

Planning (Regulatory) Committee

Item No: 5

Report Title: FUL/2022/0056 Land off Crab Apple Lane, Haddiscoe, Norfolk, NR14 6SJ

Date of Meeting: 24 May 2024

Responsible Cabinet Member: N/A

Responsible Director: Steve Miller, Lead Director Communities and Environment

Proposal & Applicant: Extraction of sand and gravel with low level restoration to meadow species rich grassland with ephemeral water body (Breedon Trading Limited)

Is this a Key Decision? No

Executive Summary

This report relates to a planning application for the development, of a “satellite extension” to the existing Norton Subcourse Quarry, on agricultural land on the north side of the B1136 Loddon Road, to the immediate north-west of Haddiscoe.

It is proposed to extract 650,000 tonnes of gravel for export to Norton Subcourse Quarry for processing over a maximum period of seven years, with an additional year to complete restoration of the site. 510,000 tonnes of sand would also be extracted that would be retained on-site and used in its restoration. Extraction of the mineral and phased restoration would be followed by 5 years of aftercare. Access to the site would be from a new access on to Crab Apple Lane to the west of the site and then on to the B1136 Loddon Road, which is a designated lorry route.

The site would be progressively restored, as the mineral is extracted, without the import of any fill material, so this would be to a lower level than the existing landform, i.e. low-level restoration. The proposed restoration which would make use of the retained soils as well as the sand, to a species rich lowland neutral grassland, that would be used for grazing, with new native hedgerows, the creation of an area of marshy habitat in the winter to enhance the site for biodiversity, and the reinstatement of Haddiscoe Bridleway BR5, which runs through the site, along its statutory route, following its temporary diversion during extraction.

Whilst the application site does not comprise one of the allocated sites in the current Norfolk Minerals and Waste Development Framework: Minerals Site Specific Allocations Development Plan Document, it is included as allocation MIN25, Land at Manor Farm, Haddiscoe, in the emerging Norfolk Minerals and Waste Local Plan.

There have been objections to the application from Haddiscoe Parish Council and Toft Monks Parish Council; Hales and Heckingham Parish Council and Thurlton Parish Council have expressed concerns about the potential traffic and environmental impacts of the proposal, and Norton Subcourse Parish Council has advised that it has no objection. In addition, there have been 387 third-party representations received from 177 individuals and organisations, with some making multiple representations, of which 383 offer objection, 1 supports and 3 provide comments without stating either support or an objection.

The objectors include a local action Group Stopit2, which states that it represents 253 residents in Haddiscoe, and has made detailed submissions on the application which have included a consultant report providing a review of the Dust Assessment submitted with the application.

The key issues for consideration are:

- Principle of the Development including Need;
- Traffic, Highway Safety and Public Rights of Way;
- Amenity;
- Heritage;
- Landscape and Visual Impact, Trees and Restoration;
- Ecology and Biodiversity (including the need for Appropriate Assessment);
- Flood Risk, Surface Water and Groundwater;
- Soils, Agricultural Land and Geodiversity;
- Sustainability;
- Cumulative Effects; and
- Other Issues.

It is considered that the proposal would be in accordance with the policies contained in the Norfolk Minerals and Waste Development Framework (NM&WDF): Core Strategy and Minerals and Waste Development Management Policies, the NM&WDF: Minerals Site Specific Allocations Development Plan Document (DPD) (2013) (with amendments adopted December 2017), the Greater Norwich Local Plan (Adopted March 2024), the South Norfolk Local Plan Development Management Policies Document (Adoption Version October 2015) and the National Planning Policy Framework (NPPF) (December 2023), which is a key material consideration.

Full details of the Planning Application Ref. FUL/2022/0056, including the consultation responses and representations can be found online through the following link:

<https://eplanning.norfolk.gov.uk/Planning/Display/FUL/2022/0056#undefined>

Recommendations:

That the Lead Director Communities and Environment (or equivalent) be authorized to:

1. **Grant planning permission subject to the conditions outlined in section 11;**
2. **Discharge conditions where those detailed above require the submission and implementation of a scheme, or further details, either before development commences, or within a specified date of planning permission being granted;**
3. **Delegate powers to officers to deal with any non-material amendments to the application that may be submitted.**

1. Background

- 1.1 The application has been submitted by Breedon Trading Limited, for a “satellite extension” to its existing Norton Subcourse Quarry, which is located 4.1km north-west of the application site.
- 1.2 Norton Subcourse Quarry was developed in the 1960s and over the years has had a number of planning permissions to update and extend its operations. The latest permission, Planning Permission Ref. C/7/2012/7017, for an extension to working area was permitted in 2015 and enabled the extraction of 2.37 million tonnes of sand and gravel over a period of 11-21 years. The life of the quarry has subsequently been extended to 2036 by Planning Permission Ref. C/7/2018/7014.
- 1.3 The current application explains that as extraction of the sand and gravel has progressed, the aggregate deposit at Norton Subcourse Quarry has been found to have a higher sand to gravel ratio than expected, with the result that the quarry has not been able to operate and produce the 150 000 - 200,000 tonnes per annum level for which it was consented. The current application at Haddiscoe, has therefore been submitted to extract the gravel from the site so that it can be transported to Norton Subcourse Quarry, to be blended to continue to create the saleable products that have been produced at the quarry.
- 1.4 As a result, there is no intention to undertake any processing of the gravel on the current application site, other than screening to separate the sand from gravel.
- 1.5 It should also be noted that the current application site formed part of a previous planning application, by a different applicant, Earsham Gravels Ltd, Planning Application Ref. C/7/2011/7020, submitted in 2011. This was for the extraction of 1,450,000 tonnes of sand and gravel in a phased manner over a 21-year period, with progressive restoration to a combination of nature conservation and agricultural after-uses. That application extended over a larger area than the current application and included a substantial plant area to the south of the B1136 Loddon Road. The application was refused by the Committee in January

2013, and was subsequently appealed. The appeal was dismissed in July 2014, with the Inspector attaching significant weight to the fact the site had not been included in the then recently adopted Norfolk Minerals and Waste Development Framework (NM&WDF): Minerals Site Specific Allocations DPD (2013) and the adverse impact arising from the development of the area to the south of B1136, in relation to which he considered that there would be a moderate adverse change to the landscape quality for the 21-year duration of the quarry proposed. He also considered that there would be significant harm to the setting of the adjacent Grade I Listed Church of St Mary. Other potential negative factors were also identified as arising from increased noise, dust and traffic.

- 1.6 The site lies wholly within area of Haddiscoe Parish Council.

2. Proposal

SITE

- 2.2 The Application Site comprises a single irregular shaped arable field extending to 21.5 hectares (ha) to the immediate north-west of Haddiscoe, comprising all the land to the west of Manor Farm within the area defined by the B1136, Loddon Road to the south-west, Crab Apple Lane to the north-west, and Church Road/Thorpe Road to the north-east. There is small area of former mineral working, which is used as a recreational area, to the north-west of Manor Farm that is excluded from the Site.
- 2.3 The topography is relatively flat with a gentle gradient downwards to the north of the site, with the highest point having an elevation of approximately 16m AOD in the south-western corner and the lowest point an elevation of 12m AOD along the northern boundary. The land is predominately Grade 3b agricultural land, with only 0.5ha comprising Grade 3a, Best and Most Versatile (BMV) agricultural land. It is surrounded on its south-west, north-west and north-east sides (i.e. the sides adjoining the adjacent roads) by a belt of mature advanced tree planting, approximately 24m wide.
- 2.4 The farm buildings at Manor Farm extend along most of the south-eastern boundary, with The Loke linking the A143 and Thorpe Road beyond this, and the larger part of Haddiscoe village located beyond this but within 500m of the south-east boundary. The nearest residential properties include a number of individual dwellings located along Church Road to the immediate north-east, including Windmill Cottage, The Boundaries and Willows Barn, the nearest of which lies less than 10m from the site boundary, albeit separated from the proposed working area by the belt of advanced tree planting.
- 2.5 There are also a number of properties to the south-east of the Site on the south side of the B1136, Loddon Road, the nearest, which are identified in the application as, Nos. 1 and 2 Loddon Road. These lie approximately 25m from the boundary, adjacent to the Church of St Mary, which is situated 100m south of the south-west boundary on the south side of the B1136, Loddon Road. There are two other properties, the Gables and Gable End which are located slightly

further away to the south. Haddiscoe Village Hall is situated approximately 320m east of the south-east corner of the site.

- 2.6 Beyond Church Road, to the north-east, the land falls away down to Haddiscoe Marshes, approximately 160m from the site boundary, and the River Waveney, which lies approximately 2.2km to the north-east.
- 2.7 The northern side of the Site adjoins the Broads Authority boundary which has equivalent status to a National Park.
- 2.8 There are no immediately nearby nationally protected ecological designations. The nearest is the Staney and Alder Carrs, Aldeby Site of Special Scientific Interest (SSSI), 3.9km to the south of the site and Halvergate Marshes SSSI located 4.5km north of the Site. This is also as designated as part of the Broads Special Area of Conservation (SAC), the Broadland Special Protection Area (SPA) and Breydon Water SPA and Broadland Ramsar site.
- 2.9 There are four County Wildlife Sites (CWS) within 2km of the Site boundary:
 - Devil's End Meadows, 140m to the south;
 - Marsh Farm Meadows, 815m to the north;
 - Willow Farm Meadow 1.1km north-west; and
 - Middle Row Wood 1.6km south.
- 2.10 The nearest area of Ancient Woodland is Long Row Wood, which is an area of Ancient Semi-Natural Woodland, 1.5km south of the Site.
- 2.11 There are four listed buildings within 250m of the site: White House Farm which is Grade II Listed on the northern side of Thorpe Road, 160m from the site; Church of St Mary which is Grade 1 listed to the south east of the B1136, 100m from the site; the Monument to William Salter set in Churchyard Wall which is Grade II listed to the south east of the B1136, 130m from the site; and Haddiscoe War Memorial which is Grade II listed to the south east of the B1136, 120m from the site. In addition, Thorpe Hall which is Grade II listed is located 315m to the north-west of the site, and the Church of St Matthias which is Grade 1 listed is located 450m north-west of the site. There are no Scheduled Monuments, Conservation Areas or Registered Parks and Gardens within the immediate setting of the Application Site.
- 2.12 The Application Site is in Flood Zone 1, i.e the area of lowest flood risk, and is not subject to flooding from any rivers.
- 2.13 There is a Bridleway, Haddiscoe BR5 which runs east to west across Crab Apple Lane to Haddiscoe village centre through the Application Site. This links up with and continues as Bridleway, Haddiscoe BR4 to the north-west.

PROPOSED DEVELOPMENT

Summary

- 2.14 The application is for the extraction of 650,000 tonnes of gravel for export to Norton Subcourse Quarry for processing over a maximum period of seven years, with an additional year to complete the final phases of restoration. 510,000 tonnes of sand would also be extracted that would be retained and used in the restoration.
- 2.15 Extraction would take place in seven phases at a rate of 100,000 tonnes of gravel per annum (tpa). Phase 1 would start in the south-west corner of the site and then move south-east into Phase 2 and then south-east again into Phase 3. Extraction will then progress in an anticlockwise direction, to the north and then north-west into Phase 4, 5, 6 and finishing in Phase 7 on the north-west side of the Site. Restoration would also be undertaken on a phased basis, so that as extraction finishes in Phase 1 and moves into Phase 2, restoration works would commence in Phase 1, and then move into Phase 2 as extraction moves into Phase 3.
- 2.16 The extraction boundary would be offset from the red line boundary of the Site, with an unworked margin to maintain a suitable distance to the adjacent and nearby residential properties, and in order to enable the tree belt around the edge of the site to be retained and protected, with space for the soils and sub-soils to be stored in amenity bunds. Bridleway, Haddiscoe BR5 would be temporarily diverted while Phases 4,5, 6 and 7 are being work.
- 2.17 The site would be restored at a low level to species rich lowland neutral grassland for grazing and wildlife and biodiversity with 5 years of aftercare after restoration is completed.

Site Set-Up and Access Works

- 2.18 There would be an initial period in the first year during which the site set up and access works would be undertaken. These would be relatively straightforward as there would be no need for the construction of processing plant or lagoons. This would last two to three months.

Tree and Vegetation and Protection of Service Infrastructure

- 2.19 Prior to works commencing, the existing boundary trees and hedgerows on the site would be fenced and protected from the site set-up works and extraction operations. There are no trees or hedgerows within the extraction area, although there two mature oak trees on the north-western side of the site within the boundary tree belt, one on the inside edge of the boundary tree belt, that would be protected with post and wire fencing.

Amenity Bunds and Right of Way Diversion

- 2.20 Bridleway, Haddiscoe BR5, which runs east to west through the Site, would be fenced whilst site-set up operations take place and temporarily stopped up whilst top and subsoils are moved to construct amenity bunds along the sections of the south-western and north-eastern boundaries and at the north-eastern corner of the extraction area. As extraction operations move through into Phase 4, the bridleway would be diverted for the duration of the remaining extraction operations, and then once these later phases are restored it would be reinstated onto its original statutory alignment.
- 2.21 The bridleway would be diverted north along the western side of Phase 6 and then along the north-eastern boundaries of Phase 5 and 6, to re-join its statutory alignment where it exits the site into Haddiscoe on Church Road/Thorpe Road. The diverted bridleway would run between the outside edge of the amenity bunding to be constructed on the edge of the extraction area and the fencing erected to protect the existing hedge and tree belt.

Access Works and Passing Bay

- 2.22 It is proposed that access into the site would be taken from Crab Apple Lane. It had initially been proposed that this would use the existing field access located approximately 200m north-east of the junction of Crab Apple Lane with the B1136, Loddon Road. However, following the initial round of consultation and the receipt of consultation comments from the Highway Authority (See paragraph 3.16 below), this access has been moved closer to the junction. It would be constructed as a hard-surfaced bell mouth junction with a visibility splay in each direction.
- 2.23 Crab Apple Lane would be widened, to a minimum of 6.5 m at the junction with the B1136 and through to the relocated access. This is because the existing lane is essentially a single-track road and unsuitable for use by passing HGVs.
- 2.24 The applicant has proposed that a condition be attached to the permission, if approved requiring the submission for approval of the roads works which would be delivered by a Section 278 Agreement with the Highway Authority.
- 2.25 A lorry loading and turning area with an as dug stockpile would be created inside the access in Phase 1 or 2 or 7 of the Site, with a haul road constructed from the access down into Phase 1 of the extraction area. This will ensure there is no vehicle queuing or waiting along Crab Apple Lane.

Staff Facilities

- 2.26 Once the access, turning area and stocking area is created a portacabin site office/messroom would be located inside the access alongside the haul road for staff working on the site.

Top-Soil and Sub-Soil Movement – Soil Bund Creation

- 2.27 Prior to extraction operations taking place in each phase, the topsoil and subsoils will be stripped and placed in 3m high grass seeded amenity bunds that would be constructed in the north-western corner of the Site (Bund 1), along the southern western boundary (Bund 2), and along the north-eastern boundary and partly along the south-eastern boundary (Bund 3).

Archaeological Works

- 2.28 Once the site set up and soil stripping works have been undertaken, archaeological works would commence for each phase of working. The archaeological works will be undertaken in accordance with a programme to be set out in an Archaeological Written Scheme of Investigation (WSI).
- 2.29 The extraction boundary for Phase 1 at the south-western corner of the Site, is set back from the southern boundary to avoid disturbance to an area of archaeological interest. This area will be fenced to ensure its protection during extraction.

Mineral Extraction Operations

- 2.30 Once the archaeological works are complete for each phase, extraction of the mineral will commence. The sand and gravel would be extracted dry with no dewatering required, using a 360-degree excavator. The depth of deposit varies across the site from 4.0m to 9.5m below ground level – but would be worked to an average depth of 7.0m. The material will be screened to separate the sand from the gavel and the gravel then loaded into HGVs and taken to Norton Subcourse Quarry along the B1136 for processing. The gravel will be exported off-site at a rate of 100,000tpa. Each phase will take approximately a year to work.
- 2.31 0.5 million tonnes of sand will also be extracted at the same time as the gravel. The separation of the sand and gravel will be undertaken by a mobile screen, with the retained sand subsequently re-used to shape the restoration landform. The screen would be located and operated at the extraction face in the mineral void and at a distance of at least 60m from the extraction boundary. There would also be plant for soil stripping, bund construction and placement, comprising one or two excavators and dumpers and a loading shovel.
- 2.32 All HGVs taking gravel to Norton Subcourse will be sheeted and the road and access inspected regularly and swept as necessary to keep clean. The gravel will be processed and blended with the existing permitted sand deposit at Norton Subcourse Quarry to allow the full range of aggregate products to continue to be produced.

HGV Movement and Traffic Associated with Haddiscoe Extension

- 2.33 All HGV traffic would enter and leave the site via Crab Apple Lane and then join the B1136 to travel west to the entrance to the haul road access to Norton Subcourse Quarry. It is expected that on average there would be 38 HGV (20 tonne) movements per day (19 in and 19 out), with 4-6 movements by staff in cars or light vehicles. Peak HGV movements are anticipated at 4 movements per hour (2 in and 2 out).

Movement and Traffic Associated with Norton Subcourse

- 2.34 The import of gravel to Norton Subcourse Quarry will involve the HGVs travelling west from Haddiscoe along the B1136 to the quarry, for almost the entire length of the route between the two sites. There is a priority junction on the B1136 with Ferry Road, 4.5km west of Crab Apple Lane. Immediately to the north of this junction, there is a further priority T-junction with the private Norton Subcourse Quarry haul road. The haul road is used for quarry traffic, but also provides occasional field access to the adjacent farmland.
- 2.35 In terms of movements into and out of the access at Norton Subcourse Quarry the application, if permitted, would result in an additional 38 HGV movements, over that originally assessed and permitted approaching and leaving the quarry from the east and turning into and out of Ferry Road. However, once the gravel is delivered to site and processed, the Haddiscoe material would be blended with the on-site extracted Norton Subcourse Quarry sands and gravels and would be produced and exported on the same annual rate as assessed for the 2017 approved Planning Permission Ref. C/7/2012/7017 for Norton Subcourse Quarry, i.e. at a rate of approximately 200,000 tonnes per annum. The import of gravel from Haddiscoe is not intended to extend the lifetime of the Norton Subcourse Quarry, which is permitted until 2036.

Hours of Operation

- 2.36 The proposed hours of working are Monday to Friday 0800-1700 and Saturday 0800-1300 with no working on Sundays or on Public or Bank Holidays.

Lighting

- 2.37 No fixed or permanent lighting is proposed. During dull or short winter days the lights from the excavator or truck mounted directional temporary lighting only would be used and only during the hours of working.

Employment/Staff

- 2.38 The Site would be intended to operate as a "satellite extension" to the existing Norton Subcourse Quarry. It would have one or two staff to undertake extraction operations. A small messroom/facility portacabin will be located on site, positioned in Phase 1, 2 or 7, close to the access road and bunds.

Restoration Concept and Aims

- 2.39 The Application Site is not owned by Breedon, the applicant company. It is owned by the neighbouring property, Manor Farm. The application states that the design of the sand and gravel extraction has been undertaken in liaison with the landowner and with the purpose of retaining agricultural land quality once restored. Following restoration, there would be a loss of 0.5 hectares of Grade 3a land but overall, it is intended to restore the site to Grade 3b land, with the site being returned to grazing.
- 2.40 The application states that the general aim of the restoration scheme is to achieve restoration to the highest standards, in order to ensure the community is left with an attractive restored site, which also delivers increased wildlife, habitats in terms of net biodiversity gain.
- 2.41 The application was submitted before the introduction of statutory biodiversity net gain (BNG), which consequently does not apply. Nevertheless, the application states that the restoration proposals seek to provide a significant increase in biodiversity by creating a mosaic of habitats when compared to the existing agricultural land and to help meet the targets of the Norfolk Biodiversity Action Plan. It states that it is also intended to contribute to the rural character of the surrounding area.
- 2.42 The sand and gravel extraction process would create a void. It is not proposed to import material and restore the site back to the existing ground levels. Because of the lack of local market for the sand, this will be retained on the site for use in its restoration, to provide a lower-level landform. The restoration profile would slope gently down into the centre of the site from a level of 15-11m AOD at the field perimeter to around 7m AOD at the lowest level, to create an area of lowland neutral grassland.
- 2.43 The lowland neutral grassland would be species rich. New native hedgerows would be planted across the site, with the intention that these would serve as green corridors linking the existing perimeter tree belts and additional new areas of woodland. New woodland would be planted around the perimeter of the site, with scrub edges, inside the existing perimeter tree belt, with one or two woodland areas also allowed to regenerate within the site to create visual and nature conservation habitat interest. At the lowest point in the centre of the site it is proposed that an area of marshy habitat in the winter, and at times when groundwater levels are high, would be created. This would also serve to hold water, when water levels are high and prevent flooding elsewhere. To encourage reptiles and invertebrates to move into the restored site, hibernacula comprising piles or logs and/or stones with turf on top will be constructed in south facing glades or adjacent to the wet area/scrapes. To encourage bats and nesting birds, bat and bird boxes would be erected in suitable locations as part of the operational and restoration schemes.

- 2.44 Public access to the Site would be restored, with Bridleway Haddiscoe BR5 being reinstated along its designated statutory route through the field, following its previous temporary diversion.

Biodiversity Gain

- 2.45 The proposed restoration scheme would result in the creation of 14.33ha of species rich lowland meadow grassland, 2.48ha of woodland, 0.71 ha of scrub, 0.12 ha of wet woodland, 0.13 ha of marsh, and 518m of new hedgerow with 19 new hedgerow trees. There would as a result be some loss of the area of land that could be used for agriculture.

Restoration Aftercare

- 2.46 The restored grassland and planting areas will be subject to a 5 year aftercare scheme, and it proposed that there would be annual aftercare meetings and reporting on the previous 12 months aftercare works and proposals for the subsequent 12 months.

ENVIRONMENTAL IMPACT ASSESSMENT

- 2.47 In accordance with the Town and Country Planning Environmental (Impact Assessment) Regulations 2017 (the “EIA Regulations”) an Environmental Statement has been submitted with the application. The assessment of the matters in the statement is set out below under the relevant headings in the Appraisal section below.
- 2.48 A request for the submission of further environmental information was issued under Regulation 25 of the EIA Regulations, following the responses from consultees to the initial round of consultation.

3. Impact of the Proposal

DEVELOPMENT PLAN POLICIES

- 3.1 The following policies of the Norfolk Minerals and Waste Development Framework (NM&WDF): Core Strategy and Minerals and Waste Development Management Policies and DPD 2010-2026 (2011), the NM&WDF: Minerals Site Specific Allocations DPD (2013), the Greater Norwich Local Plan (Adopted March 2024), and the South Norfolk Local Plan Development Management Policies Document (Adoption Version October 2015) are of relevance to this application:

NM&WDF: Core Strategy and Minerals and Waste Development Management Policies and Development Plan Document 2010-2026 (2011)

- Policy CS1: Minerals Extraction;

- Policy CS2: General Locations for Mineral Extraction and Associated Facilities;
- Policy CS13: Climate change and renewable energy generation;
- Policy CS14: Environmental Protection;
- Policy CS15: Transport;
- Policy DM1: Nature Conservation;
- Policy DM3: Groundwater and Surface Water;
- Policy DM4: Flood Risk;
- Policy DM8: Design, Local Landscape and Townscape Character;
- Policy DM9: Archaeological Sites
- Policy DM10: Transport;
- Policy DM11: Sustainable Construction and Operations;
- Policy DM12: Amenity;
- Policy DM13: Air Quality;
- Policy DM14: Progressive Working, Restoration and After-Use
- Policy DM15: Cumulative Impacts; and
- Policy DM16: Soils.

