



Norfolk County Council

Norfolk Minerals and Waste Local Plan

Statement of Consultation - Part B Regulation 19 Publication stage (September to December 2022)

www.norfolk.gov.uk

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Contents

1. Introduction	3
2. Regulation 19 Pre-submission Representations Period (2022).....	4
2.2 List of Consultees	4
2.2.2 General Consultation bodies:	6
2.2.3 Other consultation bodies.....	8
2.3 How consultees were notified.....	10
2.4 Summary of respondents to the Pre-Submission Representations Period.....	15
3. Summary of the main issues raised at the Regulation 19/20 stages	23
3.1 Norfolk Minerals and Waste Local Plan.....	23
3.2 Background documents	42

1. Introduction

- 1.1. 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, where there is the potential for those proposals to impact safeguarded mineral resources, safeguarded mineral sites or waste management facilities.
- 1.2. 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 and further information is contained in the Statement of Consultation (May 2022).
- 1.3. The Regulation 19 formal representations period on the Publication version of the NM&WLP took place in Autumn 2022 and is the final stage of representations before submitting to the Secretary of State for independent examination.
- 1.4. This Statement of Consultation contains:
 - which bodies and persons the local planning authority invited to make representations under regulation 19
 - how those bodies and persons were invited to make representations under regulation 19
 - a summary of the main issues raised by the representations made pursuant to regulation 19,
 - whether any of the representations made pursuant to regulation 19 have resulted in the County Planning Authority proposing modifications to the NM&WLP.
- 1.5. The Statement of Consultation (Part B) comprises the following sections:

Section 1 is an introduction.

Section 2 summarises the Regulation 19 Publication representations period, who was invited to make representations, how they were notified of the representations period and a summary of the number of responses received.

Section 3 sets out the representations received in response to the Regulation 19 and 20 stages and includes a summary of the main issues raised by respondents and whether any changes are proposed to be made to the Plan due to those representations.

2. Regulation 19 Pre-submission Representations Period (2022)

2.1 The Regulation 19 publication stage took place for 12 weeks from 28 September to 19 December 2022. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, this is a formal part of the plan-making process which specifically seeks representations from members of the public, stakeholders and other organisations, in relation to the Plan's soundness for examination in public and legal compliance.

The publication document can be found at <https://norfolk.oc2.uk/document/51>. The background documents relevant to the publication version on the Minerals and Waste Local Plan are listed below and can be accessed at <https://norfolk.oc2.uk/document/53>

- Policies Map
- Habitats Regulations Assessment
- Sustainability Appraisal Report
- Equality Impact Assessment
- Statement of Consultation
- Silica Sand Topic Paper
- Statement of Common Ground
- Waste Management Capacity Assessment

2.2 List of Consultees

The following organisations were notified of the representations periods:

2.2.1 Specific consultation bodies

Local Planning Authorities in Norfolk

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

Local Planning Authorities Adjoining Norfolk

- East Suffolk Council
- Mid Suffolk District Council
- West Suffolk Council
- East Cambridgeshire District Council
- Fenland District Council
- South Holland District Council

Other relevant Minerals and Waste Planning Authorities

- London Borough of Barking & Dagenham
- Bedford Borough Council, Central Bedfordshire Council and Luton Council
- Birmingham City Council
- Bristol City Council
- Cambridgeshire County Council and Peterborough City Council
- Durham County Council
- Cumbria County Council
- Derbyshire County Council
- Devon County Council
- City of Doncaster Council

- Dudley Metropolitan Borough Council
- East Sussex County Council
- Essex County Council
- Hampshire County Council
- London Borough of Havering
- Hertfordshire County Council
- Kent County Council
- (Kingston Upon) Hull City Council
- Kirklees Council
- Knowsley Council
- Lancashire County Council
- Leeds City Council
- Leicester City Council
- Leicestershire County Council
- Lincolnshire County Council
- North East Lincolnshire Council
- Medway Council
- Newcastle City Council
- North Lincolnshire Council
- North Tyneside Council
- North Yorkshire County Council
- North Northamptonshire Council
- West Northamptonshire Council
- Nottingham City Council
- Nottinghamshire County Council
- Oxfordshire County Council
- Redcar and Cleveland Borough Council
- Salford City Council
- Sandwell Metropolitan Borough Council
- Sheffield City Council
- Staffordshire County Council
- Stockton-on-Tees Borough Council
- Stoke-on-Trent City Council
- Suffolk County Council
- Telford and Wrekin Co-operative Council
- Thurrock Council
- Walsall Council

Silica Sand Authorities

- Cheshire East Council
- Cheshire West and Chester Council
- Surrey County Council
- Worcestershire County Council
- West Sussex County Council
- South Downs National Park Authority
- Dorset County Council (soft sand)

Parish Councils in Norfolk

All parish and town councils in Norfolk were consulted.

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

Other specific consultation bodies

- Coal Authority
- Historic England
- Marine Management Organisation
- Natural England
- Network Rail (Infrastructure) Ltd
- Highways Agency
- Police and Crime Commissioner for Norfolk, Suffolk, Cambridgeshire, and Lincolnshire
- BT Group plc
- Virgin Media
- City Fibre
- SSE Telecom
- Zayo
- ITS Technology
- Hyperopic
- Vodafone
- EE
- 3
- O2 Telefonía
- NHS Norfolk and Waveney Integrated Care System
- UK Power Networks
- Cadent Gas
- National Grid
- Fisher German
- Anglia Water
- Northumbrian Water
- Homes and Communities/Homes England
- Civil Aviation Authority
- Office of Road and Rail
- Department for Transport
- East of England Local Government Association
- Defence Infrastructure Organisation
- NCC Public Health
- NCC Natural Environment Team
- NCC Historic Environment Service
- NCC Highway Authority
- NCC Transport Development
- NCC Lead Local Flood Authority
- NCC Waste Disposal Authority

2.2.2 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
- 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-
project now part of Discover Suffolk
- National Trust
- Sustrans
- New Anglia LEP
- Cambridgeshire & Peterborough
Combined Authority
- 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
- CAA: Norwich International Airport
- Norfolk Association of Local Councils
- Equality and Human Rights
Commission
- Freight Transport Association Ltd
(Logistics UK)
- 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
- 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
- Church of England
- Equal Lives
- West Norfolk Islamic Association
- West Norfolk and District Chinese
Association
- Greater Anglia (rail)
- Environmental Services Association
- Visit East Anglia
- Visit Norfolk
- Norfolk Rural Community Council
- The Bridge Plus+: Norwich
Integration Partnership
- Norfolk Orienteering Club
- Southwest Norfolk Constituency
Labour Party
- East Anglian Orienteering Club
- Campaigners Against Two Silica
Sites
- Bernard Matthews Foods Ltd
- Campaign for National Parks
- About with Friends
- Felthorpe Airfield
- St Andrew's School Trust
- The Broads Society
- King's Lynn Mountain Bike Club
- Middle Level Commissioners
- Aldeby Liaison Group

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

Minerals Operators

- Sibelco (UK) Ltd
- Needham Chalks Ltd / Paramoudra Ltd
- Brett Group Ltd
- Drayton Stone Pits/Carter Concrete Ltd
- McLeod Aggregates Ltd
- EAS Plant Hire Ltd (East Anglian Stone Ltd)
- Mick George Ltd (Frimstone Ltd)
- Tharros Ltd
- Middleton Aggregates Ltd
- Earsham Gravels Ltd
- The Lyndon Pallett Group
- Breedon Southern Ltd
- Folkes Plant & Agg. Ltd
- Longwater Gravel Co Ltd
- Tarmac Trading Ltd
- William George Sand and Gravel Ltd
- West Norfolk Lime Ltd
- Gresham Gravels Ltd
- The Silica and Moulding Sands Association
- Bathgate Silica Sand Limited
- Garside Sands/ Aggregate Industries UK Ltd
- Hanson Aggregates
- Mansfield Sand Company Ltd.
- William George Recycling Ltd
- John Brown (Gazeley) Ltd
- Silverton Aggregates Ltd
- Mineral Products Association
- Lignacite Ltd
- Brett Group
- Breedon Aggregates Ltd
- Cemex Ltd
- British Aggregates Association
- UK Onshore Oil and Gas (UKOOG)
- Igas Energy Plc

Land agents/consultants

- Stephen M Daw Limited
- Martin Smith Partnership Ltd
- Pike Partnership Ltd
- Clover Planning
- PDE Consulting Ltd
- Bidwells LLP
- Tetra Tech UK Ltd (was WYG UK)
- David L Walker Ltd
- Mills and Reeve LLP
- David Lock Associates Ltd
- M Falcon Property Solutions
- TW Gaze LLP
- Case & Dewing Ltd
- Arnolds Keys LLP - Irelands Agricultural
- Barry L Hawkins Ltd
- Strutt & Parker LLP
- Atkins Ltd
- George Durrant & Sons Ltd
- Brown & Co LLP
- Birketts LLP
- Wardell Armstrong LLP
- Watsons Property Group Ltd
- Knight Benjamin & Co Ltd
- The Landscape Partnership Ltd
- RPS Planning and Development Ltd
- Lanpro Services Ltd
- Leathes Prior (Solicitors) Ltd
- Pegasus Group Ltd
- David Jarvis Associates Ltd
- Cruso & Wilkin Ltd
- Heaton Planning Ltd
- Colliers International UK Plc
- Savills (UK) Ltd
- Shakespeare Martineau LLP
- Shiels Flynn Ltd
- Martin Robeson Planning Practice Ltd
- SLR Consulting Ltd
- BNP Paribas Real Estate Ltd
- Historic Landscape Management Ltd
- Fenn Wright LLP
- Planning Places Ltd (was La Ronde Wright Ltd)
- Arcus Consultancy Services Ltd

- Jonathan Cheetham (Contracting) Ltd
- Drayton Farms Group Ltd (was R G Carter Farms)
- Sentry Ltd
- Crestwood Environmental Ltd
- Wisser Environment Ltd
- NKF Planning Consultancy Ltd
- Peter Humphrey Associates Ltd
- Phillips Planning Services Ltd
- Plandescil Ltd
- Robert Doughty Consultancy Ltd
- Lawson Planning Partnership Ltd
- Michael P Coe Architectural Services
- Oaktree Environmental Ltd
- Parker Planning Services Ltd
- Patterson Design Ltd
- Cornerstone Planning Ltd
- Windsor Architectural
- Oak Square Architectural Design
- Howes Percival LLP
- Fisher German LLP
- Nathaniel Lichfield & Partners Ltd T/A Lichfields
- Evolution Town Planning Ltd
- David L Walker Ltd
- Porta Planning LLP
- The Johnson Dennehy Planning Partnership Ltd
- Cam Planning Ltd
- Arcus Consulting LLP
- David L Walker Ltd
- Avison Young UK
- RSK ADAS Ltd
- Planning Direct Ltd
- Stirling Maynard and Partners Ltd
- Swann Edwards Architecture Ltd
- DWD LLP
- JB Planning Services
- D K Symes Associates
- Mineral Services Ltd

