk Wildlife Trust (92410) Natural England (95037) CPRE Norfolk (92021)	Initial Consultation and Preferred Options: Agrees with conclusion the site is unsuitable for allocation.	No Action Required: Noted. The sites are considered unsuitable for allocation as they are a designated Core River Valley, and the proposed restoration does not provide landscape enhancement sufficient to meet the policy requirements.
Norfolk Geodiversity Partnership (91943)	Initial Consultation: Insert additional comments, to modify the existing paragraph on Geodiversity.	Action Required: Text amended as requested in the Preferred Options document.
Ministry Of Defence (Defence Infrastructure Organisation) (92341)	Initial Consultation: The MOD would have no safeguarding concerns subject to open water being kept to a minimum. 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.	No Action Required: Noted.
Borough Council of King's Lynn and West Norfolk Environmental Health (99012)	Preferred Options: Amenity and health impacts on residents regarding air pollution, dust and noise will need to be assessed and mitigated. A flood risk assessment, surface water drainage and hydrogeological assessment will need to be provided.	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to sites MIN 19 & MIN 205 land north of the River Nar, Pentney	NCC Planning Officer's Response
Individual (94157)	Preferred Options: Must find other non-invasive ways of providing human needs.	No Action Required: The NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance.

Table 80: Main issues raised during the Consultation stages about site MIN 74 land at Turf Field, Watlington Road, Tottenham

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction on this site would cause unacceptable impacts on the landscape and on the historic environment due to its location adjacent to Tottenham Row Conservation Area. It is not considered that screening/bunding would be able to appropriately mitigate such impacts and would be intrusive in its own right.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 74 land at Turf Field, Watlington Road, Tottenham	NCC Planning Officer's Response
Highway Authority (93141)	Initial Consultation: The site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site.	No Action Required: Noted. The site is considered unsuitable for allocation due to unacceptable landscape impacts and harm to Tottenham Row Conservation Area.
Historic England (92978)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.	No Action Required: The site is unsuitable to allocate because any mineral working on this site would have unacceptable impacts on the landscape and the historic environment.
MOD (Defence Infrastructure Organisation) (92351)	Initial Consultation: If there was potential for wet working as part of the extraction scheme, DIO Safeguarding would need to be consulted.	No Action Required: Noted. The site is not considered suitable to allocate.
Frimstone Limited (98740)	Preferred Options: Request to allocate site based on following amendments: Residential properties will be in excess of 100m from the extraction area. The site will require careful design of boundary treatments to negate any visual impact and stand-offs from any potential receptors in excess of 100m to reduce other impacts such as from noise and dust. Amend the wording to state that there are no Listed Buildings or Scheduled Monuments within 1km of the extraction area and that Tottenham Row Conservation Area is in excess of 50m from the site given the amendments to the scheme detailed above.	No Action Required: Noted. Our assessment of the distance of the proposed site to residential properties is based on the red line boundary provided by Frimstone Ltd in the Access Plan, Local Site Plan, Location Plan and Site Plan (all dated July 2017). It is considered that screening and bunding would be intrusive in its own right, especially given the sloping nature of the site. The small area of the site and the proximity to the Conservation Area means that any marginal changes to distances for extraction will not make any difference to overall potential for harm. The site is considered unsuitable for allocation due to unacceptable landscape impacts and harm to Tottenham Row Conservation Area.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 74 land at Turf Field, Watlington Road, Tottenhill	NCC Planning Officer's Response
Environment Agency (98725)	Preferred Options: A hydrogeological assessment will need to be provided.	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. The site is considered unsuitable for allocation due to unacceptable landscape impacts and harm to Tottenhill Row Conservation Area.
Environment Agency (98725) Norfolk Wildlife Trust (92421, 98690) Individuals (91982, 98447, 98289, 98539, 98544, 98600, 98605, 98612, 98925, 98922, 98538)	Initial Consultation and Preferred Options: Agrees with conclusion the site is unsuitable for allocation. Impacts to biodiversity and protected species.	No Action Required: Noted. A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. The site is considered unsuitable for allocation due to unacceptable landscape impacts and harm to Tottenhill Row Conservation Area.
Borough Council of King's Lynn and West Norfolk Environmental Health (99013) Tottenhill Parish Council (98456) Individuals (92271, 92270, 98337, 98447, 95092, 98337, 98289, 98539, 98544, 98459, 98600, 98605, 98612, 98925, 98522)	Initial Consultation and Preferred Options: Amenity and health impacts on residents regarding air pollution, light, dust and noise will need to be assessed and mitigated. The nearest property is within 77m of the site.	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. The site is considered unsuitable for allocation due to unacceptable landscape impacts and harm to Tottenhill Row Conservation Area.
Tottenhill Parish Council (98456)	Preferred Options: States Sand and gravel will be transported by existing conveyor, affecting vulnerable properties due to subsistence and vibration. The water	No Action Required: Details of the proposed conveyor route have not been provided at the Local Plan stage. It is unlikely that a conveyor route between the two locations would need to go

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 74 land at Turf Field, Watlington Road, Tottenham	NCC Planning Officer's Response
Individuals (95092, 98447, 98337, 98343, 98539, 98544, 98459, 98925, 98922, 98538)	table is dropping due to MIN 76. Impact on the sewage system.	behind the properties to the west of the site. The only water abstraction which has taken place at the Tottenham sites is for a licence which has been in use since the late 1960s. This is for a low loss activity, so much of this water will be returned to ground. The Environment Agency state groundwater levels have decreased generally due to lower-than-average rainfall/drought conditions. The site is considered unsuitable for allocation due to unacceptable landscape impacts and harm to Tottenham Row Conservation Area.
Tottenham Parish Council (98456) Individuals (95092, 98447, 98337, 98289, 98343, 98459, 98600, 98605, 98612)	Preferred Options: A quarry on this site would have an unacceptable impact to the area. Bunding would be intrusive to this conservation and Area of Natural Beauty area. Surrounding areas completely surrounded by water due to historic extraction and existing sites.	No Action Required: The site is considered unsuitable for allocation due to unacceptable landscape impacts and harm to Tottenham Row Conservation Area. It is proposed to be restored back to agricultural use at the original ground level. Therefore, this proposal would not lead to additional areas of open water.
Tottenham Parish Council (98456) Individuals (98337, 98343, 98922, 98297)	Preferred Options: Quarrying in Tottenham has been going on for a 100 years or more the first planning application in the 1990s, 60 years disturbance and disruption in the area.	No Action Required: The site is considered unsuitable for allocation due to unacceptable impacts on the landscape and on Tottenham Row Conservation Area.
Individuals (97844, 97850, 97856, 97862, 97868, 97874, 97880, 97886, 97892, 97898, 97904, 97910, 97916, 97922, 97934, 97940, 97946, 97952, 97958, 97964, 97970, 98570, 98574, 97976, 95092, 98447, 98337,	Preferred Options: Individuals made the following representations: Tottenham surrounded by Quarries Number of HGV/Traffic congestion Pollution, noise and dust Too near Wormegay School Accident black spot A134/A10 roundabout and Wormegay school. Loss of woodland No footpaths for walking. 30m Close from County Wildlife Site of Tottenham Row Common Sample survey trenches do not survey the whole site	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. The Highway Authority has no objections. The site is not wooded, it is an arable field. There are no Public Rights of Way within or adjacent to the site. The parking for the safari park is located next to part of site MIN 206, but is not within it. However, the route to be used by the buggies to access the wildlife park is across part of site MIN 206. Trial trenching for archaeological survey is agreed as part of the investigation scheme.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 74 land at Turf Field, Watlington Road, Tottenham	NCC Planning Officer's Response
98459, 98600, 98605, 98612, 98925, 98922, 98522)	<p>Planning permission has been granted on the site for car parking to the safari park, where will this parking be located</p> <p>Taking Arable land out of the food chain which is needed</p> <p>Breach of human rights (right to the enjoyment of property)</p>	<p>The mineral resource at this site is expected to take two years to extract. Therefore, there would not be a permanent loss of agricultural land.</p> <p>The Human Rights Act Article 8 rights are a material planning consideration. The rights have to be balanced against all other material considerations and this will be a planning judgment. The site is considered unsuitable for allocation due to unacceptable landscape impacts and harm to Tottenham Row Conservation Area.</p>
Individuals (94584, 98447, 98544, 98459, 98925, 98297)	<p>Preferred Options: Living 130m from the site, we are unable to enjoy our property, garden or environment, constant repetitive mind-numbing noise and disruption 5 days plus per week since the operation began on MIN 76, this would only continue if MIN 74 was allowed. MIN 75 and MIN 76 operating at the same time over the summer. Operators not following restrictions.</p>	<p>No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. MIN 76 got planning permission in 2019 with mitigation measures conditioned. Permitted sites are inspected regularly for compliance with planning conditions and any complaints received are investigated.</p>
Individuals (98447, 98297)	<p>Preferred Options: Notifying people within 250m, a small site notice on a pole is insufficient. Not everyone has access to the internet. Cases where people within 250m have not been notified. Some tenants in nearby houses occupy landowner's house.</p>	<p>No Action Required: Noted. The decision to write to residential properties within 250m, and the use of a site notice were additional measures taken to increase the level of notification for the consultation. All Parish councils were notified of the consultation. The individual properties within 250m were written to, so it should not have made any difference whether tenants/owners were occupying the property.</p>
Individuals (98343, 94158)	<p>Preferred Options: Digging sand and gravel in these areas to then make concrete to be poured over another part of the County is environmentally unsound.</p>	<p>No Action Required: NCC is also required to produce a Minerals Local Plan taking into account national planning policies, guidance and legislation, and should provide for the extraction of mineral resources of local and national importance.</p>
Individuals (98459)	<p>Preferred Options: Fear that history will repeat itself where sites have been claimed to be unsuitable then applied for at a later date.</p>	<p>No Action Required: If a planning application was to be submitted for mineral extraction at site MIN 74 then Norfolk County Council cannot legally refuse to consider it.</p>
Individuals (98600, 98605, 98612, 98522, 98297)	<p>Preferred Options: The development will negatively affect property values and cause loss of business, making Andel Lodge Hotel unviable.</p>	<p>No Action Required: Property values and impacts on other local businesses are not a material planning considerations, in themselves; only if unacceptable amenity impacts could not be mitigated. The site is considered unsuitable for allocation due to</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 74 land at Turf Field, Watlington Road, Tottenham	NCC Planning Officer's Response
		unacceptable landscape impacts and harm to Tottenham Row Conservation Area.

Table 81: Main issues raised during the Consultation stages about site MIN 77 land at Runns Wood, south of Whin Common Road, Tottenham

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction on this site would cause unacceptable harm due to unacceptable landscape and ecological impacts due to the loss of a significant area of mature mixed deciduous woodland.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 77 land at Runns Wood, south of Whin Common Road, Tottenham	NCC Planning Officer's Response
Highway Authority (93142)	Initial Consultation: The site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site.	No Action Required: Noted. The site is considered unsuitable for allocation due to unacceptable impacts to landscape and ecology as a result of the proposed loss of a significant area of mature woodland.
NCC Natural Environment Team (93119, 93107, 93094) Norfolk Wildlife Trust (92413) Environment Agency (98726) Individuals (94585)	Initial Consultation and Preferred Options: Agree with conclusion the site is unsuitable for allocation in accordance with Section 15 of the NPPF.	No Action Required: Noted. The site is considered unsuitable for allocation due to unacceptable impacts to landscape and ecology as a result of the proposed loss of a significant area of mature woodland.
Historic England (92980)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.	No Action Required: Noted. The site is considered unsuitable for allocation due to unacceptable impacts to landscape and ecology as a result of the proposed loss of a significant area of mature woodland.
Ministry Of Defence (Defence Infrastructure Organisation) (92343)	Initial Consultation: We would recommend dry restoration and dry phased working.	No Action Required: 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 considered unsuitable for allocation due to unacceptable impacts to landscape and ecology as a result of the proposed loss of a significant area of mature woodland.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 77 land at Runns Wood, south of Whin Common Road, Tottenhill	NCC Planning Officer's Response
Frimstone Limited (98741)	<p>Preferred Options: Request to allocate site based on following amendments: A planning application would provide a further Heritage Assessment, assessment of the significance of archaeological remains, further noise and dust assessment and outline mitigation measures to deal appropriately with any amenity impacts. Runs Wood no longer constitutes a significant area of woodland within the local landscape and therefore does not have a significant biodiversity value, due to lack of management and the dominance of Rhododendron ponticum. The restoration proposals will subsequently mitigate against the loss of the existing woodland and provide for a net biodiversity gain. It would be an extension to an existing site and therefore under the current Local Plan will be preferred by the MPA to new sites.</p>	<p>No Action Required: Noted. The responses of the NCC Natural Environment Team, and Norfolk Wildlife Trust agree that this area still constitutes a significant mixed woodland. The site is considered unsuitable for allocation due to unacceptable impacts to landscape and ecology as a result of the proposed loss of a significant area of mature woodland. Extensions to existing sites should not be automatically preferred to new sites. National Planning Policy Guidance has clarified under Paragraph: 010 (Reference ID: 27-010-20140306) the suitability of each proposed site, whether an extension to an existing site or a new site, must be considered on its individual merits.</p>
Borough Council of King's Lynn and West Norfolk Environmental Health (99014) Norfolk Wildlife Trust (98691)	<p>Preferred Options: Amenity and health impacts on residents regarding air pollution, light, dust and noise will need to be assessed and mitigated.</p>	<p>No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. However, the site is considered unsuitable for allocation due to unacceptable impacts to landscape and ecology as a result of the proposed loss of a significant area of mature woodland.</p>
Tottenhill parish council (98457) Individuals (98448, 98338, 98290, 98342, 98545, 98460, 98926, 98920, 91984,)	<p>Initial Consultation and Preferred Options: Woodland and biodiversity loss. Increased congestion on the roads. Due to existing quarrying the whole area is drying out and the water table is dropping. Further quarrying could have an impact on the sewage system. Intrusive to the landscape. Cumulative long-term continuation of impacts on the area. Taking arable land out of the food chain when it is needed.</p>	<p>No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. As an extension area to an existing extraction site, the number of vehicle movements is expected to remain the same as existing, but continue for a longer time period. The only water abstraction which has taken place at the Tottenhill sites is for a licence which has been in use since the late 1960s. This is for a low loss activity, so much of this water will be returned to ground. The Environment Agency state groundwater</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 77 land at Runns Wood, south of Whin Common Road, Tottenhill	NCC Planning Officer's Response
		<p>levels have decreased generally due to lower-than-average rainfall/drought conditions.</p> <p>The majority of the site is currently woodland, around a quarter is currently arable land.</p> <p>However, the site is considered unsuitable for allocation due to unacceptable impacts to landscape and ecology as a result of the proposed loss of a significant area of mature woodland.</p>
<p>Individuals (97845, 97851, 97857, 97863, 97869, 97875, 97881, 97887, 97893, 97899, 97905, 97911, 97917, 97923, 97934, 97941, 97947, 97953, 97959, 97965, 97971, 98569, 98575, 97977, 98448, 98338, 98290, 98290, 98542, 98460, 98601, 98606, 98610, 98926, 98920, 98545, 98342, 98448)</p>	<p>Preferred Options: Issues raised by individuals included:</p> <p>Tottenhill surrounded by Quarries</p> <p>Number of HGV/Traffic congestion</p> <p>Pollution, noise and dust</p> <p>Too near Wormegay School</p> <p>Accident black spot A134/A10 roundabout and Wormegay school.</p> <p>Loss of [ancient] woodland</p> <p>No footpaths for walking.</p> <p>30m Close to the County Wildlife Site of Tottenhill Row Common</p> <p>Sample survey trenches do not survey the whole site</p> <p>Planning permission has been granted on the site for car parking to the safari park, where will this parking be located?</p> <p>Surrounding areas completely surrounded by water due to historic extraction and existing sites.</p> <p>Existing disruption and noise</p> <p>Operators not following existing restrictions</p> <p>Breach of human rights (right to enjoyment of Property)</p> <p>Sand and gravel from Tottenhill should not be used in other parts of Norfolk</p> <p>Fears that the unallocated sites will be applied for anyway.</p> <p>Negative impact on property values</p>	<p>No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission.</p> <p>The Highway Authority has no objections.</p> <p>There are no Public Rights of Way within or adjacent to the site.</p> <p>The parking for the safari park is located next to part of site MIN 206, but is not within it. However, the route to be used by the buggies to access the wildlife park is across part of site MIN 206.</p> <p>The site is proposed to be restored to a lower level comprising a mixture of ponds, wet woodland and wet grassland.</p> <p>MIN 76 at Tottenhill received planning permission in 2019 with mitigation measures conditioned. Permitted sites are inspected regularly for compliance with planning conditions and any complaints received are investigated.</p> <p>Human Rights Act Article 8 rights are a material planning consideration. The rights have to be balanced against all other material considerations and this will be a planning judgment.</p> <p>NCC is also required to produce a Minerals Local Plan taking into account national planning policies, guidance and legislation. If a planning application was to be submitted for mineral extraction at site MIN 77 then Norfolk County Council cannot legally refuse to consider it.</p> <p>Property values are not a material planning consideration.</p> <p>However, the site is considered unsuitable for allocation due to unacceptable impacts to landscape and ecology as a result of the proposed loss of a significant area of mature woodland.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 77 land at Runns Wood, south of Whin Common Road, Tottenhill	NCC Planning Officer's Response
Individuals (98448)	Preferred Options: Notifying people within 250m, a small site notice on a pole is insufficient. Not everyone has access to the internet. Cases where people within 250m have not been notified. Some tenants in nearby houses occupy landowner's house.	No Action Required: Noted. The decision to write to residential properties within 250m, and the use of a site notice were additional measures taken to increase the level of notification for the consultation. All Parish councils were notified of the consultation. The individual properties within 250m were written to, so it should not have made any difference whether tenants/owners were occupying the property.

Table 82: Main issues raised during the Consultation stages about site MIN 206 land at Oak Field, west of Lynn Road, Tottenhill

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 206 land at Oak Field, west of Lynn Road, Tottenhill	NCC Planning Officer's Response
Highway Authority (93140, 98840)	Initial Consultation: The site is acceptable subject to the use of the existing access and the use of conveyor / haul routes to the plant site. Preferred Options: Acceptable subject to access via land to north, then A10. Routing agreement required.	No Action Required: Noted and contained in site policy within Publication Version of the Plan
Ministry Of Defence (Defence Infrastructure Organisation) (92352)	Initial Consultation: 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.	No Action Required: The site is proposed to be restored to an agricultural afteruse at original ground levels.
Frimstone Limited/Stephen M Daw Limited (91921)	Initial Consultation: Investigations have proven a larger deposit of Sand and Gravel than originally envisaged. It is proposed to increase the site to 13.9ha and increase the estimated mineral reserve figure to 780,000 tonnes.	No Action Required: Noted. The site area and estimate resource figures were subsequently amended again. The site policy within the Publication version of the Plan is for a 14.7ha. site area, and an estimated resource of 750,000 tonnes sand and gravel.
Environment Agency (98727)	Preferred Options: The need for a hydrogeological impact assessment must be included. It's likely that de-watering will be required here.	Action Required: The site policy in the Publication version of the Plan contains a requirement for a Hydrogeological Impact Assessment to support a future planning application.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 206 land at Oak Field, west of Lynn Road, Tottenhill	NCC Planning Officer's Response
Borough Council of King's Lynn and West Norfolk Environmental Health (92333, 92029, 98994, 99015)	Initial Consultation and Preferred Options: The Tottenhill sites should be worked sequentially to mitigate any cumulative impacts. Amenity and health impacts on residents regarding air pollution, light, dust and noise will need to be assessed and mitigated. In a 1 in 1000-year rainfall event there are additional small areas of surface water pooling, so this should be considered within a surface water drainage scheme.	No Action Required: Noted and within draft policy. A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission.
Historic England (92981, 98804)	Initial Consultation and Preferred Options: A heritage statement is needed to identify appropriate mitigation with any planning application. The policy could be improved by including specific reference to the nearest heritage assets.	Action Required: Noted. The site policy in the Publication version of the Plan contains a requirement for the submission of a Heritage Statement to support a future planning application with specific reference to Tottenhill Row Conservation Area.
Norfolk Wildlife Trust (92383)	Initial Consultation: We recommend that co-ordinated restoration to enhance landscape connectivity between all the nearby CWS should be supported in the site policy.	No Action Required: The CWSs are not adjacent to the proposed site. 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.
Norfolk Wildlife Trust (98687)	Preferred Options: Need for hydrological assessment in the policy as well as supporting text.	Action Required: Noted. The site policy in the Publication version of the Plan contains a requirement for the submission of a Hydrogeological Impact Assessment to support a future planning application.
Tottenhill parish council (98458) Individuals (98458, 98927, 98921, 98461, 98339, 98291, 94728, 91985)	Preferred Options: Woodland and biodiversity loss. Increased congestion on the roads. Existing quarrying the whole area is drying out and dropping the water table. Further quarrying could have an impact on the sewage system. Intrusive to the landscape. Cumulative long-term continuation of impacts on the area.	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. The majority of the site is currently agricultural land. The Highway Authority has not objections. As an extension area to an existing extraction site, the number of vehicle movements is expected to remain the same as existing, but continue for a longer time period. The only water abstraction which has taken place at the Tottenhill sites is for a licence which has been in use since the late 1960s. This is for a low loss activity, so much of this water will be returned to ground. The Environment Agency state groundwater

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 206 land at Oak Field, west of Lynn Road, Tottenham	NCC Planning Officer's Response
		levels have decreased everywhere due to lower-than-average rainfall/drought conditions in recent years.
<p>Tottenham Parish Council (98458) Individuals (97846, 97852, 97858, 97864, 97870, 97876, 97882, 97888, 97894, 97900, 97906, 97912, 97918, 97924, 97936, 97942, 97948, 97954, 97978, 97960, 97966, 97972, 98571, 98576, 98602, 98607, 98611, 98458, 98927, 98921, 98546, 98546, 98461, 98449, 98359, 98339, 94728, 98344)</p>	<p>Preferred Options: Individuals made the following representations: Tottenham surrounded by Quarries No. of HGV/Traffic congestion Pollution, noise and dust Too near Wormegay School Accident black spot A134/A10 roundabout and Wormegay school. No footpaths for walking. 30m Close from County Wildlife Site of Tottenham Row Common Sample survey trenches do not survey the whole site Planning permission has been granted on the site for car parking to the safari park, where will this parking be located? Surrounding areas completely surrounded by water due to historic extraction and existing sites. Taking Arable land out of the food chain which is needed more than ever. Breach of human rights (right to the enjoyment of Property). Adverse impact on property values. No benefit of extraction to the local community. Existing disruption, noise and operators not following restrictions.</p>	<p>No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact (including from noise and dust) arising from the operations. Any mitigation provided would be conditioned in a planning permission. The Highway Authority has no objections. As an extension to an existing extraction site, the number of vehicle movements is expected to remain the same as existing, but continue for a longer time period. There are no Public Rights of Way within or adjacent to the site. The parking for the safari park is located next to part of site MIN 206, but is not within it. However, the route to be used by the buggies to access the wildlife park is across part of site MIN 206. Article 8 human rights are a material planning consideration. The rights have to be balanced against all other material considerations and this will be a planning judgment. Property values are not a material planning consideration. The National Planning Policy Framework states that "great weight should be given to the benefits of mineral extraction, including to the economy". It is proposed to be restored back to agricultural use at the original ground level. Therefore, this proposal would not lead to additional areas of open water nor a permanent loss of agricultural land. MIN 76 got planning permission in 2019 with mitigation measures conditioned. Permitted sites are inspected regularly for compliance with planning conditions and any complaints received are investigated.</p>
<p>Individuals (98449)</p>	<p>Preferred Options: Notifying people within 250m, a small site notice on a pole is insufficient. Not everyone has access to the internet. Cases where people within 250m have not been notified. Some tenants in nearby houses occupy landowner's house.</p>	<p>No Action Required: The decision to write to residential properties within 250m, and the use of a site notice were additional measures taken to increase the level of notification for the consultation. All Parish councils were notified of the consultation. The individual properties within 250m were written</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 206 land at Oak Field, west of Lynn Road, Tottenham	NCC Planning Officer's Response
		to, so it should not have made any difference whether tenants/owners were occupying the property.
Individuals (98344)	Preferred Options: Digging sand and gravel in these areas to then make concrete to be poured over another part of the County is environmentally unsound.	No Action Required: NCC is also required to produce a Minerals Local Plan taking into account national planning policies, guidance and legislation, and should provide for the extraction of mineral resources of local and national importance.
Individuals (94160)	Preferred Options: Fear that history will repeat itself where sites have been claimed to be unsuitable then applied for at a later date.	No Action Required: If a planning application was to be submitted for mineral extraction at site MIN 206 then Norfolk County Council cannot legally refuse to consider it.