NM&WDF: Minerals Site Specific Allocations Development Plan Document (2013) (with amendments adopted December 2017)

- Policy SD1: The Presumption in Favour of Sustainable Development.

Greater Norwich Local Plan (GNLP) (Adopted March 2024)

3.2 The Greater Norwich Local Plan (GNLP) has been found to be sound by an Independent Inspector and was adopted in March 2024 as part of the development plan for Broadland District Council, Norwich City Council and South Norfolk District Council, subject to the inclusion of the main modifications recommended by an Independent Inspector. It replaces the former Joint Core Strategy for Broadland, Norwich and South Norfolk (Adopted March 2011, amendments adopted January 2014). The following policies are relevant to the application:

- Policy 2: Sustainable Communities; and
- Policy 3: Environmental Protection and Enhancement.

South Norfolk Local Plan Development Management Policies Document (Adoption Version October 2015)

- Policy DM 1.1 Ensuring development management contributes to achieving sustainable development in South Norfolk;
- Policy DM 1.4 Environmental Quality and Local Distinctiveness;
- Policy DM 3.8 Design Principles Applying to all Development;
- Policy DM 3.11 Road Safety and the Free Flow of Traffic;
- Policy DM 3.13 Amenity, Noise and Quality of Life;
- Policy DM 3.14 Pollution, Health and Safety;
- Policy DM 4.2 Sustainable Drainage and Water Management;

- Policy DM 4.4 Natural Environmental Assets – Designated and Locally Important Open Space;
- Policy DM 4.5 Landscape Character and River Valleys;
- Policy DM 4.8 Protection of Trees and Hedgerows;
- Policy DM 4.9 Incorporating landscape into Design; and
- Policy DM 4.10 Heritage Assets.

Neighbourhood Plan

- There is no Neighbourhood Plan for the Parish of Haddiscoe.

OTHER MATERIAL CONSIDERATIONS

National Planning Policy Framework (December 2023)

- 3.3 The latest iteration of the National Planning Policy Framework (NPPF) was published in December 2023 and sets out the Government’s planning policies for England and how these should be applied. Whilst not part of the development plan, policies within the NPPF are also a material consideration capable of carrying significant weight. Paragraph 11 sets out the presumption in favour of sustainable development and Paragraph 47 states that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Norfolk Minerals and Waste Local Plan: Pre-Submission Publication

- 3.4 Paragraph 48 of the NPPF states that local planning authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan and the extent to which there are unresolved objections to those policies and the degree of consistency between them and the NPPF.
- 3.5 The production of a new Norfolk Minerals and Waste Local Plan is currently ongoing. The Pre-Submission Publication draft of the Plan (‘the emerging NM&WLP’) was published for a period of representations between September and December 2022. The Pre-Submission document was submitted to the Secretary of State in December 2023, for public examination by a Planning Inspector. At this stage only limited weight can be attributed to the policies in the emerging plan, although Policies MW2, MW3, MW5, MP6 and MP8 do not have any objections to them and can therefore be given greater weight. Draft policies relevant to this application include the following:
- Policy MW1: Development Management Criteria;
 - Policy MW2: Transport
 - Policy MW3: Climate change mitigation and adaption
 - Policy MW5: Agricultural soils
 - Policy MP1: Provision of Minerals Extraction;

- Policy MP2: Spatial Strategy for Minerals Extraction;
- Policy MP6: Cumulative Impacts and Phasing of Workings;
- Policy MP7: Progressive working, restoration and after-use;
- Policy MP8: Aftercare; and
- Specific Site Allocation Policy MIN 25: Land at Manor Farm Haddiscoe.

3.6 Specific Site Allocation Policy MIN 25 applies to the Land at Manor Farm (between Loddon Road and Thorpe Road), Haddiscoe, which extends to 21.95 hectares. This includes the whole of the current application site and has an estimated sand and gravel resource of 1,300,000 tonnes.

CONSULTATIONS

3.7 **South Norfolk District Council – Planning:** No objection, but express concern about the impact of the proposal in relation to its potential impact on the amenity of nearby residential properties, highway safety, biodiversity and the historic environment. They have restated these concerns following the submission of the response to the Regulation 25 request for further information.

3.8 **South Norfolk District Council – Environmental Quality:** No objection, subject to the inclusion of conditions to secure the recommended mitigation measures contained in the Noise chapter of the Environmental Statement, and the supporting Appendix, together with conditions stipulating the permitted working hours, and the submission for approval of an Operations Management Plan to control any noise, dust and smoke arising from operations on the site.

3.9 Additional comments have been submitted in response to submission of the response to the Regulation 25 request for further information, requesting that the bund (Bund 3) to be constructed along the south-eastern boundary of the extraction area be extended further south to provide further protection to the adjacent farm, Manor Farm, from any wind borne dust, and that the condition requiring the submission of an Operations Management Plan, be expanded include additional specified mitigation measures relating to dust management.

3.10 **Broads Authority:** Comments that the application site lies immediately adjacent to the Broads Authority boundary, and it offers the following specific comments in relation to the impacts on biodiversity, landscape, and the historic environment:

3.11 Biodiversity: That as long the specified mitigation is followed, and restoration is undertaken in accordance with the submitted details, the development would not have significant impacts on the Broads. It also advises that biosecurity protocols should be followed by all workers and visitors on site at all times to prevent the establishment or spread of any invasive species into the Broads, and that a biosecurity strategy should be put in place.

- 3.12 Landscape: That the overall landscape and visual effects following restoration would not have any significant adverse effects on the Broads or the setting of the Broads. It is however concerned that the extraction period is likely to have adverse effects on the tranquillity of the landscape, and on sensitive visual receptors, and it therefore recommends that it would be beneficial if the extraction period could be limited to reduce the duration of these effects, that a condition to prevent future applications for extension of time is added, and that there are restrictions on use of external lighting.
- 3.13 Historic Environment: That there are a number of designated heritage assets in close proximity to the site within the Broads Authority area. These include the Church of St Matthias (Grade I Listed), Thorpe Hall (Grade II Listed) and White House Farm (Grade II Listed). It comments that Thorpe Hall has not been included in the Cultural Heritage assessment provided with the application, despite it being closer to the site than the Church of St Matthias.
- 3.14 It has also expressed concerns about how the impact on the designated heritage assets has been assessed. This, it comments is primarily because the assessment is almost entirely based on whether there are views between the site and the designated heritage assets, and that impacts from noise and dust have only been considered in the other assessments submitted as part of the Environmental Statement, when it is also influenced by other environmental factors, such as noise, dust and vibration from other land uses in the vicinity. As such it considers that the potential for detrimental impacts on designated heritage assets is greater than stated in the submitted Cultural Heritage assessment.
- 3.15 **Norfolk County Council - Lead Local Flood Authority (LLFA):** Has advised that it has no comment to make on the application. It has not offered any additional comments following the submission of the response to the Regulation 25 request for further information.
- 3.16 **Norfolk County Council - Highway Authority:** No objection. It initially advised that the access into the site, which was to be located approximately 200m north-east of the junction of Crab Apple Lane with the B1136 Loddon Road, should be located closer to the junction and that Crab Apple Lane should be widened (to a minimum of 6.5 m) at the junction with the B1136 and through to the relocated access. This is because the existing lane is essentially a single-track road and unsuitable for use by passing HGVs.
- 3.17 In response to this the applicant has, as set out above, amended the access proposals as recommended by Norfolk County Council Highways, who have advised that these would need to be delivered through a Section 278 Agreement.
- 3.18 They have advised that revised access proposals are acceptable, and that the visibility at the junction of Crab Apple Lane onto Loddon Road is also

acceptable, and more generally that the route from the site to/from the Norton Subcourse Quarry is suitable for the level of HGV traffic proposed. They do however advise that once processed, the onward transport of mineral from Norton Subcourse Quarry will lead to a marginal increase in traffic, both on Loddon Road and on the wider network, but that this would not be significant.

- 3.19 On this basis, they do not consider that the proposals to be unacceptable, subject to the inclusion of conditions relating to submission for approval of the construction details of proposed access, including the related surface water drainage, the siting of any access gates, the provision only of the access shown on the approved plans, the provision and maintenance of the required visibility splays, and the submission for approval and completion of the off-site highway improvement works before substantive mineral extraction works on the site commence.
- 3.20 **Norfolk County Council - Public Rights of Way:** Initially returned a holding objection to the application on the basis that the Public Right of Way, Bridleway Haddiscoe BR5, which crosses the northern side of the site, and that whilst a temporary diversion is proposed, no additional detail had been provided, but have subsequently confirmed that the details of the alignment, width, gradient and construction details of the diversion and the restored alignment can be reserved by condition.
- 3.21 **Norfolk County Council - Ecology:** No objection. The County Ecologist identifies that the Environmental Statement included with the application includes a chapter on ecology and that this is supported by a Preliminary Ecological Appraisal (PEA) and reports on bat activity surveys, Great Crested Newt surveys and breeding bird surveys. The PEA identifies that there is a belt trees around the edge of the site, that are to be retained for the purposes of screening. General precautionary working measures, mitigation, and compensation and enhancement measures are outlined in the Environmental Statement Ecology chapter, that the County Ecologist advises, must be implemented.
- 3.22 They further advise that the restoration scheme is considered appropriate. As well as the retention of the existing tree belt, it provides for the enhancement of the site with additional native woodland planting with scrub edge, native hedgerow planting with trees, species rich lowland meadow grassland and marshy areas. They comment that opportunities to further enhance the site for biodiversity are outlined in the PEA report and the Ecology Chapter.
- 3.23 As part of the submission of the response to the Regulation 25 request for further information, additional information was submitted, at the request of the County Ecologist, setting out details of the restoration of the hibernacula and the provision of bird and bat boxes on the site. The County Ecologist has

advised that the submitted details, included in an Ecological Enhancement Plan, are acceptable, subject to a requirement, by condition to ensure this.

- 3.24 They advise that the submitted Concept Restoration Plan and/or Landscape Planting & Aftercare Plan are also revised to include the locations of the bird and bat boxes and reptile hibernacula, which can be reserved by condition.
- 3.25 **Norfolk County Council - Arboriculture:** No Objection. The Arboricultural Officer initially returned a holding objection because no tree report had been submitted with the application. This has been addressed through the submission of an Arboricultural Impact Assessment and Method Statement as part of the response to the Regulation 25 request for further information.
- 3.26 They have advised that the Environmental Statement identifies that all the trees and hedgerows on the site will be retained, and that the unexcavated margins will be left with the perimeter trees and hedgerows protected by tree protection fencing to be erected at a distance of 3-5m from the tree belt, where no existing fencing exists. The fencing will be kept and maintained for the duration of the extraction operations and until final restoration has been completed.
- 3.27 They further advise that the submitted Arboricultural Impact Assessment and Method Statement as part of the response to the Regulation 25 request for further information, is fit for purpose and acceptable and includes details of the proposed use of post and wire tree protective fencing, which in this case is considered acceptable given the length of operation and the lowered risk of incursion into root protection areas.
- 3.28 Provided that the submitted Arboricultural Method Statement is adhered to, they consequently have no objection to the application.
- 3.29 **Norfolk County Council - Landscape:** No objection. Initially returned a holding objection, on the basis that further information was required relating to the access and vegetation retention, which has now been addressed as part of the response to the Regulation 25 request for further information.
- 3.30 They advise that the submitted LVIA is fit for purpose and that they broadly agree with its conclusion that the Site is well located in the landscape to the extent that it would be screened by the intervening and boundary vegetation from potential public viewpoints and that the proposed restored low level restoration is unlikely to have any major adverse impacts on the landscape character of the area.
- 3.31 They comment that bunding is proposed during the operational period, but that the bunds would be minimal in height and would be predominantly located behind the peripheral tree belt.

- 3.32 The restoration scheme would include retention of the existing tree belt, and some enhancement works are also proposed. Whilst the site would be restored to a lower level, they further comment that the restoration proposals would be beneficial in terms of the landscape.
- 3.33 They also comment that the experience of users of Public Right of Way, Bridleway Haddiscoe BR5 would change following restoration, but they consider that the changes would be beneficial, and the reinstatement would provide a suitable route.
- 3.34 They further comment that they agree with the conclusions of the additional information provided in the Landscape and Visual Impact Assessment (LVIA): Addendum as part of the response to the Regulation 25 request for further information and confirm that the report and LVIA have been undertaken following professional standards and to a high and suitable quality. Accordingly, they have no objection to the application.
- 3.35 **Norfolk County Council - Historic Environment:** Have advised that the site has been subject to a pre-application geophysical survey and trial trenching. This confirms that an area of possible late Saxon or medieval settlement south of the Loddon Road appears to extend north of the road, and that a further ditch dated to the Roman period was found a short distance to the east. They comment that a cropmark of a possible ploughed-out Bronze Age burial mound is located a short distance to the north which also requires excavation. Therefore, they advise that there is potential for archaeological interest (buried archaeological remains) to be present at the site and that their significance will be adversely affected by the proposed development.
- 3.36 Accordingly, they advise if planning permission is granted, that this should be subject to a condition requiring a programme of archaeological mitigatory work.
- 3.37 **Norfolk County Council – Public Health:** Initially advised that a full Health Impact Assessment (HIA) should be submitted using an appropriate methodology to cover the extraction phase of the project, and to set out appropriate mitigation measures if required, which should consider both the direct impacts on health from changes in air quality, dust, noise, vibration, and increased traffic, but also discuss the wider determinants of health such as temporary changes and disruption to Public Rights of Way. They are particularly concerned that any fine particulate matter caused by quarrying activities should be at safe levels and that the assessment should give consideration to Public Health England’s 2019 “net health gain” principles which are intended to deliver an overall benefit to people’s health from new development, incorporating interventions into the design to reduce emissions, exposure to pollutants and contribute to better air quality management.

- 3.38 In response to these comments that applicant has, as part of the response to the Regulation 25 request for further information, submitted a Health Impact Assessment (HIA) and a Dust Management Plan.
- 3.39 Public Health has subsequently advised that the applicant has used a sound methodology to conduct the HIA, using available data, although it also comments that whilst the HIA concludes that there will be no negative impacts from the quarry on the health of residents in South Norfolk or Haddiscoe Parish, no materially positive impacts have been identified either.
- 3.40 They advise that the Dust Management Plan addresses most of their previously raised concerns raised, although they would like to see ongoing monitoring and reporting of dust emissions.
- 3.41 They comment that the applicant has used data published by the Department for Environment Food and Rural Affairs (DEFRA) to establish that the baseline values for PM₁₀s in Haddiscoe range from 13.0-15.2 µg/m³ which do not exceed the 17µg/m³ threshold that would warrant further action. However, they also advise that the data is modelled, with potential variances of up to 50%, and that because currently no PM₁₀ monitoring is undertaken in the area, there is no way to verify the accuracy of the modelled data.
- 3.42 Consequently, they recommend that the applicant undertakes indicative real-time automated monitoring of dust emissions from the site for the duration of operations to ensure emissions do not exceed levels set out in the Air Quality Standards Regulations 2010; that the applicant establishes a process for reporting dust emissions from the site and any complaints received by the Environmental Quality Officer (EQO) at South Norfolk District Council; and that an Operations Management Plan includes setting operational cut-offs for wind speeds across the site, and a process for notifying the results of monitoring, as requested by South Norfolk District Council.
- 3.43 **Waveney, Lower Yare & Lothingland IDB:** Advise that the application site is near to the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB) and is within the Board's Watershed Catchment (meaning water from the site will eventually enter the IDD).
- 3.44 It comments that no new impermeable area is proposed and that the operations will be carried out above the water table, and therefore that no detailed strategy is proposed for any surface water or groundwater discharge to the ground or to a watercourse. However, as the site is located within the watershed catchment of the Board's IDD, it requests that any discharge that may subsequently be proposed is facilitated in line with the non-statutory technical standards for sustainable drainage systems (SuDS), and that the discharge is attenuated to the Greenfield Runoff Rates wherever possible. Any discharge should be

filtered and treated as necessary to reduce the risk of pollution to surrounding watercourses.

- 3.45 **Norfolk Wildlife Trust:** Advises that the application site is close to Devil's End Meadow County Wildlife Site (CWS), a site of importance for wildlife protected by planning policy and designated for its mosaic of habitats, including grassland and wet woodland. It was initially concerned that there was insufficient information on the precautionary measures proposed in the Ecological Impact Assessment submitted as part of the Environmental Statement, in relation to the hydrological impacts, air quality impacts and the restoration proposals.
- 3.46 However, following the submission of the response to the Regulation 25 request for further information, it recommend that if the application is approved, that the mitigation measures set out in Ecological Impact Assessment are secured by way of condition. Its specific comments are as follows:
- 3.47 **Hydrological Impacts:** That 'the extraction of mineral from each phase should be undertaken dry without dewatering to ensure that surrounding water features will not be affected. This should be secured by condition, in order to safeguard the Devil's End Meadow CWS which is vulnerable to changes in local hydrology.
- 3.48 **Air Quality Impacts:** That the mitigation measures set out in the Dust Management Plan, should be secured by condition. It also comments that the proposed mitigation measures include the use of water suppression but note that as there is no water on site. Details of where the water is to be supplied from should therefore be secured by condition. It also notes that it is proposed that on a windy day, operations will cease, and it therefore recommends that further details about the threshold of when this would happen are secured.
- 3.49 **Environment Agency:** Advises, as there will be no impact to groundwater levels as it is proposed that site will be worked dry without dewatering, that it has no objection to the application. It has maintained its position following re-consultation on the submitted Regulation 25 information.
- 3.50 **Natural England:** No objection. It advises that it considers that the proposed development will not have significant effects on designated sites, which include The Broads Special Area of Conservation (SAC), Broadland Special Protection Area (SPA) and Ramsar site, and Breydon Water SPA and Ramsar site, which are European designated sites.
- 3.51 Natural England's further advice on other designated sites/landscapes and advice on other natural environment issues is set is as follows:
- 3.52 **Halvergate Marshes & Staney and Alder Carrs, Aldeby Sites of Special Scientific Interest (SSSI):** It advises that it considers that the proposed

development will not damage or destroy the interest features for which these sites has been notified and has no objection.

- 3.53 Protected Landscapes – The Broads National Park: It advises that the application site is close to the Broads National Park, and accordingly that the County Council should use national and local policies, together with local landscape expertise and information to determine the proposal.
- 3.54 The County Council’s decision should be guided by paragraph 176 and 177 of the NPPF which gives the highest status of protection for the ‘landscape and scenic beauty’ of AONBs and National Parks. Alongside national policy it advises that the landscape policies set out in the development plan should be applied in the determination of the application.
- 3.55 It also advises that the statutory purposes of the National Park need to be taken into account. These are to conserve and enhance the natural beauty, wildlife and cultural heritage of the park; and to promote opportunities for the understanding and enjoyment of the special qualities of the park by the public. Careful consideration needs to be given as to whether the proposed development would have a significant impact on or harm those statutory purposes.
- 3.56 Protected Species: Natural England advises that its standing advice on protected should be applied.
- 3.57 Landscape: Advises that paragraph 174 of the NPPF highlights the need to protect and enhance valued landscapes. The County Council may therefore want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments.
- 3.58 Best and Most Versatile (BMV) Agricultural Land and Soils: The application site which extends to approximately 22ha, largely comprises Grade 3b and Grade 4 agricultural land, also includes approximately 0.5ha of Grade 3a land, which falls within what is defined as BMV agricultural land, i.e. Grades 1, 2 and 3a land. It advises that NPPF paragraphs 174 and 175 should be applied, and that for mineral working and landfilling guidance on soil protection for site restoration and aftercare, the detailed guidance on soil handling for mineral sites set out in the Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings should be used.
- 3.59 It otherwise offers its standing advice in relation to the impacts on landscape, protected species, local sites and priority habitats and species (including ancient woodland), access and recreation, rights of way, access land, coastal access and national trails, and the biodiversity duty.

- 3.60 Natural England has maintained its original comments in response to the re-consultation following the submission of the response by the applicant to the Regulation 25 request for further information.
- 3.61 **Historic England:** Whilst not objecting to the application Historic England has submitted detailed comments, advising that it has serious concerns about the application on heritage grounds, due to the impact on the setting of the Church of St Mary, a Grade I listed building.
- 3.62 It comments that the temporary and permanent changes to the landscape resulting from the proposed quarry would affect the setting of a number of listed buildings, although it is principally concerned with the potential harm that would be caused to the significance of the Church St Mary which is located approximately 100 metres south of the site boundary.
- 3.63 It advises that the Church of St Mary is amongst Norfolk's most striking round tower churches and that it holds exceptional architectural and historic interest, reflected in its Grade I listing, which places it in the top 2.5% of listed buildings nationally. Though not readily accessible to the public, panoramic views are available over this landscape setting from the tower of the church. It considers that the application site, being very large and close to the church, has a dominant part in these views that would be seen as a jarring intrusion in its setting.
- 3.64 It also comments the quarry's occupation of a large portion of the land between Church of St Mary and the Church of St Matthias would diminish their high group value, including but not limited to featuring prominently in connecting views.
- 3.65 In addition, it comments that the Church of St Mary was not selected as a sensitive receptor in the noise assessment, and that consequently no indication is given of the existing or worst-case noise scenarios or the impact this would have on the experience of anyone attending or visiting the church and churchyard.
- 3.66 It advises that when considering the impact of a proposed development, great weight should be given to the conservation of a designated heritage asset, irrespective of the potential degree of harm to its significance. The more important the asset the greater this weight should be, in accordance with Paragraph 199 of the NPPF. As a Grade I listed building, the conservation of the Church of St Mary should be given very great weight.
- 3.67 It specifically advises that it considers that the application does not, in this case, meet the requirements of the NPPF, in particular paragraph numbers 7, 8, 189, 194, 195, 197, 199, 200, 202, 206.