Waste operators

- A C Environmental Services Ltd
- A E Daniels & Son
- A R Kent & Son Ltd
- Abbey Pets Remembrance Gardens and Crematoria Ltd
- Anglian Demolition & Asbestos Ltd
- AC Environmental Services Ltd
- KN & H Curtis T/A Agri-Cycle Norfolk
- AKS Skip Hire Services Ltd
- Alpheus Environmental Ltd
- Animal Funeral Services Ltd
- Asbestrip Ltd
- ASCO UK Ltd
- Atlas Metal Recycling Ltd
- JR Evans Skip Hire (Attleborough)
- Aylsham Plant Hire Ltd
- Biffa Waste Services Plc
- British Sugar Plc (Whissington)
- C & L Waste Oil Collection Ltd
- Carl Bird Ltd
- R H Childerhouse (Crows Farm)
- Crane & Sons Farms Limited
- D & J Metals Ltd
- Dave's Skips
- DLH Auto Recyclers Ltd
- Doubledays Waste Disposal Ltd
- Drury's Environmental Services Ltd
- E E Green & Son Ltd
- East Coast Insulations Ltd
- East Coast Waste Ltd
- European Metal Recycling Ltd
- FCC Environment (UK) Ltd
- Fibrephos Ltd
- Freedom Recycling Ltd
- Gamble Plant (Norfolk) Ltd
- Glaven Pits Ltd
- Glazewing Ltd
- Greencomp Ltd
- Greenworld Sales Ltd
- Grundon Waste Management Ltd
- G Haller Skip Hire
- J P Skip Hire Ltd
- Jays Total Waste Management
- KLM UK Engineering Ltd
- M & M Norfolk Services Ltd
- M Gaze & Co Ltd
- M T Skips

- M W White Ltd
- Morrisey Builders Ltd
- MPH (Monk Plant Hire Limited) / Norfolk Recycling
- Mr D Jones - Bartons Farm
- TMA Bark Supplies Ltd
- Mr I Leonard – Blackmoor Farm
- Hendry and Sons Ltd
- Serruys Property Company Ltd
- R Richmond & Son
- Mr Rounce
- MRE UK
- NEWS Ltd
- Norfolk Pet Crematorium Ltd
- Norman Wenn Ltd T/A Norman Wenn Skip Hire
- OCS Group UK Ltd
- ORM North Norfolk Ltd
- PSH Environmental Ltd T/A Parkers Skip Hire
- Peaceful Pets Ltd
- Peter Bacon Recycling Limited
- PHS Group Ltd
- Pips Skips Ltd
- Mr G Playford
- R & C Bettinson Bros.
- Biffa Waste Services Plc T/A Recyclite Ltd
- Rentokil Initial Plc
- Richardson Recycling
- Skippy Skip Hire
- T Farrow Construction Ltd
- TEG Energy Ltd
- Viridor Waste Management Ltd
- Veolia ES (UK) Ltd
- Baldwin Skip Hire Ltd
- WT Waste Ltd T/A WT Skip Hire
- Countrystyle Recycling Limited

Local Residents

We also wrote to over 3,500 individuals. These people were contacted either because they had responded to the Initial Consultation in 2018 or Preferred Options in 2019 or because their address was within 250m of the boundary of a proposed site or area of search.

County Councillors

All County Councillors were consulted at the time of the Pre-submission Representations Period in 2022.

2.3 How consultees were notified

The Pre-Submission Publication Representations Period (Regulation 19) 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)
- A public notice was published in the Eastern Daily Press.

Text of Public Notices in the EDP

Public notice of representations period in the EDP on 28 September 2022

Norfolk County Council

Town and Country Planning (Local Planning) (England) Regulations 2012 Norfolk Minerals and Waste Local Plan Publication of Pre-Submission Documents

Norfolk County Council has published the Pre-Submission version of the Norfolk Minerals and Waste Local Plan (NM&WLP) which will plan for Norfolk's minerals and waste management requirements up to the end of 2038.

The NM&WLP contains policies to be used to decide planning applications for minerals developments and waste management facilities. The NM&WLP contains forecasts of the quantities of waste that need to be planned for over the plan period. The NM&WLP also includes the quantities of sand and gravel, carstone and silica sand that need to be planned for to provide a steady and adequate supply of minerals. The plan allocates 16 sites for sand and gravel extraction, one site for Carstone extraction and two sites for silica sand extraction. Only the sites considered suitable to allocate are included in the publication document. The plan contains criteria-based policies to determine those planning applications that come forward for waste management facilities.

The Norfolk Minerals and Waste Local Plan has been published along with the following documents which provide information to support the policies in the NM&WLP: Policies Map, Sustainability Appraisal Scoping Report, Sustainability Appraisal Report, Habitat Regulations Assessment, Waste Management Capacity Assessment, Equality Impact Assessment, Statement of Common Ground and a Statement of Consultation. The NM&WLP is published at this stage to enable representations to be made to Norfolk County Council about its legal compliance and soundness (whether it is justified, effective, positively prepared, and consistent with national policy).

The period for making representations on the above documents is between 9am on 28 September until 5pm on 11 November 2022. Any representations on the documents must be made during the representations period; late representations will not be accepted.

The above documents can be viewed on the Norfolk County Council website at <https://norfolk.oc2.uk/where> direct online representations can be made. Direct online representations are the preferred method of response.

Representations can also be sent by email or post, using the representations form, 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 local plan website.

If you have any queries please call 01603 222193

The pre-submission publication documents will be made available for public inspection, free of charge, within normal opening hours during the representations 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 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

Representations may be accompanied by a request to be notified, at a specified address, of any of the following:

- That the Norfolk Minerals and Waste Local Plan has been submitted to the Secretary of State for independent examination by a Planning Inspector.
- The publication of recommendations of the Planning Inspector appointed to carry out the independent examination of the Local Plan
- The adoption of the Norfolk Minerals and Waste Local Plan

Following the end of the representations period, all representations received will be submitted to the Planning Inspectorate on behalf of the Secretary of State and considered as part of a public examination by an independent Planning Inspector. The examination is expected to take place in 2023.

Norfolk County Council

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

Norfolk Minerals and Waste Local Plan

Publication of Pre-Submission Documents

Norfolk County Council has published the Pre-Submission version of the Norfolk Minerals and Waste Local Plan (NM&WLP) which will plan for Norfolk's minerals and waste management requirements up to the end of 2038.

The NM&WLP contains policies to be used to decide planning applications for minerals developments and waste management facilities. The NM&WLP contains forecasts of the quantities of waste that need to be planned for over the plan period. The NM&WLP also includes the quantities of sand and gravel, carstone and silica sand that need to be planned for to provide a steady and adequate supply of minerals. The plan allocates 16 sites for sand and gravel extraction, one site for Carstone extraction and two sites for silica sand extraction. Only the sites considered suitable to allocate are included in the publication document. The plan contains criteria-based policies to determine those planning applications that come forward for waste management facilities.

The Norfolk Minerals and Waste Local Plan has been published along with the following documents which provide information to support the policies in the NM&WLP: Policies Map, Sustainability Appraisal Scoping Report, Sustainability Appraisal Report, Habitat Regulations Assessment, Waste Management Capacity Assessment, Equality Impact Assessment, Statement of Common Ground and a Statement of Consultation. The NM&WLP is published at this stage to enable representations to be made to Norfolk County Council about its legal compliance and soundness (whether it is justified, effective, positively prepared, and consistent with national policy).

The period for making representations on the above documents has been extended to between 9am on 28 September 2022 until 5pm on 19 December 2022. Any representations on the documents must be made during the representations period; late representations will not be accepted.

The above documents can be viewed on the Norfolk County Council website at <https://norfolk.oc2.uk/where> direct online representations can be made. Direct online representations are the preferred method of response.

Representations can also be sent by email or post, using the representations form, 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 local plan website.

If you have any queries please call 01603 222193

The pre-submission publication documents will be made available for public inspection, free of charge, within normal opening hours during the representations period, at:

Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH
Breckland District Council, Elizabeth House, Walpole Loke, East Dereham, NR19 1EE
South Norfolk Council and 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
The Broads Authority, Yare House, 62-64 Thorpe Road, Norwich, NR1 1RY

Representations may be accompanied by a request to be notified, at a specified address, of any of the following:

- That the Norfolk Minerals and Waste Local Plan has been submitted to the Secretary of State for independent examination by a Planning Inspector.
- The publication of recommendations of the Planning Inspector appointed to carry out the independent examination of the Local Plan
- The adoption of the Norfolk Minerals and Waste Local Plan

Following the end of the representations period, all representations received will be submitted to the Planning Inspectorate on behalf of the Secretary of State and considered as part of a public examination by an independent Planning Inspector. The examination is expected to take place in 2023.

Inspection Points

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

- 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

Note: South Norfolk Council moved from their premises in Long Stratton to Thorpe Lodge on 4 November 2022

2.4 Summary of respondents to the Pre-Submission Representations Period

There were 80 respondents to the Pre-Submission representations period who made a total of 403 representations about the NM&WLP and the background documents during the formal representations period. 27 of the representations were in support, 169 were comments and 207 were making objections.

The responses received to the Publication document can be viewed online at:

<https://norfolk.oc2.uk/document/51>

The responses received to the Background documents can be viewed online at:

<https://norfolk.oc2.uk/document/53>

The following specific consultation bodies made representations:

Internal consultation bodies

- NCC - Lead Local Flood Authority
- NCC - Natural Environment Team

Parish and Town Councils

- Bradwell Parish Council
- Bungay Town Council
- Dersingham Parish Council
- Gressenhall Parish Council
- Haddiscoe Parish Council
- Horsham St Faith & Newton St Faith Parish Council

Local Planning Authorities/County Planning Authorities

- Broads Authority
- Broadland District Council
- Breckland District Council
- Derbyshire County Council & Derby City Council
- Essex County Council
- East Suffolk Council
- Borough Council of King's Lynn & West Norfolk
- Kirklees Council
- Norwich City Council
- South Norfolk Council
- Surrey County Council
- Suffolk County Council
- Central Bedfordshire, Bedford Borough and Luton Borough Council Shared Service

Other specific consultation bodies

- The Coal Authority
- Marine Management Organisation
- King's Lynn Internal Drainage Board
- Historic England
- National Highways
- Anglian Water
- MOD Defence Infrastructure Organisation
- Natural England
- Norfolk Wildlife Trust

The following general consultation bodies made representations:

- Mineral Products Association
- Haddiscoe Parochial Church Council
- Sibelco UK Ltd
- Folkes Plant & Aggregates Ltd
- Longwater Gravel Co Ltd
- Breedon Trading Limited
- Stopit2
- Norfolk Gravel
- Norfolk Holiday Properties
- Norfolk Local Access Forum
- Longwater Gravel Co Ltd
- Earsham Gravels Ltd
- McLeod Aggregates Ltd
- Beetley Methodist Chapel
- Middleton Aggregates Ltd
- Westwick Farming Partnership
- Taylor Wimpey UK Ltd & Manor Farm Rackheath
- Lyndon Pallett Group

Background documents

We received 14 representations about the Sustainability Appraisal Report; the responses were from Natural England, Historic England, the Broads Authority, Middleton Aggregates Ltd, Earsham Gravels Ltd, Breedon Trading Ltd, The Lyndon Pallett Group Ltd, and six individuals.

We received one representation about the Habitats Regulations Assessment; the representation was from Natural England.

We received two representations about the Waste Management Capacity Assessment; the responses were from Central Bedfordshire, Bedford Borough and Luton Borough Council Shared Service and Derbyshire County Council and Derby City Council.

No representations were received about the Silica Sand Topic Paper, the Policies Map or the Equality Impact Assessment.

Table 1: Summary of representations received about the Pre-Submission Publication document

Table 1 below sets of a summary of the responses received to the Pre-Submission representations period. It shows the number of respondents per section of the document and whether the representation was an objection, support or comment. Where respondents have made more than one representation this figure is reflected in the ‘total representations’ column.