Table 83: Main issues raised during the Consultation stages about site MIN 32 land west of Lime Kiln Road, West Dereham

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction on this site would cause unacceptable impact on the landscape. It is considered that the screening/bunding proposed would be intrusive in its own right.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 32 land west of Lime Kiln Road, West Dereham	NCC Planning Officer's Response
NCC Historic Environment Service (93207)	Initial Consultation: The archaeology text needs amending: A number of Anglo-Saxon buildings and remains of burial mounds were found during excavations on adjacent land.	No Action Required: Noted. The site assessment text was amended to include this information in the Preferred Options consultation document. However, the site is considered unsuitable for allocation due to an unacceptable impact on the landscape.
Highway Authority (93143)	Initial Consultation: The site is acceptable subject to the use of the existing access and continued routing arrangements.	No Action Required: Noted. However, the site is considered unsuitable for allocation due to an unacceptable impact on the landscape.
Historic England (92974)	Initial Consultation: 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.	No Action Required: Noted. However, the site is considered unsuitable for allocation due to an unacceptable impact on the landscape.
MOD (Defence Infrastructure Organisation) (92353)	Initial Consultation: If there was wet restoration or potential for wet working as part of the extraction scheme, DIO Safeguarding would need to be consulted.	No Action Required: Noted. There is no proposal for a wet restoration or a wet working. The site is considered unsuitable for allocation due to an unacceptable impact on the landscape.
Frimstone Limited (91799, 98742)	Initial Consultation: The area of land proposed for extraction has been reduced and a detailed specification	No Action Required: Noted. The introduction of hedgerows and bunds would appear incongruous in the landscape. Therefore, the

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 32 land west of Lime Kiln Road, West Dereham	NCC Planning Officer's Response
	<p>for screen bunding and landscaping arrangements has been prepared so it will not be intrusive in the landscape.</p> <p>Preferred Options: Request to allocate site based on following amendments: A planning application would provide a further Heritage Assessment, assessment of the significance of archaeological remains, landscape, further noise and dust assessment and outline mitigation measures to deal appropriately with any amenity impacts. Mitigation proposals have been implemented as per the concept development plan the site will not afford any views to potential external sensitive receptors. Under current Local Plan an extension to an existing site and therefore will be preferred by the MPA to new sites.</p>	<p>site is considered unsuitable for allocate due to an unacceptable impact on the landscape. The Publication version of the NM&WLP does not include a preference for extensions, in accordance with current national planning policy and guidance which states that applications should be determined on their own merits.</p>
Borough Council of King's Lynn and West Norfolk Environmental Health (99016)	<p>Preferred Options: The site has the potential to cause emission of PM10 and PM2.5 which can affect the health and amenity of local residents. Amenity and health impacts on residents regarding air pollution, light, dust and noise will need to be assessed and mitigated.</p>	<p>No Action Required: Noted. The site is considered unsuitable for allocation due to an unacceptable impact on the landscape.</p>
Environment Agency (92936, 98728)	<p>Initial Consultation and Preferred Options: Agree with the conclusion that the site is unsuitable to be carried forward. A hydrogeological impact assessment would be needed if the site was carried forward and groundwater protected.</p>	<p>Action Required: Noted. The site is considered unsuitable for allocation due to an unacceptable impact on the landscape.</p>
Individuals (98294, 28262, 98260, 94936, 93484)	<p>Preferred Options: Issues raised included: Increase in HGV's, negatively affect the landscape/no acceptable mitigation, and threat of pollution, noise and dust. Potential impacts to nearby Grade I Listed Church. Negative effect on property values.</p>	<p>Action required: Noted. As an extension to the existing operations it would not result in an increase in HGVs movements, but the existing operations would continue for longer (7 years). Any future planning application would need to assess the potential for amenity impacts and implement mitigation measures to ensure no unacceptable impacts. Property values are not a material planning consideration. Notwithstanding this, the site is considered unsuitable for allocation due to an unacceptable impact on the landscape.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 32 land west of Lime Kiln Road, West Dereham	NCC Planning Officer's Response
Individuals (94161)	Preferred Options: We need to protect the earth from exploitation and find other non-invasive ways of providing for human needs or learn to live differently.	No Action Required: The NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance.

Table 84: Main issues raised during the Consultation stages about site MIN 40 land east of Grandcourt Farm, East Winch

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy. Planning application ref: C/2/2018/2016 was submitted by Sibelco UK Ltd for site MIN 40 in 2018. As at May 2022, the planning application for site MIN 40 is subject to an appeal for non-determination, the NCC Planning Regulatory Committee at its meeting in April 2022 stated that if the application came before them, they would be minded to refuse the application based on the impacts on the Public Rights of Way network.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 40 land east of Grandcourt Farm, East Winch	NCC Planning Officer's Response
NCC Natural Environment Team (93113, 93108)	Initial Consultation: An AIA would be required.	No Action Required: Noted and the site allocation policy within the Publication version of the NM&WLP includes a requirement for an Arboricultural Impact Assessment would be required at the planning application stage.
Ministry Of Defence (Defence Infrastructure Organisation) (92344)	Initial Consultation: No objection subject to the Bird Management Hazard Plan being implemented as part of planning consent.	No Action Required: Noted. The site allocation policy within the Publication version of the NM&WLP includes a requirements for a Bird Hazard Assessment report and a Bird Hazard Management Plan if necessary to be submitted at the planning application stage.
Natural England (92111)	Initial Consultation: Question whether the site should have been screened out in the Habitats Regulations Assessment (HRA) due to potential impacts of dewatering. 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.	Action Required: 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 Initial Consultation document had not taken this into account and has now been corrected. The site allocation policy requires the submission of an acceptable Hydrogeological Impact Assessment at the planning application stage.
Sibelco UK Limited (92482, 98645)	Initial Consultation and Preferred Options: Sibelco submitted a planning application accompanied by an environmental impact assessment which determines that	No Action Required: Planning application ref: C/2/2018/2016 was submitted by Sibelco UK Ltd for site MIN 40 in 2018. As at May 2022, the planning application for site MIN 40 is subject to an

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 40 land east of Grandcourt Farm, East Winch	NCC Planning Officer's Response
	there will be no significant impacts from the continued working of Grandcourt quarry.	appeal for non-determination, the NCC Planning Regulatory Committee at its meeting in April 2022 stated that if the application came before them they would be minded to refuse the application based on the impacts on the Public Rights of Way network.
Highway Authority (98840)	Preferred Options: The site is acceptable subject to material processing at existing plant, use of existing internal haul-route required and continued use of rail for material transportation.	No Action Required: Noted and the requirement for use of conveyor and/or internal haul routes to the current processing plant site are contained within the site allocation policy. Around 70% of the material will be taken by rail. The remainder is permitted to be transported from the plant site by road.
Environment Agency (92932, 92918, 98719) Norfolk Wildlife Trust (92384, 98671)	Initial Consultation and Preferred Options: Object. The need for a hydrogeological impact assessment must be included if taken forward. De-watering will need to be severely minimised due to the principal aquifer. Restoration proposals should also include heathland due to the proximity to heathland habitats on East Winch Common. There is potential for provision of green infrastructure.	Action Required: In the planning application, 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. The site allocation policy requires the submission of an acceptable Hydrogeological Impact Assessment at the planning application stage.
Historic England (92976, 98813)	Initial Consultation and Preferred Options: Prepare a HIA now to consider the suitability of the site, and inform its extent and any potential heritage mitigation in advance of the next draft of the Plan. The findings of the HIA would then need to inform the policy and supporting text.	Action Required: Noted. The site allocation policy has been amended in to also specifically refer to All Saints Church, East Winch, in the requirement for a Heritage Statement. The revised restoration scheme submitted in the current planning application reduces the extent of the eastern lake and restores the eastern field immediately opposite All Saints Church to grassland and Historic England had no objections. The site is also allocated in the current adopted Minerals Site Specific Allocations DPD. Therefore, we consider that an HIA is not required to be produced for the NM&WLP.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 40 land east of Grandcourt Farm, East Winch	NCC Planning Officer's Response
Individuals (92281)	Initial Consultation: There should be minimum of 500m from residential boundaries, with garden boundaries being given the same status as houses themselves.	No Action Required: The site assessment and planning application submission demonstrate that the development would not have an unacceptable impact on local amenity and health. Planning conditions have been proposed as appropriate. The site allocation policy requires the submission of noise, dust and air quality assessments and mitigation measures to deal appropriately with any amenity impacts at the planning application stage. The policy also requires the submission of an acceptable Landscape and Visual Impact Assessment and a scheme of phased working and progressive restoration.
Borough Council of King's Lynn and West Norfolk Environmental Health (99017)	Preferred Options: A planning application for mineral extraction at this site must include noise, vibration, dust and air quality assessments, plus mitigation measures to minimise harmful emissions to air and address appropriately any human health or amenity impacts. Additionally the cumulative impacts of nearby allocations MIN06 and WS5 need to be included. Potential exists for silt ingress to the Mintlyn Stream from material transported by HGV on the haul route, unless conditions are required. Due to the continued use of the existing haul route, the conditions regarding dust in relation to the haul route should be replicated in any future planning permission for MIN 40 to mitigate against watercourse contamination.	No Action Required: Noted and the site allocation policy requires the submission of noise, dust and air quality assessments and mitigation measures to deal appropriately with any amenity impacts at the planning application stage. A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. The planning application (C/2/2018/2016) contained proposed mitigation (within the Environmental Statement) to include a dust monitoring scheme, and a dust action plan. The Borough Council response to the application stated that, "the adoption of the Dust Monitoring Scheme and the Dust Action plan should control and mitigate dust emissions and prevent adverse effects from dust at the sensitive receptors"
Individuals (98252, 98259)	Preferred Options: Issues raised included: Existing issues with large amount of dust depositing onto nearby residential properties. The development will negatively affect property values.	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. Property values are not a material planning consideration. The issues raised regarding dust from the existing mineral extraction have been investigated by the Council's monitoring team.
Mr and Mrs Plaxton/Fisher	Preferred Options: This proposed silica extraction site is deemed to be more suitable than the land north of Stow Bardolph (AOS F).	No Action Required: Multiple sites for silica sand extraction will be required to meet forecasted demand for this scarce resource.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 40 land east of Grandcourt Farm, East Winch	NCC Planning Officer's Response
German LLP (98910)		The issues raised regarding AOS F are responded to in the section of this report specifically covering AOS F.
Individuals (94162)	Preferred Options: We need to protect the earth from exploitation and find other non invasive ways of providing for human needs or learn to live differently.	No Action Required: NCC is required to produce a Minerals Local Plan to provide a steady and adequate supply of industrial minerals taking into account national planning policies, guidance and legislation.

Table 85: Main issues raised during the Consultation stages about site SIL 01 land at Mintlyn South, Bawsey

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. A planning application, for this site, (FUL/2020/0021) for silica sand extraction, associated works and progressive restoration to wildlife habitat, geological exposures and a lake was granted permission in August 2021.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site SIL 01 land at Mintlyn South, Bawsey	NCC Planning Officer's Response
Ministry of Defence (92345, 98658)	Initial Consultation and Preferred Options: This site is of concern to the MOD. However, due to its location depending on the nature and scale of the restoration should be manageable with the right restoration and Bird Hazard Management Plan in place.	No Action Required: The site allocation policy contains a requirement for a Bird Hazard Assessment to support future planning applications. The Environmental Statement for the planning application included an assessment of Bird Hazard. The MOD replied with no safeguarding objections.
Norfolk Wildlife Trust (92385, 98672) Individuals (98266, 95114)	Initial Consultation and Preferred Options: Loss of biodiversity, wildlife and protected species, on a County Wildlife Site. Recommend that CWS 416 is completely excluded from the proposed allocation, and include a non-worked buffer between it and both CWS sites. The site is part of a valuable wildlife corridor on the edge of King's Lynn serving the Gaywood River, Roydon Common SPA, Sugar, Leziate and Derby Fen SSSIs. There are likely to be protected species present. Restoration post extraction should complement the adjoining habitat.	No Action Required: The CWS has not been excluded from the allocated site SIL 01 because silica sand is recognised as a nationally important industrial mineral which can only be worked where it is found, whilst County Wildlife Sites are of county ecological importance. The site allocation policy requires the submission of a Biodiversity Survey and Report as well as an Arboricultural Impact Assessment at the planning application stage. The site allocation policy also requires the restoration plan to include ecological enhancement and biodiversity net gain.
NCC Natural Environment Team (98977)	Preferred Options: Requirement of an Arboricultural Impact Assessment (AIA) to ensure sufficient standoff from the adjacent trees, plus a Landscape and Visual Impact Assessment (LVIA) and Restoration scheme to	No Action Required: Noted. The site allocation policy requires the submission of an AIA and an LVIA at the planning application stage. The Natural Environment Team's consultation response to

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site SIL 01 land at Mintlyn South, Bawsey	NCC Planning Officer's Response
	demonstrate that impacts of the development can be sufficiently mitigated.	the planning application concluded that there were no objections to the submitted documents.
Highway Authority (98852)	Preferred Options: The site is acceptable subject to extraction phased with MIN 40, submission of Transport Assessment with acceptable access strategy. Material transportation to existing processing plant via internal haul route and acceptable crossing / conveyor of highway and utilise existing rail facilities.	Action Required: The site allocation policy has been amended to state that a conveyor and/or internal haul routes must be used to transport mineral from the extraction area to the current processing plant site.
Environment Agency (92919, 98730)	Initial Consultation: This is potentially a high risk site with a County Wildlife site situated within it. An appropriate hydrogeological risk assessment should be included. Preferred Options: Dewatering should not be allowed at this site.	Action Required: The allocation policy contains a requirement for a Hydrogeological Impact Assessment to support any future planning application stage to identify potential impacts to groundwater and propose appropriate mitigation to protect any abstraction points, ecosystems and surface water features that are reliant on groundwater. The planning application contained a Hydrogeological Impact Assessment which indicated that 13 metres AOD was a critical elevation for dewatering, which the Environment Agency response to the application agreed. Therefore, the draft policy contains the requirement that 'No dewatering to take place on site below 13 metres AOD'.
Historic England (92977, 98814)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy. Preferred Options: Include specific reference to the nearest heritage assets to read 'heritage assets and their settings (including...).	Action Required: The site allocation policy has been amended to specifically refer to the Grade II* Ruins of Church of St Michael. Historic England responded to the planning application in June 2020 and said: "while we would not object to the proposals in principle we consider that that the development could result in harm to significance of the listed St Michael's Church, Mintlyn in terms of the NPPF paragraphs 193 and 200. We agree with the HIA that landscaping should be used to mitigate that effect and would recommend the extent of landscaping buffer is increased where it is smallest along the western boundary that additional planting is added to the existing area of trees. This would reduce the harmful impact and better achieve the NPPF's overarching aim of promoting sustainable development".
Borough Council of King's Lynn and West Norfolk	Preferred Options: A planning application for mineral extraction at this site must include noise, vibration, dust and air quality assessments, hydrogeological and surface	No Action Required: Noted and requirements contained within the site allocation policy where appropriate. The planning application through assessment and mitigation demonstrated that

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site SIL 01 land at Mintlyn South, Bawsey	NCC Planning Officer's Response
Environmental Health (99018)	water drainage plus mitigation measures to minimise harmful emissions to air and address appropriately any human health or amenity impacts, including the proposed route of the conveyor.	there would not be an unacceptable adverse impact arising from the operations. Any mitigation required was conditioned in the planning permission.
Mr and Mrs Plaxton/Fisher German LLP (98911)	Preferred Options: This proposed silica extraction site is deemed to be more suitable than the land north of Stow Bardolph (AOS F).	No Action Required: Multiple sites for silica sand extraction will be required to meet forecasted demand for this scarce resource. The issues raised regarding AOS F are responded to in the section of this report specifically covering AOS F.
Individual (94164)	Preferred Options: We need to protect the earth from exploitation and find other non invasive ways of providing for human needs or learn to live differently.	No Action Required: NCC is required to produce a Minerals Local Plan to provide a steady and adequate supply of industrial minerals taking into account national planning policies, guidance and legislation. Silica sand is a nationally important industrial mineral.
Individual (98266)	Preferred Options: The development will mean loss of agricultural land, resulting in the loss of the farm.	No Action Required: The loss of agricultural land was a consideration in the determination of the planning application (Policy DM16: Soils now Policy MW5: Agricultural soils) which was assessed and the planning balance weighted in line with the national need for industrial sand.
Individual (98266)	Preferred Options: Extraction of silica sand from this site goes against the principles of the Environment Bill.	No Action Required: The NPPF states Silica sand is a mineral of 'national importance', and we are required to plan for reserves for at least 10 years for individual silica sand sites. Need is assessed annually. The Local Plan would fail the test of soundness and compliance with national policies if it did not plan for silica sand extraction. The Environment Bill, which has now got assent and known as The Environment Act 2021, is considered alongside National Planning Policy through the determination of each planning application.
Individuals (98266, 95114)	Preferred Options: The previous extraction sites leased to Sibelco/ previous owners have not been restored properly or are now contaminated.	No Action Required: The acidity of the water is due to the naturally occurring pyritic deposits that are in the Leziat mineral beds. The mineral extraction has exposed these deposits, but they are naturally occurring.
Individual (98266)	Preferred Options: Too many large lakes for restoration, which encourage swimming and have caused deaths.	No Action Required: No public access is planned to be permitted on the restored areas; the nearest Public Right of Way is adjacent to the site. This is in contrast to Bawsey Country Park where Public Access was a specific requirement of restoration.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site SIL 01 land at Mintlyn South, Bawsey	NCC Planning Officer's Response
individuals (98266, 95114)	Preferred Options: Various covenants restricting the use of the land exist, and more should be added. There are Covenants on previous extraction sites for community assets but planning was granted to Leziat Sailing club land for the development of housing.	No Action Required: Covenants are private land interests and are not material planning considerations. The permission for Leziat Sailing Club was determined by the Borough Council of King's Lynn and West Norfolk.

Table 86: Main issues raised during the Consultation stages about Area of Search (AOS) E land to the north of Shouldham

In order to meet the remaining forecast need for silica sand, the Preferred Options document proposed to continue to allocate the four Areas of Search (E, F, I and J) for silica sand extraction that are currently allocated in the existing adopted Norfolk Minerals Site Specific Allocations DPD. However, following the exclusion of some parts of AOS E on agricultural land at the Preferred Options stage due to potential severe impacts on the setting of heritage assets, at Wormegay and Pentney Priory, the remaining low lying areas are still subject to concerns from the MOD (Defence Infrastructure Organisation) about bird strike risks to aircraft from wet working and the creation of large areas of open water following mineral extraction, whilst Shouldham Warren is an important area of public open space and forms a significant part of the higher land within Area of Search E. Together, these three issues means that AOS E ceases to be an Area of Search with any realistic potential for providing a future silica sand site within part of it. The three remaining Areas of Search (F, I and J) would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site, which means that the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk. Therefore, the Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand extraction, which is considered to be the most appropriate and effective method of planning for the remaining forecast need of this nationally important mineral.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
MOD (Defence Infrastructure Organisation) (92347, 98663) Individuals (including individual responses, action group standard letters and emails)	Initial Consultation and Preferred Options: The site's use is already constrained by Historic England. Therefore, the land to the south, east and west of AOS E is being identified for mineral extraction. The area of search is approximately 6km west from the centre of the main runway at RAF Marham. 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 to its potential to attract and support hazardous waterfowl closer within	No Action Required: Noted. AOS E is not allocated in the publication version of the Local Plan due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
	critical airspace. Therefore, further information would be required before a definitive response can be made. The MOD has concerns and would require further information to determine whether the sites could be managed with design principles and a Bird Management Plan.	
NCC Historic Environment Service (93220) Historic England (93004) Individuals (including individual responses, action group standard letters and emails)	<p>Initial Consultation and Preferred Options: E.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 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>No Action Required: Noted. The text was amended as requested at the Preferred Options stage. However, AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space.</p>
NCC Natural Environment Team (93114, 93110, 93095) Marham Parish Council (91946)	<p>Initial Consultation: 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>[Parish Council and Individuals] A corridor of trees must be supplied in Spring Lane, the main adjacent landholding to the development.</p>	<p>No Action Required: Noted. AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
<p>Campaigners Against Two Silica Sites (98619, 98917)</p> <p>Individuals (including individual responses, action group standard letters and emails)</p> <p>Shouldham parish council (94436)</p> <p>Wormegay parish council (98452)</p> <p>CPRE Norfolk (94293)</p> <p>Open Spaces Society (98269)</p> <p>South West Norfolk Constituency Labour Party (98234)</p>	<p>Initial Consultation and Preferred Options:</p> <p>Issues raised included:</p> <p>Consultation process did not adequately inform the public</p> <p>Need for increased glass recycling rather than mineral extraction</p> <p>Concerns regarding HGV transport and impacts, together with how highway improvements would be funded</p> <p>Concerns that Forestry England have not been consulted and their Forestry Plan has not been considered</p> <p>That the Plan is not consistent with NPPF.</p> <p>Views expressed that a foreign owned company (Belgian) should not be allowed to carry out extraction and make profit.</p> <p>Concerns that proposals do not take into account Core River Valley Policy.</p> <p>Concerns regarding flooding, water quality and water supply, mainly from a supposition that 'wet working' would require the existing water level to be increased, and that any wet restoration would increase flood risk.</p> <p>Concerns that SIL 02 had not been removed but subsumed into AOS E.</p> <p>Negative effect on Property values.</p> <p>Loss of agricultural land.</p> <p>Perception that mineral is really intended for use as frac sand.</p> <p>Concern that there is no independent audit of quantities of mineral extracted, reliance on Sibelco to supply data.</p> <p>Proposals would breach human rights.</p> <p>Concerns that the soils stripped would be moved by HGVs, uncertainty about what would happen to stripped soils.</p>	<p>No Action Required: The consultation process used for the Preferred Options Consultation either met or exceeded that required by national guidance, regulations and the SCI.</p> <p>Norfolk recycles virtually all the waste glass from households, according to the Norfolk County Council household waste audits. High purity silica sand, such as is found in Norfolk is needed in order to produce glass from recycled glass cullet; it is an ingredient within the feedstock which balances the higher level of impurities found in recycled glass so that glass of acceptable quality can be made.</p> <p>If highway improvements are required to make a mineral extraction, then the mineral operator would be expected to fund these through the use of a legal agreement.</p> <p>Forestry England have been consulted at both the Initial and Preferred Options Consultation, and are aware of the Area of Search. It is a matter for Forestry England as to whether they choose to respond to such consultations. The Mineral Planning Authority is aware of the Forestry Plan and has considered it in the planning process.</p> <p>The Plan is considered to be generally consistent with the NPPF. The nationality of a company is not a material planning consideration. Any potential future planning permission would be attached to the land, as opposed to any particular person, organisation or company.</p> <p>AOS E does not include any land within the Core River Valley designation.</p> <p>The concept of 'wet working' does not normally rely on water flowing into the working, but on the level of the natural water table; however, AOS E does not contain any proposal on how mineral extraction would take place.</p> <p>AOS E and SIL 02 should be considered as entirely separate. SIL 02 is a proposal by a mineral operator for site which includes an outline of a potential working method, in this case 'wet working'.</p> <p>An Area of Search such as AOS E is a geological area which may potentially be underlain by mineral resources and there is no</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
		<p>proposal relating to working methods. Property values are not a material planning consideration.</p> <p>The loss of agricultural land would be a consideration in any future planning application (see Policy MW5: Agricultural soils) and assessed and the planning balance weighted in line with the national need for industrial sand.</p> <p>The silica sand in the Leziate beds, underlying AOS E, is glass sand. The grain shape of glass sand makes it unsuitable for use as frac sand.</p> <p>The supply of production figures by Sibelco follows the way in which figures are collected for a range of industries across the country for government statistics.</p> <p>Article 2, Article 8 and Protocol 1 of the European Convention on Human Rights are known as 'qualified rights' in that a legal framework (the planning system) exists to consider these rights against the needs of society as a whole.</p> <p>Soils stripped as preparation for extraction phases would normally be stored onsite and used in screening bunds, they are then normally used as part of the restoration of phases.</p> <p>Notwithstanding these comments, AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space.</p>
<p>Campaigners Against Two Silica Sites (98619, 98917)</p>	<p>Initial Consultation and Preferred Options: Objections raised to the consultation process are in table 7 of this document.</p>	<p>No Action Required: Responses to the objections raised about the consultation process are in table 7 of this document.</p>
<p>Norfolk County Council – Highway Authority (98853)</p>	<p>Initial Consultation and Preferred Options: Submission of Transport Assessment including delivery of acceptable highway improvements. Access to be via A143 with right turn lane with suitable levels of visibility. Access via West Briggs Drove would not be appropriate without significant improvement. Movement of material using off-highway routes, or conveyor/pipeline etc.</p>	<p>No Action Required: Noted. AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
	preferred. Should material be conveyed by highway, a suitable access to the processing facility shall be provided shall be provided at B1145, to an acceptable standard including visibility.	
Borough Council of King's Lynn and West Norfolk (99005)	Preferred Options: In light of the NCC Environment Policy to plant 1 million trees over the next 5 years to mitigate for the effects of climate change, it would be appropriate to delete the word 'ancient', leaving an enhanced level of protection to woodland generally.	No Action Required: Provision (f) in the strategic climate change Policy MW3 expects both minerals and waste developments to take opportunities to incorporate trees, retain existing trees and include measures to assist habitats and species to adapt to the potential effects of climate change wherever possible.
Borough Council of King's Lynn and West Norfolk (99007)	Preferred Options: The site has the potential to cause emissions of PM10 and PM2.5 which can affect the health and amenity of local residents. A planning application with assessments of cumulative effects on air quality from AOS F, AOS I and AOS J along the A10, A149, A134 and B1145, transport assessment, surface water drainage scheme, Hydrogeological Risk Assessment, assess the potential for impacts on the River Nar, including from silt ingress and modification. Assessments of noise, air quality, odour, and lighting assessments, along with details of appropriate mitigation measures to reduce both amenity and health impacts on nearby receptors would be required.	No Action Required: Noted. AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space. Policy MPSS1 (Silica Sand extraction sites) sets out the requirements and submissions/assessments needed for silica sand extraction located outside of allocated sites.
Environment Agency (98729)	Preferred Options: All extraction to be above the watertable.	No Action Required: Noted. AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space.
East of Ouse, Polver & Nar Internal Drainage Board (98450)	Preferred Options: The Board is concerned that the industrialisation of the area will have a detrimental impact on the Board's operations to maintain vital watercourses. Any future permission given for this site by the Council, does not guarantee the consent of this Board.	No Action Required: Noted. AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space. .