- 3.68 In determining the application, it advises that the County Council must bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Relevant decision-making policies are also to be applied, but they cannot directly conflict with or avoid the obligatory consideration in these statutory provisions.
- 3.69 In response to the further consultation on the response to the Regulation 25 request for further information, it has maintained its position and states that the additional information does not change its view and states that it continues to highlight the importance of the assessment of the impacts on setting, which should include influences and other factors such as noise, vibration, dust and traffic. It considers that further assessment is required on these factors and their impact to the significance of Grade I listed Church of St Mary and the Church of St Matthias. It advises that the harm to significance of the Church of St Mary, and other nearby designated heritage assets should be weighed against public benefit in the County Council's determination of the planning application.
- 3.70 **National Planning Casework Unit:** Has not commented on the application.
- 3.71 **Open Space Society:** Has not commented on the application.
- 3.72 **Haddiscoe Parish Council:** Haddiscoe Parish Council have submitted extensive and detailed comments on the application in response to the initial consultation and the subsequent consultation relating to the response to the Regulation 25 request for further information. It has maintained a strong objection throughout. Specific concerns raised relate to dust, the impact on the setting of the Church of St Mary which is a Grade 1 Listed Building, traffic, and the impact on trees. It has also submitted a separate consultant report providing a review of the Dust Assessment submitted with the application, that was commissioned by the local action group Stopit2. Full copies of the Parish Council's comments and the report are available on-line through the hyperlink included at the end of Executive Summary at the beginning of this report.
- 3.73 The following provides a summary of the key points made by Haddiscoe Parish Council in its submissions:

Dust

- A 100m cordon between the application site and the boundary of the nearest residential properties has not been provided, and the submitted Dust Risk Assessment is insufficient in that it does not adequately address the potential dispersion of particulate matter within the 400m boundary, although this has subsequently been amended;
- The reliance on visual dust monitoring is inadequate, especially considering that silica dust, a significant health concern, is not visible to

the human eye. The prevailing west to southwest wind direction consequently poses a serious threat to the residents of Haddiscoe;

- Inaccurate wind data has been provided by the applicant, using the Norwich Wind Rose model rather than site specific Met Office data. The inaccurate wind model understates the dust and noise impacts on the health and wellbeing of local residents;
- Approval of the application would potentially endanger life and would consequently breach Article 2 of the European Convention on Human Rights relating to the Right to Life;
- There are 106 houses and 205 people in Haddiscoe located within 400 metres of the application site that would be impacted by dust and particulate matter. This number would rise by approximately 35 houses and 70 people to 141 houses and 275 people if the proposed housing development for Haddiscoe is passed as part of the South Norfolk Village Clusters Housing Allocations Plan;
- The site is placed at the most elevated position in Haddiscoe. The higher elevation of the site over the village will intensify the impact of dust, noise and light pollution on the village;

Consultant Review of the Dust Assessment

3.74 The consultant review of the applicant's Dust Assessment identifies a number of shortcomings which are stated as being:

- A failure to address the requirements of the Environmental Act 2021 and specifically new targets for PM_{2.5};
- A failure to complete a phase-by-phase analysis of the dust impacts of the development;
- That the impact of terrain height has not been considered or modelled;
- That although some dust mitigation measures are included in the submitted Dust Management Plan, there are no proposals for continuous monitoring during operations that would provide a valuable tool for minimising dust emissions;
- That a dust cloud has the potential to engulf 69 houses and 132 people with dust and particulate matter. This number would rise by approximately 35 houses and 70 people to 104 houses and 202 people, if the proposed housing development for Haddiscoe is passed as part of the South Norfolk Village Clusters Housing Allocations Plan;
- Not all of the properties that would be dust sensitive receptors have been identified;

Church of St Mary and Other Listed Buildings

- There are four listed buildings within 250 metres of the site but the screening of the site will not be adequate. In particular, the historic Church of St Mary and graveyard is located within view of the site and its close proximity to the application site means it will adversely affect the character and tranquillity of the users of the church;

- Historic England's concerns about permanent and temporary changes to the landscape, particularly impacting Grade 1 Listed churches (Church of St Mary and the Church of St. Mathias), are valid;
- The proposed quarry would interrupt a historical visual connection between the two churches and may negatively affect the churches' architectural and historical significance;
- References to the tower of the Church of St Mary being closed to the public in the application documents is inaccurate;
- The sand and gravel screening plant to be located on the site will have a more significant impact than the proposed plant area included in the 2011 planning application;

Traffic

- Concern that Crab Apple Lane is not suitable for HGVs;
- The proposed route of HGV lorries, leaving Crab Apple Lane and crossing the B1136, raises significant safety concerns. Lorries crossing traffic on the same road to access Norton Subcourse Quarry, and the identified use of Great Yarmouth as a receptor site for the gravel, will result in increased traffic through Haddiscoe, including its narrow main street, poses potential risks to public safety;

Trees

- There is Ancient Woodland in close proximity to the proposed extraction site, the preservation of which should be prioritized;

Physical and Mental Health of Local Residents

- Concern for the physical and mental health of local residents as result of noise, light and dust emissions (particularly the silica contained in the extracted sand), and because the proximity of the nearest properties to the site and because further new homes are proposed within 250m;

Impact on Protected Species

- The impact on protected species including bats;

Public Right of Way

- The re-routing of Public Right of Way, Bridleway Haddiscoe BR5 will be through an active working area of the quarry;
- The profile of the restored site will hinder access along the Bridleway Haddiscoe BR5 and horses will be endangered by the proximity to working machinery;

Pollution

- Concern that water for dust suppression will be discharged into the ground affecting the natural levels in the water table increasing the risk of flooding or discharge of silica laden water;

Application Details and Methodology

- The application details and information submitted by the applicant do not fully or adequately address the issues raised by local residents;
- Many of the applicant's supporting documents are based on desktop evaluation and not recent site based studies, and some documents cite studies which are historic, so substantially out of date;
- There would be 20,000 tonnes less mineral than has been identified on the site by the applicant and substantially less than the 1.3 millions tonnes identified in the emerging NM&WLP.

Support for Stopit2 Action Group

- The Parish Council endorses and supports all of the points raised in the objection prepared by the Stopit2 action group;

Policy

- The application is inconsistent with or contrary to the Norfolk Minerals and Waste Development Framework (NM&WDF): Core Strategy and Minerals and Waste Development Management Policies and DPD 2010-2026 (2011), Policies CS 14 (Environmental Protection), DM12 (Amenity) and DM13 (Air Quality), and also Policy MW1(Development Management Criteria) and Policy MPSS1 (Silica Sand Extraction Sites) in the emerging Norfolk Minerals and Waste Local Plan.

Planning (Regulatory) Committee Site Visit

- Request that Planning (Regulatory) Committee makes a site visit in order to understand the relative location of the application site in relation to nearby residential and business properties.

3.75 **Norton Subcourse Parish Council:** No objection.

3.76 **Thurlton Parish Council:** Whilst not objecting, Thurlton Parish Council has expressed concern that no traffic from the Quarry should come through the Thurlton village, and that it should be routed only along B1136 Loddon Road. It has requested that the applicant be asked to provide a plan, showing a secondary route that would be used in the event of road closure on the B1136.

3.77 **Toft Monks Parish Council:** Objects. It has expressed concerned about the impact of the development on a National Landscape (previously the Area of Outstanding Natural Beauty (AONB)), the disruption to the lives of people living

in the vicinity, and the impact on wildlife. It expresses particular concern about the potential increase in heavy traffic along the A143 (to the south of Haddiscoe) and on the Glebeland Community Primary School (located on the A143 1.3km south-west of Haddiscoe, between Haddiscoe and Toft Monks), where existing HGV traffic is already a risk to pedestrians and children.

- 3.78 **Raveningham Parish Council:** Has not commented on the application.
- 3.79 **Hales and Heckingham Parish Council:** Has also expressed concern about HGV traffic from the proposed quarry travelling through Hales (6.5km west of Haddiscoe on the B1136), and the likely resulting increase in the risk of accidents and noise and expressed concern about any increased HGV traffic at a locally known local accident black-spot at the staggered junction between Thurlton Road and Beccles Road on B1136. It also expresses concern about the impact on wildlife along the route and the potential for an increase in wildlife, cyclist's and motorist's injuries and deaths.
- 3.80 **County Councillor Barry Stone:** Has not commented on the application.

REPRESENTATIONS

- 3.81 The application has been advertised by means of neighbour notification letters, site notices, and an advertisement in the Eastern Daily Press newspaper. 554 submissions have been received making representations from 178 named individuals or organisations and there has been one anonymous submission, although. These have in some cases included multiple submissions relating to individual representations and multiple representations from a number of individuals and organisations. Of these 554 submissions, 550 relate to representations offering objection, 1 supports and 3 provide comments without stating either support or an objection. The grounds of objection and comment raised are summarised as follows:

Objections (550):

Planning Policy and Need

- The application is contrary to Minerals Strategic Objectives, in particular MSO7 in the emerging NM&WLP which states "To ensure potential impacts on the amenity of those people living in proximity to minerals development are effectively controlled, minimised and mitigated to acceptable levels".
- The emerging NM&WLP states that the shortfall of 12.6m tonnes is less than the estimated resource bank at 15.4m tonnes, so the Specific Site Allocation Policy MIN 25 (land at Manor Farm, Haddiscoe) could be removed altogether;
- There is not a justified need to develop the site for mineral extraction;

- The proposal is contrary to emerging NM&WLP Minerals Strategic Objective MSO6;
- The need can be met by the use of recycled aggregates;
- The amount of gravel to be extracted just not justify the harm that would be caused;
- There should be no landfilling;
- The emerging NM&WLP Specific Site Allocation Policy MIN 25 (land at Manor Farm, Haddiscoe) has the highest number of residential properties within 250 of the site all the proposed allocations (except MIN40 which is an existing quarry);
- The site will take longer than seven years to extract all the mineral;
- The proposal is only for extraction and use of the gravel, but not the sand and so maximising the benefit of the mineral resource;

Traffic and Highway Safety

- Concern about the road safety impact of the proposal
- Concern about the number of HGV movements; there will be 80 additional HGV movements per day;
- The junction of Crab Apple Lane and the B1136 is not safe and needs improvement;
- The B1136 does not provide a safety route to North Subcourse Quarry;
- Concerns that HGVs will not follow the proposed route to Norton Subcourse along the B1136 in the event of a road closure and divert through Thurlton;
- Mud and debris on the public highway;
- Safety impact on pedestrians, cyclist and children;
- Junction of the B1136 and A143 with poor visibility and is dangerous;
- Additional HGV traffic on the A143 would be dangerous;
- There have been a number of accidents recently on the A143 including a fatality;
- Crab Apple Lane is a single-track road and unsuitable and unsafe;
- The transport of mineral to Great Yarmouth could be sourced from elsewhere and without causing pollution to Haddiscoe, Fitton and Bradwell or the Broads

Public Rights of Way and Recreation

- Adverse impact in terms of noise and dust on the adjacent recreation ground and users of public footpath network including the Bridleway Haddiscoe BR5 across the site and the church to the south adjacent to the Spring Beck to the west of the Church, Haddiscoe FP7;
- Adverse impact on the enjoyment of recreational activities in and around Haddiscoe;

Amenity Impacts

- Concern about the level of disturbance to local residents and to the character and tranquillity of the village and the countryside;

Dust and Air Pollution

- Dust emissions and pollution, including silica dust which can be carcinogenic;
- The site is located on a high point in the village which will exacerbate the adverse impacts on local residents;
- Modelling of emissions has confirmed that the impact from dust will extend to impact up to two thirds of the village (104 properties);
- There are residential properties very close/too close to the site with the nearest only 19m from the site boundary;
- Bunds will not stop dust;
- Evidence from Stopit2s Air Quality consultant demonstrates that the proposal is not acceptable;
- Proposed dust suppression measures will not be adequate;
- There is no water supply on the site for dust suppression;
- There is no bund to the east of the site to control dust;
- Dust may be generated even when there are extraction activities going on, especially when wind speeds exceed 5 metres per second (m/s);
- There are four additional properties (dust sensitive receptors) that have not been identified in the Environmental Statement) and a fifth Manor Farm, is less than 100m from the extraction boundary;

Noise

- Concern about noise from quarrying operations and HGV traffic;
- The Noise assessment does not adequately reflect the impact of local topography;
- Adverse impact on the tranquillity of the Church of St Mary's churchyard;

Light

- Adverse impact of lighting on residential amenity, the character of the area including the countryside and wildlife;

Impact on Haddiscoe

- Site lies within the village boundary;
- Close proximity to residential properties in Haddiscoe; there are 55 properties within 250m;

- Harm to the character of Haddiscoe as a village and the surrounding countryside;
- Devaluation of property values;
- Haddiscoe has been subject to a number of other previous mineral extraction sites;
- The working of the site will gradually bring it closer to Haddiscoe;
- Adverse impact on the Church as a community facility and the community activities undertaken in the church;
- Stopit2 states that in a survey of residents in Haddiscoe undertaken in August 2022; 825 were opposed to the application, 175 neutral and 1% supported;

Heritage

- Adverse Impact on the setting of four nearby listed buildings including the Church of St Mary, Whitehouse Farm and Monument to William Salter, which will be adversely affected by noise, traffic and general disturbance;
- Impact on the Church of St Matthias and the visual relationship between the Church of St Mary and the Church of St Matthias would be detrimental by the introduction of an industrial element in the landscape;

Landscape and Designated Landscapes and Landscape Features

- Not in keeping with landscape and will have an adverse impact on the landscape;
- Adverse impact on the tranquillity of the countryside and the Broads;
- Adverse impact on trees;
- Some of the tree belt around the site is deciduous so will not provide a completely effective visual screen or protection from pollution;
- Bunds will be unsightly
- The site is clearly visible and cannot be screened;
- The propose low level restoration is not appropriate

Trees

- There as ancient woodland/veteran trees close to the southern boundary of the site

Ecology and Biodiversity

- Adverse impact on flora and fauna including brown hares
- Disruption to bats and birds, including Red Kite and Barn Owl;
- Adverse impact on wildlife and the nearby County Wildlife Sites and BAP Priority Species including the Devils End Meadows CWS;

- Bat survey cannot be relied on because the bat detector is reported as having malfunctioned;
- The bird survey does not take account of winter birds;
- Greta Newt Habitat would be affected by the proposal;

Water Environment

- The excavation will have an unspecified impact on the water tables of the adjacent and nearby dwellings and property;
- Risk of pollution to watercourses;

Agricultural Land and Existing and Future land Use

- Loss of agricultural land and production;
- Adverse impact of the future use for landfill;

Climate Change

- Concern about the resulting Greenhouse Gas (GHG) Emissions which would be particularly high and would be 100% arising from both the sand and gravel extraction when only the gravel then transported off site for processing;

Cumulative Effects

- The emerging Greater Norwich Local Plan include(s) a housing site/sites adjacent to the A143 in the middle of Haddiscoe village; if some or all of these sites are adopted, then the timeframes will overlap and there is the potential for two major construction sites working either end of the village at the same time which would be even more disruptive in what is already a congested road system;
- Approval of this current application will be the start of further development on the site;
- The cumulative impacts of the application in combination with the impact of the proposed landfilling at nearby Wiggs Road should be considered particularly in relation to traffic and the impact on air quality;

Health and Safety Impacts

- Risk of sand and dust particles and air pollution creating a health hazard;
- Adverse impact on mental health;
- Danger to children from noise, dust and additional traffic;
- There local residents living close to the site who suffer from asthma and other medical conditions who will be adversely affected

Impacts on Tourism, Local Businesses and the Church

- Adverse impact on local businesses, which including a car sales business, kennels;
- Adverse impact on tourism and local businesses and B&Bs and holiday lets;
- There will be a loss of income to the Church of St Mary;

Alternative Sites

- Alternative sites where mineral extraction may be prevented by future sea level rise should be developed first;

Community Benefits

- The applicant should be required to pay annual financial contribution to the village to secure benefits or the provision of direct benefits such as tree planting and use of the site as public open space for the local community;

Mineral Resource Assessment

- That the Mineral Resource Assessment is Inaccurate;
- The amount of gravel available for extraction has been reduced by 20,000 tonnes as a result of amendment of extraction boundary (as shown on the amended phasing drawings included in the Regulation 25 submission);

Public Safety

- The adjacent former mineral working is used as a recreational ground for children playing and dog walkers; there is danger to children playing unsupervised in this area straying into the quarry working;
- Risk to children from dust, fumes and HGV traffic at the Glebeland Primary School on the A143 to the south of the site;

Determination

- That the Planning (Regulatory) Committee Should Visit the Site;

Previous Appeal Decision

- The proposal was previously turned down at appeal as unacceptable;

Assessments and Assessment Methodology and Plans

- Some of the assessments undertaken are based on surveys that are up to fifteen years old and out of date;
- The Soil Assessment is based on a field survey undertaken in 2010 and is out of dated and the removal of the gravel from the site and changed use from arable to grassland will change the soil characteristics of the retained soils;
- The archaeological assessment including the supporting geophysical survey and field walking surveys were undertaken in 2008 and are out of date;
- Most of the species surveys are desktop assessments and the bat surveys were undertaken in 2022 and suffer from shortcomings so the results are invalid;
- The Air Quality Assessment is based meteorological data for Norwich which would not be appropriate for the site and should use average rainfall over a thirty-year period;
- Old geological data on the mineral resource is used;
- The Transport assessment is out of date;
- Groundwater monitoring data has not been provided or any assessment of the risk of settlement;
- Plans for the revied access are incomplete;
- Dust Assessment fails to take into account the requirements of the Environment Act 2021 and specifically new targets for PM2.5 particulates
- Planning Permission has been approved for additional 3 houses within 200m of the site;

Amendments to the Application

- Do not make the proposal any more acceptable;
- The restoration proposals have been amended to create a waterbody because there is not enough fill material available to complete the originally proposed restoration scheme;

Supporting Comments (1):

- Will provide jobs and bring wealth to the area.

Comments (3):

- Impacts on residential amenity in terms of air quality, dust, visual impact, noise and lighting.
- The Bridleway Haddiscoe BR5 will be affected.
- Traffic on A143
- The details of the highway improvements on Crab Apple Lane are limited;

- The details on some drawings are inaccurate

3.9 APPRAISAL

3.82 The key issues for consideration are:

- A. Principle of the Development including Need;
- B. Traffic, Highway Safety and Public Rights of Way;
- C. Amenity;
- D. Heritage;
- E. Landscape and Visual Impact, Trees and Restoration;
- F. Ecology and Biodiversity (including the need for Appropriate Assessment);
- G. Flood Risk, Surface Water and Groundwater;
- H. Soils, Agricultural Land and Geodiversity;
- I. Sustainability;
- J. Cumulative Effects; and
- K. Other Issues.

A. Principle of the Development including Need

3.83 The basic principle when assessing planning applications is outlined in Section 38(6) of the Town and Country Planning Compulsory Purchase Act 2004 which states:

“if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

3.84 Relevant development plan policy is, as detailed above, set out in the NM&WDF Core Strategy, Policies CS1 and CS2, and Paragraph 219 of the NPPF which states that Minerals Planning Authorities should plan for a steady and adequate supply of aggregates, is also relevant.

3.85 The key issue of principle arises from the development plan status of the site, and that whilst the application site does not comprise one of the allocated sites in the current NM&WDF Minerals Site Specific Allocations DPD, it is included as allocation MIN25 Land at Manor Farm, Haddiscoe, in the emerging NM&WLP. On this basis it was initially advertised as a departure from the development plan.

3.86 As set out above the weight that can be attributed to the proposed allocation in the emerging NM&WLP, can as yet only be relatively limited, because, although it has now been submitted to the Secretary of State for examination, the examination is still on-going and objections have been raised regarding the

inclusion of the MIN25 allocation in the plan. As such the application has essentially still to be considered on the basis of the currently adopted NM&WDF.

- 3.87 Notwithstanding that this is the case, Policy MIN25 in the emerging NM&WLP makes clear that the site is allocated for sand and gravel extraction. It states that any planning application will need to demonstrate compliance with Minerals and Waste Local Plan policies, and specific requirements set out in the policy relating to, the submission of noise and dust assessments, landscape and visual Impact assessment, a phased working and restoration scheme, a Heritage Statement, archaeological assessment, and transport assessment and include details of the proposed highway access and the submission of a scheme for the temporary diversion and reinstatement of the Public Right of Way that crosses the site.
- 3.88 Outside of allocated sites, the policy approach set out in the current NM&WDF Core Strategy for the determination of applications for new mineral extraction proposals is that contained in Policy CS2. This is not intended to prevent other and additional sites being brought forward. The Core Strategy identifies that the general locations for sand and gravel extraction and associated facilities will be based on the resource areas shown on the key diagram included in the Plan. This includes the area in and around Haddiscoe. It states that a clear preference will be given to sites which are close to and/or particularly well-related via appropriate transport infrastructure, to the Norwich Policy Area, Great Yarmouth urban area, Thetford or King's Lynn or the main market towns (Attleborough, Aylsham, Cromer, Dereham, Diss, Downham Market, Fakenham, Hunstanton, North Walsham, Sheringham, Swaffham and Watton). It also states that extensions to existing sites will be preferred to new sites. Within this context the Policy CS2 make clear that each application will be considered on its merits, whether it relates to an allocated site or not.
- 3.89 In this instance, whilst the application site would be a new site, it has been brought forward, and as set out above, the application describes the site as a "satellite extension" to the existing Norton Subcourse Quarry, and can as such be considered to be an extension to the extent that all of the mineral extracted from it would be transferred to Norton Subcourse for substantive processing, and exported for sale from there only. It can also be considered to be well related to the Norwich Policy Area (13.5km to the north-west) and Great Yarmouth (11.0km to the north-east).
- 3.90 Whilst need is not directly identified as a criterion in the determination of planning applications, the NM&WDF Core Strategy, Policy CS1 makes clear that the intention of the plan is to maintain a landbank of permitted sand and gravel reserves of between seven and, ten years' supply. The requirement to provide a landbank of at least seven years is set out in the NPPF, paragraph 219, which stresses the need to maintain a steady and adequate supply of aggregates, and it states that this should be achieved through preparing an

annual Local Aggregate Assessment (LAA), to forecast future demand, based on a rolling average of ten years' sales data and other relevant local information.

- 3.91 Paragraph 219 of the NPPF makes clear that landbanks of aggregate mineral reserves are principally to be used as an indicator of the security of aggregate minerals supply, and to indicate the additional provision that needs to be made for new aggregate extraction going forward. They are not intended in themselves to be used as a limit or to provide the basis for the refusal of permission on the basis of need.
- 3.92 The Planning Practice Guidance (PPG) on Minerals (paragraph 84) is explicit on this point and the question of whether a landbank above the minimum level is justification to refuse planning permission. It makes clear that there is no maximum landbank level and each application for minerals extraction must be considered on its own merits regardless of the length of the landbank. However, it is also clear in stating that where a landbank is below the minimum level this may be seen as a strong indicator of urgent need.
- 3.93 As of 31 May 2024, the sand and gravel landbank of permitted reserves in Norfolk is calculated to be 11.6 years, and the 0.65 million tonnes proposed in the planning application would take the landbank up to 12 years. This is above the range for the landbank indicated in Policy CS1 and above the 7 seven-year minimum contained in national policy and guidance, and so cannot be taken as indicative of urgent need, but equally is not itself a reason for refusal.
- 3.94 As set out in a paragraph 1.5 above, the current application site formed part of a previous planning application for mineral extraction, by a different applicant. That application was refused in 2013, the decision was appealed, and the appeal was dismissed in 2014. In dismissing the appeal, the Inspector attached significant weight to the fact the site had not been included in the NM&WDF Minerals Site Specific Allocations DPD (2013), which had been recently adopted at the time of the appeal decision. This raises the question as how, if at all, the circumstances can now be considered to have changed since the Inspector's appeal decision in 2014.
- 3.95 In answer to this, the position is that the circumstances have moved on and changed significantly. In the Inspector's decision letter in 2014, he drew particular attention to the fact that the NM&WDF Core Strategy and the NM&WDF Minerals Site Specific Allocations (DPD) had both, at that time, only been relatively recently adopted, the Core Strategy in 2011 and the Minerals Site Specific Allocations DPD in 2013.
- 3.96 The Inspector made particular reference, to the site having been put forward following the 'call for sites consultation' in 2007 for inclusion in the then emerging Minerals Site Specific Allocations DPD. In particular he noted that the appeal site was deemed unacceptable for allocation, and consequently was not included in the adopted DPD. On this basis he considered that it would be

inappropriate to permit the unallocated Appeal Site when sufficient alternative sites were allocated in the Minerals Site Specific Allocations DPD.