Document section	Respondents	Objectors	support	object	comment	Total representations
Responses about the document as a whole	13	1	1	1	11	13
1. Introduction	1	0	0	0	1	1
2. M&WLP process chapter	2	1	0	1	1	2
3. Norfolk spatial portrait chapter	2	1	0	1	1	2
4. Vision	4	1	1	1	2	4
4.2 Waste Strategic Objectives	1	0	0	0	1	1
4.3 Mineral Strategic Objectives	6	1	0	1	5	6
5. Presumption in favour of sustainable development chapter	1	0	0	0	1	1
Policy MW1. Development Management Criteria	12	5	2	6	5	13
Supporting text for MW1 (paras 6.1 – 6.55)	8	4	0	8	6	14
Policy MW2. Transport	4	0	1	0	3	4
Supporting text for MW2 (paras 7.1 – 7.10)	0	0	0	0	0	0
Policy MW3. Climate change mitigation and adaption	4	0	0	0	4	4
Supporting text for MW3 (paras 8.1 – 8.8)	0	0	0	0	0	0
Policy MW4. The Brecks protected habitats and species	1	0	0	0	1	1
Supporting text for MW4 (paras 9.1 – 9.6)	0	0	0	0	0	0
Policy MW5. Agricultural soils	2	0	0	0	2	2
Supporting text for MW5 (paras 10.1 – 10.4)	0	0	0	0	0	0
Policy WP1. Waste management capacity to be provided	0	0	0	0	0	0
Supporting text for WP1 (paras W1.1 – W1.13)	0	0	0	0	0	0
Policy WP2. Spatial Strategy for waste management	5	3	1	3	1	5
Supporting text for WP2 (paras W2.1 – W2.6)	2	0	0	0	2	2
Policy WP3. Land suitable for waste management facilities	5	2	0	2	3	5
Supporting text for WP3 (paras W3.1 – W3.6)	0	0	0	0	0	0

Document section	Respondents	Objectors	support	object	comment	Total representations
Policy WP4. Recycling or transfer of inert CD&E waste	2	0	0	0	2	2
Supporting text for WP4 (paras W4.1 – W4.2)	1	0	0	0	1	1
Policy WP5. Waste transfer stations, MRF, WEEE & ELV facilities	2	0	0	0	2	2
Supporting text for WP5 (paras W5.1 - W5.4)	0	0	0	0	0	0
Policy WP6. Transfer, storage, processing and treatment of hazardous waste	0	0	0	0	0	0
Supporting text for WP6 (paras W6.1 – W6.3)	0	0	0	0	0	0
Policy WP7. Household waste recycling centres	2	0	0	0	2	2
Supporting text to WP7 (paras W7.1 – W7.5)	0	0	0	0	0	0
Policy WP8. Composting	1	0	0	0	1	1
Supporting text to WP8 (paras W8.1 – W8.3)	0	0	0	0	0	0
Policy WP9. Anaerobic Digestion	3	0	1	0	2	3
Supporting text to WP9 (para W9.1)	1	0	0	0	1	1
Policy WP10. Residual waste treatment facilities	0	0	0	0	0	0
Supporting text to WP10 (paras W10.1 – W10.3)	0	0	0	0	0	0
Policy WP11. Disposal of inert waste by landfill	2	0	0	0	2	2
Supporting text to WP11 (paras W11.1 – W11.7)	0	0	0	0	0	0
Policy WP12. Non-hazardous and hazardous waste landfill	2	0	0	0	2	2
Supporting text to WP12 (paras W12.1 – W12.6)	0	0	0	0	0	0
Policy WP13. Landfill mining and reclamation	1	0	0	0	1	1
Supporting text to WP13 (paras W13.1 - W13.5)	0	0	0	0	0	0
Policy WP14. Water recycling centres	2	1	0	1	1	1
Supporting text to WP14 (paras W14.1 – W14.2)	1	0	0	0	1	1
Policy WP15. Whitlingham WRC	3	1	0	1	2	3
Supporting text to WP15 (paras W15.1 – W15.7)	2	1	0	4	1	5
Policy WP16. Design of waste management facilities	5	1	0	1	4	5
Supporting text to WP16 (paras W16.1 – W16.4)	0	0	0	0	0	0
Policy WP17. safeguarding waste management facilities	4	0	1	0	3	4
Supporting text to WP17 (paras W17.1 – W17.4)	0	0	0	0	0	0
Policy MP1. Provision of minerals extraction	7	5	1	5	2	8

Document section	Respondents	Objectors	support	object	comment	Total representations
Supporting text to MP1 (paras MP1.1 – MP1.28)	5	5	0	5	0	5
Policy MP2. Spatial strategy for minerals extraction	6	5	0	5	1	6
Supporting text to MP2 (paras MP2.1 – MP2.11)	3	1	0	3	1	4
Policy MPSS1. Silica sand extraction sites	5	3	1	5	1	7
Supporting text to MPSS1 (paras MPSS1.1 – MPSS1.3)	1	1	0	1	0	1
Policy MP3. Borrow pits	2	0	0	0	2	2
Supporting text to MP3 (para MP3.1)	0	0	0	0	0	0
Policy MP4. Agricultural or potable water reservoirs	1	0	0	0	1	1
Supporting text to MP4 (para MP4.1)	0	0	0	0	0	0
Policy MP5. Core river valleys	5	2	0	2	3	5
Supporting text to MP5 (paras MP5.1 – MP5.4)	0	0	0	0	0	0
Policy MP6. Cumulative impacts and phasing of workings	2	0	1	0	1	2
Supporting text to MP6 (paras MP6.1 – MP6.3)	0	0	0	0	0	0
Policy MP7. Progressive working, restoration and after use	9	3	0	3	6	9
Supporting text to MP7 (paras MP7.1 – MP7.10)	5	0	1	0	5	6
Policy MP8. Aftercare	2	0	0	0	2	2
Supporting text to MP8 (paras MP8.1 – MP8.3)	0	0	0	0	0	0
Policy MP9. Asphalt plants, concrete batching etc	1	0	0	0	1	1
Supporting text to MP9 (para MP9.1)	0	0	0	0	0	0
Policy MP10. Safeguarding of port and rail facilities etc	5	1	1	1	4	6
Supporting text to MP10 (paras MP10.1 – MP10.5)	0	0	0	0	0	0
Policy MP11. Mineral safeguarding areas and mineral consultation areas	5	2	1	2	2	5
Supporting text to MP11 (paras MP1.1 – MP11.11)	0	0	0	0	0	0
Implementation, monitoring and review	0	0	0	0	0	0
Appendix 1. Existing Core Strategy & DM policies	0	0	0	0	0	0
Appendix 2. Existing Mineral SSA policies	1	0	0	0	1	1
Appendix 3. Existing Waste SSA policies	0	0	0	0	0	0
Appendix 4. Development excluded from safeguarding provisions	0	0	0	0	0	0

Document section	Respondents	Objectors	support	object	comment	Total representations
Appendix 5. Safeguarded mineral infrastructure	0	0	0	0	0	0
Appendix 6. Safeguarded mineral extraction sites (2021)	0	0	0	0	0	0
Appendix 7. Safeguarded waste management facilities by district (2021)	0	0	0	0	0	0
Appendix 8. Safeguarded water recycling centres (2021)	0	0	0	0	0	0
Appendix 9. Schedule of requirements for MIA and WMFIA	0	0	0	0	0	0
Appendix 10. Implementation of mineral safeguarding and mineral consultation areas policy	0	0	0	0	0	0
Appendix 11. Forecast waste arisings	0	0	0	0	0	0
Appendix 12. Glossary	1	1	0	1	0	1
Mineral extraction sites	2	1	0	1	1	2
SSA Policy MIN12 (Chapel Lane, Beetley)	6	2	0	3	4	7
Supporting text for SSA MIN12 (paras M12.1 – M12.21)	1	0	0	0	1	1
SSA Policy MIN 51/13/08 (Beetley)	6	2	1	2	3	6
Supporting text for SSA MIN 51/13/08 (paras M51.1 – M51.22)	2	0	0	0	3	3
SSA Policy MIN200 (Carbrooke)	2	0	0	0	2	2
Supporting text for SSA MIN200 (M200.1 – M200.20)	1	0	0	0	1	1
SSA Policy MIN202 (Attlebridge)	4	2	1	2	1	4
Supporting text for SSA MIN202 (paras M202.1 – M202.20)	1	0	0	0	1	1
SSA Policy MIN37 (Mayton Wood)	0	0	0	0	0	0
Supporting text for SSA MIN37 (paras M37.1 – M37.20)	1	0	0	0	1	1
SSA Policy MIN64 (Horstead)	1	0	0	0	1	1
Supporting text for SSA MIN64 (paras M64.1 – M64.21)	2	0	1	0	1	2
SSA Policy MIN65 (Stanninghall)	2	2	0	2	0	2
Supporting text for SSA MIN65 (paras M65.1 – M65.18)	2	1	0	2	1	3
SSA Policy MIN96 (Spixworth)	4	0	0	0	4	4
Supporting text for SSA MIN96 (paras M96.1 – M96.20)	2	1	0	1	1	2
SSA Policy MIN06 (Middleton)	1	1	0	1	0	1
Supporting text for SSA MIN06 (paras M6.1 – M6.21)	2	1	0	1	1	2

Document section	Respondents	Objectors	support	object	comment	Total representations
SSA Policy MIN 206 (Oak Field, Tottenhill)	1	0	0	0	1	1
Supporting text for SSA MIN206 (paras M206.1 – M206.21)	0	0	0	0	0	0
SSA Policy MIN40 (East Winch)	2	1	0	1	1	2
Supporting text for SSA MIN40 (paras M40.1 – M40.21)	2	2	0	3	0	3
SSA Policy SIL01 (Bawsey)	2	2	0	2	0	2
Supporting text for SSA SIL01 (paras S1.1 – S1.19)	1	0	0	0	1	1
SSA Policy MIN69 (Aylmerton)	1	0	0	0	1	1
Supporting text for SSA MIN69 (paras M69.1 – M69.26)	2	1	6	5	6	17
SSA Policy MIN115 (North Walsham)	5	2	1	2	2	5
Supporting text for SSA MIN115 (paras M115.1 – M115.23)	1	0	0	0	1	1
SSA Policy MIN207 (Briston)	1	1	0	1	0	1
Supporting text for SSA MIN207 (paras M207.1 – M207.19)	1	0	0	0	1	1
SSA Policy MIN208 (East Beckham)	1	0	0	0	1	1
Supporting text for SSA MIN208 (paras M208.1 – M208.20)	1	0	0	0	1	1
SSA Policy MIN25 (Haddiscoe)	21	16	2	20	3	25
Supporting text for SSA MIN25 (paras M25.1 – M25.24)	20	19	0	85	1	86
TOTAL	73	47	26	198	158	382

Table 2: Summary of representations received about the background documents

Document	Respondents	Objectors	support	object	comments	Total representations
Habitats Regulations Assessment	1	0	0	0	1	1
Sustainability Appraisal Report (and appendices)	13	5	1	5	8	14
Policies Map	0	0	0	0	0	0
Equality Impact Assessment	0	0	0	0	0	0
Statement of Consultation	0	0	0	4	0	4
Statement of Common Ground	0	0	0	0	0	0
Silica Sand Topic Paper	0	0	0	0	0	0
Waste Management Capacity Assessment	2	0	0	0	2	2
TOTAL	15	5	1	9	11	21

3. Summary of the main issues raised at the Regulation 19/20 stages

3.1 Norfolk Minerals and Waste Local Plan

Whole document

Historic England:

- Policy insufficient, a specific separate policy for the historic environment is expected and there is a lack of detail on below ground archaeology;
- Concern about wording in relation to harm to the historic environment in policies WP2 and MP2 - suggest policy wording is amended to make policies consistent with the NPPF and effective;
- Site allocations require further assessment/ proportionate evidence, and concern about sites where permission has been granted but not yet implemented (MIN 207 and MIN 65), and also where an application is due (MIN 25 and MIN 96).

Bungay Town Council: issues raised regarding consultation on planning applications and that pre-application advice should be published.