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
Norfolk Wildlife Trust (98673, 92406)	<p>Initial Consultation: Areas of Search should be modified to provide sufficient stand off from nearby CWS to safeguard them from adverse impacts.</p> <p>Preferred Options: Mow Fen CWS is within the AoS and not suitable for minerals extraction, therefore we strongly recommend its removal from AoS and the provision of a buffer around it to avoid impacts such as dust. The AoS lies adjacent to CWS 373, species-rich grassland which will need buffering from the AoS.</p>	<p>No Action Required: Noted. AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space.</p>
<p>Historic England (93004, 98450) Marham Parish Council (94273) Wormegay parish council (98452) Open Spaces Society (98269) CPRE Norfolk (94293) Campaigners Against Two Silica Sites (98619) Individuals (including individual responses, action group standard letters and emails)</p>	<p>Initial Consultation and Preferred Options: It has to be reviewed cumulatively alongside the new preferred area of SIL 02 and MIN 19 and MIN 205. 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>The HIA should be revised to include an assessment on non-designated assets and the wider historic landscape, to include a more thorough assessment of significance and setting which may in turn lead to further recommendations for areas to be excluded from the areas of search. This will provide a better understanding of the historic environment in this area and more helpfully inform the extent of the Area of Search and Site allocation. We recommend the inclusion of a graphical display of potential avoidance/mitigation measures in the HIA itself. Depending on the findings of the revised HIA, the AOS and site area may need to be further reduced. The areas hatched in purple are removed from Plan altogether.</p> <p>Impacts on the historic environment in relation to the setting of Pentney Priory Gate and other environs. A well-preserved monastic Medieval landscape with high evidential, social and historic value. Blackborough</p>	<p>No Action Required: AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space.</p> <p>Notwithstanding this, the Historic Environment Impact Assessment was carried out by suitably qualified Historic Environment professionals who were independent of the Minerals and Waste Local Plan team. The report considers the potential landscape changes that would result from a potential quarry within AOS E, and concludes that with mitigation measures those changes could result in less than substantial harm in certain areas of AOS E which could be made acceptable in planning terms.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
	<p>Priory, Marham Abbey, Wormegay Priory, The priory at Pentney.</p> <p>The small bridge near the pumping station at Wormegay and Mow Fen was built by the Canadian forces during World War 2. The bridge and the Mission room within Wormegay were gifted to the village. Therefore, one would suggest that this bridge on the approach of Mow Fen is also of significant historical value. With a similar flat landscape over the Fen towards Spring Lane, need to extend exclusion zone with protecting the view towards or away from the Gatehouse.</p> <p>Potentially buried roman road south side of Abbey Farm.</p> <p>Areas used in World War II.</p>	
Marham Parish Council (91946)	<p>Initial Consultation: Each quarry site must be reinstated prior to moving onto the next throughout the development.</p>	<p>No Action Required: 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. AOS E is not allocated in the Publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space.</p>
<p>Marham Parish Council (91946, 94273) Shouldham parish council (94436) Wormegay parish council (98452) CPRE Norfolk (94293) Open Spaces Society (98269)</p>	<p>Initial Consultation and Preferred Options:</p> <ul style="list-style-type: none"> • Loss of natural spaces has been proven to adversely affect health, mental and physical. • Associated cost to NHS • Impacts on use on amenity and leisure, plus educational and leisure groups using the area. • No concern or regard to negative effect on the community • Ruin the landscape, destroy habitats (woodland) and protected species, and British birds of concern. • Bunds will be visually detrimental to landscape. 	<p>No Action Required: AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space.</p> <p>Any impacts are required to be assessed and mitigated in order to ensure there are no unacceptable impacts on (but not limited to) the landscape, health and wellbeing, the natural environment and protected species, existing Public Rights off Way, the safety and capacity of the road network and road users, as set out in Policy MW1, and criteria-based policy (MPSS1. Silica Sand extraction sites) as part of any future planning application for silica sand</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
<p>Ramblers Association Norfolk Area (98268) Norfolk Orienteering Club (98465) East Anglian Orienteering Club (94689) King's Lynn Mountain Bike Club (98354) South West Norfolk Constituency Labour Party (98234) Churches Together group (98000) Rt. Hon Elizabeth Truss MP (98771) Campaigners Against Two Silica Sites (98619, 98621, 18623, 98917) Individuals (including individual responses, action group standard letters and emails)</p>	<ul style="list-style-type: none"> • Silica sand particles will have a negative impact on health and respiratory diseases and will be carried great distances. • Unacceptable Impact on air quality, noise ('a continual hum' according to Sibelco), dust, light, odour, pollution. • 24 hour working • HGV impacts on local roads, effects of increasing traffic on A134, A10 and King's Lynn Bypass (especially to QE hospital). • Danger to pedestrians/other road users. • Geodiversity impacts of mineral extraction ("Special hill with high landscape value and part of a Mediaeval warren") • Archaeological investigations needed • Need to protect Public Rights of Way (PROW's) • Impacts on tourism • Cumulative noise impact of quarrying activities and jet noise from RAF Marham. • No economic impact in terms of jobs to the local economy. • Put the wider public interest before private profit. • Noise due to explosives use. 	<p>extraction. Modern planning conditions specify mitigation measures to control noise or working hours, and there are numerous examples of these working effectively for mineral extraction sites; both nationally and locally. Therefore, if potential noise impacts can be effectively mitigated, the effect on any neighbouring areas would be minimised.</p> <p>As an area of search no working hours have been proposed for AOS E. Working hours are controlled by planning conditions, as well as phased working and progressive restoration. There is no restoration scheme specified, however, this is covered by policy MPSS1 silica sand extraction, Policy MP6: Cumulative impacts and phasing of workings and Policy MP7: Progressive working, restoration and after-use.</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>Shouldham Warren is a commercial plantation planted after the Second World War, with the trees as a source of timber. As such areas of the woodland would be cropped once the trees reach maturity. There is no certainty that the woodland is underlain by commercially viable mineral, it is part of the area within which a mineral operator could search provided that the landowner was willing for such a search to take place. If mineral was found and a planning application made in the future; it would be for that application to suggest appropriate mitigation for any restriction of public access and replacement tree planting.</p> <p>There are no areas of Ancient Woodland within AOS E, the nearest Ancient Woodland is Bowl Wood just over 1.3km south of the boundary of the AOS, Button Fen is not designated as an Ancient Woodland.</p> <p>The Institute of Air Quality Management has issued a publication entitled 'Guidance on the Assessment of mineral dust impacts for</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
		<p>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.</p> <p>There are active mineral workings on the opposite side of the River Nar. These workings have been able to mitigate effectively to prevent potential impacts on the River Nar. Anglian Water and the Environment Agency have raised no objection to AOS E on the grounds of potential impacts on potable water. The nearest point of AOS E is approximately 1,500 metres from the Anglian Water facility.</p> <p>The British Geological Survey silica sand factsheet states that the downstream economic benefits of industrial sand in the glass industry are many hundreds of millions of pounds.</p> <p>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>
Individuals (including individual responses, action group standard letters and emails)	<p>Initial Consultation: 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>No Action Required: In land-use planning, permanent residential dwellings are treated differently to recreational areas with permissive access and footpaths 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. However, it is recognised that in addition to PRoWs, Shouldham Warren is an area with permissive public access and is important for outdoor recreation. This is one of the reasons why AOS E is not allocated within the Publication version of the NM&WLP.</p>
Marham Parish Council (94273) Shouldham parish council (94436)	<p>Preferred Options: The unaffordable risk to life and cost to emergency services and aircraft through wet working and restoration in close proximity to RAF Marham will</p>	<p>No Action Required: AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
<p>Wormegay parish council (98452) South West Norfolk Constituency Labour Party (98234) Rt. Hon Elizabeth Truss MP (98771) Campaigners Against Two Silica Sites (98619, 98623, 98917) Individuals</p>	<p>increase the risk of "bird strikes" and unaffordable financial risk:</p>	<p>wet working and wet restoration and the loss of access to public open space.</p> <p>Notwithstanding this, a planning application which did not address or mitigate unacceptable impacts, which is verified technically by the relevant statutory consultee, will not receive planning permission.</p>
<p>Shouldham parish council (94436) Wormegay parish council (98452) CPRE Norfolk (94293) Open Spaces Society (98269) Campaigners Against Two Silica Sites (98756, 98917) Local Residents (including individual responses, action group standard letters and emails)</p>	<p>Initial Consultation and Preferred Options: Concerns over Norfolk County Council announcing the removal of SIL 02 when in reality a third of it is now/still included in AOS E.</p>	<p>No Action Required: AOS E and SIL 02 should be considered as entirely separate. SIL 02 is a proposal by a mineral operator for site which includes an outline of a potential working method, in this case 'wet working'. An Area of Search such as AOS E is a geological area which may potentially be underlain by mineral resources and there is no proposal relating to working methods. The MOD DIO objection for SIL 02 relates to 'wet working' and restoration, which may not be the case for AOS E, and consequently the DIO have not objected to AOS E.</p> <p>Notwithstanding this, AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space. This means the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk, and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand extraction.</p>
<p>Marham Parish Council (94273)</p>	<p>Preferred Options: Import the material or find alternative locations and questioning the need for silica</p>	<p>No Action Required: The process by which the Areas of Search were defined within the Single Issue Silica sand Review 2015-2017 used a sieving process which progressively removed</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
<p>Rt. Hon Elizabeth Truss MP (98771)</p> <p>Individuals (including individual responses, action group standard letters and emails)</p>	<p>sand to be extracted in Norfolk, and should only be extracted in brownfield areas.</p> <p>The government does not set out how much silica sand the country needs.</p> <p>Sirius Minerals are sourcing from elsewhere in the north of England, whilst Sibelco are taking advantage of the local area/apathy here. Norfolk should not be required to comply with national policy for silica sand provision.</p>	<p>environmental, heritage and biodiversity higher level designations which would be incompatible with areas of search; while recognising that silica sand is a nationally important mineral resource. The Planning Inspector who examined the Silica sand Review concluded that the process of designating the Areas of Search were consistent with national policy.</p> <p>Notwithstanding this, AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space. This means the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk, and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand extraction.</p> <p>Mineral can only be extracted where it occurs, and silica sand of appropriate quality for glassmaking is sparsely located in England. As Norfolk has an established processing plant, national policy states that the Mineral Planning Authority should plan for sufficient mineral extraction to meet the demands of the processing plant using historic sales data. Virtually all mineral extraction occurs in the open countryside, on land that is either in agricultural or forestry use. Areas of previously developed land are largely unsuitable and unavailable for extraction.</p> <p>In the case of Sirius Minerals, this is a new mineral venture to extract Polyhalite, a nationally important mineral. The mineral deposit is found underlying part of the North Yorkshire Moors National Park, and it is a matter of fact that minerals can only be dug where they occur, and the mining of the Polyhalite takes place in the National Park. Due to the fact that following the extraction of Polyhalite, a significant part would be exported by ship, an underground pipeline to Teeside was constructed, and</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
		processing takes place there. This is actually in some ways similar to Sibelco's operation, excepting that Sibelco process the silica sand relatively close to the extraction location, and then transport the processed product to UK manufacturing plants, mostly by rail.
Shouldham parish council (94436) Wormegay parish council (98452) Norfolk Orienteering Club (98465) South West Norfolk Constituency Labour Party (98234) Churches Together group (98000) Campaigners Against Two Silica Sites (98919) Individuals (including individual responses, action group standard letters and emails)	<p>Initial Consultation and Preferred Options: Impacts from the loss of woodland at Shouldham Warren and links to climate change including the loss of woodland as a carbon sink, impact on the landscape, environment and biodiversity, use of finite resources, Trees as producers of oxygen, and the government policy to seek the planting of additional trees.</p> <p>The UK has signed up to the Paris Agreement which in turn led to the Climate Change Act which commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. The Norfolk Climate Change Partnership that NCC and the BC KL&WN are partners in published the 'Tomorrow's Norfolk, Today's Challenge' Climate Change Strategy and that states that in West Norfolk the per capita CO2 emissions is was 10.7 tonnes in 2006, far higher than the rest of Norfolk.</p>	<p>No Action Required: The Warren is a commercial plantation, within which trees would be cropped for timber as part of normal forestry practices. When the trees are harvested, the most efficient way for carbon to be locked in, is for mature trees to be processed into timber and then into products, followed by replanting (Cannell, Institute of Chartered Foresters, 1999).</p> <p>It would be for any future planning application to propose potential restoration schemes, which could include replanting on parts of the site. Strategic Policy MW3: Climate change mitigation and adaption expects proposals for new minerals developments (including extensions to existing sites) take opportunities to incorporate trees, retain existing trees and include measures to assist habitats and species to adapt to the potential effects of climate change wherever possible (provision f). Restoration proposals must provide for biodiversity net gains in accordance with Policy MP7.</p> <p>High purity silica sand, such as is found in Norfolk is needed in order to produce glass from recycled glass cullet; it is an ingredient within the feedstock which balances the higher level of impurities found in recycled glass so that glass of acceptable quality can be made. As the use of recycled glass within the feedstock reduces the energy required to achieve a satisfactory melt, this reduces the climate change impacts of glassmaking, but a proportion of silica sand is required for this to be possible.</p> <p>The use of silica in the manufacture of high quality, thermally efficient window glass, makes a positive contribution to reducing climate change by reducing heating and cooling demands, for which fossil fuels may be used, both directly and indirectly.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
<p>Marham Parish Council (94273) Wormegay parish council (98452) Campaigners Against Two Silica Sites (98623) Individuals (including individual responses, action group standard letters and emails)</p>	<p>Preferred Options: Conflicts and impacts on District Local Plan allocation and housing developments in Marham, the Borough's Open Space Policy, DM22 and NCC Environment Policy. The potential of Shouldham Warren to be designated as 'Local Green Space' through the Local or Neighbourhood Plan.</p>	<p>No Action Required: In principle there is no reason why a mineral extraction area could not operate without unacceptable adverse impacts at the distances between the closest parts of AOS E and Marham. There have been a number of mineral extraction areas which have operated at that distance or sometimes closer without such impacts. It would be a matter for any future planning application to consider the potential for adverse impacts and suggest suitable mitigation measures to address these. Compliance with Policy MPSS1 And MW1 would ensure there are no unacceptable impacts of mineral workings on the environment and the local community.</p> <p>No areas within AOS E have been designated as 'Local Green Space'. If it were to be designated as a 'Local Green Space' then NPPF paragraph 101 would be relevant, 'Policies for managing development within a Local Green Space should be consistent with those for Green Belts'. The NPPF states that mineral extraction within Greenbelts is not inappropriate in principle. Any future planning application would need to consider this balance.</p> <p>Biodiversity, geodiversity and public access gains have been delivered on previous mineral workings, both in Norfolk and other parts of England, even though these have resulted in change. It will be for any future planning application to identify mitigation and restoration proposals, and how this equates with the potential impacts of mineral extraction. Former mineral extraction sites have in particular delivered Biodiversity Action Plan priority habitats on restoration; the creation of such habitats delivering the aims of Biodiversity 2020. Former mineral workings such as Pensthorpe Natural Park, Watatunga wildlife reserve, and Whitlingham Country Park, deliver economic, social, biodiversity benefits to Norfolk.</p>
<p>Individuals (including individual</p>	<p>Preferred Options: In Norfolk County Council's, 'Together for Norfolk' research publication titled, 'AN AMBITIOUS PLAN FOR OUR COUNTY 2019-2025'. You</p>	<p>No Action Required: The Minerals and Waste Local Plan is there to ensure proposed developments meet the local and national need as required by national planning policy and to</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) E land to the north of Shouldham	NCC Planning Officer's Response
responses, action group standard letters and emails)	state that, "here at Norfolk County Council, we have a clear ambition: for our County to be a place where we put people first, where everyone works together to create a better place to live. A place of opportunity: where we can fulfil our potential and lead productive, healthy and independent lives. A place where we all have the chance to contribute to and benefit from economic growth and regeneration, as well as protecting our unique environment."	<p>ensure development is undertaken in an appropriate way to ensure no unacceptable impacts on the environment or the local residents/community. Consultation is carried out during the planning process at all stages to capture the issues and seek to mitigate impacts. There is always a planning balance, but this is assessed on a case by case basis, after consultation. There are to be no Areas of search allocated in the NM&WLP, however where silica sand extraction sites do come forward, they will have to comply with the criteria based policy MPSS1 in the Local Plan.</p> <p>There are opportunities with minerals developments, which are temporary by nature and requirements for biodiversity net gain. Former mineral extraction sites have in particular delivered Biodiversity Action Plan priority habitats on restoration; the creation of such habitats delivering the aims of Biodiversity 2020. Former mineral workings such as Pensthorpe Natural Park, Watatunga wildlife reserve, and Whitlingham Country Park, deliver economic, social, biodiversity benefits to Norfolk. Where there are public rights of way, the local plan requires these to be retained.</p>
Sibelco UK Limited (98647)	Preferred Options: We disagree with the updated plans of the area which identify an arbitrarily drawn heritage setting standoff. The standoffs are based on a Heritage Impact Assessment (Percival, 2019) which by its own admission is incomplete. There is not 'clear and convincing justification' for these arbitrarily drawn standoffs. Any application forthcoming within the Areas of Search should be determined on its own merits and supported by a detailed environmental impact assessment.	No Action Required: Noted. AOS E is not allocated in the publication version of the Local Plan, due to the cumulative issues of the impact on the setting of heritage assets, the risk of birdstrike from wet working and wet restoration and the loss of access to public open space. Notwithstanding this, the Historic Environment Impact Assessment was carried out by suitably qualified Historic Environment professionals who were independent of the Minerals and Waste Local Plan team. The report considers the potential landscape changes that would result from a potential quarry within AOS E, and concludes that with mitigation measures those changes could result in less than substantial harm which could be made acceptable in planning terms.