- 3.97 The Inspector also drew particular attention to the Planning Practice Guidance (PPG) on Minerals (published in March 2014), which remains extant, and which in Paragraph 80, makes clear that any shortfall in aggregate landbanks should be used principally as a trigger for a Mineral Planning Authority to review the current provision of aggregates in its area and to consider whether to conduct a review of the allocation of sites in the plan, rather than as the Inspector commented by “automatically granting further permissions on an ad hoc or windfall basis”.
- 3.98 Finally, the Inspector also identified that the site was, in addition to not being an allocated site, not an extension to an existing quarry, that NM&WDF Core Strategy Policy CS2 states “will be preferred to new sites”, and that there were other nearby sites, including the existing quarry at Norton Subcourse. However, the Minerals PPG, which was published more recently than the Core Strategy, states that “The suitability of each proposed site, whether an extension to an existing site or a new site, must be considered on its individual merits”.
- 3.99 With this context in mind the Inspector considered that there was no justification at that time, in terms of the principle of the development, to allow the appeal, given the very newly adopted DPD. The Inspector concluded that “Under these circumstances, there is no justification for an early review of the DPD or the release of any unallocated site at this time”.
- 3.100 Although the application is still to be determined in accordance with the same development plan, the position now is very different. Compared to the previous Appeal Site, the current application is on a smaller site with a much-reduced output, that would be operational over a considerably shorter period of time (eight years rather than 21 years), and most notably does not include the parcel of land to the south of the B1136 which was included in the Appeal Site application. It is a proposed allocation in the emerging NM&WLP, based on an assessment that finds that it is in principle acceptable, subject to the requirements set out Policy MIN 25. The existing NM&WDF is coming to end of the period that it covers, i.e. to 2026, and the new (emerging) plan period is due to start. The site has been proposed to meet the identified shortfall in the sand and gravel landbank set out in the emerging NM&WLP. In other words, the site has been brought forward in the context of the review of the allocation of sites in the plan, in accordance with the PPG on Minerals, in line with the Inspector’s advice in the previous appeal. The details and the circumstances of the current application are therefore very different from those that existed at the time of the previous application and the subsequent appeal.
- 3.101 On this basis, and although the landbank is currently in excess of the 7 year minimum required by the NPPF, the application, comprising an allocated site

being proposed in the emerging Norfolk Minerals and Waste Local Plan, can still in principle be considered to be acceptable and in accordance with the development plan, and specifically the NM&WDF Core Strategy, Policies CS1 and CS2, subject to it being demonstrated that it is acceptable on its own merits and otherwise in accordance with the other policies of the development plan.

B. Traffic, Highway Safety and Public Rights of Way

- 3.102 The key issues in relation to traffic, highway safety and Public Rights of Way relate to the traffic and highway safety impacts of the development between the site access on Crab Apple Lane and the existing Norton Subcourse Quarry, along the B1136 Loddon Road, including at the junction of Crab Apple Lane with the B1136, and the impact of the diversion of Bridleway Haddiscoe BR5 during the extraction period. Additional concerns raised by objectors also relate to the potential for HGV traffic between the two sites to use alternative routes, notably through Thurlton, and also the impact on the A143 to the south of Haddiscoe in the vicinity of the Glebeland Community Primary School.
- 3.103 Relevant policies include the NM&WDF Core Strategy, Policies CS15 and DM10 which seek to ensure that suitable highway access and egress in accordance with published highway design guidance is provided; that there is a suitable route to the nearest major road (trunk road or principal road or main distributor road), which may need to be incorporated in a formal Routing Agreement; and that there has been adequate consideration of other road users, including cyclists, horse riders and pedestrians. In addition, GNLP Policy 2 seeks to ensure the development contributes to the achievement of sustainable communities, through inter alia ensuring safe and convenient access and encouraging walking and Policy 3, the provision or enhancement of adequate green infrastructure to provide for informal recreational needs whilst Policy DM3.11 of the South Norfolk Local Plan Development Management Policies Document makes clear that development will not be permitted that endangers highway safety or the satisfactory functioning of the highway network. In addition, NPPF paragraphs 104, 108 and 114 and 115 seek to ensure that development proposals do not have any unacceptable impacts on highway safety or give rise any residual cumulative impacts on the road network and protect and enhance Public Rights of Way.
- 3.104 The site-specific requirements set out in Policy MIN25 of the emerging NM&WLP require the submission of a Transport Assessment or Statement (as appropriate) to assess the impacts of HGV traffic along the access route, and appropriate mitigation for any potential impacts to the highway, the provision of a highway access that is considered suitable by the Highway Authority, and the submission of a suitable scheme for the temporary diversion and reinstatement of Bridleway Haddiscoe BR5. Policy MW2 additionally seeks to ensure that minerals development proposals are satisfactory in terms of access where anticipated HGV movements, taking into account cumulative impacts and any

mitigation measures proposed, do not generate unacceptable risks to the safety of road users and pedestrians or unacceptable impacts on the capacity and/or efficiency of the highway network, and do not have unacceptable impacts on the Public Rights of Way network.

- 3.105 As set out in paragraphs 2.22-2.23 above, following the receipt of the initial comments from the Highways Authority, the proposed access arrangements have been amended, with the access now to be located close to the junction of Crab Apple Lane with the B1136, and the lane between the access and the junction widened to a minimum of 6.5 m.
- 3.106 The Environmental Statement (ES) submitted with the application includes chapter a on Traffic and Highways and is accompanied by a Transport Assessment, which is included as an Appendix.
- 3.107 The Assessment identifies that all gravel extracted from the application site would be hauled to the existing Norton Subcourse Quarry for processing and blending with the sand heavy Norton Subcourse mineral to produce a range of aggregate products. It is envisaged that the gravel from Haddiscoe will allow overall output from Norton Subcourse Quarry to revert to about 200,000tpa, in line with the tonnages that the current planning permission for Norton Subcourse Quarry had originally envisaged.
- 3.108 It is intended that 100,000 tonnes per annum of gravel in its 'as dug' state would be hauled to Norton Subcourse. As set out above all HGV traffic will enter and leave the site from and to Crab Apple Lane and then join the B1136 to travel west to Norton Subcourse Quarry. It is expected that on average there would be 38 20t HGV movements per day (19 in and 19 out), with 4-6 movements by staff in cars or light vehicles. Peak HGV movements are anticipated at 4 movements per hour (2 in and 2 out).
- 3.109 In total therefore in terms of movements into and out of the access at Norton Subcourse Quarry the application, if permitted, would result in an additional 38 HGV movements, over that originally assessed and permitted approaching and leaving the quarry from the east and turning into and out of Ferry Road, at the Norton Subcourse end of the route.
- 3.110 The import of gravel from Haddiscoe would not extend the lifetime of Norton Subcourse Quarry, which is consented until 2036.
- 3.111 The Transport Assessment identifies that impacts across the local network would not be significant on either the B1136, Loddon Road or A143. It identifies that the only section of the B1136, Loddon Road with an increase in traffic above 1%, would be the stretch to the immediate west of Crab Apple Lane with up to 2.5% additional vehicle movements during the 14:00-15:00 PM peak hour. This

level of increase it states would be the result of just 6 additional vehicle movements and is considered negligible.

- 3.112 The impact on Crab Apple Lane is anticipated to be an 81.0% increase in the AM peak, 106.4% in the PM peak and 44.2% across the 12-hour period. This percentage change appears to be very large but arises because of the extremely low existing baseline flows on Crab Apple Lane (i.e. 7 two-way traffic flows in the AM and PM peaks and 113 across the 12-hour period). The extraction of mineral from the application site would result in up to 7 two-way vehicle movements in the AM & PM peak periods and 50 two-way vehicle movements across the 12-hour period, which again is considered negligible. Suitable levels of visibility would be achieved at the junction of Crab Apple Lane where it meets the B1136.
- 3.113 The assessment identifies that the private Norton Subcourse haul road would also experience a large percentage increase in HGV movements, although again this is due to low baseline flows. Given that this is a purpose-built haul road to serve the existing Norton Subcourse Quarry, the assessment identifies that the route is entirely suitable to accommodate the negligible level of additional movements which would deliver material to the site from Haddiscoe.
- 3.114 The assessment identifies that the traffic impact on the short section of Ferry Road between the B1136 and Norton Subcourse Quarry haul road (a distance of approximately 40m) would experience an increase of 15-30%. This increase would be the result of 4 two-way vehicles movements in the AM and PM peak periods and 38 across the 12-hour period, which again is considered to be negligible.
- 3.115 The assessment also includes a review of Personal Injury Accident (PIA) data. This identifies a generally good overall accident record on the immediate local highway network, and the low frequency of incidents with no clear common contributory factors, so that it is not considered that there are any prevailing road safety issues that would call the development of the application scheme into question.
- 3.116 Finally, the Environmental Statement Chapter also includes an assessment of the key traffic and highways related environmental impacts on Crab Apple Lane including, pedestrian delay, pedestrian amenity, severance, driver delay, and road safety, and identifies all of these as being negligible.
- 3.117 The assessment accordingly concludes that over and above the proposed access and junction improvement between the site access and the junction between Crab Apple Lane and the B1136, there is no requirement for any other or additional mitigation to improve highway capacity or safety.

- 3.118 Two additional points arising from the comments submitted by Thurlton Parish Council and Haddiscoe Parish Council and Toft Monks Parish Council, and also in the third-party representation received, relate to the routing of HGVs between Haddiscoe and Norton Subcourse Quarry, with the concern being raised by Thurlton Parish Council that HGVs should not be routed through Thurlton in the event of a closure on the B1136 Loddon Road, and the impact of additional HGV traffic on the A143 and on the B1136. In relation to the possible routing of HGV traffic through Thurlton, the applicant has confirmed that no HGVs would be routed through Thurlton, in the event that the A143 were to be closed. They have advised that if the A143 were to be closed along the route, they would simply suspend any movement of mineral between the two sites. This can be secured by the imposition of a condition relating to the submission of an HGV Management Plan to control the routing of HGVs between the application site and the Norton Subcourse Quarry access on Ferry Road. In relation to other concerns about the impact of HGV traffic on the A143 and the B1136 to the west of Ferry Road, there would be no HGV traffic arising from the extraction activities on the site along either of these routes. There may be some increase in HGV traffic travelling to and from Norton Subcourse Quarry, but as set out above, the Highway Authority has advised that this onward transport of mineral from Norton Subcourse Quarry would lead to an only marginal increase in traffic, both on Loddon Road and on the wider network.
- 3.119 As set out above the Norfolk County Council Highways Authority have advised that the revised access proposals are acceptable, and that the visibility at the junction of Crab Apple Lane onto Loddon Road is also acceptable, and more generally that the route from the site to/from the Norton Subcourse Quarry is suitable for the level of HGV traffic proposed, albeit that once processed, the onward transport of mineral from Norton Subcourse Quarry would lead to an only marginal increase in traffic, both on Loddon Road and on the wider network. On this basis they advise approval subject to the inclusion of conditions as set out above.
- 3.120 In relation to Public Rights of Way the application does not include a separate assessment of the impacts on the local footpath network but the temporary diversion and reinstatement of Bridleway Haddiscoe BR5, is addressed as part of the Environmental Statement Traffic and Highways chapter and the supporting Transport Assessment, and is also considered in the other Environmental Statement Chapters, notably that on Landscape and Visual Impact. These identify the need for the diversion of the Bridleway when extraction moves into Phases 4,5, 6 and 7, together with the outline details of how it will be restored as part of the Concept Restoration Plan and Landscape Planting and Aftercare Plan.
- 3.121 The Public Rights of Way Officer, as set out above, initially returned a holding objection to the application on the basis that it did not include precise details of the temporary diversion and restored alignment, but has subsequently agreed that these can be reserved by condition.

3.122 Overall, the application can therefore be considered to be acceptable in relation to relevant development policy, i.e. NM&WDF Core Strategy, Policies CS15, DM10, GNLP Policies 2 and 3, South Norfolk Local Plan Development Management Policy Document, Policy DM3.11, emerging NM&WLP Policies MIN25 and MW2, and the NPPF paragraphs 104, 108, 114 and 115.

C. Amenity

3.123 The key amenity and health issues raised by the application relate to the potential impacts on residential amenity from noise and emissions to air and particularly dust and lighting. These are issues that have been raised as major concerns by Haddiscoe Parish Council and objectors, with the local action group, Stopit2 having commissioned their own consultant (Michael Bull and Associates) to review and critique the submitted dust assessment included with the Air Quality chapter of the Environmental Statement.

3.124 Relevant policies include the NM&WDF Core Strategy, Policies CS14 and DM12 and DM13, which seek to protect residential amenity in close proximity to potential mineral extraction sites, as a result of noise, vibration, dust, lighting, and visual intrusion, and ensure that proposals effectively minimise harmful emissions to air and mitigate potentially harmful air quality impacts to human health. The visual impacts are considered under heading F below. In addition, GNLP Policy 2 seeks to ensure the development contributes to the achievement of sustainable communities, by avoiding risks of unacceptable levels of soil, air, and noise pollution, and the South Norfolk Local Plan Development Management Policies Document Policies DM3.13 and DM3.14 seek to ensure that new development delivers a reasonable standard of amenity and minimises and where possible reduces the adverse impact of all forms of emissions and other forms of pollution and has no unacceptable impacts on public health and safety. Relevant national policy is set out in the NPPF, Chapter 15, paragraphs 191, 194 and Chapter 17, paragraph 217.

3.125 The site-specific Policy MIN25 in the emerging NM&WLP includes the requirement for the submission of acceptable noise and dust assessments and a programme of mitigation measures to deal appropriately with any amenity impacts and it states that mitigation measures should include setting back the working area at least 100 metres from the nearest residential properties. Policy MW1 additionally seeks to ensure that minerals development proposals do not have an unacceptable impact on local amenity and health (including noise levels, odour, air quality, dust, litter, light pollution and vibration) and Policy MW2 that the transport impacts of new minerals development does not generate unacceptable impacts on air quality.

3.126 The Environmental Statement includes chapters on noise and air quality including dust, which are supported by related Appendices, and an Assessment of the Potential Noise Impacts on Listed Assets and a Dust Management Plan.

- 3.127 The noise chapter of the Environmental Impact Assessment includes the results of a baseline noise survey to determine existing background noise levels at the closest noise sensitive properties and other locations to establish residual, permissible levels, based on the guidance set out in the Planning Practice Guidance (PPG) on Minerals. This identifies a noise limit for normal operations which does not exceed the existing background sound level by no more than 10 dB(A), which in this instance has been measured to be between 39.5 dB LA90,1hr and 43.7 dB LA90,1hr so that the noise limit should be set at 53.7 dB LAeq,1hr, or otherwise should not exceed 55 dB LAeq,1hr at the nearest noise sensitive receptors. For temporary day time operations, the noise should not exceed 70 dB(A) LAeq,1hr (free field) for periods of up to 8 weeks in each year to enable short-term activities, such as construction of earth bunds around the site perimeter or undertaking of restoration works. This is also to be applied to the transient users of the nearby public footpaths.
- 3.128 The assessment concludes that with Best Practicable Means (BPM) mitigation measures in place, the predicted noise levels, whilst exceeding the daytime background sound level, would not exceed the noise limits set out in the PPG for either normal or temporary operations.
- 3.129 As set out above the South Norfolk District Council Environmental Quality officer has advised that they have no objection to the application, subject to the inclusion of conditions to secure the recommended mitigation measures contained in the Noise chapter of the Environmental Statement, and the supporting Appendix, together with conditions stipulating the permitted working hours, and the submission for approval of an Operation Management Plan to control any noise, dust and smoke arising from the activities on the site. These measures include both embedded mitigation (i.e. mitigation built into the design of the quarry) comprising attenuation from the soil bunds to be constructed on the boundaries of Phases 2, 3, 4, 5 & 6, and operational best practice measures, including the fitting exhaust silencers, reducing material drop heights and installing white noise reversing alarms on all mobile plant vehicles.
- 3.130 The Air Quality the assessment considers the likely impact of dust from the operation of the quarry and its impact on local air quality and the amenity of residential properties close to the application site. It identifies that fugitive dust emissions during the operation of the quarry have the potential to impact on amenity, i.e. produce visible dust, and affect health as a result of fine particulate matter, i.e. PM₁₀ particulates.
- 3.131 It identifies that the operation of the quarry would potentially lead to dust emissions and that there would be human receptors within 250m of dust generating activities and as result that a detailed dust assessment is required. It identifies that there would be no dust sensitive ecological features within 250m

of dust generating activities and that as a result dust impacts on ecology do not need to be considered.

- 3.132 The assessment identifies ten residential properties as the closest dust sensitive receptors to the north-east and south of the site and that the potential impact of dust emissions at these properties would be dependent on the distance from the source to each property and the presence of any physical features that would affect dispersion.
- 3.133 The assessment concludes that the overall magnitude of dust effects at local receptors would be negligible, with a risk of slight adverse effects at two properties to the north-east of the site (Windmill Cottage and The Boundaries) during the Phase 4 and Phase 5 works, but that there would otherwise be a negligible risk of adverse effects at the two properties for most of the period of operation of the quarry. The assessment does however identify that the two properties would be separated from the on-site activities by a screening bund and the retained belt of trees, so that even during works within 100m of the two properties, it concludes that dust effects would be unlikely. It concludes that the designed in mitigation measures, which include the provision of 3m high screening bunds, retention of the existing screen of hedgerow and trees and operational practices, would provide an appropriate level of mitigation at the site, and that consequently there would not be any significant effects due to dust emissions. Further details of the operational dust management measures are set out in the submitted Dust Management Plan.
- 3.134 As set out above Stopit2 have appointed a consultant, Michael Bull and Associates, to review the submitted dust assessment included in the Air Quality Chapter of the Environmental Statement. A full copy of the report can be viewed on the County Council's website with the application details through the hyperlink included at the end of the Executive Summary at the beginning of this report. In summary, the review, whilst accepting that the assessment has followed relevant guidance on how it should be undertaken, comments that it has not responded to recent changes in regulatory environment for fine particulate matter, and in particular changes introduced by the Environment Act 2021, which has set a new PM_{2.5} target value that has been proposed for England, and World Health Organisation (WHO) updated air quality guidelines. It argues that the assessment has not used these updated and more stringent PM₁₀ and PM_{2.5} guidelines to determine the scale of impact from the proposals and therefore has underestimated its impact.
- 3.135 The review also criticises the assessment for not examining the extraction activities on a phase by phase basis and argues that this should have been undertaken because the site boundary is within 50m of the closest housing and because many of the residential properties in Haddiscoe are within 400m of the application site which is downwind from the prevailing wind direction. It identifies that there are 106 properties and an estimated population of 205 people within

400m of the application site which could be affected by particulate emissions from the application site and it argues that the assessment could have been improved by estimation of the likely scale of emissions from each planned source of dust on the site and the use of dispersion modelling to determine the scale of the impact at nearby receptors and to inform the Health Impact Assessment.

- 3.136 It argues that had this been done, then it would have indicated the potential for significant adverse effects at nearby properties and the applicant should be asked to produce a more appropriate dust assessment and determine the impact using the revised PM_{2.5} targets. It also argues that the impact of terrain height has not been considered and that the applicant has used long term average wind frequency data that does not take into account the considerable variations in frequency on a year-by-year basis. In addition, it comments that although some dust mitigation measures are included in the Dust Management Plan, there are no proposals for continuous monitoring during operations that would provide a valuable management tool for minimizing dust emissions.
- 3.137 In reply to this critique the applicant has submitted amended phasing drawings showing amendments to the boundary of proposed extraction area and the location of the amenity bunds, so that extraction boundary is located at least 100m nearest residential properties, and their own consultant's response to the review by Michael Bull and Associates. This is also a lengthy and detailed report and so can only be summarised here.
- 3.138 The applicant's response states that the approach that has been adopted to the assessment is appropriate because PM₁₀ particles emitted from the extraction area would mostly be in the coarse range, i.e., larger than PM_{2.5}. Consequently, it states that PM₁₀ should be the focus when assessing the potential health impacts due to quarrying operations, which it (correctly) states is in line with the Planning Practice Guidance on Minerals (PPG Minerals, Paragraph 030). It also makes the point that although PM₁₀ is the focus when assessing the health effects due to quarrying operations, further information, included in the response, also confirms that the proposed development would not hinder progress towards the PM_{2.5} target values, which are set for 2040, with an interim target set for 2028. It also comments that the WHO guidelines are not air quality standards and are not legally binding and do not apply in the UK.
- 3.139 The applicant's response does acknowledge that some of the dust sensitive receptors are located within 40m of the application site boundary, but it states that extraction works will take place not closer than 100m from the nearest receptors and that the Institute for Air Quality Management (IQMA) minerals guidance is clear that distances refer to dust generating activities rather than the site boundary.

- 3.140 It further states that dispersion modelling has not been undertaken due to the lack of accurate UK emissions data for minerals sites, in accordance with IAQM guidance, and it contends that the modelling undertaken by Michael Bull and Associates results in a significant overestimate of particulate concentrations due to the use of an inappropriate emissions factor and that the unrealistically conservative modelling undertaken for the Michael Bull and Associates dust screening model actually shows that there would not be an adverse effect on health due to particulate emissions and that further detailed work should not be necessary.
- 3.141 It states that the Source-Pathway-Receptor approach undertaken for the visible dust risk assessment in the Air Quality ES chapter assessed the impacts at receptors where a highly effective pathway effectiveness was determined and that this is the most conservative pathway effectiveness in the Source-Pathway-Receptor approach, so that the worst-case impact on visible dust has been assessed in the Air Quality ES chapter.
- 3.142 It comments that the comparison between the site-specific meteorological data and Norwich 2020 meteorological data presented in the Michael Bull and Associates report shows close agreement between the data sets, with the prevailing wind from the southwest. Substituting the Norwich meteorological data with the site-specific data to undertake the Source-Pathway-Receptor assessment, it responds, would not change the conclusions of the assessment and that it is appropriate to use long term average wind data to determine the prevailing conditions and define whether a receptor is “downwind” or “upwind” of quarrying activities.
- 3.143 Finally, it comments that the assessment framework in the PPG on Minerals is clear that, where PM₁₀ concentrations are not likely to exceed the air quality objective, good practice measures should be sufficient, without the need for monitoring and specific controls on PM₁₀ emissions.
- 3.144 As set out in Section 3 above, neither the District Council Environmental Quality Officer, Norfolk Public Health nor the Environment Agency have expressed any objection in principle to the submitted assessment or the application as a whole. The District Council Environmental Quality Officer (EQO) has advised that they have no objection to the application, subject to the inclusion of a condition requiring the submission of an Operation Management Plan (OMP) to control any dust from activities on the site. Given that a Dust Management Plan has been submitted with the application the appropriate way forward would be to condition the implementation of the Dust Management Plan, with the OMP cross referencing to this, as there is no need to require the submission of an additional duplicate document setting out the same measures. The District Council EQO has also requested the extension of the bund along the south-eastern boundary of the extraction area to provide further protection to Manor Farm, from any wind-borne dust. The applicant has advised that they would be willing to do this, and this can be conditioned.