Marine Management Organisation: Recommend reference to marine aggregates, the Marine Policy Statement (MPS) (section 3.5), NPPF, the Managed Aggregate Supply System (MASS), and national and regional guidelines for aggregates provision in England 2005-2020.

Broadland District Council and South Norfolk District Council: Amendments suggested at previous stages have not been included within the latest version of the Plan.

Breckland District Council: Nutrient Neutrality - Nitrogen and Phosphorus affects water and air quality – Consider location of waste facilities (particularly agricultural waste and composting) and its impact on the River Wensum and Broads SAC.

Any changes proposed by NCC due to these representations? Yes, regarding the historic environment.

Chapter 1. Introduction

Broads Authority: [Para 1.2] Current wording excludes the Broads Authority - amend 'lodged with district councils' to 'lodged with Norfolk Local Planning Authorities'.

Any changes proposed by NCC due to these representations? Yes, amendment to paragraph 1.2

Chapter 2. NM&WLP process

NCC Natural Environment Team: [Para 2.6] Requirement to submit ecological information to demonstrate proposal achieves a minimum 10% net gain in biodiversity needs to be clarified.

Historic England: [Para 2.8/2.9] The site assessments for allocations do not constitute Heritage Impact Assessments (HIAs) - Prepare HIAs for MIN 96 and MIN 25 prior to EiP to inform site allocations and revised policy wording.

Any changes proposed by NCC due to these representations? No

Chapter 3. Norfolk Spatial Portrait

Broads Authority: [Para 3.12] Query whether Broads navigable waterways could be used for transport of freight.

Historic England: [Para 3.21-3.23] issue raised about the provision of building stone (Carstone) for repair of heritage assets and new building in traditional vernacular.

Any changes proposed by NCC due to these representations? No

Chapter 4. Vision

Norfolk Wildlife Trust: Need to address biodiversity loss and climate change in more detail within the Plan vision

Natural England: Requested reference the Nature Recovery Network in the Plan vision (pg. 19); Strengthen BNG wording by stating the minimum BNG uplift required to be delivered and consider BNG delivery above mandatory requirement, eg 15% or 20%

Norfolk Gravel: Emphasis should be placed on the value and significance of minerals and waste development in providing a diverse and affluent rural economy - for consistency with NPPF Paragraph 84.

Any changes proposed by NCC due to these representations? Yes

Mineral and Waste Strategic Objectives

Breedon Trading Limited and Mineral Products Association: issues raised about defining aggregate landbank durations within MSO1 in line with NPPF wording

Mineral Products Association: issues raised about defining industrial sand landbank durations within MSO2 in line with NPPF wording

Norfolk Gravel: Minerals Objectives need to include actual commitment to provide a steady and adequate supply (i.e requirement to maintain relevant landbanks).

Historic England: no heritage designations are shown on Key Diagram

Norwich City Council: For the avoidance of doubt, 'agent of change' should be defined within the explanatory text or within the glossary.

Natural England: Reference Nature Recovery Network within MSO9 and WSO7; strengthen BNG wording by stating the minimum BNG uplift required to be delivered and consider BNG delivery above mandatory level, e.g. 15% or 20%.

Any changes proposed by NCC due to these representations? Yes, to objectives WSO7 and MSO9.

Chapter 5. Presumption in favour of sustainable development

Norfolk Gravel: No clear policy regarding commitment to Sustainable Development - not consistent with NPPF or Planning Practice Guidance.

Any changes proposed by NCC due to these representations? No

Policy MW1. Development Management Criteria

Broads Authority: [Policy and supporting text] Policy should consider wider impact of light pollution on dark skies, not just on amenity; also request settings of protected landscapes to be included in policy.

Additional detail proposed for paragraph 6.16 on lighting.

Para 6.19 should refer to 'Norfolk LPA Local Plans' to include the Broads Authority.

Historic England: [Policy] Insufficient provision for historic environment and its protection; lack of below ground archaeology detail, regarding its potential, consideration of direct, indirect and adjacent area impacts of proposed extraction; recommend reference to historic environment publications; policy wording should be amended to meet requirements of NPPF; limited historic environment criteria against which planning applications will be assessed to ensure that there are no unacceptable adverse impacts.

[Para 6.30] Heritage and archaeology assessment work (Heritage Impact Assessments) for MIN 96 Spixworth and MIN 25 Haddiscoe need to be done prior to allocation and EiP.

Anglian Water: [Policy] Policy approach to enhancement is unclear and does not provide sufficient detail for applicants. This list of enhancements should be informed by the context of the application, as the nature of mineral extraction and waste management proposals vary significantly.

Disagree with use of 'must' in the final section, replace with 'should' – the purpose of planning is to balance benefits versus harm;

Supporting text does not provide interpretation of geodiversity net gain nor how applicants should demonstrate how it will be provided and managed.

Policy may be clearer if it is split into specific subject/topic areas reflecting the supporting text.

Dr L David Ormerod: [Policy and supporting text] Issues raised regarding public interest and public recreational sites should be off limits to silica sand extraction site selection.

Suggested addition of 'appropriate well-used, open access, Forestry Commission land' to policy point (j).

Suggested addition of 'public rural recreational areas' to para 6.9, para 6.25, para 6.26 and 6.28.

Suggested addition to para 6.27 regarding under-registered and unregistered public rights of way.

Norfolk Wildlife Trust: [Para 6.19] The Plan's HRA should be able to demonstrate without reliance on deferral to the project level stage that it can avoid adverse effects on European Sites.

Ministry of Defence (Defence Infrastructure Organisation): [Policy] Paragraph 6.49 Should mention that it may be necessary that mitigation is secured through planning condition and/or planning obligation.

Norfolk Local Access Forum: [Policy] concern regarding compliance with restoration conditions, request to use every opportunity to enhance PROW, and request for the NLAF to be a consultee on development impacting on public access.

Norfolk Gravel: [Policy] When considering potential environmental benefits this could clearly state geo-diversity benefits where applicable.

Natural England: [Policy] Should reference the Nature Recovery Network; strengthen BNG wording by stating minimum BNG uplift required to be delivered and consider BNG delivery above mandatory requirement, e.g. 15% or 20%.

Broadland District Council / South Norfolk Council: [Policy] Policies in the plan should be read as a whole - several policies concerning particular development types still referring to Policy MW1.

Mineral Products Association: [Paragraphs 6.18 – 6.21] The paragraphs do not properly distinguish between the hierarchy of international, national and locally designated sites (required by paragraph 171 of the NPPF).

NCC Natural Environment Team: [Paragraph 6.22] The UK Habitat Classification will replace the Phase 1 Habitat Survey method as the standard survey method used as part of Preliminary Ecological Appraisals - reference to both Phase 1 and the UK Habitat Classification is advised.

NCC Lead Local Flood Authority: [Paragraph 6.40] suggest it covers the requirement for consenting and/or permitting from the appropriate body for any works that could affect the flow or cross-sectional area of a watercourse.

Pauline Davies: [Policy] Climate change flooding issues not addressed sufficiently.

Any changes proposed by NCC due to these representations? Yes, policy changes to include intrinsically dark landscapes, to include additional historic environment requirements, to include the minimum 10% biodiversity net gain requirement and the Nature Recovery Network objectives. Also changes to paragraph 6.16 (additional information on lighting), paragraph 6.19 (to refer to Local Planning Authorities), paragraph 6.21 (geodiversity gains), paragraph 6.31 (additional archaeology information), paragraph 6.40 (watercourse consents), paragraph 6.49 (methods to secure bird hazard mitigation).

Policy MW2. Transport

Mineral Products Association: [Policy] Issue regarding requirement for Transport Assessment or Statement to demonstrate appropriate measures to reduce car travel in all cases and recommended 'where practical' instead.

Norfolk Gravel: [Policy] Issue regarding requirement for proposed development to demonstrate appropriate measures to reduce car travel in all cases and recommended 'where practical' instead.

Broads Authority: [Policy] Query whether there should be reference to how staff travel to and from the site as a place of work; and the potential to use clean fuel/net zero emissions fuel for the HGVs or other work vehicles.

Any changes proposed by NCC due to these representations? No

Policy MW3. Climate change mitigation and adaption

Anglian Water: [Policy] issues raised were the need to include empirical data for baseline emissions of minerals and waste sector in Norfolk and pathway to reduce emissions. Advised Anglian Water's operational sites could be potential locations for onshore wind generation and highlighted AW Net Zero Strategy to 2030.

Mineral Products Association: [Policy] consider that public transport and cycling not practical for access to mineral workings, therefore amend the policy requirement to 'where practical'.

Norfolk Wildlife Trust: [Policy] Issue raised in relation to policy requirement (f) because retention of all existing priority habitats on site is preferable (not just trees) and recommend inclusion of specific targets within the policy.

Broads Authority: [Policy] Query whether resilience to the effects of climate change for a site that will be in place for a number of years should be considered.

Any changes proposed by NCC due to these representations? No

Policy MW4. The Brecks Protected Habitats and Species

Natural England: [Policy] Natural England are currently revising our guidance on assessing development effects on Breckland SPA stone curlew populations, which could influence the detail of policy MW4. Advise removing second paragraph under Stone Curlew heading: "A buffer zone has also been defined (indicated in orange hatching on Map 2) ..."

Any changes proposed by NCC due to these representations? Yes, policy amendments and supporting text amendments as advised by Natural England due to their revised guidance.

Policy MW5. Agricultural Soils

Mineral Products Association: [Policy] The last bullet point is unnecessary and could dilute the policy in terms of the importance of agricultural restoration and should be deleted;

Broads Authority: [Policy] Issue raised regarding potential peat extraction as part of a minerals or waste development and whether a policy is needed within the Plan (similar to Broads Authority Policy DM10)

Any changes proposed by NCC due to these representations? No

Policy WP1. Waste Management Capacity to be provided

No representations received.

Policy WP2. Spatial Strategy for waste management facilities

Broads Authority: Questioned why Broads Authority Executive Area not excluded entirely. Request policy wording to be changed to require proposers of waste management facilities to demonstrate

no alternative sites are available outside of Broads Authority or Norfolk Coast AONB, to work closely with the Broads Authority and North Norfolk Coast Partnership.

Pauline Davies: Location of waste management locations outside of flood-prone areas may go beyond 3/5-mile guideline.

Historic England: [Policy] Amend policy wording on heritage assets to include conservation areas, and to state "... if the proposed development would cause harm to the significance of the heritage asset (including any contribution to significance by setting)".

Breckland DC: Issue raised whether Nutrient Neutrality as a constraint particularly for River Wensum and Broads needs to be included in Policy wording.

Any changes proposed by NCC due to these representations? Yes, regarding heritage assets.

Policy WP3. Land suitable for waste management facilities

Anglian Water: [Policy] Policy only allows a limited list of waste management facilities on WRCs - other facilities may be suitable dependant on scale and location; Stifles innovations coming forward in bio-resources field – policy should be flexible (especially in context of climate change mitigation and nutrient neutrality); Amend point g of policy to delete '(composting and anaerobic digestion only);'

Middleton Aggregates Ltd: Clarification required to allow wider option for positioning recycling facilities at a quarry e.g., previously worked and or adjoining land providing other criteria is met, otherwise could be unnecessarily restrictive and problematic for operations.

Breckland DC: Impact of open air composting on air and water quality for habitat sites to be considered.

Any changes proposed by NCC due to these representations? Yes, to point g.

Policy WP4. Recycling of inert construction, demolition and excavation waste

Essex County Council: Paragraph W4.1 - 'Marine-won aggregate cannot always be used as a direct substitute for land-won aggregate' could be mentioned.

Any changes proposed by NCC due to these representations? No

Policy WP5. Waste transfer stations, MRF, WEEE and ELV facilities

No issues raised.