Table 87: Main issues raised during the Consultation stages about Area of Search (AOS) F land to the north of Stow Bardolph

In order to meet the remaining forecast need for silica sand, the Preferred Options document proposed to continue to allocate the four Areas of Search (E, F, I and J) for silica sand extraction that are currently allocated in the existing adopted Norfolk Minerals Site Specific Allocations DPD. However, due to a number of planning reasons AOS E is now considered unsuitable to allocate and the three remaining Areas of Search (F, I and J) would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site, which means that the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk. In addition, the MOD (Defence Infrastructure Organisation) raised concerns about the risk of birdstrike from wet extraction and the creation of large areas of open water on restoration, making this location undeliverable for future silica sand extraction. Therefore, the Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand extraction, which is considered to be the most appropriate and effective method of planning for the remaining forecast need of this nationally important mineral.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) F land to the north of Stow Bardolph	NCC Planning Officer's Response
Ministry of Defence (98661)	<p>Preferred Options: This site is of concern to the MOD. Wet working and restoration at 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. We would require further information to determine whether sites could be managed with design principles and a Bird Management Plan.</p>	<p>No Action Required: AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site. The criteria-based Policy MPSS1 includes a requirement for proposals of future silica sand extraction to include 'Submission of a Bird Hazard Assessment report to 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>
NCC Historic Environment Service (93209)	<p>Initial Consultation: 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>Action Required: The text was amended as requested at the Preferred Options stage. However, AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p>
Historic England (93005)	<p>Initial Consultation: 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>No Action Required: Noted. However, AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) F land to the north of Stow Bardolph	NCC Planning Officer's Response
	<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>Whilst the Publication version of the NM&WLP does not allocate any areas of search for silica sand, it instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand extraction, including Heritage Impact Statement and Landscape and Visual Impact Assessments.</p>
<p>Norfolk Wildlife Trust (92405) Norfolk Wildlife Trust (98674)</p>	<p>Initial Consultation: Provide sufficient stand off from CWS 365 'Broad Meadow Plantation' which is adjacent to AoS F. Preferred Options: recommend buffer between northern part of AOS F and CWS 365 Broad Meadow. There are a high number of ponds in the area and the potential for impacts on protected species and the likely requirements for ecological restoration will need to be considered as part of any application. Proposals in proximity to a CWS would need to be accompanied by hydrology and dust assessments.</p>	<p>No Action Required: AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p>
<p>Borough Council of King's Lynn and West Norfolk Environmental Health (99020)</p>	<p>Preferred Options: Impacts from the operations must not be unacceptable. A planning application for mineral extraction at this site must include noise, vibration, dust and air quality assessments, hydrogeological, hydrological, archaeology and surface water drainage plus mitigation measures to minimise harmful emissions to air and address appropriately any human health or amenity impacts, including cumulative impacts.</p>	<p>No Action Required: AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p>
<p>Highway Authority (98854)</p>	<p>Preferred Options: Both Northern and Southern sites need highway improvements to be made acceptable. Movement of material using off-highway routes, or conveyor/pipeline etc. preferred. Submission of a Transport Assessment including delivery of acceptable highway improvements.</p>	<p>Action Required: Noted. However, AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) F land to the north of Stow Bardolph	NCC Planning Officer's Response
	<p>Highways England should be consulted regarding vehicle movements at Hardwick Interchange.</p> <p>Extraction to be phased so that no more than one Silica site at any one time will transport material by road.</p>	
Environment Agency (98731)	<p>Preferred Options: Starting position should be no dewatering on this site.</p>	<p>Action Required: Noted. However, AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p> <p>Notwithstanding this, a Hydrogeological Risk Assessment would be required at the planning application stage to identify potential impacts to groundwater and propose appropriate mitigation to protect any abstraction points, ecosystems and surface water features that are reliant on groundwater.</p>
Historic England (98816)	<p>Preferred Options: Amend paragraph F4 for note the need for consideration of cumulative impacts on the historic environment.</p>	<p>Action Required: Noted. However, AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p>
Borough Council of King's Lynn and West Norfolk (99003)	<p>Preferred Options: It would be unrealistic to seek to have no areas of search at all, and the Plan could be found 'unsound'.</p>	<p>No Action Required: Noted. AOS F is not allocated in the Publication version of the NM&WLP as the three smaller Areas of Search (E, I and J) would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site, which means that the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk.</p> <p>Therefore, the Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand extraction, which is considered to be the most appropriate and effective method of planning for the remaining forecast need of this nationally important mineral.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) F land to the north of Stow Bardolph	NCC Planning Officer's Response
West Norfolk Riding for Disabled Association (98307) Mr and Mrs Plaxton/Fisher German LLP (98351)	Preferred Options: The site is likely to disrupt our charity to provide sporting activity to disabled people and a more suitable site agreed.	No Action Required: AOS F is not allocated in the Publication version of the NM&WLP, as the three smaller Areas of Search (F, I and J) would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.
Individuals (98487, 98298, 98351)	Preferred Options: Extraction close to residential properties would collapse private sewers which extend into AOS F approximately 25 metres. Concerns about the impact of additional HGV movements on the roads including safety of junctions from the A10 and smaller roads, noise, dust and air quality impacts from HGVs and proximity of schools, villages and businesses to roads that may be used to transport the silica sand.	No Action Required: However, AOS F is not allocated in the publication version of the Local Plan, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.
Individuals (98356)	Preferred Options: Objection to continued extraction in the area around Tottenhill, Wormegay and Shouldham, especially adverse amenity impacts. Doubt about whether restoration proposals will take place given the potential timescales of extraction. Concern about impacts on water table from extraction, perception that existing extraction has already caused adverse impacts to water levels.	No Action Required: AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site. The restoration conditions attached to a planning permission go with the land so if it is sold the new owner takes on the requirement to carry out the restoration of the site, unless to apply for planning permission to change the restoration scheme and are granted those changes.
Mr and Mrs Plaxton/Fisher German LLP (98351)	Preferred Options: A substantial proportion of the area of search is not supported by the landowner within this area of search and as such extraction in this location is undeliverable.	No Action Required: Noted. The area of search was amended to take this into account. AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.
Mr and Mrs Plaxton/Fisher German LLP (98351)	Preferred Options: Alternative silica sand extraction sites would be more appropriate to be allocated than this site (MIN40, SIL01, AOSE, AOSI, AOSJ, SIL02).	No Action Required: AOS F is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) F land to the north of Stow Bardolph	NCC Planning Officer's Response
Individual (94167)	Preferred Options: We need to protect the earth from exploitation and find other non invasive ways of providing for human needs or learn to live differently.	No Action Required: NCC is required to produce a Minerals Local Plan taking into account national planning policies, guidance and legislation.

Table 88: Main issues raised during the Consultation stages about Area of Search (AOS) I land to the east of South Runcton

In order to meet the remaining forecast need for silica sand, the Preferred Options document proposed to continue to allocate the four Areas of Search (E, F, I and J) for silica sand extraction that are currently allocated in the existing adopted Norfolk Minerals Site Specific Allocations DPD. However, due to a number of planning reasons AOS E is now considered unsuitable to allocate and the three remaining Areas of Search (F, I and J) would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site, which means that the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk. In addition, the MOD (Defence Infrastructure Organisation) raised concerns about the risk of birdstrike from wet extraction and the creation of large areas of open water on restoration, making this location undeliverable for future silica sand extraction. Therefore, the Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand extraction, which is considered to be the most appropriate and effective method of planning for the remaining forecast need of this nationally important mineral.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) I land to the east of South Runcton	NCC Planning Officer's Response
Ministry of Defence (Defence Infrastructure Organisation) (98660)	Preferred Options: This site is of concern to the MOD. Wet working and restoration at 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. We would require further information to determine whether sites could be managed with design principles and a Bird Management Plan.	No Action Required: AOS I is not allocated in the publication version of the NM&WLP, due to the risk of birdstrike from wet working and restoration and also because the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site. The criteria-based Policy MPSS1 includes a requirement for proposals of future silica sand extraction to include 'Submission of a Bird Hazard Assessment report to 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'
NCC Natural Environment Team (93096)	Initial Consultation: 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.	No Action Required: AOS I is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) I land to the east of South Runcton	NCC Planning Officer's Response
		However, where sites do come forward, they will have to comply with the criteria-based policy MPSS1 in the NM&WLP to provide a Landscape and Visual Impact Assessment to identify potential landscape impacts, together with suitable mitigation measures to address the impacts.
Historic England (93006)	Initial Consultation: There are 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.	No Action Required: AOS I is not allocated in the publication version of the Local Plan, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site. However, where sites do come forward, they will have to comply with the criteria-based policy MPSS1 in the Local Plan to provide Landscape and Visual Impact Assessment and a Heritage statement to identify potential landscape impacts, together with suitable mitigation measures to address the impacts.
Norfolk Wildlife Trust (92404)	Initial Consultation: Areas of Search should be modified to provide sufficient stand off from these CWS to safeguard them from adverse impacts.	No Action Required: AOS I is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site. Notwithstanding this, 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.
Borough Council of King's Lynn and West Norfolk Environmental Health (99021) Tottenhill Parish Council (98453)	Preferred Options: Concerns impacts from the operations must not be unacceptable. A planning application for mineral extraction at this site must include noise, vibration, dust and air quality assessments, hydrogeological, hydrological and surface water drainage plus mitigation measures to minimise harmful emissions to air and address appropriately any human health or amenity impacts, including the proposed route of the conveyor. Air quality impacts may require an Air Quality Management Area to be declared. Impacts on protected species, loss of woodland, footpath. A restoration scheme will be required. Transport Assessment including delivery of acceptable	No Action Required: Noted and these requirements were in the draft Areas of Search policy. However AOS I is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site. Notwithstanding this, mineral planning applications are required through both the NPPG and NCC's Local list for the Validation of Planning Applications to be supported by dust assessments, and dust management plans where appropriate. There has not been a case of a mineral extraction site in Norfolk requiring an AQMA to be declared. However, where silica sand sites do come forward, they will have to comply with the criteria-based policy MPSS1 in the Local Plan including the provision of a noise assessment, air

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) I land to the east of South Runcton	NCC Planning Officer's Response
	<p>highway improvements. Highways England should be consulted regarding vehicle movements at Hardwick Interchange.</p> <p>A comprehensive phased working scheme to mitigate cumulative emissions from the extraction of AOS E, AOS F, AOS I, and AOS J.</p>	<p>quality/dust assessment, hydrogeological impact assessment, biodiversity survey and report, a transport assessment, phased working and restoration scheme at the planning application stage. There are no public rights of way within or adjacent to AOS I.</p>
Highway Authority (98855)	<p>Preferred Options: Highway improvements needed for site to be made acceptable. Movement of material using off-highway routes, or conveyor/pipeline etc. preferred. No more than one Silica site at any one time will transport material by road.</p>	<p>Action Required: Noted. AOS I is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p>
Environment Agency (98732)	<p>Preferred Options: Dewatering should not be allowed at this site.</p>	<p>Action Required: A Hydrogeological Risk Assessment would be required at the planning application stage to identify potential impacts to groundwater and propose appropriate mitigation to protect any abstraction points, ecosystems and surface water features that are reliant on groundwater.</p> <p>Notwithstanding this, AOS I is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p>
Borough Council of King's Lynn and West Norfolk (99001)	<p>Preferred Options: It would be unrealistic to seek to have no areas of search at all, and the Plan could be found 'unsound'.</p>	<p>No Action Required: Noted. AOS I is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site. This means that the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk. Therefore, the Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand extraction, which is considered to be the most appropriate and effective method of planning for the remaining forecast need of this nationally important mineral.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) I land to the east of South Runcton	NCC Planning Officer's Response
<p>Individuals (See Footnote⁴, 97793, 97796, 97799, 97802, 97805, 97808, 97811, 97814, 97817, 97842, 97848, 97854, 97860, 97866, 97872, 97878, 97884, 97890, 97896, 97902, 97902, 97908, 97914, 97920, 97932, 97938, 97944, 97950, 97956, 97962, 97968, 98572, 98577, 97974, 98464, 98582, 98602, 98603, 98607, 98608, 98611, 98613, 98928, 98924, 98340, 98357, 98300)</p>	<p>Preferred Options: Issues raised included:</p> <ul style="list-style-type: none"> • Very close proximity to RAF Marham, will increase the risk of "bird strikes" and may result in an accident. • Permanent loss of agricultural land • Silica sand particles and loss of amenity space negatively affect physical and mental health. • Ruin the landscape • Loss of biodiversity, ecology and protected species. • Trees needed to combat climate change. • Unsustainable use of a finite mineral resource, when the county only recycles a fraction of the glass already in circulation. • Damage to water/groundwater supply. • Operator will not restore the site properly. • Object to a Belgian company being allowed to carry out mineral extraction in Norfolk • Potential for restoration to be waste landfill • No benefit to the local community • Loss of public use of the land during extraction and after restoration • Existing extraction drying up residential wells, sewage system/septic tanks, lowering water table and increasing risk of property subsidence. • Local areas completely surrounded by water due to historic extraction and existing sites. • Adverse impact of HGVs on A10/A134, and surrounding routes • Negative effect on Property values 	<p>No Action Required: AOS I is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site. MOD Defence Infrastructure Organisation states in their response that further information in the form of a Bird Hazard Assessment and potential a Bird Management Plan would be required to support any future planning application to ensure concerns regarding aviation safety could be addressed.</p> <p>Areas of Search do not contain any proposals regarding working methods or restoration concepts, these would be matters for any future planning application. However, due to the geological requirements for non-hazardous landfill, the site is unlikely to be acceptable for this use.</p> <p>Any future planning application will consider any potential loss agricultural land using Policy MW5: agricultural soils balanced against the need for silica sand.</p> <p>Norfolk already has a well-developed and effective collection process for glass recycling. Silica sand is a necessary ingredient in the remelt feedstock for recycled glass.</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>The nationality of the mineral operator is not a material planning consideration; planning permission goes with the land, not the developer.</p> <p>There are no Public Rights of Way within AOS I.</p> <p>The existing extraction referred to is the sand and gravel extraction at Watlington/Tottenhill approximately 1.5km to the NW. The only abstraction which has taken place at the Tottenhill sites is for a licence which has been in use since the late 1960s. This is</p>

⁴ 33 responses were received from individuals for this site allocation using the same standard template letter.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) I land to the east of South Runcton	NCC Planning Officer's Response
		for a low loss activity, so much of this water will be returned to ground. The Environment Agency state groundwater levels have decreased everywhere due to lower-than-average rainfall/drought conditions over recent years. The Highway Authority has concluded that a suitable highway access could be formed and A roads are the preferred routes for HGVs. Property values are not a material planning consideration
Individual (94163)	Preferred Options: We need to protect the earth from exploitation and find other non invasive ways of providing for human needs or learn to live differently.	No Action Required: NCC is required to produce a Minerals Local Plan taking into account national planning policies, guidance and legislation.
Mr and Mrs Plaxton/Fisher German LLP (98913)	Preferred Options: This proposed silica extraction site is deemed to be more suitable than the land north of Stow Bardolph (AOS F).	No Action Required: Multiple sites for silica sand extraction will be required to meet forecast demand for silica sand during the Plan period. The issues raised regarding AOS F are responded to in the section of this report specifically covering AOS F.

Table 89: Main issues raised during the Consultation stages about Area of Search (AOS) J land to the east of Tottenhill

In order to meet the remaining forecast need for silica sand, the Preferred Options document proposed to continue to allocate the four Areas of Search (E, F, I and J) for silica sand extraction that are currently allocated in the existing adopted Norfolk Minerals Site Specific Allocations DPD. However, due to a number of planning reasons AOS E is now considered unsuitable to allocate and the three remaining Areas of Search (F, I and J) would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site, which means that the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk. In addition, the MOD (Defence Infrastructure Organisation) raised concerns about the risk of birdstrike from wet extraction and the creation of large areas of open water on restoration, making this location undeliverable for future silica sand extraction. Therefore, the Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand extraction, which is considered to be the most appropriate and effective method of planning for the remaining forecast need of this nationally important mineral.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) J land to the east of Tottenhill	NCC Planning Officer's Response
NCC Historic Environment Service (93211)	Initial Consultation: 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'	Action Required: The text was amended as requested at the Preferred Options stage. However, AOS J is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) J land to the east of Tottenhill	NCC Planning Officer's Response
		area within which to find a potentially viable silica sand extraction site.
Historic England (93007)	Initial Consultation: 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).	No Action Required: These heritage assets have been included in the site assessment. However, AOS J is not allocated in the publication version of the Local Plan, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.
Woodland Trust (92424)	Initial Consultation: 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.	No Action Required: 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. However, AOS J is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.
Ministry of Defence (92358, 98659) Wormegay Parish Council (98555) Individuals (See Footnote ⁵ , 98484, 98485, 98341)	Initial Consultation and Preferred Options: This site is of concern to the MOD. Wet working and restoration at 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. We would require further information to determine whether sites could be managed with design principles and a Bird Management Plan.	No Action Required: AOS J is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site. The criteria-based Policy MPSS1 includes a requirement for proposals of future silica sand extraction to include 'Submission of a Bird Hazard Assessment report to 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'.
Norfolk Wildlife Trust (98675) Highway Authority (98855)	Preferred Options: Concerns impacts from the operations must not be unacceptable. A planning application for mineral extraction at this site must include noise, vibration, dust and air quality assessments, ecology, hydrogeological, hydrological and surface water	No Action Required: Noted and was put in draft policy. However, AOS J is not allocated in the publication version of the Local Plan, as the three smaller areas of search would be too

⁵ 39 responses were also received from individuals for this area of search using the same standard template letter.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) J land to the east of Tottenhill	NCC Planning Officer's Response
Borough Council of King's Lynn and West Norfolk Environmental Health (99022) Tottenhill Parish Council (98455)	drainage plus mitigation measures to minimise harmful emissions to air and address appropriately any human health or amenity impacts. Impacts on protected species, loss of woodland. A restoration scheme will be required. Transport Assessment including delivery of acceptable highway improvements. Highways England should be consulted regarding vehicle movements at Hardwick Interchange. A comprehensive phased working scheme to mitigate cumulative emissions from the extraction of AOS E, AOS F, AOS I, and AOS J.	fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.
Highway Authority (98856)	Preferred Options: Highway improvements needed for site to be made acceptable. Movement of material using off-highway routes, or conveyor/pipeline etc. preferred. No more than one Silica site at any one time will transport material by road.	No Action Required: Noted. AOS J is not allocated in the publication version of the Local Plan, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.
Environment Agency (98733)	Preferred Options: Dewatering should not be allowed at this site.	Action Required: A Hydrogeological Risk Assessment would be required at the planning application stage to identify potential impacts to groundwater and propose appropriate mitigation to protect any abstraction points, ecosystems and surface water features that are reliant on groundwater. However, AOS J is not allocated in the publication version of the Local Plan, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.
Borough Council of King's Lynn and West Norfolk (99002)	Preferred Options: It would be unrealistic to seek to have no areas of search at all, and the Plan could be found 'unsound'.	No Action Required: Noted. AOS J is not allocated in the Publication version of the NM&WLP as the three smaller Areas of Search (E, I and J) would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site, which means that the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk. Therefore, the Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) J land to the east of Tottenhill	NCC Planning Officer's Response
		extraction, which is considered to be the most appropriate and effective method of planning for the remaining forecast need of this nationally important mineral.
Wormegay Parish Council (98555) Individuals (98350)	<p>Preferred Options: Section 12 of the 2012 Act 4 introduced a new duty for all upper-tier and unitary local authorities in England to take appropriate steps to improve the health of the people who live in their areas. If however, we were to import sand to the glass manufacturers that would maintain glass making jobs in the North of England and the transport jobs to move the sand to the glass factories. This would have the positive outcome of no further job losses in the north of England. There are other areas nationally and internationally other than AOS E & J. In the short term existing sites can continue to be exploited by necessity that have less effect on a community.</p> <p>Quarrying is at odds with aims of the NPPF – principally the definition of sustainable development, and 'best use needs to be made of [finite minerals] to secure their long-term conservation', and use of recycling. There is no discussion within the NCC to discuss how to improve recycling or reuse glass within Norfolk, to reduce new mineral needed.</p>	<p>No Action Required: Noted. However, AOS J is not allocated in the publication version of the NM&WLP, as the three smaller areas of search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p> <p>Notwithstanding this, as an Area of Search there are no details of a working or restoration scheme. If an application came forward this would have to provide details of a working scheme. Any impacts, such as (but not limited to) dust and noise are required to be assessed and mitigated in order to ensure there are no unacceptable impacts on (but not limited to) the landscape, health and wellbeing.</p> <p>Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan, for mineral resources found within the county. The NPPF reflects that Statutory Duty. It is unlikely that a Minerals Plan would be found sound at Examination if it suggested that the mineral could be sourced internationally, or nationally. Policy MP1 sets out the quantity of silica sand to be planned for based on the throughput of the existing processing plant site at Leziate. Norfolk already has a well-developed and effective collection process for glass recycling. Norfolk recycles virtually all the waste glass from households, according to the Norfolk County Council household waste audits. High purity silica sand, such as is found in Norfolk is needed in order to produce glass from recycled glass cullet; it is an ingredient within the feedstock which balances the higher level of impurities found in recycled glass so that glass of acceptable quality can be made.</p>
Individuals (See Footnote ⁶ ,	Preferred Options: A number of issues were submitted by individuals, mainly through a standard template letter	No Action Required: Noted. AOS J is not allocated in the publication version of the Local Plan, as the three smaller areas of

⁶ 39 responses were also received from individuals for this area of search using the same standard template letter.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) J land to the east of Tottenhill	NCC Planning Officer's Response
<p>98484, 98485, 98341, 98556, 98463, 98604, 98609, 98614, 98358, 98745, 98923, 98929, 98463, 98923, 98929, 98350) Wormegay Parish Council (98555)</p>	<p>and a bullet point list, with the issues summarised below:-</p> <ul style="list-style-type: none"> • Very close proximity to RAF Marham, will increase the risk of "bird strikes" and may result in an accident. • Permanent loss of agricultural land • Silica sand particles and loss of amenity space negatively affect physical and mental health. • Ruin the Landscape • Loss of woodland, biodiversity, ecology and protected species. • Trees needed to combat climate change. • Unsustainable use of a finite mineral resource, when the county only recycles a fraction of the glass already in circulation. • Damage to water/groundwater supply. Existing extraction drying up residential wells, sewage system/septic tanks, lowering water table and increasing risk of property subsidence. • Operator will not restore site properly. • NCC have not provided satisfactory response on how restoration policy would be enforced. • No benefit to local community • Tottenhill surrounded by Quarries • No of HGV/Traffic congestion • Pollution • Too near Wormegay School • Accident black spot A134/A10 roundabout and Wormegay school. • Cumulative impacts of long-term quarry and multiple sites. 	<p>search would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site.</p> <p>Defence Infrastructure Organisation states in their response that further information in the form of a Bird Hazard Assessment and potential a Bird Management Plan would be required to support any future planning application to ensure concerns regarding aviation safety could be addressed.</p> <p>Areas of Search do not contain any proposals regarding working methods or restoration concepts, these would be matters for any future planning application. However, whatever restoration proposal could be put forward, due to the geological requirements for non-hazardous landfill, the site is unlikely to be acceptable for this use.</p> <p>Any future planning application will consider any potential loss agricultural land using Policy MW5: agricultural soils balanced against the need for silica sand.</p> <p>Norfolk already has a well-developed and effective collection process for glass recycling. Norfolk recycles virtually all the waste glass from households, according to the Norfolk County Council household waste audits.</p> <p>High purity silica sand, such as is found in Norfolk is needed in order to produce glass from recycled glass cullet; it is an ingredient within the feedstock which balances the higher level of impurities found in recycled glass so that glass of acceptable quality can be made.</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 are no Public Rights of Way within AOS J.</p> <p>The existing extraction referred to is the sand and gravel extraction at Watlington/Tottenhill approximately 1.5km to the W.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Area of Search (AOS) J land to the east of Tottenhill	NCC Planning Officer's Response
		<p>The only water abstraction which has taken place at the Tottenhill sites is for a licence which has been in use since the late 1960s. This is for a low loss activity, so much of this water will be returned to ground. The Environment Agency state groundwater levels have decreased everywhere due to lower-than-average rainfall/drought conditions over recent years.</p> <p>The Highway Authority has concluded that a suitable highway access could be formed and A roads are the preferred routes for HGVs.</p>
<p>Individuals (98350, 94169)</p>	<p>Preferred Options: We need to protect the earth from exploitation and find other non invasive ways of providing for human needs or learn to live differently.</p>	<p>No Action Required: NCC is required to produce a Minerals Local Plan taking into account national planning policies, guidance and legislation.</p>
<p>Individual (98745)</p>	<p>Preferred Options: Development against DEFRA guidance (Rural Proofing, practical guide to access impacts of policies on rural areas, 2017). If you allow valuable farmland and rural jobs to be traded for silica sand extraction for glass manufacturing in other parts of the country, you are not using the guidance that government policy affords you and are neglecting the needs of your own constituents.</p>	<p>No Action Required: Norfolk County Council has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan, for mineral resources found within the county. The NPPF reflects that Statutory Duty. Mineral can only be extracted where it is found and silica sand suitable for glass manufacture is only found in limited locations in the UK. The NPPF 2021 (footnote 58) 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>Mr and Mrs Plaxton/Fisher German LLP (98914)</p>	<p>Preferred Options: This proposed silica extraction site is deemed to be more suitable than the land north of Stow Bardolph (AOS F).</p>	<p>No Action Required: Multiple sites for silica sand extraction will be required to meet forecast demand for silica sand. The issues raised regarding AOS F are responded to in the section of this report specifically covering AOS F.</p>