- 3.145 Norfolk Public Health has recommended that the applicant undertakes indicative real-time automated monitoring of dust emissions from the site for the duration of operations to ensure emissions do not exceed levels set out in the Air Quality Standards Regulations 2010 and that the applicant establishes a process for reporting dust emissions from the site and any complaints received by the EQO at South Norfolk District Council. They have accordingly, in agreement with the District Council EQO, advised that the OMP, should include setting operational cut-offs for wind speeds across the site (when working would cease), and set details of the process for notifying the results of the monitoring to the EQO.
- 3.146 In relation to lighting there is no separate assessment of lighting, but this is because, as set out above, no permanent or fixed lighting is proposed on the site. Some concerns have been expressed by objectors as to whether this will be adequate, but this is an operational matter for the applicant. To provide a safeguard against the erection of any lighting without the approval of the County Council first being obtained, it is recommended that a condition be included to prevent the installation of fixed lighting.
- 3.147 It is also recommended that a conditions be included to limit the operational processing plant on the site to the mobile screening plant required to separate the sand from gravel and to withdraw permitted development rights to ensure that no other plant, or fixed lighting is brought into or erected on the site, that may have more significant amenity and environmental impacts than have been assessed in the Environmental Statement.
- 3.148 On this basis the application can, with the imposition of the conditions recommended by the District Council Environmental Quality Officer and Norfolk County Council Public Health, be considered to be acceptable and in accordance with the NM&WDF Core Strategy, GNLP Policy 2, Policies CS14 and DM12 and DM13, South Norfolk Local Plan Development Management Policies Document Policies DM3.13 and DM3.14, emerging NM&WLP Policies MIN25. MW1 and MW2, and the NPPF, Chapter 15, paragraphs 191, 194 and Chapter 17, paragraph 217.

D. Heritage

- 3.149 There are two considerations relating to the impact of the development on heritage; whether there is any impact on, or on the setting of, any designated heritage assets and particularly the adjacent and nearby Listed Buildings, and whether there is any potential for buried archaeology on the site, and how this is addressed. The impact on the nearby listed buildings has been a particular concern raised by objectors and by Historic England, and especially the impact on the significance of the Church of St Mary, which is a Grade I listed building, located approximately 100 metres south of the site boundary. This was a significant issue at the time of the appeal against the refusal of the previous application for mineral extraction on the extended site, that the current application site forms part of.

- 3.150 Relevant development plan policy is set out in the NM&WDF Core Strategy, Policies CS14 and DM9, which require that development proposals that could potentially affect heritage assets, or which are in areas with high potential for archaeological interest, are supported by an appropriate desk-based assessment. In addition, GNLP Policy 3 sets out a requirement that development proposals should enhance the historic environment by avoiding harm to designated and non-designated heritage assets, including their setting, and having regard to their level of significance in accordance with the requirements of the NPPF and relevant policies in other Development Plan Documents, and South Norfolk Local Plan Development Management Policies Document, Policy DM 1.4 seeks to ensure that designated heritage assets are protected in accordance with their historic significance, and Policy DM 4.10 seeks to ensure that all development proposals must have regard to the historic environment and take account of the contribution that heritage assets make to the significance of an area and its sense of place. Relevant policy set out in the NPPF includes Chapter 16, paragraphs 195, and 200-211 and also Chapter 17, paragraph 217.
- 3.151 The emerging NM&WLP in Policy MIN25 includes a requirement for the submission of an acceptable Landscape and Visual Impact Assessment which will identify any potential impacts to the wider landscape and must include appropriate mitigation measures that provide protection of the setting of nearby listed buildings. These, the policy makes clear, should include a combination of advanced planting with native species and bunds. The policy also sets out a requirement for the submission of an appropriate archaeological assessment and an acceptable Heritage Statement to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required. Policy MW1 additionally seeks to ensure that minerals development proposals do not have an unacceptable impact on the historic environment, including heritage and archaeological assets and their settings.
- 3.152 The County Council, as well as determining the application in accordance with relevant development plan policy, must also take in account the statutory duty of s. 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.
- 3.153 The Environmental Statement includes a Cultural Heritage chapter, which presents the findings of a cultural heritage desk-based assessment, fieldwalking, geophysical survey and trial trenching of the application site, with separate reports of the surveys undertaken included as Appendices. A separate Technical Note has also been submitted in response to the Regulation 25 Request for Further Information which assesses the noise impact on the nearby listed buildings.
- 3.154 In relation to the impact on the significance of the adjacent and nearby listed buildings the assessment identifies that there are two Grade I listed buildings and three Grade II Listed buildings within 2km. The two Grade I listed buildings

include the Church of St Mary, located 100m south of the site, and Church of St Matthias, Thorpe, located 450m north-west of the site.

- 3.155 As set out above The Broads Authority have identified, and correctly so, that the assessment has omitted to identify and include Thorpe Hall as one of the listed buildings located within 2km of the site. In fact, there are others as well, but not whose setting would be affected or whose omission is significant. Thorpe Hall is located 315m north-west of the site, close the Church of St Matthias, and is in a location close enough to the site that could be considered that its setting has the potential to be affected.
- 3.156 Notwithstanding this potential deficiency in the assessment, it identifies that there would be no intervisibility between the application site at ground level from any of the Listed Buildings due to topography, intervening vegetation and distance. It does identify that there would be a view of the application site from the tower of the Church of St Mary. The change in this view is assessed as being negligible adverse and of slight significance, although the assessment states that there would be no discernible effect on the setting of the church during the working of the site or after restoration. The effect on all other designated assets is considered neutral (i.e. no change to the existing situation). It also concludes that there would be no effect upon the ability to appreciate the significance of any of the heritage assets. Although Thorpe Hall has been omitted in undertaking the assessment, given its distance from the application site, and taking into account the assessment did include the potential impact on the nearby Church of St. Mathias, and the fact that the surrounding tree belt extends round the north west corner of the site closest to Thorpe Hall, it is not unreasonable to conclude that the findings and conclusions of the assessment would remain the same, even if Thorpe Hall had been included.
- 3.157 The assessment concludes on this basis that no additional mitigation is required. There is no obvious reason to disagree with this conclusion. The additional Technical Note which assesses the noise impact on nearby Listed Buildings concludes that the change in ambient noise levels at the nearest of these would have a 'not significant' impact.
- 3.158 As set out above, Historic England has returned a lengthy comment on the application and whilst not objecting to it, has advised that it has serious concerns about the application on heritage grounds, due to the impact on the setting of the Church of St Mary, as a Grade I Listed Building. This is on the basis that there would be potential harm caused to the significance of the church, albeit it does not quantify that harm. In its initial comments on the application it advised that further assessment of impact on the setting of the church as a result of noise, vibration, and dust was required. As set out above the applicant has responded to this through the submission of their response to the Review of Dust Assessment by the consultants for Stopit2 and the Technical Note which assesses the noise impact on nearby listed buildings.
- 3.159 Turning to the potential impacts on archaeology, the assessment identifies that the application site lies within an area of moderate multi-period archaeological

potential, which includes cropmarks and other features from prehistoric, Roman, medieval and postmedieval periods.

- 3.160 The assessment concludes that the inevitable loss of archaeology needs to be offset by a programme of mitigation by way of recording, but that there is no evidence of any archaeology requiring preservation in situ. It does identify a small area of Roman activity marking the northern edge of a possible settlement, in the south-west corner of the application site. This it states, would be protected by a stand-off from the excavation area and fencing. This is shown on the submitted application drawings as part of the design of the site. It also identifies a second area of about 2ha on the eastern side of the application site, which it states may contain evidence related to the historic development of Haddiscoe and which would be subject to excavation, recording, analysis and publication. It is proposed that details of the works would be formalised in a Written Scheme of Investigation (WSI) to be agreed with the County Archaeologist.
- 3.161 As set out above the County Archaeologist has advised that because there is potential for archaeological interest (i.e. buried archaeological remains) to be present at the site, that its significance will be adversely affected by the proposed development. However, they do not consider that this is grounds to object to the application, and they advise if planning permission is granted, that this should be subject to a condition requiring a programme of archaeological mitigatory work.
- 3.162 It should be noted that the impacts on heritage were a significant factor in the determination of the previous planning application for the development of the site, Planning Application Ref. C/7/2011/7020, in 2013 and at the subsequent appeal, and that one of the reasons for refusal related to the adverse impact on the setting of the Church of St Mary. The Inspector in the appeal, essentially agreed with the Council's view at that time that there would be harm to the setting of the Church of St Mary concluding that "the harm to the setting of the Church to be approaching, if not, moderate" and "that the setting of the Grade I Listed Church would not be preserved and this counts as a strong negative factor to be weighed in the balance".
- 3.163 There are however significant reasons to distinguish the current application from the previous proposal; these being that the Inspector's concerns related almost entirely to the impact of the part of the previous application site to the south of the B1136, which included a not insubstantial plant area and bunding, and that the duration of the permission sought was 21 years, which the Inspector considered to be "a very long time".
- 3.164 The Inspector helpfully, drew a significant distinction between the impact of the part of the previously proposed development to the north of the B1136 (i.e. what is now the current application site) and the area to the south (which is not included in the current application). He said that "Although the northerly parcel of land, containing by far the greater proportion of the mineral resource, creates very little visual harm during operations, the same cannot be said of the much smaller area to the south. Here there would be something approaching a

moderate adverse change to the landscape quality for the 21-years duration and significant harm to the setting of the Grade I Listed St Mary's Church". The appeal decision was issued in July 2014, when the tree belt around the site, whilst already planted, was considerably less mature than it is now.

- 3.165 Given the conclusion of the assessment submitted with the current application, there is no substantive reason to take a fundamentally different view from the Inspector in 2014 in relation to development of the land to north of the B1136, in terms of its impacts on the setting of the Church of St. Mary. If anything, the potential impact would be less, given the much more limited duration of the extraction and restoration works proposed in the current application, i.e. up to eight years, compared with the 21 years proposed as part of the 2011 planning application, the absence of any processing plant, and because the tree belt around the perimeter of the site has matured significantly with an additional ten years' growth.
- 3.166 As such it cannot be considered that there would be any more than negligible, if any, impact on the setting of the Church of St Mary (or any of the other nearby Listed Buildings, including Thorpe Hall), which can as a result be considered to be at the very lower end of less than substantial harm to its/their significance.
- 3.167 It should be noted that less than substantial harm, is not intended to mean that the harm is minor or inconsequential; it is the terminology used in the NPPF to categorise the level of harm to the significance of a heritage asset. It covers a wide spectrum of harm from very minor harm through to a level of harm stopping short of "substantial harm", so has a wide meaning.
- 3.168 Paragraph 206 of the NPPF states that any harm to, or loss of significance of a designated heritage asset requires clear and convincing justification, and paragraph 208 states that where development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 3.169 The main issue to be addressed then is how the less than substantial harm to the significance of the nearby listed buildings as designated heritage assets, even if only minimal, is to be considered. On the one hand paragraph 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater that weight should be) and paragraph 206 states that any harm to, or loss of significance of a designated heritage asset, should require clear and convincing justification. On the other hand, paragraph 217 of the NPPF also states that when determining planning applications, great weight should also be given to the benefits of mineral extraction. It does then also go on to say that in considering proposals for mineral extraction, mineral planning authorities should ensure that there are no unacceptable adverse impacts on the historic environment.
- 3.170 When the different paragraphs of the NPPF are read together, it is clear in the circumstances that apply in this instance, that the issue is whether the less than significant harm, is outweighed by the public benefit of the proposal. In the

context of the need for the supply of mineral identified in the Norfolk Minerals and Waste Local Plan, the application is for the development of what is currently an unallocated site. It is however a proposed allocation in the emerging Minerals and Waste Local Plan, required to meet the identified shortfall in permitted reserves required during Minerals and Waste Local Plan period to the end of 2038. Whilst, as set out above, the landbank for sand and gravel currently stands at 11.8 years, so that this cannot be taken as indicative of urgent need, the application site will nevertheless provide part of the shortfall of 12.597 million tonnes, identified in the emerging plan, which can be considered to amount to public benefit, and can, even in the absence of urgent need, be considered to outweigh, the very low level of less than substantial harm to the significance of any of the nearby designated heritage assets.

- 3.171 On this basis the application can, when considered in the context of the development plan as a whole, be considered to be acceptable and in accordance with the NM&WDF Core Strategy, GNLP Policy 3, the South Norfolk Local Plan Development Management Policies Document, Policies DM 1.4 and DM 4.10, emerging NM&WLP Policies MIN25 and MW1, and the relevant paragraphs of the NPPF, including paragraph 217.

E. Landscape and Visual Impact, Trees and Restoration

- 3.172 The key issues in relation to landscape and visual impact, trees and restoration, concern the impact in terms of landscape and visual impact, including the impact on The Broads Authority area, the impact on key landscape features including trees and hedgerows, and the acceptability of the proposed Concept Restoration Plan for the site.
- 3.173 Relevant policies include; the NM&WDF Core Strategy, Policies CS14, DM8 and DM14, which seek to ensure that there are no unacceptable adverse impacts on, and ideally improvements to the character and quality of the landscape and that there is phased and progressive working and restoration of the site to enhance the landscape; GNLP Policy 3 which states that development proposals should enhance the natural environment through being designed to respect, conserve, and enhance, natural assets, and avoid harm to designated and non-designated assets of the natural environment, having regard to their level of significance (local, national and international) in accordance with the requirements of the NPPF and relevant policies in other Development Plan Documents. It should respect landscape character and retain important views and features, having regard to Landscape Character Assessments and sensitive areas such as landscape settings, and to the importance of the nationally designated Broads Authority Area and its setting; South Norfolk Local Plan Development Management Policies Document Policies DM 1.4 DM 3.8, DM 4.4, DM 4.5 DM 4.8 and DM 4.9 which seek to protect environmental quality and local distinctiveness, natural environmental assets, landscape character including rural river valleys, significant tree, woodlands and hedgerows and ensure high quality design in landscape design. Relevant national planning policy is set out in the NPPF, Chapter 12, paragraphs 135 and 136, and Chapter 15, paragraphs 180 and 186.

- 3.174 As set out above the emerging NM&WLP in Policy MIN25 includes a requirement for the submission of an acceptable Landscape and Visual Impact Assessment which identifies any potential impacts to the wider landscape and includes appropriate mitigation measures including a combination of advanced planting with native species and bunds and the submission of an acceptable phased working and progressive restoration scheme to a nature conservation afteruse, including retention of boundary hedgerows and trees. In addition, Policy MW1 seeks to ensure that minerals development proposals do not have an unacceptable impact on the appearance, quality and character of the landscape, countryside and visual environment and any local features that contribute to its local distinctiveness, the character and quality of the area, and protected landscapes including the Broads.
- 3.175 Because of the proximity of the site to boundary of The Broads, which lies along the north-eastern boundary of the application site, the County Council also has a duty to 'have regard' to the statutory purposes of the National Park, which applies to proposals located outside the designated area but potentially impacting on its natural beauty.
- 3.176 The submitted Environment Statement includes a chapter on landscape and visual impact. It is supported by a separate Landscape and Visual Impact Assessment (LVIA) and Addendum, and an Arboricultural Impact Assessment and Arboricultural Method Statement. The application also includes Phased Working Scheme Plans, a Concept Restoration Plan and Landscape Planting & Aftercare Plan.
- 3.177 The supporting Landscape and Visual Impact Assessment (LVIA) has been undertaken in accordance with the Landscape Institute and the Institute of Environmental Management and Assessment Guidelines for Landscape and Visual Impact Assessment (GLVIA 3).
- 3.178 The assessment identifies that the Site is in agricultural use (comprising mainly Grade 3b agricultural land), is not designated for its landscape or scenic value and that its character is influenced by its arable use and its enclosed nature arising from the 24m wide tree belt around its northern, western and southern boundaries, with vegetation cover and agricultural buildings enclosing the eastern side of the Site.
- 3.179 It identifies the site, in common with the surrounding areas, as being part of a productive, working agricultural landscape with the B1136 extending along its southern boundary, so that there are times when it is not considered particularly tranquil. As a result, it identifies that the sensitivity of the landscape, including its landform and character, to development of the type proposed, is influenced by its location and context.
- 3.180 It concludes that there would be unavoidable significant effects on the landscape character within the site due to the temporary extraction works, although effects would reduce within unworked areas and within areas that had been worked and restored. As a result, it concludes that the character of areas in operational use would be detrimentally affected by a notable amount, but that

other areas would be subject to effects of less significance. However, it also concludes that the effects on the character of the site would not influence the character of the immediate surroundings or wider landscape (character area) to a noticeable degree, mainly due to the enclosed nature of the site as a result of the enclosing boundary tree belt.

- 3.181 It identifies that there would be significant effects on Bridleway Haddiscoe BR5 which would need to be temporarily diverted for the entirety of its route through the site, for the duration of the extraction and progressive restoration during working in Phases 4,5, 6 and 7. This would be unavoidable, although users would still be able to avoid using a stretch of Church Road, with the proposed diversion in place, and restoration would reinstate the Bridleway along its existing route, albeit with slightly different topography which the assessment concludes would add interest for walkers, along with the nature conservation led landscaping of the restored land.
- 3.182 The assessment identifies that there would be no effects on the adjacent woodland or hedgerows and the permanent effects on the low sensitivity arable land would be mitigated by the restoration scheme, which would provide lowland neutral grassland with a species rich element with woodland and wet woodland blocks, scrubby planting, hedgerows and an ephemeral, low area which, it is anticipated, would become seasonally wet or damp, providing a different habitat to the rest of the Site. The restoration proposals, the assessment concludes, would provide a net benefit to nature conservation in excess of 10%.
- 3.183 As set out above the assessment identifies that the landscape setting of the Grade I Listed Church of St Mary to the south of the Site would be limited due to the physical and visual separation between the Site and the Listed Building and its setting, with no intervisibility at ground level, even during winter periods when the density of the woody vegetation would still block or filter views. However, as set out above there would be views into the Site from the tower of the Church of St. Mary. In addition, it identifies that the B1136 lies between the church and the Site, which introduces movement and activity into the landscape and effectively marks the edge of the church setting, beyond which is the wooded boundary to the site and then the site itself. It identifies that any adverse effects on the church or its setting would be minor and would not be significant. These effects may include quarry related vehicle movements along the B1136 which would be glimpsed from the Church but would be fleeting and intermittent, with the junction of Crab Apple Lane and B1136 being at a distance of 430m to the north-west of the church. In addition, the operational stage would be for a temporary period of approximately 7 years, during which the Site would be progressively restored to a nature conservation afteruse, which would preserve the Church and its setting permanently.
- 3.184 In terms of the effects on visual amenity, the assessment identifies that its visibility is primarily influenced by the boundary woodland belts which extend around the northern, western and southern boundaries, with further vegetation along the parts of the eastern boundary, along with farm buildings and a yard. In addition, the local, gently undulating landform influences visibility from some

locations in the vicinity, as does the relative absence of residential properties to the west and south.

- 3.185 The assessment concludes that no residential properties would experience significant adverse effects on visual amenity due largely to the boundary vegetation along with other layers of vegetation which, for the majority of residents along Church Road, Thorpe Road, The Loke and Gravel Pit Lane, would effectively screen views towards the operational activities, at all times throughout the year. It identifies that views of the initial bund construction (and later removal) works would be evident from Windmill Cottage, but these would be short term (extending over no more than one week) and would involve mobile plant machinery which is already occasionally typical of the site due to its agricultural use. Once in place, the bund would screen views of all subsequent works and its presence would not, the assessment concludes, cause any notable visual disturbance to residents.
- 3.186 The assessment does identify that significant visual effects would occur for users of Bridleway Haddiscoe BR5 as it passes through the site so that even when diverted, views of the works would be evident for sections of the route not screened behind the soil bund along the northern boundary. However, it also identifies that once restored, effects would be beneficial for users of the Bridleway as the route would offer increased interest in the landscape. Other Public Rights of Way are assessed as being unaffected, although the assessment does identify that users of Bridleway Haddiscoe BR4, to the immediate north-west, would catch glimpses of vehicles entering and leaving the site, albeit that these would be intermittent, fleeting and not significant. It similarly concludes that road users in relatively close proximity, may have occasional views of quarry vehicles in the vicinity of the Site which would cause limited visual disturbance, which is not considered significant.
- 3.187 Finally, the assessment identifies that there would be no other mineral extraction operations or proposed operations within a radius of 5km surrounding the site that would, in combination with the proposed development, give rise to any cumulative landscape or visual effects (although Norton Subcourse Quarry does lie within this radius of the application Site).
- 3.188 The assessment concludes that the proposed restoration scheme would alter the landscape character of the Site in a beneficial way, by introducing a more nature conservation led land use including lowland neutral grassland with a species rich element, woodland and wet woodland, scrubby planting and hedgerows along with a seasonally wet or damp low area. This it considers would integrate well with the surrounding rural and agricultural landscape, including The Broads to the immediate north and east.
- 3.189 As set out above neither South Norfolk District Council Planning nor the Broads Authority have objected to the application on landscape and visual impact grounds. Whilst both have identified the impact, particularly on heritage assets as being a concern, the Broads Authority has advised that it does not consider that the overall landscape and visual effects following restoration would have any significant adverse effects on The Broads or the setting of The Broads. It is

however concerned that the extraction period which is likely to have adverse effects on the tranquillity of the landscape, and on sensitive visual receptors, and it therefore recommends that it would be beneficial if the extraction period could be limited to reduce the duration of these effects and that a condition to prevent future applications for extension of time are added to any consent and that there are restrictions on use of external lighting. The former would not be lawful, but as set out above it is proposed that permitted development rights for lighting be withdrawn by condition.

- 3.190 The County Arboricultural Officer as set above, raises no objection, subject to the implementation of the submitted Arboricultural Method Statement, and the County Landscape Officer has similarly also returned a no objection. As set out above they comment that the experience of users of Public Right of Way, Haddiscoe Bridleway BR5 will change following restoration, but they consider that the changes will be beneficial, and the reinstatement will provide a suitable route. They agree with the conclusions of the Landscape and Visual Impact Assessment (LVIA) and confirm that it has been undertaken in accordance with the accepted methodology and to a high and suitable quality.
- 3.191 As set out above, Natural England has advised that it has no objection, although it advises that the statutory purposes of the National Park [sic] need to be taken into account.
- 3.192 It should also be noted, as set out above, that the Inspector in the 2014 appeal decision on the previous planning application in this location, which the application site forms part of, concluded that the development of the land to the north of the B1136 for mineral extraction, gave rise to very little, if any visual harm, during operations.
- 3.193 On this basis, the proposals are considered to satisfy the requirements set out in national policy, the Development Plan and other material considerations, in relation to the landscape and visual impact, trees and restoration. The amended restoration scheme can also be considered to be acceptable and in accordance with other relevant development plan policy including NM&WDF Core Strategy Policies CS14, DM1, DM8, and DM14, GNLP Policy 3, and South Norfolk Local Plan Development Management Policies Document Policies DM 1.4 DM3.8, DM4.4, DM4.5 DM 4.8 and DM4.9, emerging NM&WLP Policies MIN25 and MW1, and the NPPF paragraphs, 135, 136, 180 and 186. It can also be considered that the development of the site as proposed would not have a significant impact on or harm the statutory purposes of The Broads.

F. Ecology and Biodiversity (including the need for Biodiversity Net Gain and Appropriate Assessment)

- 3.194 The key issues in relation to ecology and biodiversity concern the impacts on protected species including the habitats that support them and whether these are adequately mitigated, and whether the proposed restoration of the site delivers biodiversity net gain. Because the application site is located within 10km of the Broads Special Area of Conservation (SAC), the Broadland Special

Protection Area (SPA) and Breydon Water SPA and Broadland Ramsar site, consideration has also to be given to whether Appropriate Assessment is required. As set out above specific concerns have been raised by objectors about the potential adverse impacts on protected species and the nearby County Wildlife Sites (CWS).