Policy WP6. Transfer, storage, processing, and treatment of hazardous waste

No representations received.

Policy WP7. Household waste recycling centres

Broadland DC & South Norfolk DC: [Policy] Policy could be reworded to make more effective - difficulty 'retro-fitting' new Household Waste RCs into identified growth locations – consider allocating sites with good access to growth locations.

Any changes proposed by NCC due to these representations? No

Policy WP8. Composting

Breckland DC: Consider air pollution on sensitive habitat sites.

Any changes proposed by NCC due to these representations? No

Policy WP9. Anaerobic digestion

Broads Authority: Query whether anaerobic digesters impact on nutrient enrichment and therefore nutrient neutrality.

Breckland DC: Consideration should be given to nitrogen and phosphorus pollution on the river catchment areas of the River Wensum and Broads SAC.

Anglian Water: Replace the text in paragraph W9.1 that states methane gas drives a diesel generator, to demonstrate wider options available from anaerobic digestion (AD), i.e. the production and uses of biogas and biomethane.

Any changes proposed by NCC due to these representations? Yes, amendment to paragraph W9.1

Policy WP10. Residual waste treatment facilities

No representations received.

Policy WP11. Disposal of inert waste by landfill

Suffolk County Council: [Policy] Point d “improvements to biodiversity” could be changed to “deliver measurable improvements to Biodiversity net gain”.

Any changes proposed by NCC due to these representations? No

Policy WP12. Non-hazardous and hazardous waste landfill

Suffolk CC: [Policy] Point e “improvements to biodiversity” could be changed to “deliver measurable improvements to biodiversity net gain”.

Any changes proposed by NCC due to these representations? No

Policy WP13. Landfill mining and reclamation

Broads Authority: [Policy] Omission of the need to mitigate the potential rapid release of leachate or emissions and odours in policy WP13 but specifically raised in W13.5.

Any changes proposed by NCC due to these representations? No

Policy WP14. Water recycling centres

Anglian Water: [Policy] Policy wording should be changed to include “incorporate climate change and mitigation measures (as detailed in Policy MW3)”

Breckland DC: [Policy] Replace ‘and/or’ with ‘and’ as follows “WRCs will only be acceptable if they treat greater quantity of water and improve quality of discharged water” in light of the issues around nitrogen and phosphorus pollution.

Anglian Water: [para W14.2] Issue raised regarding supporting text description of permitted development rights for Water Recycling Centres, and suggest change to include reference to GDPO (2015)

Any changes proposed by NCC due to these representations? Yes

Policy WP15. Whitlingham Water Recycling Centre

Anglian Water: [Policy and supporting text] Request the policy requirement for a site masterplan to be removed and consider it unnecessary given that other AW Management Plans exist, including Drainage and Wastewater Management Plan (DWMP) and future Asset Management Plan (AMP) periods for capital investment, and also state it is not possible to produce a masterplan due to potential future changes. Query whether policy criteria d) and e) are necessary when they are

addressed in Policy MW1. Consider the supporting text should not include the need for a Liaison Group.

Broads Authority: Query how the likely requirement for all WRCs to be at best available technology by 2030 relates to the policy.

Breckland Council: should the policy refer to water quality improvements required at the site.

Any changes proposed by NCC due to these representations? Yes, factual changes to the supporting text regarding permitted development rights, the Local Liaison Group, investment at Whitlingham, the DWMP and time period to be covered by a masterplan.

Policy WP16. Design of waste management facilities

Broads Authority: [Policy] the use of the word 'will' is stronger than existing term of 'should'. Should the policy refer to impact on the Broads and AONB and their setting and requirement to comply with Policy MW1.

Breckland DC: Reference natural based solutions within the design.

Broadland DC & South Norfolk DC: [Policy] Overlaps with Policy MW1 - combine this policy with MW1.

Any changes proposed by NCC due to these representations? No

Policy WP17. Safeguarding waste management facilities

Essex CC: [policy] Inclusion of 'allocated sites' in the policy wording may future proof the policy.

Suffolk CC: There may be hazardous waste management facilities operating below 20,000 tonnes worth safeguarding.

Any changes proposed by NCC due to these representations? No

Policy MP1. Provision of minerals extraction

Norfolk Gravel: Query why 2021 data was not included within the sand and gravel landbank ten-year sales.

Mineral Products Association and Sibelco UK Ltd: Issues raised regarding the landbank period for silica sand in the policy, seeking inclusion of wording to cover the extension of the landbank to 15 years if significant new capital is required. Request increase to the calculation of forecast need for silica sand to 11.3 million tonnes as 10-year sales are greater than the maximum throughput on the CLEUD for the processing plant site. Request to require minerals landbanks to be maintained at the end of the Plan Period.

Mineral Products Association: [Policy] Request policy amendment to clarify landbank levels have to be maintained to be in place at the end of the Plan period and inappropriate to state a 10-year landbank shall be maintained 'where practical' and not in accordance with NPPF.

McLeod Aggregates Ltd: [Para MP1.25] Request wording change to include formation of freshwater and silt lagoons at an existing quarry as a circumstance when a non-allocated site can be permitted.

Longwater Gravel Co Ltd: Issues raised regarding the extension of the Plan period from 2036 to 2038, suggestion that it should have been subject to consultation and may result in a supply gap at the end of the Plan Period due to a shortfall between the estimated mineral resources and permitted reserves on certain sites. Suggested amendments to Policy wording to provide greater flexibility for non-allocated sites to come forward, in case allocated sites have a lower reserve than expected or do not come forward as applications, and that extensions to existing sites or replacements for existing sites be viewed favourably.

Breedon Trading Ltd: Issues raised regarding Policy approach to non-allocated sites and revised wording suggested to view such sites more positively, and that the policy reference a list of the

allocated sites.

The Lyndon Pallett Group Ltd: Concern raised that the mineral production will fall in the middle of the Plan period due to a shortfall in allocations operating within that period. Suggested that allocation of the omission site at Feltwell could help to address this shortfall. Concerns also raised that additional allocations are needed to address ongoing decline in permitted reserves nationally at a time when aggregate demand is predicted to increase.

Middleton Aggregates Ltd: Issue raised that 10% additional forecasted need for flexibility is not sufficient, and that the figure should be 20%. Allocation of omission site MIN 205 at Pentney and additional land could partly meet this requirement.

Earsham Gravels Ltd: Issue raised that 10% additional forecasted need for flexibility is not sufficient, and that the figure should be 20%. Allocate omission site at MIN 212 at Mundham to partly meet this requirement.

Folkes Plant & Aggregates Ltd: Issues raised regarding supply of aggregate to Great Yarmouth Urban Area and that Policy wording would not allow a future extension to a non-allocated site in proximity to Great Yarmouth resulting in greater transport costs and vehicle emissions. Suggested revised wording to allow non-allocated sites to come forward where there is inadequate mineral supply in a sub-area of the county

Historic England: Concern raised regarding the potential crushing of good quality carstone which could be used as building stone and recommend allocation of additional site for building stone quality carstone.

Dr L David Ormerod: [para MP1.19] Issues raised regarding glass recycling in Norfolk and its substitution for silica sand to contribute to the shortfall, suggesting improved collection, sorting and recycling facilities.

Any changes proposed by NCC due to these representations? Yes, additional text to paragraphs MP1.7, MP1.15, and MP1.20 to set out which sites are allocated in the NM&WLP to meet the forecast need.

Policy MP2. Spatial strategy for minerals extraction

Historic England: [Policy] Amend policy wording on heritage assets to include conservation areas, and to state "... if the proposed development would cause harm to the significance of the heritage asset (including any contribution to significance by setting)".

[Para MP2.1] Ensure that historic environment is given due consideration in spatial strategy and (if it has) add reference to the historic environment in this paragraph.

Norfolk Wildlife Trust: [Policy] County Wildlife Sites should be added to the list at the end of the policy.

Mineral Products Association: [Policy] The policy undermines the national importance of silica sand and prejudices specific applications which may evidence that a particular location is suitable for extraction. No justification for restricting silica sand sites to locations able to access existing processing plant and railhead at Leziate. States there are not exceptional circumstances in Norfolk for a criteria-based policy and the reasoning for removing Areas of Search from the plan is flawed. Areas of Search were found sound in the examination of the Single Issue Silica Sand Review in 2017. Suggests deleting the current policy and replacing with new policy wording to include Areas of Search and to set out a hierarchy of delivery via MIN 40 and SIL 01 followed by the Preferred Area, and then sequentially an extension within an 'Area of Search', and extension outside an 'Area of Search' or a new quarry inside or outside an 'Area of Search'.

Sibelco UK Ltd: [Policy] Raised objection that constraints with little planning basis have been used to reject the Areas of Search approach. The policy undermines the national importance of silica sand and prejudices specific applications which may evidence that a particular location is suitable for extraction. The Areas of Search were previously found sound in the examination of the Single

Issue Silica Sand Review in 2017. Omitting Areas of Search and introducing a criteria-based approach renders the Plan unsound. No justification for restricting silica sand sites to locations able to access existing processing plant and railhead at Leziate. States there are not exceptional circumstances in Norfolk for a criteria-based policy. Suggests deletion of existing policy location requirements and revised policy wording to include Areas of Search and set out a hierarchy of delivery to properly set out a spatial strategy for silica sand development. Suggests revised policy wording to identify delivery via MIN 40 and SIL 01 followed by the Preferred Area, and then sequentially an extension within an 'Area of Search', and extension outside an 'Area of Search' or a new quarry inside or outside an 'Area of Search'. Also suggests the following omission sites/areas are allocated to help meet the identified need: Grandcourt Quarry Extension – Charity Fields, Preferred Area South of A47, Areas of Search at Roydon, Ashwicken, Shouldham (AOS E will additional land immediately adjacent the River Nar) and Sandringham. Submitted supporting information for the proposed Preferred Area and Areas of Search.

Norfolk Gravel: Are the “resource areas” within the policy referring to the “Mineral Safeguarding Areas” on the Key Diagrams as a “reserve area” is noted in the legend for those plans. Para MP2.5 - Query definition of a Main Town due to omission of Sheringham.

Dr L David Ormerod: [Policy] suggested to remove 'ancient' from the policy wording to provide increased protection to all woodland from mineral extraction citing climate change mitigation policies regarding tree cover. Revised wording suggested to supporting text to provide increased protection from mineral extraction for Open access land including well-used Forestry Commission land due to importance of public recreational landuse interest at Shouldham Warren.

Any changes proposed by NCC due to these representations? Yes, regarding heritage assets.

Policy MPSS1. Silica Sand extraction sites

Anglian Water: [Policy] The developer needs to confirm standoff distances for both water mains and foul sewers prior to submitting application; suggested revised Policy wording to include sewers as well as water mains within criterion (i)

Sibelco UK Ltd: [Policy] Object to the supporting text to MPSS1 dismissing silica sand extraction in / in proximity to designated areas without evidence and disregarding that minerals can only be worked where they are found. The policy is dismissive of silica sand being a mineral of national importance. Proposes that the hierarchy of sites suggested in Sibelco's proposed change to Policy MP2 form the basis of silica sand site provision within MPSS1 with other sites only being considered if those sites are unavailable or not viable to meet future silica sand needs. Also proposes policy wording change to refer to 'site' instead of 'processing plant' in criteria (a).

Dr L David Ormerod: [Policy] Objects to the criteria-based policy approach for the following reasons:

- Failure to account for cumulative landscape impacts of historic silica sand mining in West Norfolk.
- Criteria-based policy is inconsistent with the NPPF and NPPG to designate sites or areas for mineral extraction.
- Policy fails to identify sources to supply the silica sand shortfall.
- The area of search process methodology has failed to identify sites because those proposed to be allocated in the Preferred Options are not allocated in the Publication NM&WLP.
- The policy gives responsibility to Sibelco and landowners to create and submit the silica sand planning applications without collaboration with NCC. This is contrary to the Duty to Cooperate.