Table 90: Main issues raised during the Consultation stages about Policy MP13: Areas of Search for silica sand extraction

In order to meet the remaining forecast need for silica sand, the Preferred Options document proposed to continue to allocate the four Areas of Search (E, F, I and J) for silica sand extraction that are currently allocated in the existing adopted Norfolk Minerals Site Specific Allocations DPD. However, the consultation response from the Defence Infrastructure Organisation to the NM&WLP continued to raise concerns about bird strike risks to aircraft from the creation of large areas of open water following mineral extraction, whilst Shouldham Warren is designated Open Access Land and forms a significant part of the higher land within Area of Search E. The three remaining Areas of Search (F, I and J) would be too fragmentary to form an appropriately sized area within which to find a potentially viable silica sand extraction site, which means that the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk. Therefore, the Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites), which replaces Policy MP13: Areas of Search for silica sand extraction for the consideration of any future planning applications for silica sand extraction, which is considered to be the most appropriate and effective method of planning for the remaining forecast need of this nationally important mineral.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP13: Areas of search for silica sand extraction	NCC Planning Officer's Response
Environment Agency (92923, 98716)	Initial Consultation and Preferred Options: Policy MP13 needs to address the need for an FRA if in a Flood Zone Area.	No Action Required: The Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites), which replaces Policy MP13 for the consideration of any future planning applications for silica sand extraction. In Policy MPSS1, requirement (q) is for the submission of a site specific flood risk assessment and sequential test demonstrating that the development is located in an area of the silica sand resource with the lowest risk of flooding from any source.
Historic England (98819)	Preferred Options: Bullet point 3 should also include reference to Registered Parks and Gardens. Bullet point 6 should also include reference to the potential impacts of de-watering on buried archaeology. It should be made clear in the policy/supporting text that in preparing a detailed Heritage Statement/Assessment for the site, parts of the site may be found unsuitable for extraction due to harm to heritage assets.	No Action Required: The Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites), which replaces Policy MP13 for the consideration of any future planning applications for silica sand extraction. Therefore, we consider that some of the comments from Historic England are no longer applicable because there are no allocated Areas of Search. Requirement c of policy MPSS1 requires the submission of a Landscape and Visual Impact Assessment and includes reference to Registered Parks and Gardens. Requirement d of Policy MPSS1 requires the submission of a Heritage Statement and requirement e is for the submission of an archaeological statement.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP13: Areas of search for silica sand extraction	NCC Planning Officer's Response
Individual (94170)	Preferred Options: We need to protect the earth from exploitation and find other non-invasive ways of providing for human needs or learn to live differently.	No Action Required: NCC is required to produce a Minerals Local Plan to provide a steady and adequate supply of industrial minerals, taking into account national planning policies, guidance and legislation.
Individual (92009)	Initial Consultation: The loss of landscape and amenity would be obtrusive and detrimental to the wider visual amenity. A corridor of trees should be supplied in Spring Lane, the main adjacent landholding for screening. Each quarry needs to be restored prior to starting a new quarry.	No Action Required: The Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites), which replaces Policy MP13 for the consideration of any future planning applications for silica sand extraction. Policy MSS1 requires the submission of a Landscape and Visual Impact Assessment and a phased workings and restoration scheme at the planning application stage. Mineral extraction is usually phased so as to minimise the working area and progressively restore each phase. 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. Planning conditions are used to specify the date by which a permitted site must be completed and restored. The comment about tree planting along Spring Lane relates to AOS E and therefore is not directly applicable to the revised policy.
Individual (92009)	Initial Consultation: The development will negatively affect property values. Concerns over the nature of the land use post restoration. Current Public Rights of Way (PROW) needs to be retained.	No Action Required: The Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites), which replaces Policy MP13 for the consideration of any future planning applications for silica sand extraction. Property values are not a material planning consideration. Policy MPSS1 states (in requirement o) that planning applications must include the submission of a comprehensive phased working and restoration scheme, incorporating opportunities on restoration for ecological enhancement and biodiversity net gains, the improvement of public access and geological exposures for future study. Any change in the land use after restoration is likely to require a separate planning application. Policy MPSS1 states (in requirement k) that planning applications must include the submission of a suitable scheme for the temporary diversion and reinstatement of any Public Rights of Way located within the site.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Policy MP13: Areas of search for silica sand extraction	NCC Planning Officer's Response
Individual (91976)	Initial Consultation: 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.	No Action Required: The Publication version of the NM&WLP does not allocate any areas of search for silica sand and instead contains a criteria-based policy (MPSS1. Silica Sand extraction sites), which replaces Policy MP13 for the consideration of any future planning applications for silica sand extraction. Therefore, AOS E is not allocated in the Publication version of the NM&WLP. Representations regarding AOS E are covered in the section of this report which specifically deals with AOS E. Policy MW1: Development Management Criteria, states that minerals development will be acceptable where the development would not have an unacceptable impact on public open space, local green spaces, the definitive Public rights of Way network and outdoor recreation facilities.

Table 91: Main issues raised during the Consultation stages about SIL02 - land at Shouldham and Marham

This 'Preferred Area' is **not allocated** in the Publication version of the Minerals and Waste Local Plan (M&WLP) because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal. Furthermore, 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.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
Borough Council of King's Lynn and West Norfolk (92044)	Initial Consultation: 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 containing the expectations of extraction to it.	No Action Required: It is noted that SIL 02 is not wholly located within one of the previously allocated areas of search for silica sand extraction. 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. Notwithstanding this SIL 02 is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
		the proposal. There are also severe impacts on the setting of Pentney Priory and the eastern part of SIL 02 (approximately from the track adjacent to Ashholt Plantation).
<p>NCC Natural Environment Team (93105) Environment Agency (92915) Norfolk Wildlife Trust (92386) Natural England (92116) CPRE Norfolk (92022) Campaigners Against Two Silica Sites (98918, 99062) Individuals</p>	<p>Initial Consultation and Preferred Options: No extraction should take 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, including groundwater.</p> <p>A restoration scheme to protect and enhance biodiversity, an ecological assessment, groundwater and surface water assessments to determine baseline conditions on the site must be prepared. Natural England should be consulted on any proposals likely to impact the SSSI.</p> <p>Proximity of several CWS to the boundary of SIL 02 and any application would need to demonstrate it could avoid adverse impacts on these sites. Restoration proposals should enhance the landscape connectivity of the CWS network locally.</p> <p>[Individuals] Destruction of habitats, biodiversity and protected species. The River Nar 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>Cumulative impacts of all proposed extraction on the river Nar, along with the sand a gravel extraction proposed in MIN 19 and MIN 205 - land north of river Nar, Pentney.</p>	<p>No Action Required: Noted. Natural England have been consulted on the NM&WLP.</p> <p>SIL 02 is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal. There are also severe impacts on the setting of Pentney Priory from the eastern part of SIL 02 (approximately from the track adjacent to Ashholt Plantation).</p> <p>If any future planning applications were submitted, they would be required to assess the cumulative impacts under Policy MW1 Development Management Criteria and Policy MP6 'cumulative impacts and phasing of workings'.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
<p>NCC Natural Environment Team (93097) Shouldham parish council (92266) Marham Parish Council (91947) Wormegay parish council (98454) Campaigners Against Two Silica Sites (98620,98918) Individuals</p>	<p>Initial Consultation and Preferred Options: Bunding for this site has the potential to be intrusive. There are a number of views/settings, particularly historical, 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>[Individuals] A corridor of trees must be supplied in Spring Lane, the main adjacent landholding to the development.</p> <p>Propose the same restrictions to the South of Pentney Priory Gatehouse as there is to the East.</p>	<p>No Action Required: Noted. SIL 02 is concluded to be unsuitable to allocate 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>Historic England (92982) Shouldham parish council (92266) Marham Parish Council (94274) Wormegay parish council (98454) Campaigners Against Two Silica Sites (98620, 98918) Individuals</p>	<p>Initial Consultation and Preferred Options: Concerns regarding 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. It should also be viewed cumulatively with AOS E, MIN 19 and MIN 205. [Initial Consultation] A heritage impact assessment should be undertaken to assess whether areas can be taken forward to allocation.</p> <p>[Preferred Options] The HIA should be revised to include an assessment on non-designated assets and the wider historic landscape, to include a more thorough assessment of significance and setting which may in turn lead to further recommendations for areas to be excluded from the areas of search. This will provide a better understanding of the historic environment in this area and more helpfully inform the</p>	<p>No Action Required: Noted.</p> <p>NCC's Historic Environment Service have 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 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>This 'Preferred Area' is concluded to be unsuitable to allocate 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>Notwithstanding this, if any future planning application came forward, it would be required to carry out a Heritage Impact Statement and an archaeological assessment, in consultation with the Norfolk Historic Environment Service. These will require as a minimum a desk-based assessment, and dependent on the</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
	<p>extent of the Area of Search and Site allocation. [Historic England] recommend the inclusion of a graphical display of potential avoidance/mitigation measures in the HIA itself. Depending on the findings of the revised HIA, the AOS and site area may need to be further reduced. The areas hatched in purple should be removed from Plan altogether.</p> <p>[Individuals] Narborough Bone Mill, While Chapel House. Possibility of an Iron Age settlement and the possibility of other as yet unknown precious archaeological finds. Impacts on the historic environment in relation to the setting of Pentney Priory Gate and other environs. The small bridge near the pumping station at Wormegay and Mow Fen was built by the Canadian forces during World War 2.</p> <p>The bridge and the Mission room within Wormegay were gifted to the village. Therefore, one would suggest that this bridge on the approach of Mow Fen is also of significant historical value. With a similar flat landscape over the Fen towards Spring Lane, need to extend exclusion zone with protecting the view towards or away from the Gatehouse. Potentially buried roman road south side of Abbey Farm. Areas used in World War II.</p>	<p>findings, is likely to be followed up with site investigations and trial trenching.</p>
Environment Agency (92915)	<p>Initial Consultation: 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>No Action Required: The proposed extraction area does not include the Source Protection Zone surrounding the Anglian Water facility, and no dewatering has been proposed. This 'Preferred Area' is concluded to be unsuitable to allocate 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>
Ministry Of Defence (Defence Infrastructure)	<p>Initial Consultation and Preferred Options: 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</p>	<p>No Action Required: Noted. This 'Preferred Area' is concluded to be unsuitable to allocate 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>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
<p>Organisation) (92346, 98662) Shouldham parish council (92266, 94437) Marham Parish Council (94274) Wormegay parish council (98454) South West Norfolk Constituency Labour Party (98236) Campaigners Against Two Silica Sites (98622, 98624, 98918) Individuals</p>	<p>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>[Individuals] Your third criteria for a Preferred Area is; 'an area likely to gain planning permission'. MOD have objected therefore it cannot be allocated.</p>	
<p>Borough Council of King's Lynn and West Norfolk (92335) Individuals</p>	<p>Initial Consultation: There are 10 sensitive receptors within 250m of the site boundary. However, a buffer area is proposed which would mean 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>No Action Required: Noted. SIL 02 is concluded to be unsuitable to allocate 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>Individuals</p>	<p>Initial Consultation: 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</p>	<p>No Action Required: 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. The sand proposed to be extracted would be damp/wet due to the naturally high level of the water table in this area.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
	assertions that beyond this distance dust impacts are 'uncommon'.	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, "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.
Marham Parish Council (91947)	Initial Consultation: Each quarry site must be reinstated prior to moving onto the next throughout the development.	No Action Required: 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. This 'Preferred Area' is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.
Lead Local Flood Authority (91941, 99043)	Initial Consultation and Preferred Options: 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.	No Action Required: Noted. SIL 02 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.
Marham Parish Council (91947, 94274) Shouldham parish council (92266, 94437) Wormegay parish council (98454) South West Norfolk Constituency Labour Party (98236)	Initial Consultation and Preferred Options: Issues raised included - <ul style="list-style-type: none"> • Loss of natural and amenity spaces, which has been proven to adversely affect health, mental and physical and associated cost to NHS • The Health and Social Care Act 2012 delegated duties to Local Authorities to improve public health and reduce health inequalities • Impacts on community, for generations to come and use on amenity and leisure, plus educational and leisure groups using the area and in the nearby school. 	No Action Required: SIL 02 is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal. Notwithstanding this, if an application came forward for a silica sand site, any impacts are required to be assessed and mitigated in order to ensure there are no unacceptable impacts on (but not limited to) the landscape, amenity, health and wellbeing, the natural environment and protected species, existing Public Rights off Way, as set out in Policy MW1, and criteria-based policy (MPSS1. Silica Sand extraction sites) which would be assessed, and impacts mitigated in the event of a planning application.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
<p>Campaigners Against Two Silica Sites (98622, 98624, 98918)</p> <p>Individuals CPRE Norfolk (94293)</p> <p>Open Spaces Society (98269)</p> <p>Ramblers Association Norfolk Area (98268)</p> <p>Norfolk Orienteering Club (98465)</p> <p>East Anglian Orienteering Club (94689)</p> <p>King's Lynn Mountain Bike Club (98354)</p> <p>South West Norfolk Constituency Labour Party (98234)</p> <p>Churches Together group (98000)</p> <p>Rt. Hon Elizabeth Truss MP (98771)</p>	<ul style="list-style-type: none"> • Ruin the landscape, destroy habitats (including woodland), biodiversity and protected species. • Dust and silica sand particles will have a negative impact on health and respiratory diseases (such as Silicosis, COPD, asthma and obesity) and will be carried great distances. No studies of its existing impact on the current population and there are higher than average levels in this area. • Impact on air quality • Light and noise pollution • Construction impacts on inadequate roads. • Sibelco puts forward a 'best-case scenario' and moderates the impacts. • Commensurate impacts on residents - 5 years of extraction is more reasonable than 20 years of impacts. • HGV impacts on local roads, effects of increasing traffic on A134, A47, A10 and King's Lynn Bypass (especially to QE hospital). • Enhancement needed to poorly maintained local infrastructure. • Increased noise and pollution from HGV movements. • Danger to pedestrians/other road users. • Geodiversity impacts of mineral extraction ("Special hill with high landscape value and part of a Mediaeval warren") • Impacts on tourism • Cumulative noise impact of quarrying activities and jet noise from RAF Marham, at opposite ends of the village. • No economic impact in terms of jobs to the local economy. • Profits will not benefit the UK. 	<p>The area covered by the proposed site SIL 02 does not include Shouldham Warren.</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>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> <p>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>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.</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.</p> <p>There are active mineral workings on the opposite side of the River Nar. These workings have been able to mitigate effectively to prevent potential impacts on the River Nar.</p> <p>The British Geological Survey silica sand factsheet states that the downstream economic benefits of industrial sand in the glass industry are many hundreds of millions of pounds.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
	<ul style="list-style-type: none"> • Put the wider public interest before private profit. • Impact of site infrastructure construction. 	
Individuals	Initial Consultation: Extraction pits are a danger to the community.	No Action Required: This 'Preferred Area' is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal. 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.
Wormegay parish council (98454) Campaigners Against Two Silica Sites (98622, 98918) Individuals	Initial Consultation and Preferred Options: Need to protect Public Rights of Way (PROW's). Nar Valley Way and footpaths will cease to exist. No satisfactory alternative routes. Loss of natural and amenity spaces has been proven to adversely affect health, mental and physical. Impacts on use on amenity and leisure, plus educational and leisure groups using the area and in the nearby school. 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 the whole community.	No Action Required: This 'Preferred Area' is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal. NCC's Historic Environment Service have 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. Footpath FP9 is within this eastern portion of the site. The area covered by the proposed site SIL 02 does not include the Warren. Notwithstanding this, 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

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
		<p>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>
Individuals	<p>Initial Consultation: 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>No Action Required: Noted. There is the potential for the pipelines themselves to have a landscape impact, but no detail has been provided of a pipeline route by Sibelco. This would be assessed through a planning application. The landscape is already crossed by electricity pylons, which are considered to be landscape detractors. 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.</p> <p>Notwithstanding this, the 'Preferred Area' is concluded to be unsuitable to allocate 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>
Individuals	<p>Initial Consultation and Preferred Options: No proposal as to how the Core River Valley (of the River Nar) will be enhanced following mineral extraction as per NCC Local Plan policy.</p>	<p>No Action Required: SIL 02 is not in a designated Core River Valley.</p> <p>Notwithstanding this, the 'Preferred Area' is concluded to be unsuitable to allocate 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>
Individuals	<p>Initial Consultation: Prevailing North and Northwest winds will aggravate noise and dust pollution concerns and impact on health.</p>	<p>No Action Required: 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</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
		<p>mineral extraction require mitigation measures for noise and dust. These have operated effectively at mineral sites across Norfolk for many years.</p> <p>Notwithstanding this, SIL 02 is concluded to be unsuitable to allocate 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>Campaigners Against Two Silica Sites (98918, 98622, 94688)</p>	<p>Preferred Options: Does not accord with DEFRA 25 year plan which requires the protection of the rural environment and encourages access to green space to promote positive mental health and reduce obesity.</p>	<p>No Action Required: Mineral can only be extracted where the resource is found and the majority of mineral extraction occurs in rural areas. SIL 02 is located on private land, with the only public access along the PROW. Notwithstanding this, SIL 02 is concluded to be unsuitable to allocate 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>Individuals Campaigners Against Two Silica Sites (98757, 98918)</p>	<p>Initial Consultation and Preferred Options: Objections raised about the consultation process are in Table 7 of this report.</p>	<p>No Action Required: Responses to the objections raised about the consultation process are in Table 7 of this report.</p>
<p>Individuals</p>	<p>Initial Consultation: Lack of explicit involvement of statutory bodies in the site assessment document.</p> <p>No assessment and not enough information on impacts from the development (i.e. noise).</p>	<p>No Action Required: Statutory and non-statutory bodies are consulted as part of each local plan stage and their comments have been taken into account.</p> <p>The details of the impacts generated by the development (i.e. such as noise, dust, light assessments), would be a matter for a planning application. Sibelco have not provided any details of the working scheme with the site proposal for the NM&WLP.</p>
<p>Borough Council of King's Lynn and West Norfolk (99023) Anglian Water Services Ltd (98334)</p>	<p>Preferred Options: The site has the potential to cause emissions of PM10 and PM2.5 which can affect the health and amenity of local residents. A planning application with transport assessment, impact on waterbodies, surface water drainage scheme, Hydrogeological Risk Assessment. Assessments of noise, air quality, odour, and lighting assessments, along with details of appropriate mitigation measures to</p>	<p>No Action Required: Noted. SIL 02 is concluded to be unsuitable to allocate 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>Policy MPSS1 (Silica Sand extraction sites) sets out the requirements for silica sand extraction located outside of allocated sites.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
	reduce both amenity and health impacts on nearby receptors would be required.	
East of Ouse, Plover & Nar Internal Drainage Board (98451)	Preferred Options: The Board is concerned that the industrialisation of the area will have a detrimental impact on the Board's operations to maintain vital watercourses. Any future permission given for this site by the Council, does not guarantee the consent of this Board.	No Action Required: Noted. This 'Preferred Area' is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal.
Norfolk Wildlife Trust (98676) Individuals	Initial Consultation and Preferred Options: Due to the unknown potential scale of minerals development that this Area of Search would support and the number of CWS in close proximity in particular Marham Fen CWS, we are concerned at the potential for significant impacts on wildlife. [Individuals] Detrimental impact on ecology and biodiversity on nearby Country Wildlife Sites, such as Mow Fen, Marham Fen and and Bowl Wood ancient woodland.	No Action Required: Noted. SIL 02 is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal. Notwithstanding this, the distance of the County Wildlife Sites to the proposed extraction area would provide a degree of mitigation. 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.
Shouldham parish council (94437) Wormegay parish council (98454)	Preferred Options: Forestry England have not commented as a consultee nor has the Forestry England plan been referred to in any of the County officer's responses to other nature related comments. Forestry England are a significant consultee and their 2016-2026 plan has seemingly been overlooked completely.	No Action Required: Forestry England have been consulted at both the Initial and Preferred Options Consultation stages, and are aware of the proposals. It is a matter for Forestry England as to whether they choose to respond to such consultations. The Mineral Planning Authority is aware of the Forestry Plan has considered it in the planning process. The Forestry Plan does not cover any of the land within SIL 02.
Shouldham parish council (94437) Wormegay parish council (98454) Campaigners Against Two Silica Sites (94688, 99062)	Preferred Options: The current M&WLP plan contradicts national policies: <ul style="list-style-type: none"> • Paragraph 180 NPPF. • Cherry-picking parts of NPPF to suit your aim to extract minerals is disregarding other parts of NPPF, especially para 204.b and para 207 	No Action Required: SIL 02 is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal. This means the Areas of Search are no longer considered to be a deliverable method to use to plan for future silica sand provision in Norfolk, and instead the NM&WLP contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications and