- 3.195 Relevant policies include the NM&WDF Core Strategy, Policies CS14, DM1 and DM14, which seek to ensure that there are no unacceptable adverse impacts on, and ideally improvements to biodiversity, including nationally and internationally protected species and designated sites and otherwise that they prevent harm to protected species and habitats or ensure that any such harm is adequately mitigated or compensated for, and that there is enhancement to the Norfolk Ecological Network.
- 3.196 In addition, GNLP Policy 3 states that development proposals should enhance the natural environment through following a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for, and should deliver net biodiversity gain through the provision of on-site or off-site natural features, creating new or enhancing existing green infrastructure networks that have regard to local green infrastructure strategies. Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations. The new Plan also incorporate the requirements for biodiversity net gain (BNG) with a requirement to demonstrate that the gain to biodiversity is a significant enhancement (at least a 10% gain) compared to the existing situation. In addition, South Norfolk Local Plan Development Management Policies Document Policies DM1.4, and DM4.4 seek to protect environmental quality and natural environmental assets. Relevant national planning policy is set out in the NPPF, Chapter 15, paragraphs 180 and 186.
- 3.197 The emerging NM&WLP in Policy MIN25 includes a requirement for the submission of an acceptable phased working and progressive restoration scheme to a nature conservation afteruse, including retention of the boundary hedgerows and trees, to provide biodiversity net gains. Policy MW1 additionally seeks to ensure that minerals development proposals do not have an unacceptable impact on the natural environment, including internationally, nationally or locally designated sites and irreplaceable habitats.
- 3.198 The submitted Environment Statement includes a Chapter on Ecology, which is supported by a separate Preliminary Ecological Appraisal, and protected species survey reports for bats, Great Crested Newt and breeding birds, and an Ecological Enhancement Plan.
- 3.199 The assessment identifies that while protected species including bats (ten species) and birds (32 species) are present on and around the site, these comprise highly wide ranging and mobile animal and bird groups which are rarely found to be absent on and around the site or in the surrounding area. Moreover, the detailed surveys have not detected any evidence of breeding or

other key aspects to these species' lifecycles. Other widespread species are identified as including badger and reptiles.

- 3.200 Bat and bird species listed on the Norfolk Biodiversity Action Plan (BAP) were recorded at the Application Site although the assessment concludes that the site does not support significant populations of species of conservation concern.
- 3.201 It identifies that arable and bare ground will be lost as part of the proposed development, but that this is not assessed as being significant as the value of these habitats is identified as being low and that there is an abundance of similar habitat within the local area. The mixed woodland plantation is identified as the most important habitat for fauna on the Application Site and this will be retained and protected.
- 3.202 The assessment identifies that The Broads SAC, Broadland RAMSAR/SPA and Breydon Water RAMSAR/SPA are located 3.9km from the Application Site. It is also located within two SSSI Impact Risk Zones; Halvergate Marshes (4.5km to the north) and Staney and Alder Carrs, Aldeby (3.9km to the south). It identifies that there would be no direct habitat loss on statutory wildlife sites. The main potential impact is identified as being from dust deposition. However, it refers to the Institute of Air Quality Management (IAQM) guidance on mineral dust impact for planning (IAQM, 2016) as stating that adverse dust impacts from sand and gravel sites are uncommon beyond 250m measured from the nearest dust generating activities and that the greatest impacts will be within 100m of a source. As result it concludes that there will be no indirect impacts on statutory wildlife sites due to the distance between these sites and the Application Site.
- 3.203 The assessment identifies that the Devils End Meadow County Wildlife Site (CWS) is located 140m south of the application site, although it similarly concludes there will be no direct impacts on the CWS as it is located over 100m from the Application Site. It notes that the mixed woodland plantation around the boundary of the Application Site will be retained and that screen bunds will be constructed, which along with other dust prevention measures, will minimise dust reaching the non-statutory site.
- 3.204 The assessment in conclusion identifies that there would be no significant direct or indirect effects on habitats, faunal species or designated wildlife sites.
- 3.205 In relation to the proposed restoration, it identifies that the mineral extraction works will result in the certain, total direct loss of 17.8 ha of arable land, and that the impacts will be direct, irreversible and permanent as the habitat will not be replaced upon restoration. Instead, the restoration will replace arable land with better-quality habitats, including those listed in the Norfolk Biodiversity Action Plan (BAP) and it will provide more diverse habitats which will support a variety of wildlife, comprising a mosaic of habitats including wet woodland, native woodland, hedgerows, scrub, species rich grassland and seasonally wet areas. The post-development habitats, it concludes, will be more ecologically

diverse compared to the baseline and will encourage a variety of wildlife on the site.

- 3.206 Whilst no biodiversity net gain calculation has been submitted with the application, it does set out measures which are intended to enhance the biodiversity value of the site, with the assessment identifying that the restoration scheme has been designed “to create a mosaic of habitats that will provide habitats of higher ecological value compared to the baseline of agricultural land and will help meet targets within the Norfolk BAP, including wet woodland, hedgerows, lowland mixed deciduous woodland and lowland meadow and pastures”. This it states is intended to increase the overall ecological value of the Application Site by increasing floral diversity and creating suitable habitat for a range of protected and notable faunal species in line with development plan and national planning policy objectives.
- 3.207 The Environment Act 2021 introduced Schedule 7A of the Town and Country Planning Act 1990 and for major planning applications lodged after 12 February 2024 applicants now have to provide mandatory biodiversity net gain (BNG). The requirement is now reflected in Policy 3 of the GNLP. This application is however not subject to mandatory BNG on the basis that it was lodged before the implementation date of 12 February 2024, and given that this was the case it would not be reasonable to impose the requirement for ten per cent net gain now included in GNLP Policy 3.
- 3.208 Although there is no explicit development plan policy requirement for biodiversity net gain in South Norfolk, Policy DM 1.4 of the South Norfolk Local Plan DPD includes a more general requirement to “enhance biodiversity to achieve a net gain for nature”, and paragraph 180 of the NPPF similarly refers to “minimising impacts on and providing net gains for biodiversity”.
- 3.209 As set out above, there have been objections from Stopit2 and local residents expressing concern about the impacts on protected species, the adjacent CWS and biodiversity. Norfolk Wildlife Trust similarly initially expressed concern about the potential impact of the development on the Devil’s End Meadow CWS, but following the submission of the Ecological Enhancement Plan, it has confirmed that the application is acceptable subject to conditions to ensure no dewatering takes place and the mitigation measures set out in the Dust Management Plan, are secured.
- 3.210 South Norfolk District Council Planning whilst expressing concern about the potential for impacts on biodiversity, has not objected to the application. The Broads Authority has confirmed that it has no objection provided the specified mitigation is followed, and restoration is undertaken in accordance with the submitted details and a biosecurity strategy should be put in place.

- 3.211 The County Ecologist, as set out above, has confirmed that they have no objection subject to the precautionary working measures, mitigation, compensation and enhancement measures outlined in the Environmental Statement Ecology chapter and Ecological Enhancement Plan, being implemented. They further advise that the restoration scheme provided is considered appropriate and that opportunities to further enhance the site for biodiversity are outlined in the PEA report and the Environmental Statement Ecology Chapter.
- 3.212 Natural England has advised that it has no objection and that it considers that the proposed development will not have significant effects on designated sites, which include The Broads Special Area of Conservation (SAC), Broadland Special Protection Area (SPA) and Ramsar site, and Breydon Water SPA and Ramsar site, which are European designated sites.
- 3.213 As set above, the application site is located within 5km of the Broads Special Area of Conservation (SAC), the Broadland Special Protection Area (SPA) and Breydon Water SPA and Broadland Ramsar site, which are European protected habitat. The application has been assessed in accordance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017. Natural England has not raised any concerns in relation to the proposed development having any significant adverse impacts on any of the sites. Due the size and scale of the development, and its distance from the European sites, it is considered that there is no requirement for the County Planning Authority to undertake an Appropriate Assessment of the development.
- 3.214 With regards to Natural England's letter of 16 March 2022 concerning nutrient neutrality, the proposed sand and gravel quarry would not result in a discharge to the catchment of the River Wensum SAC or any of the SSSIs notified by Natural England that comprise the Broads SAC/Ramsar. The proposal would therefore not result in an addition to the nutrient load of the designated sites.
- 3.215 On this basis, the proposals are considered to satisfy the requirements set out in national policy, the Development Plan and other material considerations and is in accordance with the NM&WDF Core Strategy, Policies CS14, DM1 and DM14, GNLP Policy 3, South Norfolk Local Plan Development Management Policies Document Policies DM 1.4, and DM 4.4, emerging NM&WLP Policies MIN25 and MW1, and the NPPF, Chapter 15, paragraphs 180 and 186.

G. Flood Risk, Surface Water and Groundwater

- 3.216 In terms of Flood Risk, Surface Water and Groundwater, the key issues are whether the development gives rise to any potential impacts on water quality and flood risk.
- 3.217 Relevant policies include the NM&WDF Core Strategy, Policies CS14 and DM3 and DM4, which seek to ensure that proposed developments do not adversely impact upon groundwater quality or resources and surface water quality or

resources and are determined in accordance with national planning policy in relation to flood risk, now set out in the NPPF. In addition, GNLP Policy 2 seeks to ensure the development contributes to the achievement of sustainable communities by avoiding locating inappropriate development in areas at risk of flooding and by ensuring that sustainable drainage systems are incorporated into them and protect water quality and avoid risks of unacceptable levels of water pollution; and the South Norfolk Local Plan Development Management Policies Document (Adoption Version October 2015) Policy DM 1.4, DM 3.8, DM 3.14 and DM 4.2 seek to protect the environmental and water resources and enhance their efficient use, the use of sustainable drainage systems and ensure that there are no unacceptable impacts on surface and ground water quality or exacerbate the risk of flooding. Relevant national policy is set out in the NPPF, Chapter 14, paragraphs 165-175, Chapter 15, paragraphs 180, 191 and 194, and Chapter 17, paragraph 217.

- 3.218 There is no site-specific policy requirement relating to flood risk, surface water and groundwater set out in either Policy MIN25 of the emerging NM&WLP, although Policy MW1 does seek to ensure that minerals development proposals do not have an unacceptable impact on the quality and quantity of surface waterbodies and groundwater, the capacity of existing drainage systems or in terms of flood risk.
- 3.219 The Environmental Statement includes a chapter which sets out a Hydrogeological and Flood Risk Assessment (FRA) with separate supporting assessments as Appendices.
- 3.220 The assessment identifies that there are no surface water flow pathways affecting the Site, and that the site is not in a groundwater Source Protection Zone (SPZ). Environment Agency mapping shows that the Site overlies the Chalk, a Principal Aquifer (bedrock) but that this is confined by overlying London Clay.
- 3.221 The FRA identifies the site as being located in Flood Zone 1 on the Environment Agency's Flood Map for Planning and that there are four areas of isolated ponding (topographic depressions) within the Site, two of which are located along the southern boundary, one in the centre of the Site and one along the northern boundary. The FRA has assessed the surface water flood risk at the Site as negligible to low.
- 3.222 The assessment identifies that groundwater is the primary receptor for any contamination originating from the development. but because it is separated by at least 30m of low permeability London Clay, the Chalk principal aquifer is not a receptor.
- 3.223 Because no new impermeable areas are proposed and because operations will be carried out above the water table, no detailed drainage strategy is proposed for any surface water or groundwater discharge to the ground or to any watercourse. Consequently, no dedicated flood risk mitigation measures are identified as being required for the development, although the assessment states that if any localised surface water management is required, routing

runoff to temporary sumps, would be employed in the event that standing surface water impedes operations. It is anticipated that the surface water flooding risk will reduce as the development proceeds and less permeable subsoils are removed.

- 3.224 The Assessment also set out details of a number of embedded operational best practice mitigation measures that have been designed-in to reduce the potential for impacts on hydrology, flood risk and water quality.
- 3.225 Overall, the assessment states that no significant impacts have been identified and that there will be no significant residual effects.
- 3.226 As set out above the neither the LLFA, the Environment Agency, or Natural England have raised any objection to the application. Although the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB) have requested that any discharge that may subsequently be proposed is facilitated in line with non-statutory technical standards for sustainable drainage systems (SuDS), the regulation of any discharge would be a matter for the Environment Agency, and as such is not a matter to be controlled through the grant of planning permission.
- 3.227 Accordingly, subject to including a condition requiring the implementation of the embedded mitigation measures set out in the Environmental Statement, the application can be considered to be acceptable and in accordance with the NM&WDF Core Strategy, Policies CS14 and DM3 and DM4, GNLP Policy 2, South Norfolk Local Plan Development Management Policies Document Policies DM1.4. DM3.8, DM 3.14 and DM4.2, emerging NM&WLP Policy MW1 and the NPPF, Chapter 14, paragraphs 165-175, Chapter 15, paragraphs 180, 191 and 194, and Chapter 17, paragraph 217.

H. Soils and Agricultural Land

- 3.228 The impact on soils and agricultural land is a relatively minor issue in the determination of the application insofar, as set out in paragraph 2.3 above, only 0.5 ha of the 21.5 ha site is made up of Grade 3a Best and Most Versatile (BMV) agricultural land.
- 3.229 The effects on soil resources where mineral extraction is proposed on agricultural land of Grades 1, 2 or 3a, are addressed in NM&WDF Core Strategy, Policies CS14 and DM16, which seek to ensure that there are no unacceptable impacts on soil resources and that where development is proposed on Grades 1, 2 or 3a agricultural land, this will only be permitted where provision is made for high standards of soil management that would enable restoration to a condition at least as good as its previous agricultural land quality and that the handling of soils will be undertaken in accordance with the DEFRA “Good Practice Guide for Handling Soils” (now replaced by the Institute of Quarrying ‘Good Practice Guide for Handling Soils’. In addition, the NPPF, paragraph 180 requires that the economic and other benefits of BMV agricultural land must be taken into account in the determination of planning applications. Policy DM14 of the NM&WDF Core Strategy also seeks to ensure the restoration and enhancement of geodiversity.

- 3.230 There are no site-specific requirements relating to soils and agricultural land set out in Policy MIN25 of the emerging NM&WLP. Policy MW1 does however seek to ensure that minerals development proposals do not have an unacceptable impact on BMV agricultural land, and Policy MW5 additionally states that where minerals development is proposed on Grades 1, 2 or 3a agricultural land, it will only be permitted where provision is made for high standards of soil management that would enable restoration to a condition at least as good as its previous agricultural quality.
- 3.231 The Environmental Statement includes a chapter on Agricultural Quality and Soils, which is supported by a separate Agricultural Land Classification and Soil Resource Report, and a soils Desk Based Study, which are included as an Appendices.
- 3.232 The assessment identifies that the development of the site will affect 0.5 hectares of Grade 3a (high sensitivity) agricultural land, 15.4 hectares of grade 3b (medium sensitivity) agricultural land and 2 hectares of grade 4 (low sensitivity) agricultural land, and on restoration will be restored to agricultural grazing uses and consequently that there will only be a temporary loss of agricultural land during the Operational Phase. The magnitude of the temporary loss of agricultural land is assessed as being moderate, although there will be a permanent loss of less than 5 hectares of agricultural land which is classed as a low magnitude of loss. Across the site as a whole the intention is that it will be restored to grade 3b quality. All the soils will be retained on the site for use in its restoration and consequently the assessment concludes that there would be no discernible loss or reduction in functions, so that overall, there would be a not significant effect on the soil resource.
- 3.233 It should be noted that there is no requirement in either development plan policy or the NPPF to return BMV agricultural land to agricultural use. However, the NPPF makes clear that the impact on soils including the economic and other benefits of the BMV agricultural land, should be assessed in the context of the wider benefits from natural capital and what it refers to as “ecosystem services”, in other words, the benefits to the natural environment including its soils.
- 3.234 Natural England has advised that it has no objection to the application on the ground of the impact on soils and agricultural land, subject to the imposition of conditions to safeguard soil resources and promote a high standard of restoration appropriate to the proposed after uses and the working of the soils being undertaken in accordance with the Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings (2021).
- 3.235 On this basis the application can be considered to be in accordance with the NM&WDF Core Strategy, Policies CS14 and DM14, DM16, emerging NM&WLP Policies MW1 and MW5, and the NPPF, paragraph 180.

I. Sustainability

- 3.236 Key issues in relation to sustainability include how the application addresses climate change adaptation including the requirement for renewable energy generation and to reduce greenhouse gas emissions.
- 3.237 NM&WDF Core Strategy, Policy CS13 require minerals development to generate a minimum of 10 per cent of renewable energy on-site from decentralised and renewable or low-carbon sources, subject to environmental constraints while Policy DM11 requires water efficient design, including water recycling and sustainable drainage measures. Policy MW3 of the emerging NM&WLP requires the taking of a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. In particular, new minerals sites must through their design, construction and operation, be expected to minimise their potential contribution to climate change through reducing carbon and methane emissions, incorporate energy and water efficient design strategies and be adaptable to future climatic conditions.
- 3.238 GNLP Policy 2 seeks to ensure the development contributes to the achievement of sustainable communities, by ensuring a low level of energy consumption and the South Norfolk Local Plan Development Management Policies Document Policy DM4.2 sets out a requirement to integrate sustainable drainage measures and minimise the risk of flooding. Relevant paragraphs of the NPPF are set out in Chapter 14 (on meeting the challenge of climate change, flooding and coastal change), which in paragraph 159 states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change and help to reduce greenhouse gas emissions and in paragraph 162 states that local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.
- 3.239 Whilst not part of the development plan, or even a planning policy per se, the County Council's Environment Policy is also a material consideration. Its key policy aims include; using and managing land sustainably; recovering nature and enhancing the beauty of landscapes; connecting people with the environment to improve health and wellbeing; increasing resource efficiency, and reducing pollution and waste; securing clean, healthy, productive and biologically diverse seas and oceans; and protecting and improving our global environment. The County Council has made a commitment to use the policy to guide all the Council's future decision-making and therefore it has some, albeit very limited, weight in the determination of the application.
- 3.240 The Environmental Statement includes a section on Climate Change Adaptation, together with other relevant chapters as set out above including those on Ecology and Hydrogeology and Flood Risk.

- 3.241 The assessment identifies that because of the limited nature of the development proposed in this case, with the only processing proposed on the Application Site being screening to separate the extraction sand and gravel, it is not anticipated that the development of the site would give rise to any significant adverse impacts in terms of energy usage or climate change. It identifies that there would be emissions of carbon dioxide which contribute to climate change arising mainly from the use of fuel and electricity for transport, quarry machinery and processing, but that the installation of solar panels or wind to power plant to provide energy would take up considerable space and would not be economic or viable given the limited processing activities proposed and the temporary eight-year operational life of the site.
- 3.242 Policy CS13 is qualified in its requirement for minerals development to generate a minimum of 10 per cent of renewable energy on-site from decentralised and renewable or low-carbon sources, insofar as this is subject to any such development being environmentally acceptable. The lack of such provision does not, where this is not the case, make the development unacceptable or contrary to the Policy, provided this is justified. The Environmental Statement sets out why this is the case and to provide this justification, which arises from the only very limited level of processing that would be undertaken on the site.
- 3.243 In relation to carbon emissions which contribute to climate change these are identified as arising mainly from the use of fuel and electricity for transport, and in quarry machinery used for processing. Although a detailed quantitative assessment of the level of carbon emission has not been included with the application, it is reasonable to assume that because the development is of temporary duration and relatively small scale it will not have such a significant impact on, as to prejudice the achievement of the UK's 2050 Net Zero target, and cannot on its own be considered to render the development unacceptable or contrary to the development plan.
- 3.244 Climate change is otherwise considered as an integral part of the assessments included in the Environmental Statement, for example, in the assessment of the impacts on Hydrogeology and Flood Risk.
- 3.245 As such the application can, when considered against the development as a whole, be considered to be acceptable and in accordance with the NM&WDF Core Strategy, Policies CS13 and DM11, GNLP Policy 2, South Norfolk Local Plan Development Management Policies Document Policy DM4.2, emerging NM&WLP Policy MW3, the NPPF and the County Council's Environment Policy (taken into account the conclusions of the ES, as set out above).

J. Cumulative Effects.

- 3.246 In terms of cumulative effects, the key issues are whether there are any in-combination effects arising from the development or any effects as a result of multiple impacts from the development and other sites in a locality.

- 3.247 Relevant development plan policy is set out in NM&WDF Core Strategy, Policy DM15 which states that where a proposed mineral extraction site is considered acceptable (in its own right) but the cumulative impact of a proposal in conjunction with other nearby existing, permitted or allocated minerals extraction sites and/or waste management facilities, is considered unacceptable, the proposal may be considered acceptable if phased so that one site follows the completion of the other or it can be demonstrated that the adverse cumulative impacts can be adequately mitigated. It requires that planning applications must therefore be supported by information demonstrating how proposals relate to other development nearby and details of how any cumulative effects are proposed to be mitigated satisfactorily. South Norfolk Local Plan Development Management Policies Document Policy DM3.14 also refers to the need to assess the cumulative impacts of proposals in relation to air quality, surface and ground water quality, land quality and condition, and the health and safety of the public, and emerging NM&WLP Policies MW1 seeks to ensure that new minerals development does not have an unacceptable cumulative impact in combination with other existing or permitted development.
- 3.248 In addition the NPPF includes a number of references to the need to assess cumulative effects, including in relation to mineral development that are set out in paragraph 217, which states that in considering proposals for minerals extraction planning authorities should ensure that there are no unacceptable adverse impacts on the natural and historic environment or human health, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality.
- 3.249 The ES includes assessment of the cumulative effects in both the individual technical chapters, and as a separate overall assessment. These conclude that there will not be significant combined effects on receptors as a result of the proposal or as the result of the proposal in combination with other nearby development, subject to the identified mitigation measures proposed being implemented. None of the consultees have advised otherwise, and this conclusion can therefore be considered to be accurate.
- 3.250 On this basis, the development can be considered to be in accordance with NM&WDF Core Strategy, Policy DM15, South Norfolk Local Plan Development Management Policies Document Policy DM3.14, emerging NM&WLP Policy MW1, and the NPPF in terms of the overall cumulative effects.

K. Other Issues

- 3.251 A number of other issues have also been raised in the consultation responses from Parish Council's and in the third-party representations. These include the following:
- 3.252 Impact on Property Values: This is not directly a material planning consideration and cannot be taken into consideration. However, the impacts that may give rise to a financial loss arising from any detrimental impact on local amenity, and

the existing use of land and buildings maybe. These are considered under the previous headings in this section of the report.

- 3.253 Impacts on Health including Mental Health: The potential impacts on health including mental health have been raised by a number of objectors, and in some cases, these relate to the potential effects on individuals who suffer from a medical condition that would make them particularly susceptible to the adverse impacts of the development of the site, and in particular the air quality impacts.
- 3.254 The potential health impacts including the mental health impacts of development proposals, are increasingly recognised as being an important consideration in planning and as a material consideration in the determination of planning applications. The NPPF, includes a number of references to health and well-being, including paragraphs 96, 97, 109, 123, 135, 191 and specifically in relation to the impacts of mineral development, paragraph 217, which makes clear that when considering proposals for mineral extraction, minerals planning authorities should ensure that there are no unacceptable adverse impacts on human health. This is reflected in development plan policy with health identified in NM&WDF Core Strategy as a key issue that underpins a number of policies and explicit reference, included in Policy DM13 on Air Quality. It is also referred to in the GNLP, Policy 2, which includes the requirement for the submission of Health Impact Assessments (where appropriate), the South Norfolk Local Plan Development Management Policy Document, Policy DM 3.14, and Policy MW1 of the emerging NM&WLP.
- 3.255 In addition the Royal Town Planning Institute has issued Practice Advice on “Mental Health And Town Planning” (October 2020), which identifies that the quality of the wider built environment, including accessibility, is also a determining factor in mental health and well-being, with noise, pollution levels, quality of green space, access to services and even ‘beauty’ all playing a part and enabling, and the sense of enabling everyone to play an equal role in society.
- 3.256 As is the case in relation to other issues, assertions of potentially adverse impacts on health and mental health, including the potential impact on individuals who suffer from a medical condition that would make them particularly susceptible to the adverse impacts of the development, have to be justified in terms of the supporting evidence from the assessed impacts of the development. In this case particular concerns have been raised in relation to the impacts of noise, dust, emissions, traffic and environmental degradation as result of the adverse impacts on the peace and tranquillity of the rural environment. Details of technical assessments related to each of these issues is set out in the preceding sections. In addition, a Health Impact Assessment (HIA) has been submitted as an Addendum to the Environmental Statement submitted with the application.
- 3.257 As part of the scope of the HIA it reviewed both pre-submission concerns of individuals and the local community in relation to health and well-being issues

and also those that have been submitted to NCC in response to the submission of the planning application.