- Objects to planning applications for silica sand extraction being submitted to the district council for determination on the basis there will be an absence of public consultation, potentially unsuitable procedures and would be undemocratic.
- Further public consultation should take place on the change to a criteria-based approach.
- The public are not adequately represented in the local plan process, the public consultation has been inadequate and the public landuse interests are not recognised.
- Criteria-based policies are only intended to be used for mineral areas inside an extensive AONB which does not apply to the whole silica sand resource and North Park Quarry is located within Surrey Hills AONB.
- No explanation or justification provided for the criteria-based approach and why areas of search are no longer considered to be a deliverable method for silica sand.
- Why was the issue of the small size of AOS F, I and J being too fragmentary to form an appropriate area for a viable extraction site not foreseen?
- Dependency on the very large area of search E was a mistake due to its location in a river valley characterised by numerous medieval monasteries and close to a major military air base.
- Requesting sites within easy reach of the Leziate processing plant has the consequence of concentrating proposals within areas already badly scarred from mining sites and in areas close to the Core River Valley, River Nar SSSI, medieval monastic landscape and within the RAF bird strike area.
- Has the full extent of the silica sand reserve been comprehensively evaluated? Much of the silica sand safeguarded area appears under-investigated due to preference for sites within easy reach of Leziate processing plant.
- Can exceptional circumstances overcome the restrictive parameters? Many of the factors used in silica sand site selection are capable of being satisfactorily mitigated on a case-by-case basis.
- Acceptable mitigation has not been identified and is left for the planning application process.
- Allocated sites SIL 01 and MIN 40 are located within the RAF Marham bird strike area, therefore silica sand extraction is not excluded from this area.
- A map of the extent of all current, recent and historical mining sites in the silica sand extraction area is needed to inform judgements on site suitability and cumulative impacts.
- Regional public recreational land-use interests in Shouldham Warren and West Bilney Woods have not been recognised and intentionally disregarded.
- Evidence of historic public rights of way has not been accepted or acknowledged by the MPA and the associated implications for Shouldham Warren. This concern was raised in a letter to the NCC Executive Director of Community and Environmental Services regarding maladministration in 2020.
- Should the Norfolk silica sand requirement be reduced if site selection is as difficult as claimed?
- The silica sand site selection process is not fit for purpose. An independent consultation is needed to devise a more coherent procedural structure to bring forward land suitable for development. Early proactive landowner discussions and estimation of the proposed silica sand resource are required.

[Para MPSS1.2] Shouldham Warren should be declared off-limits to all development as it provides a unique environment for West Norfolk rural recreation. Proposes change to add 'appropriate Forestry Commission land' after 'Open Access Land'.

[Policy] Proposes policy change to add 'the possibility of unrecorded or under-recorded public rights of way on the site must be investigated' to policy criteria k.

Dersingham Parish Council: [Policy] Concern with conflict between policies MP2 and MPSS1 regarding accessing the existing processing plant at Leziate.

Any changes proposed by NCC due to these representations? Yes, to include sewers within criterion (i).

Policy MP3. Borrow Pits

Essex CC: [Policy] consider the policy requirements for borrow pits access and restoration period to be overly restrictive

Suffolk County Council: [Policy] Suggest inclusion of requirement that Borrow Pits will be restored with a measurable increase in biodiversity net gain after use if possible.

Any changes proposed by NCC due to these representations? No

Policy MP4. Agricultural or potable water reservoirs

No issues raised.

Policy MP5. Core River Valleys

Broads Authority: [Policy] the policy does not refer to the Broads or its setting or to Policy MW1.

Middleton Aggregates Ltd: [Policy] Amend so not all proposals need to result in an enhancement of the landscape, historic environment and biodiversity, to be acceptable. Proposals should be expected to result in one, or at most two, forms of enhancement; also remove requirement for enhancement(s) during working.

Breckland DC: [Policy] Amend to add it does not impede on the natural water quality infrastructure.

Suffolk CC: [Policy] Replace “enhance the biodiversity of the river valley” with “provide a measurable increase in the Biodiversity of the river valley” so wording aligns with the Environment act and BNG requirements.

Any changes proposed by NCC due to these representations? Yes, regarding biodiversity net gain

Policy MP6. Cumulative impacts and phasing of workings

Broads Authority: [Policy] wording is complicated because it references making something unacceptable – acceptable in the same sentence.

Any changes proposed by NCC due to these representations? No

Policy MP7. Progressive working, restoration and afteruse

Historic England: [Policy] Amend policy wording to read: The scheme has been informed by the historic environment and historic landscape [insert: "characterisation and landscape character"] assessments and the restoration enhances the historic environment

Natural England: [Policy] Advise policy reference to the Nature Recovery Network, strengthen policy by stating the minimum BNG uplift required to be delivered and consider BNG delivery above mandatory level, e.g. at 15% or 20% BNG.

NCC Lead Local Flood Authority: [Policy] Suggest the inclusion of a specific point relating to restoration proposals: “The restoration scheme must ensure there will be no increase in flood risk from the pre-development scenarios and opportunities for betterment are sought”.

Broads Authority: Query whether restoration could be a walk or cycle route itself (not necessarily connected to the PROW), and whether it could become an attraction itself; Query regarding importance of access to water, if a body of water becomes part of the restoration scheme.

NCC Natural Environment team: [Policy] Amend policy wording and paragraph MP7.2 to include 'a minimum 10% measurable' biodiversity net gain.

Suffolk County Council: [Policy] Replace "enhanced" with "measurable increase in biodiversity"

Breckland Council: [Policy] Suggested adding to policy wording: "Or where appropriate provide nature based water filtering enhancements". Supporting text paragraph MP7.7: Add restoration should be for the benefit of the river catchment overall.

Norfolk Gravel: [Policy] Concern that policy wording of 'exceptional circumstances' for a change to restoration schemes is a unnecessary and unjustified barrier to change. Suggest drainage and flood risk added to the policy as key to restoration design. Request a better quality map of Green Infrastructure.

Dr L David Ormerod: [Policy] Raised concerns that no consideration given to the blight of historic inactive mining sites when new sites selected and add to cumulative landscape impacts; and that preference for sites in proximity to the Leziate processing plant concentrates landscape scarring in a small area. Questions also raised regarding lack of restoration of historic extraction sites. Suggestion Government land ownership and private sponsorship should be considered to enable the restoration of historic sites, and that a comprehensive mapping of all extraction sites past and present should be carried out, in collaboration with the industry and with regard to recreational public land-use interests.

Any changes proposed by NCC due to these representations? Yes, regarding flood risk, historic landscape, minimum 10% biodiversity net gain, Local Nature Recovery Strategy and Nature Recovery Network.

Policy MP8. Aftercare

Norfolk Wildlife Trust: [Policy] issue raised regarding need for aftercare periods of greater than 5 years to achieve some restoration goals, revised policy wording suggested to incorporate this.

NCC Natural Environment Team: [Policy] An aftercare strategy of ten years is advised. Clarify that Biodiversity Net Gain (BNG) plans and their associated management and monitoring plans will require a minimum thirty year maintenance period where Biodiversity Units are to be delivered onsite.

Any changes proposed by NCC due to these representations? Yes, to paragraph MP8.3 to explain how aftercare is secured.

Policy MP9. Asphalt plants, concrete batching plants and the manufacture of concrete products

Norfolk Gravel: [Policy] Reference precast blockworks to use indigenous materials and aggregate bagging plants, as both are viable forms of ancillary development at aggregates sites in principle.

Any changes proposed by NCC due to these representations? No

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

Broads Authority: [Policy] Issue raised in relation to the strength of the word 'should' in the policy, suggested replacement term 'are required to'.

Mineral Products Association: [Policy] Issue raised regarding policy wording, suggest insertion of 'primary' in criterion (b) after '...processing and distribution of...'

Norfolk Gravel: [Policy] Suggest expansion to include reference to precast blockworks to use indigenous materials and aggregate bagging plants, as both are viable forms of ancillary development at aggregates sites in principle.

Norwich City Council: [Policy] 'agent of change' should be defined within the explanatory text or within the glossary. The Plan should acknowledge the proximity of the Trowse Railhead and

adjacent Lafarge asphalt plant to the East Norwich Strategic Regeneration Area and sensitive residential users. This could be acknowledged in explanatory text for MP10 (paragraph MP10.3) by amending the second sentence to read: “Each decision will take into account the particular use of the safeguarded site, the nature of the proposed development, including its policy context and relationship to strategic regeneration opportunities, ...”

Any changes proposed by NCC due to these representations? Yes, to supporting text to explain agent of change principle.

Policy MP11. Mineral Safeguarding Areas and Mineral Consultation Areas

Sibelco UK Ltd: Issues raised regarding need for increased protection for existing safeguarded sites, suggest revised policy wording to include consultation with mineral operators about development proposals near safeguarded sites and on safeguarded mineral resource. Suggested policy change to remove wording related to compelling planning reasons for over-riding safeguarding. Suggest increase in area defined as a mineral resource safeguarding area for silica sand to include Carstone formation as well as existing safeguarded Leziate Member and Mintyn Member resources.

Taylor Wimpey UK Limited & Manor Farm Rackheath Ltd. (GP Planning Limited): Issues raised that policy MP11 is not consistent with national policy, and that requirements for site investigations and PSD testing are too onerous and could impact on viability for smaller housing sites. Suggested revised policy wording to delete ‘appropriate’ and insert ‘proportionate’ in relation to site investigations and to remove policy wording stating the MPA will object to developments which will result in sterilisation of mineral resources.

Dr L David Ormerod: Issues raised regarding failure to involve public in silica sand site selection and silica sand resource safeguarding mapping, failure to take into account public recreation areas and open access land. Unclear whether new borehole data from Sibelco UK is incorporated into MCA/MSA map. Request the safeguarding map is published annually and distributed to all parish/town councils within 15mile radius of resource area along with all district/borough councils. Educate parish/town councils about silica sand. Shouldham Warren and West Bilney Woods should be permanently removed from MSA. Request all consultee and public comments to be retained for at least 25 years for AOS E and AOS D. Lack of collaboration between Mineral Planning Authority and mineral operators to identify suitable silica sand sites and updates to the safeguarding maps to find alternative areas for extraction.

Any changes proposed by NCC due to these representations? Yes, to supporting text to quote full text from paragraph 210 of the NPPF.

Implementation, monitoring and review

No representations received.

Appendix 1, Appendix 3, Appendix 4, Appendix 5, Appendix 6, Appendix 7, Appendix 8, Appendix 9, Appendix 10, Appendix 11

No representations received.

Appendix 2. Existing Mineral Site Specific Allocation Policies

Broads Authority: Unclear what the status of the saved policies are as not explained in the Plan. Query if the saved policies listed will still be in place on adoption of this Local Plan? Query if this Local Plan is in addition to the saved policies?

Any changes proposed by NCC due to these representations NCC? Yes, amendment to clarify status of saved policies

Appendix 12. Glossary

Dr L David Ormerod: Amend amenity in accordance with NPPF to include the local landforms provided for recreational pursuits and other open-access areas (Also amend term in the Sustainability Appraisals and Scoping Reports).

Any changes proposed by NCC due to these representations? No

Mineral extraction site allocations

Miss Helen Gough: [Supporting text] Haddiscoe site could be removed and there would still be excess sand and gravel compared with the shortfall.

Breedon Trading Limited: [Supporting text] The references to the planning status of the Attlebridge and Haddiscoe sites should be updated.

Any changes proposed by NCC due to these representations? Yes, to update planning status.