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
Individuals	<ul style="list-style-type: none"> • NPPF paragraphs 83, parts (c) and (d) and 84 NPPF should guide you in respecting the character of rural areas. • Not sustainable development as set out in the NPPF. 	<p>ensure the impacts are assessed and mitigated for silica sand extraction, in conjunction with Policy MW1 (Development Management Criteria), and other policies in the plan.</p> <p>NPPF (2021) paragraph 185 contains three points in relation to potential effects from noise and light pollution that should be taken into account in the location of new development. Modern planning conditions specify mitigation measures to control noise, and there are numerous examples of these working effectively for mineral extraction sites; both nationally and locally. Therefore, if potential noise impacts can be effectively mitigated, the effect on any neighbouring areas would be minimised. This is also true of point (c) which addresses the impact of light pollution.</p> <p>Paragraph 210 (b) (formerly paragraph 205) is mostly concerned with planning for construction aggregates. Norfolk already has a well-developed and effective glass recycling process. Silica sand is a necessary ingredient in the remelt feedstock for recycled glass.</p> <p>Paragraph 213 (a) (formerly paragraph 207) refers to a Local Aggregate Assessment, this is for aggregate minerals, namely construction sand and gravel, not industrial minerals. Therefore, the methodology for an LAA only applies to aggregates and specifically not to industrial minerals, such as silica sand.</p> <p>Paragraph 84 and 85 is to give a policy basis to the fact that rural businesses may not be able to meet all the criteria normally expected in terms of location and access. Policies MW1 and MPSS1 ensures the development will assess and mitigate impacts of development.</p>
Shouldham parish council (94437) Wormegay parish council (98454) South West Norfolk Constituency	<p>Initial Consultation and Preferred Options: National policies being ignored to allow a privately-owned Belgian company to profit from devastation and loss of a community asset.</p> <p>Sibelco do not restore as they are required to, leaving dangerous sites and do not engage with the local community to alleviate concerns.</p>	<p>No Action Required: SIL 02 is concluded to be unsuitable to allocate 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>While the response was submitted to SIL02, much of the text of the full response refers to the loss of Shouldham Warren within AOS E.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
<p>Labour Party (98236) Campaigners Against Two Silica Sites (99062, 98918) individuals</p>	<p>Concerns over post restoration land use (i.e. landfill) and one that is lost to public use.</p>	<p>There is currently no proposed restoration scheme for SIL 02. Notwithstanding this, due to the fact that silica sand extraction has taken place around Leziate for at least 160 years, many historic extraction areas did not have the benefits of modern restoration schemes. There are previous local silica sand extraction areas which have restored by Sibelco, under modern restoration conditions, that have been designated as County Wildlife Sites. Some of the restoration at Leziate and Bawsey has specified heathland creation with areas of bare sandy areas for invertebrates, this is a priority habitat for Norfolk, as much of the heathlands were planted with conifer plantations following the First World War.</p> <p>The restoration conditions attached to a planning permission go with the land so if it is sold the new owner takes on the requirement to carry out the restoration of the site, unless they apply for and are granted planning permission for an alternative restoration or after use. The former minerals site now called Bawsey Country Park had a requirement for public access written into the legal agreement in 1984, however this unfettered public access has led to issues in regard to antisocial behaviour, but this is not within the scope of Sibelco's responsibilities. Sibelco UK sold the former Bawsey and Mintlyn mineral sites in 2015. However, whatever restoration proposal could be put forward, due to the local geological and high water table, the site is unlikely to be a non-hazardous landfill site. 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>There are a number of companies in England which extract silica sand, and any of those could have submitted areas in Norfolk for consideration at the 'call for sites' stage. However, none did, and Sibelco UK are the only silica sand operator with a processing plant in Norfolk. NCC as the Mineral Planning Authority have no monetary interest in mineral extraction or preferred operators, they do not benefit from profits or royalties made through mineral</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
		<p>extraction. The nationality of a company is not a material planning consideration. Any potential future planning permission would be attached to the land, as opposed to any particular person, organisation or company.</p> <p>The Local Plan process and planning application process are separate to enforcement and cannot anticipate or assume non-compliance. Most after uses require a separate planning application to be made to the Local Planning Authority which will be determined in accordance with the development plan policies and other material considerations.</p>
<p>Shouldham parish council (94437) Wormegay parish council (98454) Individuals Campaigners Against Two Silica Sites (94688, 99062, 98624, 98918)</p>	<p>Initial Consultation and Preferred Options: Unsustainable use of a finite mineral resource, glass recycling needed instead. Recycle (i.e. processing it into high-quality glass cullet that is subsequently used in the manufacture of high-quality glass material including clear and flat glass) before extracting raw materials.</p> <p>NCC do not recycle glass, they merely collect it, and transport it to other counties for onward processing, whilst continuing to quarry raw materials.</p> <p>The concept of planning for silica sand quarries is against circular economy principle, and also means it cannot meet its own vision and objectives in terms of 'positively contributing to the environment.'</p> <p>This site fails policies and objectives (The Vision, MS02, MS03, MS06, MS07, MS08, MS09, MSO10, MW2, MW3, MW5, MW6, MP2, MP5, WP1, WP2, WS01, WS02, WS04, WS06, WS08) in the plan. Plus sustainability objectives SA2, SA5, SA9 and SA10.</p> <p>There is no attempt within the M&WLP to satisfy or comply with the NPPW, waste hierarchy, principal of self-sufficiency in waste management, BEIS Clean Growth Strategy, or Waste Framework Directive with respect to recycling glass from within Norfolk.</p>	<p>No Action Required: SIL 02 is concluded to be unsuitable to allocate 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>Notwithstanding this, Norfolk recycles virtually all the glass used by households, according to the NCC household waste audits. It is segregated into different streams within the Material Recycling Facilities in Norfolk, prior to onward transport to glassworks. Glassworks are greater than county level facilities and are owned by private companies. Therefore, it is for these companies to determine whether there is a sufficient market to support additional facilities, and what constitutes an economic distance for cullet to be transported.</p> <p>High purity silica sand, such as is found in Norfolk is needed in order to produce glass from recycled glass cullet; it is an ingredient within the feedstock which balances the higher level of impurities found in recycled glass so that glass of acceptable quality can be made. In order to comply with the NPPF, the NM&WLP needs to plan for the forecast need for silica sand during the Plan period because there is a silica sand resource and a processing plant in the County.</p> <p>The quantity of silica sand to be planned for in the NM&WLP is covered by Policy MP1.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
	<p>Promote glass reuse and lower quality coloured glass for food packaging. Educate the public like has been done for plastics. Same as for recycling aggregates.</p> <p>Thereby saving further unnecessary destruction of the countryside from the allocation of new areas for silica sand extraction, creating more jobs and helping to reduce carbon emissions.</p>	
<p>Campaigners Against Two Silica Sites (98918) Individuals</p>	<p>Initial Consultation and Preferred Options: Impact on groundwater, pollution and water supply and quality. Increased flood risk in a high risk area caused by an open water restoration and further exacerbated by the removal of ancient drainage ditches., possible subsidence as water removed from surrounding area as any extraction areas fill with water. Sibelco intending to increase water levels and flood the land in order to carry out 'wet extraction.'</p> <p>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 a unacceptable flood risk to the site itself and without increasing flood risk elsewhere.</p> <p>Many of the houses in Marham are located below sea level and are subject to flood risk.</p>	<p>No Action Required: SIL 02 is concluded to be unsuitable to allocate 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>Any impacts are required to be assessed and mitigated in order to ensure there are no unacceptable impacts on (but not limited to) the quality and quantity of water resources, flood risk from all sources, as set out in Policy MW1, and criteria-based policy (MPSS1. Silica Sand extraction sites) which would be assessed and impacts mitigated in the event of a planning application.</p> <p>Compensatory drainage features would be required if any ditches were removed.</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>The concept of 'wet working' does not normally rely on water flowing into the working, but on the level of the natural water table. Wet working is normally only practicable where ground water is found at shallow depths such as in proximity to rivers or areas with a high water table. This type of working has occurred in Norfolk along the river valleys over the course of many years, and subsidence has not been noted as a problem. As 'wet working' utilises natural water levels, it does not of itself increase flood risk. Former minerals</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
		<p>workings have been used to increase flood resilience as they provide temporary flood storage.</p> <p>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.</p> <p>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>Individuals Campaigners Against Two Silica Sites (98624, 98918)</p>	<p>Initial Consultation and Preferred Options: Loss of agricultural land will have permanent detrimental impact due to loss of jobs and potential food shortages/Brexit.</p> <p>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>No Action Required: SIL 02 is concluded to be unsuitable to allocate 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>Notwithstanding this, the loss of agricultural land would be a consideration in any future planning application (see Policy MW5: Agricultural soils) and assessed and the planning balance weighted in line with the national need for industrial sand.</p>
<p>Shouldham parish council (94437) Wormegay parish council (98454) Campaigners Against Two Silica Sites (98757, 98918) Individuals (standard objection submitted by over 1,220 people).</p>	<p>Initial Consultation and Preferred Options: Concerns over Norfolk County Council announcing the removal of SIL 02 when in reality a third of it is now/still included in AOS E. Concerns this is really long-term proposal being put on hold until SIL 02 is worked out.</p>	<p>No Action Required: AOS E and SIL 02 should be considered as entirely separate. SIL 02 is a proposal by a mineral operator as a site which includes an outline of a potential working method, in this case 'wet working'. An Area of Search such as AOS E is a geological area which may potentially be underlain by mineral resources and there is no proposal relating to working methods.</p> <p>SIL 02 has been submitted to the NM&WLP 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</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
		<p>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 located outside of the area shown on the BGS map.</p> <p>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> <p>Notwithstanding this, SIL 02 and the Areas of Search are concluded to be unsuitable to allocate and instead the Local Plan contains a criteria-based policy (MPSS1. Silica Sand extraction sites) for the consideration of any future planning applications for silica sand extraction.</p>
<p>Marham Parish Council (91947) Campaigners Against Two Silica Sites (98624) Individuals</p>	<p>Preferred Options: The development will negatively affect property values, homes will lay empty and will increase home insurance.</p>	<p>No Action Required: Property values are not a material planning consideration.</p>
<p>South West Norfolk Constituency Labour Party (98236) Individuals</p>	<p>Preferred Options: Perception that real purpose of the sand is for use in UK fracking.</p>	<p>No Action Required: The silica sand in the Leziate beds, underlying SIL 02, is glass sand. The grain shape of glass sand makes it unsuitable for use as frack sand. The processing plant at Leziate is specifically for the preparation of glass sand.</p>
<p>Marham Parish Council (94274) Shouldham parish council (94437) Wormegay parish council (98454) Individuals Campaigners Against Two Silica</p>	<p>Initial Consultation and Preferred Options: We should be importing silica sand to make up the shortfall in raw materials for clear glass production due to our inadequate glass recycling industry. NCC pat themselves on the back at their 44.9% recycling rate which masks the fact that this is for all recyclable materials.</p>	<p>No Action Required: SIL 02 is concluded to be unsuitable to allocate 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>Notwithstanding this, Mineral can only be extracted where it occurs, and silica sand of appropriate quality for glassmaking is sparsely located in England. As Norfolk has an established processing plant, national policy states that the Mineral Planning Authority should plan for sufficient mineral extraction areas to meet the demands of</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
Sites (94688, 98918)	<p>Find alternative locations and questioning the need for silica sand to be extracted in Norfolk, and should only be extracted in brownfield areas.</p> <p>The government does not set out how much silica sand the country needs. There are conflicting supply figures according to NCC and Sibelco documents.</p>	<p>the plant. The quantity of silica sand to be planned for in Norfolk is dealt with in the section of the report covering Policy MP1.</p> <p>Virtually all mineral extraction occurs in the open countryside, on land that is either in agricultural or forestry use. Areas of previously developed land are largely unsuitable and unavailable for extraction.</p>
<p>Wormegay parish council (98454) South West Norfolk Constituency Labour Party (98236) Campaigners Against Two Silica Sites (98624, 98918) Individuals</p>	<p>Preferred Options: There are no checks and balances of the amount of silica sand being quarried, the amount of money they claim to have put into the economy and where it goes to, other than NCC requesting Sibelco provide their annual production information on figures that Sibelco supplied to NCC as their requirement each year.</p>	<p>No Action Required: NCC is applying national policy and guidance to determine the quantities of silica sand to be planned for (see footnote 68 in the NPPF and national planning policy guidance). The supply of production figures by Sibelco follows the way in which figures are collected for a range of industries across the country for government statistics. Further information on silica sand production in the UK is available in the BGS mineral planning factsheet. Comments regarding the quantity of silica sand to be planned for are dealt with in the section of this report regarding Policy MP1 (Provision for mineral extraction).</p>
<p>Shouldham parish council (94437) Wormegay parish council (98454) South West Norfolk Constituency Labour Party (98236) Campaigners Against Two Silica Sites (94688) individuals</p>	<p>Preferred Options: The loss of woodland as a carbon sink, landscape protection, environmental protection, use of finite resources, Trees as producers of oxygen, sustainable development, and the government policy to seek the planting of additional trees.</p> <p>The UK has signed up to the Paris Agreement which in turn led to the Climate Change Act which commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. The Norfolk Climate Change Partnership that NCC and the BC KL&WN are partners in published the 'Tomorrow's Norfolk, Today's Challenge' Climate Change Strategy and that states that in West Norfolk the per capita CO2 emissions was 10.7 tonnes in 2006, far higher than the rest of Norfolk.</p>	<p>No Action Required: The proposed extraction area does include some existing woodland. No restoration scheme has been provided by the proposer of SIL 02. It would be for any future planning application to propose potential restoration schemes, which could include replanting on parts of the site. Strategic Policy MW3: Climate change mitigation and adaption expects proposals for new minerals developments (including extensions to existing sites) take opportunities to incorporate trees, retain existing trees and include measures to assist habitats and species to adapt to the potential effects of climate change wherever possible (provision f). Restoration proposals must provide for biodiversity net gains in accordance with Policy MP7.</p> <p>High purity silica sand, such as is found in Norfolk is needed in order to produce glass from recycled glass cullet; it is an ingredient within the feedstock which balances the higher level of impurities found in recycled glass so that glass of acceptable quality can be made. As the use of recycled glass within the feedstock reduces the</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
		<p>energy required to achieve a satisfactory melt, this reduces the climate change impacts of glassmaking, but a proportion of silica sand is required for this to be possible.</p> <p>The use of silica in the manufacture of high quality, thermally efficient window glass, makes a positive contribution to reducing climate change by reducing heating and cooling demands, for which fossil fuels may be used, both directly and indirectly.</p>
<p>Marham Parish Council (94274) Campaigners Against Two Silica Sites (98918) Individuals</p>	<p>Preferred Options: Conflicts and impacts on District Local Plan allocation and housing developments in Marham, the Borough's Open Space Policy, DM22 and NCC Environment Policy.</p>	<p>No Action Required: SIL 02 is concluded to be unsuitable to allocate 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>Compliance with Policy MPSS1 and Policy MW1 (Development Management Criteria) would ensure there are no unacceptable impacts of mineral workings on the environment and the local community.</p> <p>The area covered by the proposed site SIL 02 does not include Shouldham Warren.</p> <p>Biodiversity, geodiversity and public access gains have been delivered on previous mineral workings, both in Norfolk and other parts of England, even though these have resulted in change. It will be for any future planning application to identify mitigation and restoration proposals, and how this equates with the potential impacts of mineral extraction.</p>
<p>Individuals</p>	<p>Initial Consultation and Preferred Options: The proposals are a breach of the local resident's human rights.</p>	<p>No Action Required: Article 2, Article 8 and Protocol 1 of the European Convention on Human Rights are known as 'qualified rights' in that a legal framework (the planning system) exists to consider these rights against the needs of society as a whole. One of the purposes of the plan making process and determination of any subsequent planning application is to balance individual rights against the needs of society. Human rights legislation is considered during the planning application decision making process. Policies MW1 and MPSS1 ensure developments will not have an unacceptable impact on the environment and local residents.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
Individuals	<p>Preferred Options: In Norfolk County Council's, 'Together for Norfolk' publication titled, 'AN AMBITIOUS PLAN FOR OUR COUNTY 2019-2025'. You state that, "here at Norfolk County Council, we have a clear ambition: for our County to be a place where we put people first, where everyone works together to create a better place to live. A place of opportunity: where we can fulfil our potential and lead productive, healthy and independent lives. A place where we all have the chance to contribute to and benefit from economic growth and regeneration, as well as protecting our unique environment."</p>	<p>No Action Required: The Minerals and Waste Local Plan is there to ensure proposed developments meet the local and national need as required by national planning policy and to ensure that development is undertaken in an appropriate way without unacceptable impacts on the environment or the local residents/community. Consultation is carried out during the planning process to capture the issues and seek to mitigate impacts. There is always a planning balance, but this is assessed on a case by case basis, after consultation.</p> <p>SIL 02 is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal. However, where sites for silica sand extraction do come forward, they will have to comply with the criteria based policy MPSS1 in the Local Plan.</p> <p>There are opportunities with minerals developments, which are temporary by nature and requirements for biodiversity net gain. Former mineral extraction sites have in particular delivered Biodiversity Action Plan priority habitats on restoration; the creation of such habitats delivering the aims of Biodiversity 2020. Where there are public rights of way, the local plan requires these to be retained.</p>
Mr & Mrs J Plaxton/ Fisher German LLP (98915)	<p>Preferred Options: SIL02 proposed silica extraction site should be preferred to the AOS_F site because the SIL02 site is situated only 6km from the Leziate processing plant and this enables the mineral to have the potential to be transported by pipeline rather than road. Furthermore, the other allocations would not be needed as forecast for the required silica sand within the plan period would already have been met. In comparison the AOS_F proposed silica sand extraction site is situated 17km from the Leziate processing plant and would need to be transported by road. For these reasons, it is evident that the SIL02 proposed silica</p>	<p>No Action Required: SIL 02 is concluded to be unsuitable to allocate 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>Responses to comments made in relation to AOS F can be found in the relevant section of this report covering AOS F.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to SIL02 - land at Shouldham and Marham	NCC Planning Officer's Response
	sand extraction is a more favourable allocation than the AOS_F site.	
Sibelco UK Limited (98646)	Preferred Options: In the context of NPPF paragraph 16 the plan as written is not positively prepared and there remains a significant shortfall in silica sand supply. SIL02 should be allocated as a specific site with any subsequent planning application required to evidence the effective mitigation measure in relation to concerns regarding bird hazard.	No Action Required: Noted. SIL 02 is concluded to be unsuitable to allocate because there is a high risk of unacceptable adverse impacts on aviation safety (RAF Marham) and the MOD DIO has objected to the proposal. Given the high water table at SIL 02, and the proposed wet working and wet restoration, it is considered that the site is undeliverable in principle, and no additional information has been provided. Criteria-based policy MPSS1 will be used to determine planning applications that come forward on unallocated sites for silica sand extraction.

Table 92: Main issues raised during the Consultation stages about MIN 69 land north of Holt Road, Aylmerton

The site is **allocated** in the Publication version of the Minerals and Waste Local Plan (M&WLP) because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 69 land north of Holt Road, Aylmerton	NCC Planning Officer's Response
NCC Historic Environment Service (93212)	Initial Consultation: Although the archaeology section mentions the need for archaeological assessment, the initial conclusion does not include a requirement for it.	Action Required: The site allocation policy has been amended to include the requirement for an archaeological assessment to be provided at the planning application stage.
Historic England (92983)	Initial Consultation: 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.	Action Required: 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 site allocation 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.
Mr Brian Cushion (93565)	Preferred Options: A physical parish boundary between Beeston Regis and Aylmerton, consisting of a variable bank with irregularly spaced trees is an important part of the local historic environment, and footpaths/bridleways must be protected.	No Action Required: Noted. The planning permission has been conditioned to provide appropriate diversions and mitigation for the Public Rights of Way. There has been an appeal related to the diversion of the PROW which has determined that the diversion is appropriate.
Carter Concrete Limited (98270)	Preferred Options: The boundary on the allocation map is correct but would state that the indicative site	Action Required: Noted.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 69 land north of Holt Road, Aylmerton	NCC Planning Officer's Response
	buffer illustrated in the south of the allocation MIN69 is no longer proposed. This was proposed to provide a means of mitigation in view of the proposal to remove part of the existing woodland around the current site. This proposal no longer forms part of the scheme and therefore the mitigation isn't required.	
Carter Concrete Limited (98270)	Preferred Options: Would suggest that for context the influence of the A148 on local amenity is clearly indicated as this forms part of the baseline consideration of any scheme for paragraph M69.1.	Action Required: Text in the site assessment has been updated.
Carter Concrete Limited (98270)	Preferred Options: Add reference to road safety enhancements committed to as presented in the application in Paragraph M69.2.	No Action Required: This requirement has been in the adopted policy for the site since the MSSA was adopted in 2013.
Carter Concrete Limited (98270)	Preferred Options: Paragraph 69.3 should highlight the earthwork and bank features along the parish boundary between Aylmerton and Beeston Regis (Norfolk HER ref 57910). Amend Paragraph 69.5 to include results of trial trench evidence suggests findings would only have local value or significance. Paragraph M69.6 should reflect the woodland to the south is mainly advance planting provided by the applicant as a means of long-term visual mitigation.	Action Required: Wording has been amended for each paragraph as suggested.
Carter Concrete Limited (98270)	Preferred Options: Paragraph M69.10 – how much woodland could be removed in principle?	Action Required: It is not possible at the local plan stage to provide detail on how much woodland could be removed.
NCC Natural Environment Team (93098)	Initial Consultation: This site lies within the Norfolk Coast AONB therefore 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.	No Action Required: The site allocation policy requires further advance planting along the southern and eastern boundaries of the land to screen the site from public viewpoints. It also requires improved public access on restoration and details the landscape and ecology requirements on restoration (including a higher quality restoration for the existing adjacent site). The northern part of this site received planning permission in October 2020.
Natural England (95055, 92117)	Initial Consultation and Preferred Options: Support the requirements listed under this policy with regard to the landscape and adjacent Briton's Lane	No Action Required: The site allocation policy includes a requirement for a Landscape and Visual Impact Assessment to be submitted at the planning application stage. It also requires further

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 69 land north of Holt Road, Aylmerton	NCC Planning Officer's Response
	<p>Gravel Pit SSSI. Restoration proposals will need to be sensitive to the Cromer Ridge in terms of the proposed gradients. Removal of the strip of land that lies between the existing quarry and proposed extension would need to be undertaken carefully and in ways to minimise impacts from the removal of wooded areas on the landscape character, biodiversity and users of public rights of way within the AONB.</p> <p>Should be subject at application stage to a Landscape and Visual Impact Assessment (LVIA) for all stages of the operation.</p>	<p>advance planting along the southern and eastern boundaries of the land to screen the site from public viewpoints.</p> <p>The site assessment 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 site allocation policy details the requirements for the working and restoration of the site, including public access.</p>
<p>NCC Natural Environment Team (93098) Norfolk Coast Partnership (92894) Norfolk Wildlife Trust (92387)</p>	<p>Initial Consultation: The site lays within the Norfolk Coast AONB. Restoration would need to demonstrate the site could become exceptionally beneficial to both the landscape and the public.</p> <p>The site could be considered suitable for sand and gravel extraction but only on condition that a very high quality working scheme was developed and full implemented.</p> <p>The site should be subject to a high quality restoration creating a large new area of heathland with benefits both for wildlife and for green infrastructure provision.</p>	<p>No Action Required: The site allocation policy requires improved public access on restoration and details the landscape and ecology requirements on restoration (including a higher quality restoration for the existing adjacent site). The northern part of this site received planning permission in October 2020.</p>
<p>Norfolk Wildlife Trust (98693)</p>	<p>Preferred Options: The site should only be worked dry in order to avoid hydrological impacts on the nearby Norfolk Valley Fens SAC and be subject to high quality restoration and formal aftercare, creating a large new area of heathland with benefits both for wildlife and green infrastructure provision.</p>	<p>No Action Required: Noted and in existing site allocation policy.</p>
<p>Frimstone (98755)</p>	<p>Preferred Options: Preference should not be given to any of these sites over and above MIN 35.</p>	<p>No Action Required: The comments raised regarding the suitability of site MIN 35 are responded to in the section of this report specifically covering proposed site MIN 35. It is also relevant that the northern part of site MIN 69 (consisting of 1 million tonnes of aggregate) was granted planning permission in October 2020.</p>
<p>Highway Authority (93145, 98841)</p>	<p>Initial Consultation: Not acceptable due to concerns with the road network because Briton's Lane is sub-</p>	<p>No Action Required: 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</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 69 land north of Holt Road, Aylmerton	NCC Planning Officer's Response
	<p>standard and narrow and the junction onto the A148 is also substandard.</p> <p>Preferred Options: Site acceptable subject to improved junction, access and routing arrangement.</p>	<p>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>
D K Symes Associates (92363)	<p>Initial Consultation: 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>No Action Required: 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>
About with Friends (92523) St Andrew's School Trust (92126) Individuals (92137)	<p>Initial Consultation: Unacceptable impacts on:-</p> <ul style="list-style-type: none"> • Noise, dust, air quality • Opposite a school for autistic children (issues with noise and other sensory impacts). • Noise due to explosives use • Health • Landscape (AONB) • Biodiversity (adjacent to SSSI) • Water pollution • Increase in traffic and heavy goods vehicles 	<p>No Action Required: 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>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>The site allocation 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>The site allocation policy includes a requirement for a Landscape and Visual Impact Assessment to be submitted at the planning</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 69 land north of Holt Road, Aylmerton	NCC Planning Officer's Response
		<p>application stage. It also requires further advance planting along the southern and eastern boundaries of the land to screen the site from public viewpoints.</p> <p>The site assessment 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 adjacent SSSI is Briton's Lane Gravel Pit. This is geological SSSI notified due to the geological deposits uncovered by previous mineral extraction rather than species or habitat.</p> <p>The limit of the proposed extraction would be above the water level which is highlighted in the supporting text.</p> <p>NCC'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 or protected species.</p>

Table 93: Main issues raised during the Consultation stages about site MIN 71 land west of Norwich Road, Holt