- 3.258 The assessment sets out what the health and wellbeing baseline of the local community is, identifies the potential impacts of the proposed mineral extraction operations on the site, and including noise, dust, emissions and traffic, and the mitigation and management measures to control any potentially adverse impacts.
- 3.259 The assessment concludes that the proposed development is not predicted to give rise to any significant adverse health-related impacts, that would change the health and wellbeing baseline of Haddiscoe Parish or South Norfolk District. It identifies that as a result of the designed-in mitigation measures and the additional operational measures proposed, that the development of the site is not predicted to give rise to significant adverse health or well-being effects.
- 3.260 As set out in Section 3 above, neither the District Council EQO or Norfolk Public Health have expressed any objection in principle to the submitted assessment or the application as a whole, subject to the inclusion of conditions (as set out under the preceding heading “C. Amenity and Health”). They have however advised that conditioning of the undertaking of real-time automated monitoring of dust emissions from the site for the duration of operations to ensure emissions do not exceed levels set out in the Air Quality Standards Regulations 2010. On this basis it cannot be considered that there is any evidence to indicate that there would be any justified concerns about the potential impacts on health including mental health.
- 3.261 Adverse Impact on Tourism and Local Businesses and the Income of the Church of St Mary: This is an issue that, similar to other issues, has to be considered in relation to whether it is justified in terms of the supporting evidence from the assessed impacts of the development. Again, the particular concerns have raised in relation to the impacts of noise, dust, emissions, traffic and environmental degradation as result of the adverse impacts on the peace and tranquillity of the rural environment. As set out above details of the technical assessments related to each of these issues is set out in the preceding sections. There is no basis in the conclusions of the supporting technical assessments to indicate that there would be any adverse environmental impacts that would give rise to an adverse impact on tourism and local businesses and the income of the Church of St Mary.
- 3.262 Alternative Sites at Risk of Sea Level Rise Should be Developed First: This is comment that has been made in the third-party representations that have been submitted in response to the application. There no such sites that have currently been identified in Norfolk, and there is no policy basis, either in the development plan or in national planning policy that advocates or requires that such an approach is adopted.
- 3.263 The Developer Should Make a Financial Contribution to the Haddiscoe Village: Again, this is comment that has been made in the third-party representations that have been submitted in response to the application. There are strict rules

about when developer contributions can be sought. Developer contributions can only be secured through a planning obligation, and the Planning Practice Guidance on Planning Obligations, which was published in 2019, makes clear that they can only be used, mitigate the impact of unacceptable development to make it acceptable in planning terms. They must in accordance with the requirements of The Community Infrastructure Levy Regulations 2010 (as amended) be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development. In this instance there is no identified necessity for a financial contribution to make the development acceptable and therefore no basis for securing a contribution. Financial contributions cannot be sought simply for unspecified community benefits.

- 3.264 That the Mineral Resource Assessment is Inaccurate: There is no evidence that this is the case. Assessment of the mineral resource on the site undertaken for the assessment of the site as part of the evidence gathered for the preparation of the emerging NM&WLP indicates that the site potentially contains up to 1.3 million tonnes of sand and gravel. The application now puts this figure at 1.16 million tonnes, which whilst slightly less, is not so significantly less as to suggest that there is any significant change in the estimated reserve on the site.
- 3.265 Safety of People Using the Adjacent Recreation Ground: This concern relates to the potential for children playing on the recreational area adjacent to the north-east side of the application site to stray into the site when it is being worked. Safety aspects of the operational activities of the site, are regulated through The Mines Regulations 2014, regulated by the Health and Safety Executive, and are not a matter for the County Council as the Mineral Planning Authority.
- 3.266 Mud and Debris on the Highway: The application does not include specific details of the wheel washing provision on the site. This however can be addressed through the inclusion of a condition to ensure that vehicles leaving the site are not in a condition that would result in the deposit mud or other loose material on the public highway. This is included as Condition No. 20 in the list of recommended conditions set out in Section 11 below.
- 3.267 Cumulative Impact of the Proposed Development in South Norfolk Village Clusters in Haddiscoe: This again is a matter that has been raised in the third-party representations submitted in response to the application. It relates to the identification of a potential 3.01 ha allocated housing site on the land to the south the A143, Beccles Road, on the opposite side of the junction of the A143 and the B1136 Lodden Road, from the south-east corner of the current application site. The site was included in South Norfolk District Council's consultation on the Regulation 19 Pre-Submission Draft South Norfolk Village Clusters Housing Allocations Plan in 2023 for up to 35 dwellings. The allocation raises the prospect that the construction of the of the new housing on the site, could be undertaken at the same time as that mineral extraction is on-going, resulting in cumulative construction impacts from noise, dust and traffic. At this stage the South Norfolk Village Clusters Housing Allocations Plan has yet to be submitted for examination and there is therefore no certainty that the allocation

will be included in the final adopted version of the Plan. As a result, lonely limited weight can, as yet, be attached to it. Potentially the major concern would be the cumulative traffic impacts, although because all mineral extraction traffic would be routed west to along the B1136 to Norton Subcourse Quarry, there would be no cumulative impact on the junction of the A143 and the B1136 or the A143 through Haddiscoe, arising directly from the current proposal. It is possible that mineral from Norton Subcourse Quarry, which includes a blended products made partly from the gravel to be extracted from the current application site would be used in the construction of the new housing development, but the HGV traffic in that case would be that arising from Norton Subcourse Quarry. Furthermore, the duration of the construction of the housing development is likely to be relatively limited when compared with the operational life of the mineral extraction site.

3.268 Geodiversity: The significance of the site in terms of geodiversity is highlighted in Policy MIN25 in the emerging NM&WLP, which identifies that the site consists of sands and gravels which are known to contain features of geological interest. The policy requires the potential impacts to geodiversity to be assessed and appropriate mitigation identified including, if necessary, the provision of open faces for scientific study during operational stages, and ideally after restoration, and have a 'watching brief' during the extraction phase in case features of potential geodiversity interest are uncovered. Policy DM14 of the NM&WDF Core Strategy also seeks to ensure the restoration and enhancement of geodiversity.

3.269 The Planning Statement submitted with the application includes an assessment of the geological resources and interest on the site. This identifies that the bedrock beneath the Site is Norwich Crag (Crag Group) bedrock sands and gravels and that there is potential for vertebrate fossils to be found within the Crag Group. As mitigation it proposes that any discoveries during extraction can be recorded and that a Scheme for Geological Recording and Sampling shall be submitted for approval. This can be appropriately included as a condition to ensure that approval of the application accords with the requirements of Policies DM14 and Policy MIN25.

3.270 That the Planning (Regulatory) Committee Should Visit the Site: This is a matter for the Committee to consider. The conclusions of the Environmental Statement submitted with the application do not indicate any exceptional or unusual circumstances or environmental impacts that indicate that a site visit in this case is required any more than it would be on any other planning application for a similar proposal, but the Committee may nevertheless consider, given the higher than normal level of public comment on the application, that a site visit in this instance is justified.

3.271 **RESPONSES TO REPRESENTATIONS RECEIVED**

3.272 The application was advertised by means of neighbour notification letters, site notices, and an advertisement in the Eastern Daily Press newspaper in accordance with statutory requirements.

3.273 Details of the representations are set out in the paragraph 3.82 above. The issues raised by the representations are set out in the preceding section under each of the technical headings. No additional issues have been raised that are not addressed above.

3.274 INTENTIONAL UNAUTHORISED DEVELOPMENT

3.275 Following the Chief Planner's letter of 31 August 2015 to planning authorities, intentional unauthorised development is now a material consideration in the determination of all planning applications received after 31 August 2015. This is therefore capable of being a material consideration in the determination of this application.

3.276 In this instance this does not apply as there has been no previous development on the site and therefore no intentional unauthorised development.

4. Conclusion, Reasons for Decision and Planning Balance

4.1 The key issues for consideration are, the principle of the development including need; traffic, highway safety and Public Rights of Way; amenity; heritage; landscape and visual impact, trees and restoration; ecology and biodiversity (including the need for Appropriate Assessment); flood risk, surface water and groundwater; soils, agricultural land and geodiversity; sustainability; cumulative effects; and other issues.

4.2 The key issue of principle arises from the development plan status of the site, and that the application site does not comprise one of the allocated sites in the current NM&WDF Minerals Site Specific Allocations DPD, but it is included as allocation MIN25 Land at Manor Farm, Haddiscoe, in the emerging NM&WLP.

4.3 As set out above the weight that can be attributed to the proposed MIN25 allocation in the new plan, can as yet only be relatively limited, because, although the plan has now been submitted to the Secretary of State for examination, the examination has yet to take place and objections have been raised regarding its inclusion. As such the application has still to be considered on the basis of the currently adopted NM&WDF.

4.4 Policy MIN25 in the emerging NM&WLP nevertheless makes clear that it is intended to allocate the site for sand and gravel extraction. It states that any planning application will need to demonstrate compliance with the Plan's policies, and it sets out specific requirements relating to, the submission of noise, dust, and landscape and visual Impact assessments, a Heritage Statement, archaeological assessment, and transport assessment and details of the proposed highway access.

4.5 Outside of allocated sites, the policy approach set out in the current NM&WDF Core Strategy to the determination of applications for new mineral extraction proposals is that contained in Policy CS2. This is not intended to prevent other and additional sites being brought forward.

- 4.6 Although the landbank is currently in excess of the 7 year minimum required by the NPPF, the application site, comprising a site being proposed for allocation in the emerging NM&WLP, can still in principle be considered to be acceptable and in accordance with the development plan, and specifically the NM&WDF Core Strategy, Policies CS1 and CS2, subject to it being demonstrated that it is acceptable on its own merits and otherwise in accordance with the other policies of the development plan.
- 4.7 Development of the site has been identified as being required to meet the anticipated shortfall in sand and gravel moving into the new Plan Period from 2026 to 2038, and significant weight can be attributed to this. In addition, significant weight can be attributed to the proposed restoration which would make use of the retained sand and soils, with restoration to species rich lowland neutral grassland with new native hedgerows, the creation of an area of marshy habitat in the winter to enhance the site for biodiversity and the restoration of Haddiscoe Bridleway BR5, which would be temporarily diverted, being reinstated along its designated statutory route.
- 4.8 There are no significant highway safety, environmental or amenity impacts that cannot be adequately mitigated or which would make the proposal unacceptable. Although the proposal would have less than substantial harm on the nearby Grade Listed Church of St Mary, and Historic England have expressed considerable concern about this, this harm is at the lower end of less than substantial harm the scale and it has been demonstrated that there are public benefits which outweigh it. Although the proposal does not meet the requirement for statutory ten percent biodiversity net gain (BNG), it does not need to do so as the application was submitted prior to its introduction on 12th February 2024, and in the circumstances it would not be reasonable to require this, albeit that the requirement is now included in Policy 3 of the newly adopted GNLP.
- 4.9 The proposal can therefore be considered to contribute to the achievement of sustainable development in accordance with the NPPF on the basis that it is acceptable in principle and would help to meet the need for sand and gravel for the remainder of the existing NM&WDF plan period and going forward into the emerging NM&WLP period, but at the same time is otherwise acceptable in terms of its highway safety, environmental and amenity impacts. It can therefore be considered not to be a departure and to be in overall accordance with the policies of the development plan and the NPPF, and there are no material considerations as to why it should not be permitted. Accordingly, full conditional planning permission is recommended.

5. Alternative Options

- 5.1 Members of the Planning (Regulatory) Committee can only resolve to make a decision on the planning application before them whether this is to approve, refuse or defer the decision.

6. Financial Implications

- 6.1 The development has no financial implications from the Planning Regulatory perspective.

7. Resource Implications

- 7.1 **Staff:** The development has no staffing implications from the Planning Regulatory perspective.
- 7.2 **Property:** The development has no property implication from the Planning Regulatory perspective.
- 7.3 **IT:** The development has no IT implications from the Planning Regulatory perspective.

8. Other Implications

- 8.1 **Legal Implications:** There are no legal implications from the Planning Regulatory perspective.

8.2 Human Rights Implications:

The requirements of the Human Rights Act 1998 must be considered. Should permission not be granted Human Rights are not likely to apply on behalf of the applicant.

The human rights of the adjoining residents are engaged under Article 8, the right to respect for private and family life and Article 1 of the First Protocol, the right of enjoyment of property. A grant of planning permission may infringe those rights but they are qualified rights, that is that they can be balanced against the economic interests of the community as a whole and the human rights of other individuals. In making that balance it may also be taken into account that the amenity of local residents could be adequately safeguarded by conditions albeit with the exception of visual amenity. However, in this instance it is not considered that the human rights of adjoining residents would be infringed.

The human rights of the owners of the application site may be engaged under the First Protocol Article 1, that is the right to make use of their land. An approval of planning permission may infringe that right but the right is a qualified right and may be balanced against the need to protect the environment and the amenity of adjoining residents.

8.3 Equality Impact Assessment (EqIA) (this must be included):

The Council's planning functions are subject to equality impact assessments, including the process for identifying issues such as building accessibility. None have been identified in this case.

8.4 Data Protection Impact Assessments (DPIA):

There are no data protection implications from a planning perspective.

8.5 Health and Safety implications (where appropriate):

There are no health and safety implications from a planning perspective.

8.6 Sustainability implications (where appropriate):

This has been addressed in the sustainability section of the report above.

8.7 Any Other Implications:

There are no other implications from a planning perspective.

9. Risk Implications / Assessment

9.1 There are no risk issues from a planning perspective.

10. Select Committee Comments

10.1 Not applicable.

11. Recommendations

11.1 That the Lead Director Communities and Environment (or equivalent) be authorised to:

- 1. Grant planning permission subject to the conditions outlined below.**
- 2. Discharge conditions where those detailed above require the submission and implementation of a scheme, or further details, either before development commences, or within a specified date of planning permission being granted.**
- 3. Delegate powers to officers to deal with any non-material amendments to the application that may be submitted.**

11.2 **CONDITIONS:**

Conditions and Reasons for Conditions:

Duration of the Permission

1. The development to which this permission relates shall cease and the site shall be restored by 31 December 2032 in accordance with Drawing No. HADD009Rev.A, Concept Restoration Plan, dated August 2023 and Drawing No. HADD010 Rev. 0, Landscape Planting and Aftercare Plan, dated June 2022.

Reason: To ensure the proper and expeditious restoration of the site, in accordance the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policy DM14.

Commencement

2. Within seven days of the commencement of operations, the operator shall notify the Mineral Planning Authority in writing of the start date.

Reason: To enable the Mineral Planning Authority to be able to effectively monitor the implementation of this permission and to plan for a steady and adequate supply of aggregates as required by Paragraphs 59 and 219 of the NPPF (December 2023).

Approved Details

3. The development must be carried out in strict accordance with the following document and drawings:

Written Details

- Application Forms Part A and Part B dated 8th November 2022;
- Planning Statement, Volume 1, Manor Farm, Crab Apple Lane, Haddiscoe, Norfolk, Breedon Trading Limited, dated October 2022; and
- Environmental Statement Volume 2 (including Technical Appendices 1-15 and Non-Technical Summary), Manor Farm, Crab Apple Lane, Haddiscoe, Norfolk, Breedon Trading Limited, dated October 2022;
- Environmental Statement Non-Technical Summary (NTS) Volume 3, Manor Farm, Crab Apple Lane, Haddiscoe, Norfolk, Breedon Trading Limited, dated October 2022;
- Letter from Breedon Southern Ltd to Norfolk County Council, headed "Proposed Extraction of Gravel with Low Level restoration to create pasture/grazing land with an ephemeral water body. Land off Crab Apple Lane, Haddiscoe, Norfolk. Planning Application No. FUL/2022/0056. Breedon Trading Ltd. Town and Country Planning Act 1990 (as amended). Town and Country Planning (Environmental Impact Assessment) Regulations 2017" and the accompany documents listed in the letter, (The response to the request made for further information pursuant to Regulation 25), dated 20th October 2023;

Drawings

- Drawing No. 2022_05_26_H20_001, Location Plan, dated May 2022;
- Drawing No. 2022_05-26_H20_002 Rev. A, Site Plan, dated May 2022;
- Drawing No. 2022_05-26_H20_003, Location Overview, dated May 2022;
- Drawing No. 2022_05-26_H20_004, Aerial View, dated May 2022;
- Drawing No. 2022_05-26_H20_005, Site Survey, dated May 2022;
- Drawing No. 2022_05-26_H20_006, Phasing Overview, dated May 2022;
- Drawing No. 2022_05-26_H20_007, Right of Way, dated May 2022;
- Drawing No. J000279-01/SK101 Rev. C, Proposed Site Access, dated 19th September 2023;
- Drawing No. HADD001Rev.C, Phase 1 (Rev. Aug.23), dated September 2023;
- Drawing No. HADD002Rev.C, Phase 2 (Rev. Aug.23), dated September 2023;
- Drawing No HADD003Rev.C, Phase 3 (Rev. Aug.23), dated September 2023;
- Drawing No HADD004Rev.C, Phase 4 (Rev. Aug.23), dated September 2023;
- Drawing No HADD005Rev.C, Phase 5 (Rev. Aug.23), dated September 2023;
- Drawing No HADD006Rev.C, Phase 6 (Rev. Aug.23), dated September 2023;
- Drawing No HADD007Rev.C, Phase 7 (Rev. Aug.23), dated September 2023;
- Drawing No HADD008Rev.C, Restoration Landform, dated September 2023;
- Drawing No . HADD009Rev.A, Concept Restoration Plan, dated August 2023.
- Drawing No. HADD010 Rev. 0, Landscape Planting and Aftercare Plan, dated June 2022;
- Drawing No HADD011 Rev. 0, Restoration Concept Plan: Sections A-A' & B-B', dated June 2022;

unless otherwise amended or updated in accordance with the other conditions of this permission.

Reason: For the avoidance of doubt, in the interests of proper planning and to ensure that the development is undertaken and completed in accordance with the approved documents and drawings.

Record of Monthly Output

4. From the date of this permission the operators shall maintain records of their monthly output and shall make them available to the County Planning Authority at any time upon request. All records shall be kept for at least 2 years.

Reason: To ensure orderly working in the interests of the protection of the amenity of residential properties and the surrounding area, in accordance with

the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policy DM12.

Depth of Working

5. No excavations shall be carried out at a depth greater than 3m AOD.

Reason: To ensure orderly working in the interests of the protection of the amenity of residential properties and the surrounding area, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policy DM12.

Phasing

6. The development, including soil stripping, extraction and restoration, shall be undertaken strictly in accordance with the scheme of phasing set out in Chapter 3 of the Environmental Statement Volume 2, Manor Farm, Crab Apple Lane, Haddiscoe, Norfolk, Breedon Trading Limited, dated October 2022 and approved drawings set out in Condition No.3.

Reason: To ensure orderly working in the interests of the protection of the amenity of residential properties and the surrounding area, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policy DM12.

Access

7. Prior to the first use of the development hereby permitted the vehicular access over the verge shall be constructed in accordance with a detailed scheme to be agreed in writing with the County Planning Authority in accordance with the highways specification and thereafter retained at the position shown on the approved plan. Arrangement shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway.

Once the development has ceased operation the access shall be removed and landscaping reinstated in accordance with Drawing No. HADD009Rev.A, Concept Restoration Plan, dated August 2023 and Drawing No. HADD010 Rev. 0, Landscape Planting and Aftercare Plan, dated June 2022.

Reason: To ensure construction of a satisfactory access and to avoid carriage of extraneous material or surface water from or onto the highway in the interests of highway safety, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS15 and DM10, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.11, and the NPPF (December 2023) paragraphs 108, 114 and 115.

Access Gates

8. Any access gates/bollard/chain/other means of obstruction shall be hung to open inwards, set back, and thereafter retained a minimum distance of 8 metres from the near channel edge of the adjacent carriageway.

Reason: In the interests of highway safety enabling vehicles to safely draw off the highway before the gates/obstruction is opened, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS15 and DM10, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.11, and the NPPF (December 2023) paragraphs 108, 114 and 115.

Access From Crab Apple Lane Only

9. Vehicular access to and egress from the adjoining highway shall be limited to the access(s) shown on Drawing No. J000279-01/SK101 Rev. C, Proposed Site Access, dated 19th September 2023 only. Any other access or egress shall be permanently closed, and the highway verge shall be reinstated in accordance with a detailed scheme to be agreed with the Mineral Planning Authority concurrently with the bringing into use of the new access.

Reason: In the interests of highway safety and traffic movement, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS15 and DM10, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.11, and the NPPF (December 2023) paragraphs 108, 114 and 115.

Visibility Splays

10. Prior to the first use of the development hereby permitted visibility splays shall be provided in full accordance with the details indicated on Drawing No. J000279-01/SK101 Rev. C, Proposed Site Access, dated 19th September 2023. The splay(s) shall thereafter be maintained at all times free from any obstruction exceeding 0.6 metres above the level of the adjacent highway carriageway.

Reason: In the interests of highway safety, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS15 and DM10, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.11, and the NPPF (December 2023) paragraphs 108, 114 and 115.

Offsite Highway Improvements to Crab Apple Lane

11. Notwithstanding the details indicated on the submitted drawings no soil stripping of extraction works shall commence on site unless until detailed drawings for the off-site highway improvement works, as indicated on Drawing No. J000279-01/SK101 Rev. C, Proposed Site Access, dated 19th September

2023 have been submitted to and approved in writing by the Mineral Planning Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS15 and DM10, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.11, and the NPPF (December 2023) paragraphs 108, 114 and 115.

Completion of the Offsite Highway Improvements to Crab Apple Lane

12. Prior to the no soil stripping of extraction works hereby permitted the off-site highway improvement works (including Public Rights of Way works) referred to in Condition No. 11 shall be completed to the written satisfaction of the Mineral Planning Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS15 and DM10, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.11, and the NPPF (December 2023) paragraphs 108, 114 and 115.

HGV and Car Parking

13. Prior to the first use of the development hereby permitted space sufficient to the satisfaction of the Mineral Planning Authority shall be provided within the site to enable HGVs and cars to park, turn and re-enter the highway in forward gear. This area shall be laid out, demarcated, levelled, surfaced, drained and be retained thereafter available for that specific use.

Reason: To ensure the permanent availability of the parking/manoeuvring areas, in the interests of satisfactory development and highway safety, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS15 and DM10, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.11, and the NPPF (December 2023) paragraphs 108, 114 and 115.

HGV Management Plan

14. Prior to any operations commencing on the site the Applicant shall submit to the Mineral Planning Authority an HGV Management Plan for the routing of HGVs to and from the site.