Specific Site Allocation MIN 12 – land north of Chapel Lane, Beetley

Norfolk Wildlife Trust: [Policy] Request specific inclusion in policy wording that site will only be worked above the water table, to ensure that the plan does not result in impacts on SSSIs, CWS and ancient woodland.

Natural England: [Policy] issues raised whether land is BMV, if it is not BMV then nature based restoration to complement the aims of the Wendling Beck Environment Project and deliver more habitat creation in the area would provide greater gains

Beetley Methodist Chapel: [Policy] Concern about visual, noise and dust impacts. The restrictions suggested must be complied with, particularly the stand-off area to the south, the screening, landscaping and dust mitigation. Transportation by HGV should be restricted to the B1146 and banned from using High House Road. Request no working on Saturday afternoon or Sundays. Request buffer zone between mineral working and Beetley Chapel, any bund to be at the top of the hill, use of silencers on equipment and dust suppression, there should be phased restoration. The site is interposed between Old Beetley and Beetley village. An alternative mineral extraction site should be found away from village boundaries.

King's Lynn Drainage Board: [para M12.15 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? Yes, to specify dry working above the water table.

Specific Site Allocation MIN 51 / MIN 13 / MIN 08 – land west of Bilney Road, Beetley

Gressenhall parish council: [Policy] Issues raised that allocation should be removed, no need for third mineral operator in close proximity, land within MIN 08 is owned by a charity. Concerns regarding negative amenity impacts and cumulative impacts, MIN 08 is premature and too close to Gressenhall village.

Norfolk Wildlife Trust: [Policy] Requested revised policy wording to require working only above the watertable, and to include specific reference to wet woodland in restoration.

Natural England: [Policy] Issues raised whether land is BMV, if it is not BMV then nature based restoration to complement the aims of the Wendling Beck Environment Project and deliver more habitat creation in the area would provide greater gains.

Breckland DC: [Policy] Previously stated that MIN 08 was unsuitable due to excessive increase in traffic in the area, access issues, and deliverability - unclear whether these issues have been addressed.

[Para 51.2 Highway access] Road improvements would be required for this site due to traffic issues.

King's Lynn Drainage Board: [Para M51.16 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? Yes, regarding dry working and restoration scheme.

Specific Site Allocation MIN 200 – land west of Cuckoo Lane, Carbrooke

Historic England: [Policy] Concerns that extraction will impact upon the setting of specific heritage assets. We welcome the specific reference to the nearest heritage assets in the policy.

Norfolk Wildlife Trust: [Policy] Recommended that the reference to open grassland in MP200.10 is added to the policy wording section e for clarity.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation MIN 202 – land south of Reepham Road, Attlebridge

Norfolk Wildlife Trust: [Policy] Issues raised that site boundary partially includes County Wildlife Site and does not include sufficient standoff from ancient woodland. Concern also raised that restoration condition to require replanting has risks of introducing disease and prefer natural regeneration. Site should also be worked dry.

Natural England: [Policy] Recommend reference to standing advice for ancient woodland and ancient and veteran trees.

Claire Woodhouse: [Policy] objects to quarrying at the site due to noise report for Cemex Attlebridge planning application stating noise generation up to 85db in a peaceful location in area of protected woodland.

King's Lynn Drainage Board: [Para M202.14 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation MIN 37 – land east of Coltishall Road, Buxton

King's Lynn Drainage Board: [Para M37.14 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation MIN 64 – land at Grange Farm, Buxton Road, Horstead

Historic England: [Policy] Any extraction at the site has the potential to impact upon the setting of nearby heritage assets. We welcome the specific reference to the nearest heritage assets in the policy.

Longwater Gravel Co. Ltd: [Supporting text] Extending the plan period from 2036 to 2038 will mean that it will be necessary to apply for planning permission to extract sand and gravel from an extension area which will not be an allocated site.

King's Lynn Drainage Board: [Para M64.15 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation MIN 65 – land north of Stanninghall Quarry

Historic England: [Policy] Raised concerns for the protection of the historic environment if the extant permission was not implemented and a new application submitted. Suggests revised policy wording to include reference to the specific mitigation measures identified through the planning application. Concern raised regarding the potential impact on the setting of various heritage assets.

Broads Authority: [Policy] Issues raised regarding the height of existing plant and its potential impact on the Broads Authority Executive Area, suggesting this would need to be addressed within an LVIA accompanying an application. Clarification required on duration of extraction. Issue raised that screening has not been finalised within the allocation plan and this also needs to be addressed in an LVIA.

King's Lynn Drainage Board: [Para M65.12 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation MIN 96 – land at Grange Farm, Spixworth

Horsham St Faith & Newton St Faith parish council: [Policy] Request to ensure any further detailed applications maintain the integrity of Market Field Lane; Concern at the level of HGV traffic that would be using the existing crossing point on Spixworth Road.

Norfolk Wildlife Trust: [Policy] Recommend addition of species-rich grassland to the habitats listed in section h. on the restoration goals.

Broadland District Council and South Norfolk District Council: [Policy] The site is located between Spixworth and Horsham St Faiths where the Greater Norwich Local Plan (GNLP) has preferred sites for residential or employment use; No reference is made to the Spixworth Neighbourhood Plan.

Historic England: [supporting text] Concern raised regarding the impact of mineral extraction at this site on the setting of a number of designated heritage assets and expectation that a Heritage Impact Assessment will be required to support the allocation and inform mitigation required. Suggests revised policy wording to include recommendations from HIA.

King's Lynn Drainage Board: [Para M96.14 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? Yes, regarding mitigation measures for the setting of heritage assets and restoration requirements.

Specific Site Allocation MIN 6 – land off East Winch Road, Mill Drove, Middleton

Historic England: [Policy] Concerns raised that carstone suitable for use as dimension stone is protected from less valuable uses such as crushed fill. The importance of carstone as building stone in conservation work to buildings, and for use in new build in the traditional vernacular style. Suggestion that alternative site for building stone required.

Peter Simmons: [Para M6.1 Amenity] Dust deposits from existing quarry sites at Blackborough End on a daily basis which is unhealthy and could pose a risk to the vulnerable, and together with increased truck movements and subsequent emissions would make the village much worse; Suggest site scrapped and prioritise people and environment.

King's Lynn Drainage Board: [Para M6.15 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation MIN 206 – land at Oak Field, west of Lynn Road, Tottenhill

Historic England: [Policy] Mineral extraction has the potential to impact on the setting of Tottenhill Row Conservation Area but there are former mineral workings closer to the conservation area. We welcome the specific reference to the nearest heritage assets in the policy.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation MIN 40 - land east of Grandcourt Farm, East Winch

Historic England: [Policy] Concern with potential impact on the significance and setting of the Grade II* listed church in East Winch; No certainty that the impact on heritage assets will be properly considered; The land opposite the church should be restored to grassland. Suggest removal of the word arable in criterion k as pasture would also be acceptable.

Norfolk Wildlife Trust: [Policy] Recommended that the proposed restoration in section k is revised to incorporate as much heathland habitat similar to East Winch Common as possible, to increase the landscape connectivity and resilience of the SSSI.

Pauline Davies: [Para M40.15 Flood Risk] The proposed development is questionable and extremely close to people's homes; Concern with mineral extraction activities, and extensions of activities, given the area's flood risk.

King's Lynn Drainage Board: [Para M40.15 Flood Risk] Issues raised regarding the application of IDB regulations to the proposed development, the need for IDB Land Drainage Consents in order to deliver it. Concerns raised regarding both discharge volumes and quantities of suspended solids.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation SIL01 – land at Mintlyn South, Bawsey

Historic England: [Policy] The boundaries of this site are in close proximity of a number of heritage assets (grade II* ruined parish church of St Michael, grade II font against the south façade of Whitehouse Farmhouse, and non-designated assets: series of crop marks related to undated ditches and banks, and a possible Bronze Age barrow); Suggest adding reference to the font in the policy.

Norfolk Wildlife Trust: [Policy] Strongly recommended that impacts to the CWS are avoided by excluding it from the allocation and including a non-worked buffer between the allocation and both CWS to safeguard CWS from indirect dust impacts Concern also raised regarding potential ecological significance of grazed grassland within the allocation, and suggests its removal pending reports.

King's Lynn Drainage Board: [Para S1.13 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? Yes, to include Grade II listed font.

Specific Site Allocation MIN 69 – land north of Holt Road, Aylmerton

Norfolk Gravel: [Policy and supporting text] Issues raised regarding inconsistencies between the policy wording requiring a right-hand turn lane and the conditions of the planning permission regarding highway access; requested revised policy wording to remove requirement for highway improvements. Query need for policy criteria requiring standoff from water main due to existing advanced planting; query need for site assessment information regarding designated sites including SSSIs; questions why criteria for footpaths and interpretation boards are included in allocation policy when these are conditioned within the extant permission. Requested updates to a number of

supporting text paragraphs to state ready mix concrete production only, to include more recent information regarding planning permission FUL/2019/0001 including archaeology, old IDO permission site and rights of way diversions.

King's Lynn Drainage Board: [Para M69.20] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? Yes to criteria j (advanced planting) and factual updates to supporting text.

Specific Site Allocation MIN 115 – land at Lord Anson's Wood, near North Walsham

Mr Andrew Bluss: [Policy] Issues raised regarding environmental impacts, destruction of trees, lack of restoration, pollution, mud on roads, dust, noise, traffic impacts on minor roads, and impacts on heritage assets (Battle of North Walsham and crash site of a World War II aircraft. Suggests that allocation is removed and mineral extracted from other parts of UK

Mr Anthony Brzeczek: [Policy] Issues raised regarding traffic impacts on unsuitable roads and highway safety, impacts to woodland and wildlife. Suggests allocation removed.

Natural England: [Policy] Unclear why protected species surveys have been requested specifically for this site when they would be required for any allocated site where it is likely protected species would be present.

King's Lynn Drainage Board: [Para M115.17 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation MIN 207 – land at Pinkney Field, Briston

Historic England: [Policy] Issue raised regarding the level of protection in the Policy for the historic environment if planning permission not implemented and concern due to the site location within the Glaven Valley Conservation Area. Suggests revised policy wording to reference mitigation measures identified through the planning application process.

King's Lynn Drainage Board: [Para M207.13 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation MIN 208 – land south of Holt Road, East Beckham

King's Lynn Drainage Board: [Para M208.14] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Any changes proposed by NCC due to these representations? No

Specific Site Allocation MIN 25 – land at Manor Farm, Haddiscoe

Historic England: [Policy] Objection regarding potential impacts on heritage assets, there is insufficient historic environment evidence to justify its allocation. Prepare a proportionate Heritage Impact Assessment (HIA) ahead of the EiP to consider the suitability or otherwise of the site and inform its extent and any potential heritage mitigation. The HIA findings need to inform the policy wording and supporting text. Of particular concern is the impact on the setting of the Grade I Listed Church of St Mary and Grade II Listed White House Farm. Setting impacts are not just visual but

can include noise, dust, vibration etc. We welcome criteria a, b, g and h and the screening around the edge of the site.

Broads Authority: [Policy] Issues raised regarding location of the site adjacent to the Broads Authority boundary, potential adverse landscape impacts on the Broads and its setting and users of the footpath including visibility of processing plant, lighting and bunding causing visual intrusion. Noise and dust impacts, additional traffic movements, potential for harm to the setting of listed buildings is greater than implied in the policy and is more than visual, amenity impacts on existing properties including noise, dust, overbearing and hours of operation. Policy wording should include assessment of impacts on the Broads in the LVIA, address amenity impacts on existing buildings and occupiers and require measures to reduce all potential impacts on the setting of listed buildings.