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction on this site has the potential to cause unacceptable adverse effects to Holt Lowes SSSI (part of the Norfolk Valley Fens SAC) and its location within the Glaven Valley Conservation Area.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 71 land west of Norwich Road, Holt	NCC Planning Officer's Response
Norfolk Wildlife Trust (98700) North Norfolk District Council (98828)	Initial Consultation and Preferred Options: Agree with evaluation of the site to not allocate.	No Action Required: Noted. The site is considered unsuitable for allocation due to the potential for adverse effects on the Holt Lowes SSSI, and its location within the Glaven Valley Conservation Area.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 71 land west of Norwich Road, Holt	NCC Planning Officer's Response
NCC Historic Environment Service (93195) NCC Natural Environment Team (93099)		
Natural England (92159) Norfolk Wildlife Trust (92388)	Initial Consultation: Likely significant effect. 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.	No Action Required: The site is considered unsuitable for allocation due to the potential for adverse effects on the Holt Lowes SSSI, and its location within the Glaven Valley Conservation Area.
Highway Authority (93144)	Initial Consultation: Acceptable subject to the use of the existing access and continued routing arrangements.	No Action Required: 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 considered unsuitable for allocation due to the potential for adverse effects on the Holt Lowes SSSI, and its location within the Glaven Valley Conservation Area.
Environment Agency (92563)	Initial Consultation: Proximity to Holt Lowes SSSI and potential impact on groundwater dependant habitat.	No Action Required: 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. The site is considered unsuitable for allocation due to the potential for adverse effects on the Holt Lowes SSSI, and its location within the Glaven Valley Conservation Area.
Cemex UK Materials Ltd (94896)	Preferred Options: When viewed as an extension to Holt Quarry as opposed to a stand-alone operation, it is felt that objections can be overcome.	No Action Required: Whilst it would enable the existing site access to be used, as required by the Highway Authority; the location of the site in proximity to Holt Lowes SSSI and within the

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 71 land west of Norwich Road, Holt	NCC Planning Officer's Response
		Glaven Valley Conservation Area does not change. The site is considered unsuitable for allocation due to the potential for adverse effects on the Holt Lowes SSSI, and its location within the Glaven Valley Conservation Area.
<p>1) NCC Natural Environment Team (93099)</p> <p>2) Individuals (including a Petition signed by 113 local residents)</p>	<p>Initial Consultation and Preferred Options: The following issues need to be properly reviewed as there is likely to be a detrimental/unacceptable impact:-</p> <ul style="list-style-type: none"> • Far too close to the market town and also residential dwellings (10m away). • Too close to Holt Country Park. • Noise, vibrations, dust, air quality, light, vibration • Impacts on health and wellbeing, especially nearby school children • earthworks, stockpiling and overburden • traffic and increase of HGV's • insufficient infrastructure, dangerous junction, B road. • access is poor and accident hotspot. • water quality and use • loss of biodiversity and ecology (especially Glaven River and Spouts Common) • landscape impact • historic assets and Holt Conservation Area • hydrogeological/groundwater/affect water table. • Loss of PROW/footpaths • Restoration. • Affect tourism and local businesses • Queries relating to existing sites and quarry operations • Potential for vibration from heavy lorries affecting home from 1800s without foundations • The development will negatively affect property values. 	<p>No Action Required: The site is considered unsuitable for allocation due to the potential for adverse effects on the Holt Lowes SSSI, and its location within the Glaven Valley Conservation Area.</p> <p>Notwithstanding this, a planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations, in accordance with NCC's 'Local List for the Validation of Planning Applications'. Any mitigation provided would be conditioned in a planning permission.</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.</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.</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, subject to a Transport Assessment.</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 and the Public Right of Way so that that operation only takes place along the Hunworth Road (C267).</p> <p>NCC's Local List requires a progressive working, restoration and afteruse scheme to be submitted at the planning application</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 71 land west of Norwich Road, Holt	NCC Planning Officer's Response
		<p>stage. Compliance with an approved restoration scheme would be controlled through planning conditions</p> <p>Property values are not a material planning consideration.</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.</p>
<p>Individuals (including a Petition signed by 113 local residents)</p>	<p>Initial Consultation: Cumulative impacts of three existing 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.</p>	<p>No Action Required: 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>Notwithstanding this, a planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations, in accordance with NCC's 'Local List for the Validation of Planning Applications'. Any mitigation provided would be conditioned in a planning permission. Policy MW1 Development Management Criteria assesses cumulative impacts of development.</p> <p>The NM&WLP is planning for the forecast need of an additional 12.597 million tonnes of sand and gravel in Norfolk in the period up to 2038. The potential start date for site MIN 71 is 2030 – after extraction has ceased at the adjacent operational site. Policy MP7 (Progressive working, restoration and after-use) requires 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>Individuals (including a Petition signed by 113 local residents)</p>	<p>Initial Consultation and Preferred Options: 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>Why does there need to be further extraction from North Norfolk close to a Georgian town and where are the products sold?</p>	<p>No Action Required: 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 this 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</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 71 land west of Norwich Road, Holt	NCC Planning Officer's Response
		Holt Lowes SSSI and its location within the Glaven Valley Conservation Area. The NM&WLP is planning for the forecast need of an additional 12.597 million tonnes of sand and gravel in Norfolk in the period up to 2038. The minerals are extracted for use in the UK and are usually for a local market within approximately 30 miles of the extraction site as it is not efficient to transport sand and gravel further afield by road.

Table 94: Main issues raised during the Consultation stages about site MIN 115 land at Lord Anson's Wood, near North Walsham

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 115 land at Lord Anson's Wood, near North Walsham	NCC Planning Officer's Response
NCC Natural Environment Team (93115)	Initial Consultation: Disagree that this site is suitable for allocation, in accordance with section 170b of the NPPF. The removal of this section of woodland (deciduous woodland priority habitat) would degrade the overall capital value, ecosystem services and recreational values provided by the woodland. The landscape paragraph detailed mature trees and woodland that are to be retained and enhanced. If this site remains allocated that a full AIA and ecological assessment is required to achieve this and this should be listed in the initial conclusion.	No Action Required: The woodland is a coniferous plantation (not deciduous woodland) 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 replanted following mineral extraction. The woodland does not have public access and therefore does not currently have any recreation value. 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. Action Required: The site allocation policy has been amended to include a requirement for an Arboricultural Impact Assessment to be submitted at the planning application stage. The site allocation policy requires processive restoration to a mix of deciduous woodland and heathland with public access, to provide biodiversity net gains.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 115 land at Lord Anson's Wood, near North Walsham	NCC Planning Officer's Response
Environment Agency (92561)	Initial Consultation: Potential loss of deciduous woodland priority habitat.	No action required: The woodland is a coniferous plantation (not deciduous woodland). The site allocation policy requires an Arboricultural Impact Assessment to be submitted at the planning application stage. The site allocation policy requires progressive restoration to a mix of deciduous woodland and heathland to provide biodiversity net gains.
NCC Natural Environment Team (93100)	Initial Consultation: The 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.	No Action Required: The site allocation 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).
NCC Historic Environment Service (93213)	Initial Consultation: The text needs to flag up that that aircraft crash site is legally protected under Protection of Military Remains Act (1986).	No Action Required: The text has been amended as requested.
Natural England (92119)	Initial Consultation: There is an opportunity for the site restoration to include proposals to provide lacking accessible greenspace.	Action Required: The site allocation policy requires processive restoration to a mix of deciduous woodland and heathland with public access, to provide biodiversity net gains.
Historic England (98806)	Preferred Options: Include reference to the need for a heritage statement in the policy. Include specific reference to the nearest heritage assets to read 'heritage assets and their settings (including...)	Action Required: The site allocation policy has been amended as requested.
North Norfolk District Council (98824)	Preferred Options: Careful consideration should be given to the proximity of North Walsham and the proposed southern expansion of North Walsham and transport impacts.	No Action Required: Noted. MIN 115 is close but not adjacent to the area proposed in North Norfolk's emerging Local Plan for the southern expansion of North Walsham. Therefore, MIN 115 could provide a nearby location for mineral to support this expansion. The expansion area is also partially underlain by mineral resources and prior extraction may be appropriate and any future processing plant at MIN 115 may be able to support this.
Norfolk Wildlife Trust (98702)	Preferred Options: The site should only be worked dry to avoid impacts on nearby designated and CWS sites.	No Action Required: Noted and required in the site allocation policy.
Highway Authority (93158) (98842)	Initial Consultation: Require clarification on the proposed access strategy for the site in order to come to a view on its suitability.	No Action Required: 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

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 115 land at Lord Anson's Wood, near North Walsham	NCC Planning Officer's Response
	Preferred Options: Acceptable subject to site access being via private haul route to acceptable access at B1150.	addition, depending on the results of a Transport Assessment, a right-hand turn lane may be required. No Action Required: Noted and a requirement in the site allocation policy.
North Walsham Town Council (98486) Individuals (93567, 93141, 98257, 93247)	Preferred Options: Concerns at the impacts the works may have on nationally important event – 1381 Battle of North Walsham.	No Action Required: Noted. The draft policy in the Publication version of the Minerals and Waste Local Plan contains a requirement for an archaeological assessment. This policy specifically notes that this will include reference to the battle site.
North Walsham Town Council (98486) Individuals (93141, 93247)	Preferred Options: Future housing allocations under NNDC Local Plan need to be accounted for, as well as all the disruption and impacts on existing residents.	Action Required: Text amended to include distance from site to planned housing allocations. A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission.
North Walsham Town Council (98486) Individuals (93141, 98284, 93247)	Preferred Options: Loss and then lack of woodland habitat for the period of mineral extraction operations. Permanent loss of wildlife.	No Action Required: Much of the site is a coniferous plantation so the timber would be harvested at some point. A planning application would need to demonstrate that there would not be an unacceptable adverse impact on the natural environment arising from the operations. Any mitigation provided would be conditioned in a planning permission. The restoration required by the site allocation policy is for mixed deciduous woodland and heathland, which would provide a biodiversity gain over the current plantation.
Individuals (93567, 94131)	Preferred Options: Lack of acceptable access, which would create additional traffic and impact on highway safety.	No Action Required: The Highway Authority considers that the access via a private haul route to the B1150 would be acceptable with access improvements.
Individuals (94131, 93247)	Preferred Options: Application lacks mention/ assessment of climate change impacts.	No Action Required: This is a Local Plan site allocation not a planning application. In order for mineral to be extracted from the site, a planning application would be required and assessment of climate change impacts would be a material planning consideration, in accordance with national policy/guidance. The site has been assessed through the Sustainability Appraisal process which includes objectives regarding climate change mitigation and adaption

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 115 land at Lord Anson's Wood, near North Walsham	NCC Planning Officer's Response
Individuals (93247, 98284)	Preferred Options: Details of restoration scheme inadequate and does not improve on existing landscape and value. No guarantee it will not be built on in next NNDC Local Plan. Concern that Lord Anson's Wood is home for wildlife.	No Action Required: The restoration required in the site allocation policy is for mixed deciduous woodland and heathland, which would provide a biodiversity gain over the current plantation. A future planning application would be required to contain a detailed restoration/aftercare scheme. Any future planning application would need to be supported by assessments of biodiversity and species, together with mitigation to address potential impacts.

Table 95: Main issues raised during the Consultation stages about site MIN 207 land at Pinkney Field, Briston

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy. The site was granted planning permission in August 2019.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 207 land at Pinkney Field, Briston	NCC Planning Officer's Response
Norfolk Wildlife Trust (98703)	Preferred Options: Any allocation should demonstrate it can deliver biodiversity net gain in its own right and should include sufficient areas of priority habitats as set out in policy MP7 (see supporting text MP7.5).	Action Required: The site policy has been amended to state that the development will be subject to the "submission of a restoration scheme to an agricultural reservoir and grassland to provide biodiversity gains."
Highway Authority (93146, 98843)	Initial Consultation and Preferred Options: Acceptable subject to continuation of existing haul route.	No Action Required: Noted and in existing policy.
Historic England (92986)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.	No Action Required: Noted. The 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.
Historic England (98807)	Preferred Options: Object to allocation given its location within the Conservation Area and surrounding Historic assets.	No Action Required: Noted. No objection was made in planning application for this site. The site would be restored to an agricultural reservoir and is considered to be less than substantial harm which is outweighed by the public benefits of an agricultural reservoir and improved biodiversity on the site.

Table 96: Main issues raised during the Consultation stages about site MIN 208 land south of Holt Road, East Beckham

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 208 land south of Holt Road, East Beckham	NCC Planning Officer's Response
Highway Authority (93147, 98844)	Initial Consultation and Preferred Options: Acceptable subject to access via existing right turn facility. Right turn lane to be removed following completion of extraction/restoration.	No Action Required: Noted and in existing policy.
Historic England (92987)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.	No Action Required: Noted and in existing policy.
Historic England (98808)	Preferred Options: Include specific reference to the nearest heritage assets to read 'heritage assets and their settings (including...)	Action Required: Noted and policy amended.
Individual (92139)	Initial Consultation: 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.	No Action Required: The draft site policy requires the submission of a Landscape and Visual Impact Assessment at the planning application stage and is generally well screened. 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), as the operation would be phased with the existing site. 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. Therefore, there would be no adverse impact on the SSSI. 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).

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 208 land south of Holt Road, East Beckham	NCC Planning Officer's Response
		Separate planning application would need to be submitted, and granted, for the additional site area before mineral extraction could take place.

Table 97: Main issues raised during the Consultation stages about site MIN 25 land at Manor Farm (between Loddon Road and Thorpe Road), Haddiscoe

The site is **allocated** in the Publication version of the NM&WLP because mineral extraction on this site would not cause unacceptable adverse impacts. The submission of a planning application will assess any potential impacts and identify appropriate mitigation measures, in accordance with the relevant site allocation policy.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
Highway Authority (98848)	Preferred Options: Acceptable subject to suitable access strategy either via Crab Apple Lane, or direct to B1136. Access via Crab Lane would require local highway improvements to include widening to the access and visibility at the B1136 junction in accordance with DMRB (Design Manual for Roads and Bridges). Direct access via B1136 to include visibility in accordance with DMRB.	No Action Required: Noted. The site allocation policy requires the submission of an acceptable Transport Assessment or Statement (as appropriate) to assess the impacts of HGV traffic along the access route, and appropriate mitigation for any potential impacts to the highway; and Provision of a highway access that is considered suitable by the Highway Authority.
Individuals (94701, 92154)	Initial Consultation: [Individuals] Hope 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. [individuals] Why can't a relief road be built across the land by Cemex to link up with the Ravingham site?	No Action Required: The site allocation policy requires the submission of an acceptable Transport Assessment or Statement (as appropriate) to assess the impacts of HGV traffic along the access route, and appropriate mitigation for any potential impacts to the highway; and Provision of a highway access that is considered suitable by the Highway Authority.
Environment Agency (92562) Norfolk Wildlife Trust (92390) Individual (92277)	Initial Consultation: Potential impacts on Priority Habitats - deciduous woodland and coastal and floodplain grazing marsh need to be assessed to ensure ecology is not adversely affected.	No Action Required: 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

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
	<p>Ecological impacts on the nearby CWS 2221, 'Devil's End Meadow' need to be avoided.</p> <p>Will the works alter the hydrostatic fall and affect the Flora and Fauna?</p>	<p>demonstrate that there would not be an unacceptable adverse impact on the natural environment.</p> <p>A planning appeal 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>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>
Natural England (92121)	<p>Initial Consultation: 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. An LVIA would also be required at the application stage, for all stages of the operation.</p>	<p>No Action Required: Noted. The draft policy within the Publication version of the Plan requires an LVIA, and the site assessment includes reference to the proximity of the Broads Authority Executive Area. 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 Policy MW1 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.</p>
Historic England (92991, 98810)	<p>Initial Consultation and Preferred Options: 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>Prepare an HIA now to consider the suitability of the site and inform its extent and any potential heritage mitigation in advance of the next draft of the Plan. The findings of the HIA would then need to inform the policy and supporting text.</p>	<p>No Action Required: 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 would need to demonstrate that there would not be an unacceptable adverse impact on the historic environment, in line with Policy MW1: Development Management Criteria and the NPPF.</p> <p>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>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
South Norfolk District Council (92510) Individuals (91825, 92268, 92390, 92274, 92275)	<p>Initial Consultation: 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. Unknown depth of extraction.</p>	<p>No Action Required: The proposed site in the NM&WLP 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.</p> <p>The depth of the proposed mineral extraction has not been provided by Cemex/Breedon at the Local Plan stage, but it could be up to 13m in places.</p> <p>All impacts will need to be assessed and mitigated in line with the site allocation policy, subject to compliance with the NM&WLP policies and the assessments required in the NCC Local List for Validation of Planning Applications.</p>
South Norfolk District Council (99051) Individuals (91826, 91825)	<p>Initial Consultation: [Individuals] 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>Preferred Options: 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>No Action Required: The site allocation 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 site allocation policy states mitigation measures should include a combination of 'advanced planting with native species and bunds' and 'retention of boundary hedgerows and trees'.</p>
South Norfolk District Council (99051) Haddiscoe Parish Council (98246) Individuals (91819, 91834, 92037, 92124, 92125, 92133, 92148, 92278, 92274,	<p>Initial Consultation and Preferred Options: Concerns raised about:</p> <ul style="list-style-type: none"> • the site/operations (noise, dust, traffic, heath), working hours and close proximity to resident • impacts on landscape and heritage assets • effect on tourism, nearby business (such as nearby dog kennels) and the community as a whole, • impacts on wildlife and protected species • increased CO2 emissions. 	<p>No Action Required: The site allocation policy sets out the requirements and detailed submissions of a development for sand and gravel extraction and is subject to compliance with the NM&WLP policies, and ensure that there are no unacceptable impacts arising from the development, and appropriate mitigation is provided where required. For example, the site allocation policy includes requires for the submission of a noise assessment, a dust assessment, a heritage statement and an archaeological assessment at the planning application stage to assess potential impacts and proposed suitable mitigation measures. The NCC</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
92275, 92277, 93036, 92280, 94701, 98156, 98288, 98225, 98233, 94582, 95008, 98248, 98154, 98251, 98263, 98280)	<ul style="list-style-type: none"> • Need to address the traffic impact on the B1136-A143 junction and the B1136-A146 junctions. • Dangerous for pedestrians as no footpath (increase in traffic and HGV's). • Affects PROW • The benefit to the local community is virtually nil with few if any jobs for locals. • No detailed assessments provided at this stage. • No trust in restoration as they are required to, leaving dangerous sites 	<p>'Local List for the Validation of Planning Applications' specifies the circumstances when a Biodiversity Survey/Report are required to be submitted with a planning application.</p> <p>Statutory and technical consultees have been consulted and comments have been included in the assessment/policy where appropriate, and in the event of a planning application, these same organisations would be consulted upon the submission of the detailed proposals.</p> <p>In the event planning permission is granted, planning conditions would specify mitigation measures to control noise or working hours for example, and there are numerous examples of these working effectively for mineral extraction sites; both nationally and locally.</p> <p>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>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.</p> <p>The Highway Authority consider that an acceptable site access could be formed. The site allocation policy requires the submission of an acceptable Transport Assessment or Statement (as appropriate) to assess the impacts of HGV traffic along the access route, and appropriate mitigation for any potential impacts to the highway; and Provision of a highway access that is considered suitable by the Highway Authority.</p>
Individuals (92277)	<p>Initial Consultation: What will happen to the public right of way through the site during and after the works? 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?</p>	<p>No Action Required: 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. At the Local Plan preparation stage there are no detailed proposals available for the restoration of the site. Draft Policy MP7 requires planning applications for mineral workings to be accompanied by a scheme for the phased</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
		and progressive working and restoration of a site throughout its life.
Individuals (92148)	Initial Consultation: Current boundary screening lends itself to fly tipping and is more open during winter months.	No Action Required: The site allocation 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.
Individuals (92037)	Initial Consultation: What would the impact be to the actual soil stability and drainage and pollution.	<p>No Action Required: Working schemes for mineral extraction 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>
Broads Authority (98973)	Initial Consultation and Preferred Options: Require to be consulted on any planning application or local plan review for this site as landscape character is well defined and susceptible to change.	No Action Required: Noted.
Haddiscoe Parish Council (98246)	Preferred Options: M25.1 does not mention of light pollution, at one of the highest elevations in the village.	No Action Required: Noted. In the event of a planning application, the Norfolk County Council's 'Local List for Validation of Planning Applications' requires a lighting assessment and lighting details, for all major applications. Statutory consultees would be consulted upon the submission of the detailed proposals, and planning conditions issued in the event planning permission is granted, specify mitigation measures to ensure there are no unacceptable impacts from the development.
Haddiscoe Parish Council (98246) Individuals (98233)	Preferred Options: M25.8 describes "a small disused mineral working" on the Eastern boundary. This piece of land belongs to this Parish and is used as a recreational ground for children playing and dog walkers. M25.21 seems to have missed the line of Overhead power lines through the middle of the site.	Action Required: Noted. Paragraph 25.8 has been amended. Paragraph M25.21 of the Publication version of the NM&WLP states that electricity distribution lines cross the site.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
Haddiscoe Parish Council (98246) Individuals (98233)	<p>Preferred Options: M25.9 is misleading and should quote the original grounds for refusal in terms of the planning application and appeal - landscape impacts, noting that highway, amenity and groundwater impacts further decreased the site's acceptability. Has it been taken into account for the conclusion of the site allocation?</p>	<p>No Action Required: M25.9 sets out the main reasons for dismissal of the appeal, including the Impact on the setting of the Grade I Listed Church was one of the reasons the appeal was dismissed. Significant factors in the appeal decision were the location of the plant site to the south of the B1136 (the same side as the church), the open nature of the existing landscape on that side of the road, views along the road towards the church, and the expected length of extraction (21 years).</p> <p>Paragraph M25.10 states 'The appeal Inspector noted that the harm from the working to the south of the B1136 was increased by the longevity of the extraction and the fact that the plant site would be on that side of the road for the whole 21 years of the mineral working. The evidence to the appeal, noted in paragraph 26 of the appeal decision, states the land parcel "to the north, is well screened from Loddon Road and comprises low grade agricultural land, and attracts no landscape objection". In the current proposal, all mineral extraction and associated activity would only take place north of the B1136 and the estimated length of extraction is 9 years. Therefore, it is considered that the site is suitable in landscape terms.'</p> <p>M25.9 states the site is located over a Secondary A aquifer (superficial deposits) and a principal aquifer (bedrock). However, there are no groundwater Source Protection Zones within the proposed site. The Environment Agency have no objection to the site allocation regarding groundwater.</p> <p>The appeal and site history has been considered in the assessment, but based on the details as submitted in the Local Plan Review Process.</p>
Haddiscoe Parish Council (98246) Individuals (92274, 91826, 92275, 98233, 98280, 91834)	<p>Initial Consultation and Preferred Options: Mineral not needed, especially with Suffolk's high land bank.</p>	<p>No Action Required: Norfolk is required to plan for minerals as set out in the NPPF and NPPG. Need is monitored and assessed annually through the Local Aggregate Assessment. The existing mineral extraction operation at Norton Subcourse is included in the assessment of future need, and the sites proposed for allocation in the Minerals Local Plan Review are required in</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
		<p>addition to those existing sites. The mineral proposed to be extracted at Haddiscoe would be transported to Norton for processing. Policy MP1 sets out the quantity of aggregate mineral to be planned for in Norfolk during the period of the NM&WLP to 2038, which is 12.597 million tonnes and takes into account the existing landbank of permitted extraction sites in Norfolk, not in other counties. Other Mineral Planning Authorities are consulted at each stage throughout the Local Plan Review process, and as set out in the Duty to Cooperate. 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>
Individuals (91826)	<p>Initial Consultation: Loss of agricultural land will have permanent detrimental impact due to loss of jobs and potential food shortages/Brexit.</p>	<p>No Action Required: The site is proposed to be restored to a combination of acid grassland, woodland planting and shallow wetland/pond to provide biodiversity net gain. The loss of agricultural land would be a consideration in any future planning application (see Policy MW5: Agricultural soils).</p>
Haddiscoe Parish Council (98246) Individuals (98233)	<p>Preferred Options: GNLP housing allocation consultation is not joined with this one, there is the potential for two major construction sites working either end of our village, at the same time. The proposed selected sites for housing allocation are also within 100m of the proposed extraction area and so would be subject to noise and dust.</p>	<p>No Action Required: The GNLP is a separate planning authority and is not generally possible to co-ordinate consultations. However, as part of the Duty to Co-operate, it requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. Therefore regular strategic meetings are attended by the relevant authorities and are all consulted in each phase of the Local Plan review process. They would also be consulted in the event of a planning application.</p> <p>Cumulative impacts are required to be assessed during the planning application process, through Policy MW1 (Development Management Criteria).</p> <p>In the event of a planning permission being granted, planning conditions would specify mitigation measures to ensure there are no unacceptable impacts from the development.</p>
Individuals (91825, 98225)	<p>Initial Consultation and Preferred Options: The development will negatively affect property values.</p>	<p>No Action Required: Property values are not a material planning consideration.</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
Haddiscoe Parish Council (98246) Individuals (98233)	<p>Preferred Options: M25.23 does not detail the fact that to fill a hole will take as long as it took to dig it.</p> <p>Refilling the void will double the lifetime road movements.</p>	<p>No Action Required: Mineral extraction is usually phased so as to minimise the working area and progressively restore each phase, as required in Policy MP7: Progressive working, to ensure that the worked land is reclaimed at the earliest opportunity. Phased and progressive working and restoration must seek to reduce and mitigate potential impacts, including to amenity, landscape, the natural, built and historic environment, through minimising the area of land occupied at any one time by the mineral working. The site is proposed to be restored to a lower level to a combination of acid grassland, woodland planting and shallow wetland/pond. Therefore the void formed by mineral extraction will not be refilled with material from off site.</p> <p>The proposed phasing and restoration scheme of working would be assessed and conditioned in the event of a planning permission.</p>
Individuals (98233)	<p>Preferred Options: Will the site be viable when all mitigations measures/buffers are taken into account?</p>	<p>No Action Required: A minerals operator would take this into account in the development of their proposal, and throughout the planning process and make their own business decisions. Notwithstanding this, if a site obtained planning permission, the permission runs with the land, not necessarily the operator or landowner who submitted the application.</p>
Haddiscoe Parish Council (98246) Individuals (98233, 91826)	<p>Preferred Options: Removing aggregate from Haddiscoe, and then being dropped off by lorry at Norton Subcourse for processing, then back into a lorry for movement onto the identified primary market in Great Yarmouth, is not sustainable and increases traffic on unsuitable roads. Cumulative impact of Haddiscoe and Norton Subcourse.</p>	<p>No Action Required: Cumulative impacts are required to be assessed during the application, through Policy MW1 (Development Management Criteria). Policy MW2: Transport sets out the requirements and criteria in relation to assessing the transport impact. Policy MW3 Climate change mitigation and adaption sets out the strategy for taking a proactive approach to mitigating and adapting to climate change. Where required, planning conditions can be used to restrict the number of vehicle movements and to secure acceptable routing of HGVs when this is considered necessary to minimise highways and amenity impacts from HGV transport.</p>
Individuals (91818, 98233, 91834)	<p>Initial Consultation and Preferred Options: Would the planning term be reflected by the local community being</p>	<p>No Action Required: No, seeking developer contributions in this way would not be legally sound, as it goes beyond the remit of the</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
	<p>able to draw on a bond for damages if the planning term were to be extended? Can a developer fund be made available to offset the harm to the long term aspirations of the village.</p> <p>If it were to be approved, then we would have little choice but to seek compensation from the council and developers through the legal system.</p>	<p>Minerals and Waste Local Plan and does not form part of the landuse planning process. However, a suitable scheme for the temporary diversion and reinstatement of the Public Right of Way is required, as well as mitigating unacceptable impacts through suitable mitigation measures, this does not involve financial compensation to individuals. Breedon Group (previously Cemex) is a private company and has submitted this site for consideration into the NM&WLP process. NCC has a statutory duty as Minerals Planning Authority to produce a Minerals Local Plan and to determine planning applications for mineral extraction.</p>
Individuals (98233)	<p>Preferred Options: Development policy gives more weight to extension of existing mineral extraction areas and is more sustainable.</p>	<p>No Action Required: This is no longer the case. National Planning Policy Guidance has clarified under Paragraph: 010 (Reference ID: 27-010-20140306) the suitability of each proposed site, whether an extension to an existing site or a new site, must be considered on its individual merits.</p>
Individuals (98233, 98501)	<p>Preferred Options: More information needed to assess the restoration and timescales, and re-routed PROW and impact on water supplies and conservation of water. Should be EIA application, with biodiversity and protected species surveys. Conditions required to mitigate impacts.</p>	<p>No Action Required: These details are set out as requirements in the site allocation policy. This is a Local Plan site allocation policy not a planning application and therefore less detail is available. Each application is screened to determine whether it is an EIA application upon request or submission by the applicant. Past applications in this area have required Environmental Statements and are therefore EIA applications. If MIN 25 is adopted as a site allocation after examination, a planning application and permission would still be required before extraction could begin.</p>
Individuals (98233)	<p>Preferred Options: The NCC sustainability assessment identifies potential archaeological which would need monitoring and mitigation. It has been the grounds for removal of the Fritton site from the allocation.</p>	<p>No Action Required: The site allocation policy criteria (h) requires the submission of an appropriate archaeological assessment, which must be prepared in consultation with Norfolk County Council; this may initially be desk-based but may need to be followed up with field surveys and trial-trenching. The archaeological assessment will be used by NCC/Historic Environment Service to agree appropriate mitigation measures.</p>
Individuals (98233)	<p>Preferred Options: Should be more obligation or support for minerals suppliers to use the new outer harbour at Great Yarmouth and dredging licenses.</p>	<p>No Action Required: Marine aggregate licenses are obtained through a separate process through the Marine Management Organisation. The contribution made by marine aggregate is</p>

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
		taken into account in determining the need for land-won aggregate tonnages.
Frimstone Ltd (98754)	Preferred Options: Preference should not be given to any of these sites over and above MIN 35 and that MIN 35 should be reconsidered in light of the additional informational submitted.	No Action Required: Consultation responses about MIN 35 are responded to in the section of this report specifically covering site MIN 35.
Haddiscoe Parish Council (91816) Individuals (98154, 91826)	Initial Consultation: [Haddiscoe Parish Council] were not a recipient of your letter dated 26.06.18, notifying only the immediate residents of the proposed site. Preferred Options: A lot of residents and visitors not aware of consultations and object.	No Action Required: 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 consultation process used for the Preferred Options Consultation either met or exceeded that required by national guidance, regulations and the SCI. National guidance indicates that as part of the consultation process an appropriate method to signpost consultations is to supply Parish councils (as the lowest tier of Local Government) with the details of consultations, so that they can cascade the information to parishioners in the way in which they consider most suitable. The Consultation documents were published online and hardcopies were available at locations within each district area, and letters signposting methods by which the documents could be accessed and responses made were sent to individuals who had responded previously, those within 250m of the boundary of a site, Parish councils and Statutory and general consultees.
Haddiscoe Parish Council (91816) Individuals (92316, 92280, 91897, 93288, 98227, 92268, 92124)	Initial Consultation: 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	No Action Required: The objections and distress from local residents to the planning application (appeal ref. APP/X2600/A/13/2197841) are noted. However, the proposal in the NM&WLP is not identical to the planning application and appeal in 2014. Paragraph M25.10 sets out the differences between the refused application/appeal. The proposed allocation would not include any land to the south of the B1136 and all mineral extraction and associated activity would only take place north of the B1136 and the estimated length of extraction is 9

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 25 land at Manor Farm, Haddiscoe	NCC Planning Officer's Response
	<p>industrial scale development in the heart of our village. Of 227 households in the village, 120 were active Stopit members and in the planning process there were 175 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.</p> <p>It was not allocated in 2011 because it was "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>years, instead of 21 years. The allocation was therefore considered suitable in landscape terms.</p> <p>A planning application would need to demonstrate that there would not be any unacceptable adverse impact, and mitigation measures in place where necessary, in accordance with the NPPF and the NM&WLP (particularly but not exclusively, Policy MW1: Development Management Criteria). The site allocation 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.</p> <p>The appeal decision in 2014 did not conclude that there would be any adverse impacts on biodiversity from the proposed site. It also concluded 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 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 planning forming hedgerows on all sides of the site except for a section on the eastern boundary close to Manor Farm. An LVIA would be required to demonstrate that there would not be an unacceptable adverse impact on landscape character.</p> <p>The site has been proposed to Norfolk County Council by Cemex (now Breedon Group), in response to a 'call for mineral sites' for the Norfolk Minerals and Waste Local Plan and is therefore required to be assessed.</p>

Table 98: Main issues raised during the Consultation stages about site MIN 92 land east of Ferry Lane, Heckingham

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction on this site would cause unacceptable landscape impacts, and the required retention of the mature oaks bisecting the site will make an acceptable working scheme unlikely.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 92 land east of Ferry Lane, Heckingham	NCC Planning Officer's Response
Highway Authority (93152)	Initial Consultation: 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.	No Action Required: Noted. However, site MIN 92 is concluded to be unsuitable to allocate due to unacceptable landscape impacts, and that an acceptable working scheme is unlikely.
NCC Natural Environment Team (93116, 93111, 93102)	Initial Consultation: This site is unsuitable for allocation due to the line of mature oaks in the centre of the site.	No Action Required: The site is concluded to be unsuitable to allocate due to unacceptable landscape impacts, and that an acceptable working scheme is unlikely
Historic England (92993)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy.	No Action Required: Noted. However, The site is concluded to be unsuitable to allocate due to unacceptable landscape impacts, and that an acceptable working scheme is unlikely
Cemex UK Materials Ltd (92366) Savills (92365)	Initial Consultation: The Company does not agree with the initial conclusions, the site should be allocated. The impact on the broads is negligible, the impact on the landscape could be mitigated, and the removal of trees would not constitute an "...unacceptable landscape impact..." in the absence of mitigation measures or an assessment of the condition of the trees themselves. 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.	No Action Required: Noted. The Broads Authority have responded to the Initial Consultation and stated that they do not support this site being allocated for mineral extraction due to the landscape issues raised in the site assessment. 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. 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. 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. It is not considered that being able to use the existing processing plant on the adjacent site outweighs the landscape impacts.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 92 land east of Ferry Lane, Heckingham	NCC Planning Officer's Response
		Therefore, the site is concluded to be unsuitable to allocate due to unacceptable landscape impacts, and that an acceptable working scheme is unlikely.
<p>Natural England (92156, 92122) Broads Authority (91837) Individuals (98274, 98532)</p>	<p>Initial Consultation and Preferred Options: Concerns over impacts on nearby SSSI's, AONB landscape, Broads National Park, character and use of Ferry Road, noise, impacts on recreation and tourism.</p> <p>[Natura England] An LVIA would be required 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.</p>	<p>No Action Required: The site is concluded to be unsuitable to allocate due to unacceptable landscape impacts, and that an acceptable working scheme is unlikely. The land is not in an AONB. The proposed site access would not be along Ferry Road. A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission.</p>
<p>Natural England (92156, 92122) Individuals (98274, 98532)</p>	<p>Initial Consultation and Preferred Options: Concerns over impacts on protected species and wildlife.</p> <p>[Natura England] 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>No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. However, the site is concluded to be unsuitable to allocate due to unacceptable landscape impacts, and that an acceptable working scheme is unlikely</p>

Table 99: Main issues raised during the Consultation stages about site MIN 212 land south of Mundham Road, Mundham

The site is **not allocated** in the Publication version of the NM&WLP because mineral extraction on this site due to the concerns raised by the Highway Authority about the location of the plant site at Caistor St Edmund which necessitates the routing of HGVs through Trowse village.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 212 land south of Mundham Road, Mundham	NCC Planning Officer's Response
Historic England (92993, 98811)	Initial Consultation: The recommendations in the Sustainability Appraisal Appendix B should be incorporated in policy. Include specific reference to the nearest heritage assets to read 'heritage assets and their settings (including...).	No Action Required: The site is not allocated in the Publication version of the NM&WLP due to concerns raised by the Highway Authority regarding the routing of HGV traffic through Trowse village
Highway Authority (93201)	Initial Consultation: Acceptable subject to the use of the existing access and continued routing arrangements.	No Action Required: The site is unsuitable for allocation due to concerns raised by the Highway Authority regarding the routing of HGV traffic through Trowse village.
Highway Authority (98849) South Norfolk District Council (99050)	Initial Consultation and Preferred Options: The location of the processing site is a concern (landscape and transport impacts), particularly the routing of HGVs through Trowse village. Material should ideally be processed at the source.	No Action Required: The site is unsuitable for allocation due to concerns raised by the Highway Authority regarding the routing of HGV traffic through Trowse village.
Earsham Gravels Limited/Stephen M Daw Ltd (93273)	Preferred Options: The scale of extraction will be limited to 30,000 tpa, commensurate with previous levels and mitigation provided to make any impacts acceptable.	No Action Required: Mineral extraction ceased in the adjacent field at the end of 2017 and therefore it is not considered appropriate to restart HGV movements from Mundham, through Trowse village to the processing plant at Caistor St Edmund. The site is unsuitable for allocation due to concerns raised by the Highway Authority regarding the routing of HGV traffic through Trowse village.
Earsham Gravels Limited/Stephen M Daw Ltd (93276)	Preferred Options: Remove 4 th bullet point. Extraction has been completed within the existing Mundham Quarry and there are no other extraction sites in the immediate area which could result in any kind of cumulative impact.	No Action Required: Agreed, however, the site is unsuitable for allocation due to concerns raised by the Highway Authority regarding the routing of HGV traffic through Trowse village.
South Norfolk District Council (99050)	Preferred Options: Concerns over impacts on landscape and whether mitigation is enough to overcome the impacts.	No Action Required: A planning application would need to demonstrate that there would not be an unacceptable adverse impact arising from the operations. Any mitigation provided would be conditioned in a planning permission. The site is unsuitable for

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to site MIN 212 land south of Mundham Road, Mundham	NCC Planning Officer's Response
		allocation due to concerns raised by the Highway Authority regarding the routing of HGV traffic through Trowse village.

Table 100: Main issues raised during the Consultation stages about site MIN 79- Land north of Hickling Lane, Swardeston

The site was initially withdrawn from the Minerals and Waste Local Plan Review process in December 2018 by Tarmac and the landowners. A response made on behalf of the landowners at the Preferred Options Stage sought to have the site reconsidered for potential allocation. The site is unsuitable for allocation in the Publication version of the Minerals and Waste Local Plan (M&WLP) because the proposed highway access is considered to be unsuitable by the Highway Authority. There is also no mineral operator proposing the site and therefore it is less deliverable than other alternative sites.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to MIN 79- Land north of Hickling Lane, Swardeston	NCC Planning Officer's Response
NCC Natural Environment Team (93103)	Initial Consultation: 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.	No Action Required: The site is unsuitable for allocation as an appropriate highway access cannot be formed; also the site is not supported by a mineral operator and therefore considered less deliverable than alternative sites.
Highway Authority (93154)	Initial Consultation: Acceptable subject to the use of the existing access and continued routing arrangements.	No Action Required: The site is unsuitable for allocation as an appropriate highway access cannot be formed; also the site is not supported by a mineral operator and therefore considered less deliverable than alternative sites.
Historic England (92994)	Initial Consultation: 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. HIA required and incorporated into allocation policy.	No Action Required: The site is unsuitable for allocation as an appropriate highway access cannot be formed; also the site is not supported by a mineral operator and therefore considered less deliverable than alternative sites.
Norfolk Wildlife Trust (92392)	Initial Consultation: Being close to the Norwich growth area may support restoration that includes specifically includes green infrastructure provision.	No Action Required: The site is unsuitable for allocation as an appropriate highway access cannot be formed; also the site is not supported by a mineral operator and therefore considered less deliverable than alternative sites.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to MIN 79- Land north of Hickling Lane, Swardeston	NCC Planning Officer's Response
		supported by a mineral operator and therefore considered less deliverable than alternative sites.
National Grid/ Wood E&I Solutions Ltd (92352)	Initial Consultation: The site is crossed by a National Grid high voltage electricity transmission overhead line. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.	No Action Required: The site is unsuitable for allocation as an appropriate highway access cannot be formed; also the site is not supported by a mineral operator and therefore considered less deliverable than alternative sites.
J G Steward Trust/ M Falcon Property Solutions (98271)	Preferred Options: The site was deallocated as it was no longer possible to transport the mineral for processing on the neighbouring property, however there is a feasible alternative to process and transport mineral directly east to the A140. The site should be reinstated due to: an alternative independent access route to the A 140 and the ability to process the mineral on site. The mineral reserve extends to 1.76 million tonnes of gravel, infilled with 600,000 tonnes of inert waste. Landscape, heritage and other impacts can be appropriately mitigated.	No Action Required: The site is not allocated in the Publication version of the Minerals and Waste Local Plan, primarily because the highway access is considered unsuitable by the Highway Authority as detailed above. In addition, there is not a mineral operator promoting the site and therefore the site is less deliverable than other sites that have been proposed for extraction.

Table 101: Main issues raised during the Consultation stages about the Waste Management Capacity Assessment 2017

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Waste Management Capacity Assessment 2017	NCC Planning Officer's Response
NCC Waste Disposal Authority (94679)	Preferred Options: The current volatility in the market for the export of refuse derived fuel (RDF) is illustrative of how quickly sites can change their operations from pre-treatment to transfer. At the time of writing there is anecdotal evidence, nationally and locally; of RDF production operations resorting to considerable use of contingency operations such as transferring untreated waste for UK based Energy from Waste treatment or landfill. Sites are therefore mothballed and revert to waste transfer use.	No Action Required: The 2017 Waste Management Capacity Assessment has calculated the capacity of existing sites based on the maximum quantity of waste that they have received in the five years from 2012-13 to 2016-17.

Table 102: Main issues raised during the Consultation stages about the Sustainability Appraisal Scoping Report (Part A)

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Sustainability Appraisal	NCC Planning Officer's Response
Broads Authority (98976)	Preferred Options: The Broads Authority has adopted a new Local Plan. The policies in the Core Strategy, Development Management and Site Specific documents are all superseded and not in place any more.	No Action Required: The Report will be updated.
Campaigners Against Two Silica Sites (98916)	Preferred Options: Nothing in the NCC Silica Sand Review addresses the aims stated in section 2.2 with respect to 'alternative options for delivering sustainable minerals development in Norfolk, or 'further enhance economic effects'. Only an up to date, efficient glass recycling programme for Norfolk will address the aims stated in the SAR section 2.2.	No Action Required: The Silica Sand Review referred to in the 2015 Scoping Report has been completed and was examined and adopted in 2017. Norfolk County Council, as the Waste Disposal Authority, is responsible for the provision of Household Waste Recycling Centres in Norfolk and for the management of the Local Authority Collected Waste that is not recycled. Glass is collected and recycled at the HWRCs and from the kerbside of properties in Norfolk, as well as through 'bring banks'. The glass collected through these methods is sent to existing glass recycling facilities located elsewhere in the UK. The NM&WLP contains criteria-based policies which would be used to determine planning applications for waste management facilities including glass recycling. In terms of silica sand, National Planning Practice Guidance states that the required stock of permitted reserves for each silica sand site is based on the average of the previous 10 year sales; it does not take into account any other supply options (such as recycled materials).

Table 103: Main issues raised during the Consultation stages about the Draft Sustainability Appraisal Report (Part B)

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Sustainability Appraisal	NCC Planning Officer's Response
Natural England (93217)	Initial Consultation: 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.	Action Required: The SA and M&WLP have been revised where necessary.
Natural England (93217)	Initial Consultation: Offer green infrastructure definition and how to effectively measure the 'environmental net gain' principle	Action Required: An indicator has been added as suggested
Natural England (98886)	Preferred Options: Under Table 8.1 under SA6: To protect and enhance Norfolk's biodiversity and geodiversity, to include an indicator which demonstrates how the Local Plan is contributing to biodiversity net gain by recording the area of new habitats created following the restoration of allocated sites.	No Action Required: An indicator has been added as suggested.
Broads Authority (98975)	Preferred Options: 4.5 - did you consider a zone from the Broads?	No Action Required: There was no need to exclude the Broads from the areas of search for silica sand because there are no deposits of silica sand near the Broads.
Historic England (98823)	Preferred Options: Question the some of the assessment in the SA (i.e. historic environment). For example, MIN 40 it was concluded that there would be 'No effects expected during the extraction phase' despite a grade II* listed church being located just 50m from the site boundary.	No Action Required: For site MIN 40 the score for Sustainability Appraisal objective SA5 (to maintain and enhance the character and townscape and historic environment) was - - (significant negative effect). The statement 'no effects expected during the extraction phase' was made in relation to Scheduled Monuments, Conservation Areas and Historic Parks and Gardens and does not apply to the effect on the nearest listed building. For the assessment of the effect on listed buildings during the extraction phase, the SA Heritage Statement would be required to support any future planning application. Historic England did not wish to offer any comments during the two consultation phases this live planning application has been through.
Individuals (94691, 94928)	Preferred Options: The plan is not sound. Without a sound glass recycling policy/plan Including flat glass recycling NCC fails their own sustainability objectives SA1, SA3, SA4, SA5. SA6, SA8, SA9, SA11 and SA13	No Action Required: Norfolk County Council as the Waste Disposal Authority is responsible for the provision of Household Waste Recycling Centres in Norfolk and for the management of the Local Authority Collected Waste that is not recycled. Glass is

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Sustainability Appraisal	NCC Planning Officer's Response
	on page 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pages 15-16 of Part B (Jun 2019).	collected and recycled at the HWRCs and from the kerbside of properties in Norfolk, as well as through 'bring banks'. The glass collected through these methods in Norfolk is sent to existing glass recycling facilities located elsewhere in the UK. The NM&WLP contains criteria-based policies which would be used to determine planning applications for waste management facilities including glass recycling. In terms of silica sand, National Planning Practice Guidance states that the required stock of permitted reserves for each silica sand site is based on the average of the previous 10 year sales; it does not take into account any other supply options (such as recycled materials).

Table 104: Main issues raised during the Consultation stages about the Habitats Regulations Assessment

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Habitats Regulations Assessment	NCC Planning Officer's Response
Natural England (93218)	Initial Consultation: 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). 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.	No Action Required: 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 of the HRA.
Natural England (98886)	Preferred Options: Under Table 8.1 under SA6: To protect and enhance Norfolk's biodiversity and geodiversity, to include an indicator which demonstrates how the Local Plan is contributing to biodiversity net gain	No Action Required: An indicator will be added as suggested.

Respondents' name (Rep ID)	Main Issues raised / Feedback Stage to Habitats Regulations Assessment	NCC Planning Officer's Response
	by recording the area of new habitats created following the restoration of allocated sites.	
Broads Authority (98975)	Preferred Options: 4.5 - did you consider a zone from the Broads?	No Action Required: There was no need to exclude the Broads from the areas of search for silica sand because there are no deposits of silica sand near the Broads.
Individual (93815)	Preferred Options: There are a large number of protected species living within AOS E.	No Action Required: As AOS E is located more than 5km from a SPA, SAC or Ramsar designated site and no likely significant effects on these designated sites are expected from silica sand extraction located within Area of Search E. If a planning application was submitted for mineral extraction within AOS E in the future, then an assessment of impacts on habitats and species, including protected species would be carried out at that stage.