Norfolk Wildlife Trust: [Policy] Policy wording needs to require a hydrogeology assessment for any application to ensure no impacts on Devil's End Meadow CWS, which includes wet woodland Priority Habitat around the Landspring Beck.

Broadland District Council and South Norfolk District Council: [Policy] Issues raised regarding proximity of site to dwellings and village, especially considering volume of material, and number of HGV movements. Queries raised regarding potential use of standoffs to reduce site, and phasing of site to reduce impacts. Concerns also raised regarding potential impacts on Grade I Listed church, and the visual impact of bund on the landscape. Mature screen planting should be retained. Land opposite the allocation has been put forward for as an allocation for residential development.

King's Lynn Drainage Board: [Para M25.18 Flood Risk] A drainage strategy would be required for any site which has the potential to discharge indirectly to a WMA Board catchment. For direct discharge SuDS to appropriate technical standards will be required.

Norfolk Holiday Properties: [Policy, Para M25.1, M25.2] The site has the largest number of residential properties close-by, light pollution particularly in winter, daily HGV movements are significant for a rural location and narrow roads are unsuitable, Breedon's figures are the site has half the tonnage of material, mineral extraction would have a negative impact on tourism and the local economy.

Haddiscoe Parish Council, Haddiscoe Parochial Church Council, Stopit2, and the following individuals: Mr Anthony Burton, Mrs Sheila Burton, Ms Tanya Fairlie, Mr Tim Haycock, Mr Nicholas Kennedy, Mrs Julie Catmore, Mr Christopher Johnson, Mr Nicholas Downing, Mrs Maria Downing, Mrs Eve Basford, Mr Lee Howell, Mr Ray Long, Louise Grimmer, Miss Sari Kelsey, Mr Andrew Clouting, Alyson Moyse, Elspeth Evans, Helen Gough, Mrs Clare Beatwell, Mr Oliver Beatwell:

[Para site characteristics] The site is not required to meet the shortfall. The current planning application is for the extraction of only 0.65m tonnes.

[Para M25.1 amenity] Concerns raised about potential impacts from noise, dust, and lighting on residents, and the effects on tourism and the local economy. Concern about the location of the allocation site within the village of Haddiscoe on an elevated site and in proximity to a high number of residential dwellings, potential impacts on health, and cumulative impacts from other proposed developments at Haddiscoe. Inconsistent with objectives MSO6 and MSO7.

[Para M25.2 highway access] issues raised regarding potential impacts from HGVs, including carbon emissions and highway safety particularly relating to access at Crab Apple Lane, concerns about cumulative impacts from other proposed developments in Haddiscoe, concerns about increased impacts from mineral transport from Haddiscoe to Norton Subcourse and then back through Haddiscoe to Great Yarmouth. Inconsistent with objective MSO6.

[para M25.4 historic environment] concerns raised about potential impacts on Grade I St Mary's Church.

[Para M25.8 landscape] concerns raised about the proximity of the amenity land adjacent to the allocation site boundary and impact from noise and dust on users of the recreation ground. Concern raised about children's safety with regard to access to the mineral working from the adjacent amenity area. Inconsistent with objective MSO7 and policy MW1.

[Para M25.9- M25.10] Concerns raised about allocating site MIN 25 following the decision to dismiss the appeal against refusal of a previous planning application at the site. Also suggest the text is misleading regarding the reasons for refusal of the previous planning application.

[Para M25.15 ecology] concerns the allocation could affect the bat population.

[Policy] In addition to the issues raised above, the following issues were raised against the policy:

- concerns about the effect of extraction on the water table,
- climate impact of mineral extraction and transportation,
- concerns about what the afteruse of the site will be following restoration,
- an annual tithe should be paid by the mineral operator for improvements to be made to benefit the village.
- concerns raised about the timing of the current planning application and suggest there is no material change compared to previous application,
- deciduous tree screening will be ineffective in winter,
- the site should not be allocated.

Any changes proposed by NCC due to these representations? Yes, to include more detail on restoration requirements in paragraph M25.23.

3.2 Background documents

Habitats Regulations Assessment

Natural England: Advise to consider 'People Over Wind' Court of Justice of the EU judgement in relation to mitigation through design and operation of a site can only be included at the HRA screening stage if these measures are considered integral to the project and have not been specifically included in the Plan policy to mitigate impacts to a designated site. HRA wording should be revised to make this clearer and to state that a project level HRA will be carried out when one is required.

Any changes proposed by NCC due to these representations? No changes to the NM&WLP, but an addendum to the HRA has been produced to revise the HRA wording as advised by Natural England.

Sustainability Appraisal

Broads Authority: Query whether plan needs to address recent Government announcement on fracking and needs to set out a policy position on fracking.

Earsham Gravels Limited: Site MIN212 Mundham should be allocated as there are no issues that cannot be mitigated; There would be positive effects on biodiversity and flood risk, a proven high-grade mineral would be worked, and vehicle movements would be controlled by a HGV Management plan to ensure no adverse impacts on amenity of safety of residents.

Breedon Trading Limited: Site MIN 213 Mansom Plantation should be allocated as the permitted and implemented lodge development could be accommodated within a revised restoration scheme after extraction. Landowner has expressed preference for mineral extraction over the implemented permission and for restoration to nature conservation afteruse instead of holiday lodge afteruse. Restoration would give the opportunity for Biodiversity Net Gains and the creation of sympathetic landscape features - a revised restoration concept proposal was provided. The site benefits from direct links to the strategic highway network and is less than 5 miles from Norwich.

Middleton Aggregates Ltd: Non-allocation of site MIN 205 at Pentney is unsound and the site should be allocated; Restoration, similar to previously permitted MIN 19, will result in biodiversity and landscape enhancements, therefore not in conflict with MP5; The mineral is required as insufficient flexibility is included within calculated forecast shortfall in Policy MP1; Land immediately north of MIN 205 should be allocated for the same reasons.

The Lyndon Pallett Group Ltd: Non-allocation of the proposed extension to Feltwell Quarry (MIN 204) is not justified by uncertainty of adverse effects on the Breckland Forest SSSI (and SPA) as there is a lack of evidence of impacts and benefits outweigh this uncertainty. Additional information has been submitted as an ecological assessment of the site and proposed working and restoration concepts. The non-allocation is unsound; Natural England's assessment of the site is inadequate and not based on evidence; the existing quarry has been working for many years without impacts on Breckland SPA. The restoration of the site would allow for biodiversity net gains, complementary to the SSSI and SPA. Extensions are more sustainable than new mineral workings. Inconsistency between the assessment of and mitigation of effects from other sites proposed for allocation (MIN 69 and MIN 40) and Feltwell (MIN 204). Surveys have been undertaken which have not identified Stone Curlews or other protected species on the site and the site is unfavourable for Stone Curlew nesting. The site represents a good source of aggregate mineral (651,000 tonnes) for the local area and its allocation would reduce transport impacts compared with mineral travelling from further afield. There is the potential for significant in-combination effects on amenity from the allocated Beetley sites. There will be a lack of sand and gravel for Norfolk in the middle of the plan period. Unequal distribution of allocated sites in Norfolk will lead to increased transport of minerals and a lack of primary aggregate production in south Norfolk.

Historic England: For a number of sites (including MIN 96, 40, 207, 25 and 65) significant negative effects were identified in the SA but no explanation of these effects provided; Wherever possible, appropriate mitigation should be identified at this stage through an HIA to inform the Local Plan policy.

Dr L David Ormerod: Raised objections about the inclusion of Shouldham Warren within AOS E based on it being a major public recreation venue and the public interest of users of the site not being considered in the NM&WLP process. Shouldham Warren should be declared off limits to all development, including mineral development and should not be included in the silica sand safeguarding map due to its public recreation use. NCC has not considered the breadth of recreational use of the site in the NM&WLP process or documents and did not accept evidence for 10 old Public Rights of Way on or adjacent to the Warren. The SCI should be modified to include the responsibility of NCC to fully update PROW in areas proposed for mineral extraction.

Mr Richard Warner, Mrs Caroline Steels, Mr Rowland Dunn, Mr Ian McIntyre and Mr Alton Matherne: All raised concerns about proposed site MIN 38 at Waveney Forest, Fritton with St Olaves including the impact of mineral extraction on: global warming; destruction of sites involved with the WW2 training ground; impact on tourist industry; exacerbation of poor road safety, speeding and increase of HGV movements; unsuitable road network for HGVs and additional traffic; impact of additional HGV movements on structure of properties; impact on air pollution, damaging resident and wildlife health; damage to landscape, natural beauty, ecology and wellbeing of recreational users of the woods; impact of light and noise pollution; human rights impact; increased risk of flooding to properties and woodland fire; vicinity of extraction to properties and views; climate impact of tree loss and Woodland Carbon Code, Importance of Waveney Forest for amenity and recreation and health, loss of tranquillity, impact on amenity; impact of noise and traffic on resident's anxiety and stress.

(this site MIN 38 is not allocated in the Publication version of the NM&WLP)

Any changes proposed by NCC due to these representations? No

Statement of Consultation

Dr D Ormerod: Comments are limited to the silica sand site selection process. Objections raised about the NM&WLP consultation process which is unfit for purpose. Only writing to addresses within 250m of a proposed mineral extraction site or area boundary of the Initial Consultation ignored recreational users of Shouldham Warren. Public consultation was not carried out comprehensively and early in accordance with the NPPF.

Detail has been lost from public representations due to how they have been aggregated and summarised in the Statement of Consultation. Issues raised have been disregarded or misrepresented and not responded to adequately by the MPA (examples were provided). MPA responses disregard the multiplicity of recreational users of Shouldham Warren and solely relate to registered Public Rights of Way. The interests of local and regional communities have been ignored and the views of 4,500 local citizens who stated they use the Shouldham Warren area for recreation as an open access site have been suppressed. Inconvenient facts have been deliberately omitted. Public comments are given far less weight than those of 'official' consultees. The majority of responses where the MPA considered action was required were from organisations. The MPA stated no actions were required for the extensive submissions from the Campaign Against Two Silica Sites (CATTS) or the consultation responses objecting to AOS E and SIL 02 (and other silica sand areas of search) because they were not allocated in Publication NM&WLP. Problems include absence of recognition of local public concerns and failure to recognise rural recreational public land use issues, particularly regarding Shouldham Warren. A full Feedback Report should be published for the Preferred Options Consultation stage with an NCC officer response to each representation. It took three years for the MPA to publish responses to the Preferred Options Consultation comments and there is no evidence public consultation responses have been taken into account.

Concern regarding the silica sand criteria-based policy and details of mineral extraction proposals and mitigation measures being left for the planning application process. Concerned that the public has no legal right to be informed of most planning applications.

The MPA refused to accept the evidence I supplied directly about 10 unregistered or under-registered PROW on the AOS E site (mostly on Shouldham Warren). Norfolk County Council has a statutory duty to keep the Definitive Map in continuous review. There is a need for a formal community recreational open-space assessment in mineral and waste site selections. Also raised health concerns about silica sand particulates.

Suggested changes to the Statement of Community Involvement, including consulting all villages and towns within 3km of a proposed silica sand extraction site or area of search by a village meeting and all addresses within 500m of a proposed site/area to be consulted on the local plan and notified of a planning application. All consultee responses should be retained for 25 years.

Any changes proposed by NCC due to these representations? No

Policies Map

No representations received.

Equality Impact Assessment

No representations received.

Statement of Common Ground

No representations received.

Silica Sand Topic Paper

No representations received.

Waste Management Capacity Assessment

Central Bedfordshire, Bedford Borough and Luton Borough Council Shared Service: NCC contract to send waste to Rookery South Energy Recovery Centre will expire before the end of the Plan period - capacity not guaranteed when existing contract expires.

Any changes proposed by NCC due to these representations? No