The Plan shall thereafter be implemented as approved and make provision for:

- Monitoring of the approved arrangements during the life of the site;

- Ensuring that all drivers of vehicles under the control of the Applicant are made aware of the approved arrangements;
- The disciplinary steps that will be exercised in the event of a default;
- Appropriate signage, details to be approved by the Local Highway Authority and erected advising drivers of the vehicle routes agreed with the Local Highway Authority;
- Wheel cleaning facilities and their use/retention.

Reason: In the interests of maintaining highway efficiency and safety, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS15 and DM10, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.11, and the NPPF (December 2023) paragraphs 108, 114 and 115.

Hours of Operation

15. No operation authorised or required under this permission shall take place on Sundays or public holidays, or other than during the following periods:

08.00 - 17.00 Mondays to Fridays

08.00 - 13.00 Saturdays.

Reason: To protect the amenity of residential properties and the surrounding area, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policy DM12, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.13, and the NPPF (December 2023) paragraphs 180, 191 and 217.

Site Offices and Plant

16. Prior to the installation, details including dimensioned elevations/sections, material finishes and colours of the all the component parts of:

- (a) Site Office/Messroom; and
- (b) Sand and Gravel Screening plant;

shall be submitted and approved in writing by the Mineral Planning Authority. The Site Office/Messroom and Sand and Gravel Screening Plant shall thereafter be installed and maintained in accordance with the approved details.

Reason: To maintain control over the development and to minimise the visual and amenity impacts in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14 and DM8, Greater Norwich Local Plan Policy 3, South Norfolk Local Plan Development Management Policies Document Policies DM 1.4 DM 3.8, DM 4.4, DM 4.5, and paragraph 217 of the NPPF (December 2023).

Maintenance of Plant

17. No plant or machinery shall be used on the site unless it is maintained in a condition whereby it is efficiently silenced in accordance with the manufacturer's specification.

Reason: To protect the amenities of residential properties and the surrounding area, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026, Policy DM12, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.13, and the NPPF (December 2023) paragraphs 180, 191 and 217.

Temporary Soil Bunds

18. Prior to the construction of the Temporary Soil Bunds shown on Drawing Nos. Drawing Nos. HADD001Rev.C, HADD002Rev.C, HADD003Rev.C, HADD004Rev.C, HADD005Rev.C, HADD006Rev.C, and HADD007Rev.C, revised drawings shall be submitted to the Mineral Planning Authority for written approval, showing the extension of the Bund 3 along the full length of the south-eastern boundary of Phases 3 and 4. The Temporary Soils Bunds shall thereafter be constructed and maintained in accordance with the revised drawings for the during of the operational phases of the development.

Reason: To protect the amenities of residential properties and the surrounding area, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026, Policy DM12, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.13, and the NPPF (December 2023) paragraphs 180, 191 and 217.

Noise Limits

19. With the exception of noise emitted from the site from temporary soil stripping operations, landscape operations and bund construction and removal operations, the noise emitted from the extraction site or the plant site shall not exceed the noise limits stated below at the following properties and locations (as defined in Manor Farm, Crab Apple Lane, Haddiscoe, Norfolk, Environmental Statement and Technical Appendices, Volume 2, Chapter 8 Noise, Section 8.6 Table 8.8):

Reference	Location	Noise Limit dB LAeq (1 hour)
R1	Low Farm	49.5dB
R2	Windmill Cottage	53.7dB
R3	The Boundaries	53.7dB
R4	Willow Barn	53.7dB

R5	Whitehouse Farm	53.7dB
R6	2 Gravel Pit Lane	53.7dB
R7	Haddiscoe Manor	53.6dB
R8	1 Loddon Road	51.2dB
R9	Bridleway Diversion (North)	70.0dB
R10	Bridleway Diversion (East)	70.0dB
R11	Forner Gravel Pit	70.0dB

Noise for temporary operations from temporary soil stripping operations, landscape operations and bund construction and removal operations, at each of the properties listed above shall not exceed 70 dB LAeq (1 hour) free field. Temporary operations shall not exceed a total of 8 weeks in any calendar year.

The noise limits apply during normal site operations between 0800 and 1700 Monday to Friday and 0800 to 1300 Saturdays. Measurements should be taken at 1.5 meters above local ground level, in free-field condition away from any buildings. LAeq,T sound level should be sampled for a period of one hour at each monitoring position. Measurements within the hour should be recorded at 10-minute intervals.

Reason: To protect the amenities of residential properties and the surrounding area, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policy DM12, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.13, and the NPPF (December 2023) paragraphs 180, 191 and 217.

Noise from Reversing Vehicles

20. All heavy goods vehicles and all mobile plant operating on the site will be fitted with broadband ('white-noise') reverse warning systems and maintained in accordance with the manufacturers recommendations for the lifetime of the development.

Reason: To protect the amenities of residential properties and the surrounding area, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policy DM12, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.13, and the NPPF (December 2023) paragraphs 180, 191 and 217.

Implementation of Noise Mitigation

21. The development shall be undertaken strictly in accordance with the Manor Farm, Crab Apple Lane, Haddiscoe, Norfolk, Environmental Statement and Technical Appendices, Volume 2, Breedon Trading Limited, October 2022, Chapter 8, Noise, including the noise mitigation measures set out in Section 8.5

Embedded Mitigation and Section 8.7 Additional Mitigation, Compensation, Enhancement Measures, and the supporting Appendices 8.1 to 8.4.

Reason: To protect the amenities of residential properties and the surrounding area, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policy DM12, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.13, and the NPPF (December 2023) paragraphs 180, 191 and 217.

Mud on the Public Highway

22. Vehicles leaving the site shall not be in a condition whereby they would deposit mud or other loose material on the public highway.

Reason: In the interests of highway safety, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS15 and DM10, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document Policy DM3.11, and the NPPF (December 2023) paragraphs 108, 114 and 115.

Dust Mitigation and Dust Management Plan

23. The development shall be undertaken strictly in accordance with the Manor Farm, Crab Apple Lane, Haddiscoe, Norfolk, Environmental Statement and Technical Appendices, Volume 2, Breedon Trading Limited, October 2022, Chapter 10, Air quality, including the dust mitigation measures set out in Section 10.5 Embedded Mitigation and Section 10.7 Additional Mitigation, Compensation, Enhancement Measures, and the Dust Management Plan, Manor Farm, Haddiscoe, Breedon Trading Limited, dated September 2023, so as to prevent dust nuisance and sand blow caused by the operations, including the spraying of the access, turning area, and stocking area and stockpiles.

Reason: To protect the amenities of residential properties and the surrounding area, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM12 and DM13, Greater Norwich Local Plan Policy 2, South Norfolk Local Plan Development Management Policies Document Policies DM 1.4 and DM 3.14, and paragraphs 180, 191 and 217 of the NPPF (December 2023).

Operations Management Plan

24. Prior to the commencement of development, an Operations Management Plan (OMP) shall be submitted to and approved in writing by the Mineral Planning Authority which set the detailed noise, dust and smoke management plan to protect the occupants of the residential properties surrounding the site from noise and dust. The Operations Management Plan shall thereafter be implemented in its entirety for the lifetime of the development.

The Plan shall include:

- (a) Communications with residents/occupants of the residential properties surrounding the site before and during the works;
- (b) Contact arrangements by which residents can raise any complaints, concerns and, issues;
- (c) The recording of any complaints, concerns and, issues by residents
- (d) The mechanism for investigation and responding to residents' concerns and complaints;
- (e) Detailed management arrangements to be put in place to minimise noise and dust (including staff training such as toolbox talks);
- (f) Hours during which noisy and potentially dusty activities will take place;
- (g) Measures to control loud radios on site;
- (h) Measures to control dust from excavation, wetting of soil; dust netting and loading and transportation of soil such as minimising drop heights, sheeting of vehicles (cross referencing as appropriate to the Dust Management Plan, Manor Farm, Haddiscoe, Breedon Trading Limited, dated September 2023). This is to include specific measures to be incorporated during drought conditions;
- (i) Measures to control dust from soil stockpiles such as sheeting, making sure that stockpiles exist for the shortest possible time and locating stockpiles away from residential premises;
- (j) Measures to control dust from vehicle movements such as site speed limits, cleaning of site roads and wetting of vehicle routes in dry weather (cross referencing as appropriate to the Dust Management Plan, Manor Farm, Haddiscoe, Breedon Trading Limited, dated September 2023);
- (k) Measures to minimise dust generating activities on windy and dry days. This is to include a mechanism to monitor wind speed and alert operatives to cease work;
- (l) Measures to control smoke from burning activities;
- (m) The maximum wind speed at which operations on site can occur (i.e. the windspeed at which operations would cease);
- (n) Details of the provision of an on-site meteorological station which can be set to provide an alarm when the maximum wind speed has been breached which alerts the operations manager of the need to suspend operations;
- (o) Details of the placement of an indicative real-time particulate monitor, for the duration of the works, which will be connected to a web-based platform which can be accessed by the operations manager and officers designated by the Mineral Planning Authority. The web-based platform will have limits, set by the Mineral Planning Authority, which will alert the operations manager and the Mineral Planning Authority designated officer(s) if and when the limits are breached; and
- (p) A register of every limit breach and the actions taken.

Reason: To protect the amenities of residential properties and the surrounding area, in accordance with the with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies DM12 and DM13, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document 2015, Policies DM 1.4, DM 3.13 and DM 3.14 and paragraphs 180, 191 and 217 of the NPPF (December 2023).

Dewatering, Surface Water, Flood Risk and Water Quality

25. There shall be no dewatering of the site. The development shall be undertaken strictly in accordance with the Manor Farm, Crab Apple Lane, Haddiscoe, Norfolk, Environmental Statement and Technical Appendices, Volume 2, Breedon Trading Limited, October 2022, Chapter 9, Hydrogeological and Flood Risk Assessment, including the surface water, flood risk and water quality mitigation measures set out in Section 9.5 Embedded Mitigation and Section 9.7 Additional Mitigation, Compensation, Enhancement Measures, and the and the supporting Appendices 9.1 to 9.3.

Reason: To safeguard the surrounding water environment and to ensure the site is effectively drained in interests of pollution prevention and manage and mitigation against the risk of flooding in the surrounding area, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies, CS14, DM3 and DM4, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document 2015, Policies DM 1.4, DM 3.8, DM 3.14 and DM 4.2 and paragraphs 173, 180 and 217 of the NPPF (December 2023).

Archaeology

26. No development shall take place other than in accordance with the Archaeological Written Scheme of Investigation set out in the Environmental Statement Volume 2 Manor Farm, Crab Apple Lane, Haddiscoe, Norfolk, Breedon Trading Limited, dated October 2022, Technical Appendix 12.6, Haddiscoe Quarry Archaeological Mitigation Strategy and Written Scheme of Investigation, Andrew Josephs Associates, dated October 2022 and any addenda to that WSI covering subsequent phases of mitigation.

No mineral shall be extracted until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Archaeological Written Scheme of Investigation and the provision to be made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14 and DM9, Greater Norwich Local Plan Policy 3, the South Norfolk Local Plan Development Management Policies Document 2015, Policies DM 1.4 and DM 4.10 and paragraphs 195, 205, 211 and 217 of the NPPF (December 2023).

Soil Resource and Management Plan

27. Prior to any operations commencing on the site a Soil Resource and Management Plan, which shall be prepared in accordance with the Institute for Quarry's Good Practice Guide for Handling Soils in Mineral Workings (2021). Shall be submitted to the MPA for their consideration. The Plan shall identify clearly the origin, intermediate and final locations of soils for use in the restoration, as defined by soil units, together with details balancing the quantities, depths, and areas involved.

All soil handling operations shall be carried out in accordance with the Approved Soil Resource & Management Plan

Reason: To ensure the retention and reuse of the soil resource on the site in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM14 and DM16 and paragraph 180 of the National Planning Policy Framework (December 2023).

Retention of Soils On-Site for Restoration

28. All topsoil, subsoil, and soil-forming material shall be retained on the site in accordance with the approved drawings listed in Condition No. 3. Pockets of suitable soil-forming material shall be recovered during the stripping or excavation operations, wherever practicable, for use during the restoration phase.

Reason: To ensure the retention and reuse of the soil resource on the site in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM14 and DM16 and paragraph 180 of the NPPF (December 2023).

Soil Stripping

29. All available topsoil (and subsoil) shall be stripped before any part of the site is excavated, built upon or otherwise traversed by heavy machinery (except for the purpose of stripping or stacking soil on those parts).

Soil stripping and soil tripping depths shall accord with the details to be set out in the Soil Resource and Management Plan to be submitted and approved in accordance with Condition No. 27.

Soils identified for use as a subsoil substitute shall be stripped separately and either re-spread over the replaced overburden or stored separately for subsequent replacement.

Written notification shall be giving to the Mineral Planning Authority seven clear working days' notice of the intention to start stripping soils, within each Phase.

Reason: To protect the soil resource and integrity of the soil structure in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM14 and DM16 and paragraph 180 of the NPPF (December 2023).

Soil Handling and Storage

30. All soil handling and storage operations shall be carried out in accordance with the details to be set out in the Soil Resource and Management Plan to be submitted and approved in accordance with Condition No. XX.

Reason: To protect the soil resource and integrity of the soil structure in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM14 and DM16 and paragraph 180 of the NPPF (December 2023).

Movement of Soils

31. Soil shall only be moved when in a dry and friable condition. For all soil types no soil handling shall proceed during and shortly after significant rainfall, and/or when there are any puddles on the soil surface.

Soil handling and movement shall not be carried out between the months of October to March inclusive.

Plant or vehicle movement shall be confined to clearly defined haul routes, or the overburden surface and shall not cross areas of topsoil and subsoil.

Reason: To protect the soil resource and integrity of the soil structure in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM14 and DM16 and paragraph 180 of the NPPF (December 2023).

Soil Storage

32. Bunds for the storage of agricultural soils shall conform to the following criteria:
- (a) Topsoils, subsoils and subsoil substitutes shall be stored separately;
 - (b) Where continuous bunds are used dissimilar soils shall be separated by a third material;
 - (c) Topsoil and subsoil bunds shall not exceed 3 m in height; and
 - (d) Materials shall be stored like upon like so that topsoil shall be stripped from beneath subsoil bunds and subsoil from beneath overburden bunds.

Reason: To protect the soil resource and integrity of the soil structure in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM14 and DM16 and paragraph 180 of the NPPF (December 2023).

Management and Maintenance of Soil Storage

33. All bunds intended to remain in situ for more than 6 months or over the winter period (December, January and February) are to be grassed over and weed control and other necessary maintenance to ensure the stability of the bunds are carried out to the satisfaction of the Mineral Planning Authority.

Reason: To protect the soil resource and integrity of the soil structure in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM14 and DM16 and paragraph 180 of the NPPF (December 2023).

Differential Settlement

34. In any part of the site where differential settlement occurs during the restoration and aftercare period, the applicant, where required by the Mineral Planning Authority, shall fill the depression to the final settlement contours specified with suitable imported soils, to a specification to be agreed with the Mineral Planning Authority.

Reason: To ensure the satisfactory restoration of the site in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM14 and DM16 and paragraph 180 of the NPPF (December 2023).

Arboricultural Impact Assessment and Arboricultural Method Statement

35. The development shall be undertaken strictly in accordance with the Manor Farm, Haddiscoe, Tree Survey Review, Arboricultural Impact Assessment and Arboricultural Method Statement, The Landscape Partnership, dated 17th October 2023. The tree protection to be erected strictly in accordance with the details set out Section 7.3 of the Arboricultural Method Statement and Drawing No. E23822-TLP-602, dated 28th September 2023 (included in the Arboricultural Impact Assessment - Arboricultural Method Statement, before any machinery or materials are brought on to the site or before any stripping soils commences, and shall be maintained for the lifetime of the development.

Reason: To ensure that trees and vegetation to be retained for the benefit of landscape and visual amenity are protected from construction and mineral extraction enabling works, in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy 2010-2026 Policies CS14 and DM8, Greater Norwich Local Plan Policy 3, South Norfolk Local Plan Development Management Policies Document Policies DM 1.4, DM 3.8, and DM 4.4, and the NPPF (December 2023), Chapter 15, paragraph 180 and Chapter 17, Paragraph 217.

Revised Concept Restoration Plan

36. Within 3 months of the commencement date of operations notified in accordance with Condition No. 2, a revised version of Drawing No.

HADD009Rev.A, Concept Restoration Plan, showing the locations of the bird and bat boxes and reptile hibernacula detailed in the Ecological Enhancement Plan, Manor Farm, Haddiscoe, Norfolk, Report Ref. CE-HA-2301-RP01-FINAL, Crestwood Environmental Ltd, dated 26th April 2023, shall be submitted to the Mineral Planning Authority for written approval. The revised Concept Restoration Plan shall thereafter to be implemented.

Reason: To ensure Biodiversity Mitigation, Enhancement and Net Gain is achieved and to ensure the restoration and enhancement of the landscape in accordance with the approved details and the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM1, DM8 and DM14, Greater Norwich Local Plan Policy 3, South Norfolk Local Plan Development Management Policies Document Policies DM 1.4, DM 3.8, and DM 4.4, and the NPPF (December 2023), Chapter 15, paragraph 180 and Chapter 17, Paragraph 217.

Revised Landscape Planting and Aftercare Plan and Aftercare Strategy

37. Within 3 months of the commencement date of operations notified in accordance with Condition No. 2, a revised version of Drawing No. HADD010 Rev. 0, Landscape Planting and Aftercare Plan, showing the locations of the bird and bat boxes and reptile hibernacula detailed in the Ecological Enhancement Plan, Manor Farm, Haddiscoe, Norfolk, Report Ref. CE-HA-2301-RP01-FINAL, Crestwood Environmental Ltd, dated 26th April 2023, and a written aftercare strategy, which shall include details of measures to prevent the establishment and spread of invasive species on the site and into the surrounding area, and annual aftercare meetings, shall be submitted to the Mineral Planning Authority for written approval. The revised Landscape Planting and Aftercare Plan shall thereafter to be implemented.

An annual Monitoring Report to be prepared a competent ecologist shall be submitted to the Mineral Planning Authority by 31st December each year confirming that the specified the management and aftercare have been implemented in each Phase in accordance with the approved Concept Restoration Plan and Landscape Planting and Aftercare Plan, following the completion of extraction, following the commencement of soil stripping and extraction works in Phase 2.

Reason: To ensure the biodiversity mitigation, enhancement and net gain is achieved, to prevent the establishment and spread of invasive species on the site and into the surrounding area, including the Broads, and to ensure the restoration and enhancement of the landscape in accordance with the approved details and the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM1, DM8 and DM14, Greater Norwich Local Plan Policy 3, South Norfolk Local Plan Development Management Policies Document Policies DM 1.4, DM 3.8, and DM 4.4, and the NPPF (December 2023), Chapter 15, paragraphs 180 and 186 and Chapter 17, paragraph 217.

Bridleway Diversion and Reinstatement

38. Prior to any operations commencing on the site, details of the alignment, width, gradient and construction of the diversion and the restored alignment of Haddiscoe Bridleway BR5, and details of the timing and timescales for the implementation of the diversion and restored alignment, shall be submitted to the Mineral Planning Authority for written approval. The diversion and the restored alignment of Haddiscoe Bridleway BR5 shall thereafter to be implemented, in accordance with the approved details.

Reason: To ensure the diversion and the restored alignment of Haddiscoe Bridleway BR5 does not cause any unacceptable impacts on the users of the Brideway, in accordance with the approved details and the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policy DM14, and the NPPF (December 2023), Chapter 9, paragraphs 96, 108, 110 and 114.

Processing Plant

39. The processing plant to be located and used on the site shall be limited to mobile screening plant to separate the sand and gravel only.

Reason: To maintain control of development so as to ensure that it does not have any unacceptable adverse impacts on the natural environment and human health in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies DM12 and DM13, Greater Norwich Local Plan Policy 2, the South Norfolk Local Plan Development Management Policies Document 2015, Policies DM 1.4, DM 3.13 and DM 3.14 and paragraphs 191 and 217 of the NPPF (December 2023).

External Lighting

40. No fixed external lighting shall be erected within the site or fixed to any buildings.

Reason: To prevent light pollution in the interests of the protection of amenity, biodiversity and the dark skies of the Norfolk countryside in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policy DM14, Greater Norwich Local Plan Policies 2 and 3, South Norfolk Local Plan Development Management Policies Document Policy DM 3.13, and paragraphs 191 and 217 of the NPPF (December 2023).

Removal of Permitted Development Rights

41. Notwithstanding the provisions of Article 3 and Schedule 2, Part 17, Class A and Class B, of The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended or any subsequent or amending Order, no plant/structures, machinery or lighting, whether fixed or static, lagoons, mineral/waste or other material stocking or other structures shall be erected or placed on the site, except as provided for under the other

conditions of this permission or with the prior approval of the Mineral Planning Authority.

Reason: To maintain control of development so as to ensure that it does not have any unacceptable adverse impacts on the natural environment and human health in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies DM12 and DM13, Greater Norwich Local Plan Policies 2 and 3, South Norfolk Local Plan Development Management Policies Document Policy DM 3.13, and paragraphs 191 and 217 of the NPPF (December 2023).

Biodiversity Mitigation, Enhancement and Net Gain

42. The development shall be undertaken strictly in accordance with the Manor Farm, Crab Apple Lane, Haddiscoe, Norfolk, Environmental Statement and Technical Appendices, Volume 2, Breedon Trading Limited, October 2022, Chapter 14 Ecology, including the ecological mitigation measures set out in Section 14.6 Embedded Mitigation and Section 14.8 Additional Mitigation, Compensation, Enhancement Measures, and the supporting Appendices 14.1 to 14.5, the Preliminary Ecological Appraisal (PEA) Report, Proposed Quarry at Land at Haddiscoe, Norfolk, Report Refer. CE-HQ-1984-RP01-FINAL Rev A, Crestwood Environmental Ltd, dated 10th October 2022, including Section 5 Conclusions and Recommendations and Section 6 Enhancements, the Ecological Enhancement Plan, Manor Farm, Haddiscoe, Norfolk, Report Ref. CE-HA-2301-RP01-FINAL, Crestwood Environmental Ltd, dated 26th April 2023, and the revised version of Drawing No. HADD009Rev.A, Concept Restoration Plan, to be approved in accordance with Condition No. 37.

Reason: To ensure Biodiversity Mitigation, Enhancement and Net Gain is achieved and to ensure the restoration and enhancement of the landscape in accordance with the approved details and the Norfolk Minerals and Waste Development Framework Core Strategy DPD 2010-2026 Policies CS14, DM1, DM8 and DM14, Greater Norwich Local Plan Policy 3, South Norfolk Local Plan Development Management Policies Document Policies DM 1.4 and DM4.4, and the NPPF (December 2023), Chapter 15, paragraphs 180 and Chapter 17, paragraph 217.

Scheme for Geological Recording and Sampling

43. No development shall take place until a Scheme for Geological Recording and Sampling shall be submitted to the Mineral Planning Authority for its approval in writing. The Scheme will include details of:
- (a) The opportunities during working for geological features exposed during excavation or other operations to be recorded, sampled, studied and retained as an open face as part of the restoration of the site; and
 - (b) Access to the site to allow geological study and research by educational and research groups, as requested.

Reason: To ensure access to and the recording of geological features exposed during excavation or other operations in the interests of geodiversity in accordance with the Norfolk Minerals and Waste Development Framework Core Strategy DPD Policy DM14 and the Norfolk Minerals and Waste Development Framework Minerals Site Specific Allocations DPD (2013) (with amendments adopted December 2017) Policy MIN 51.

Positive and Proactive Statement

In accordance with the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2015, the Mineral Planning Authority has entered into discussions with the applicant during the application processing period to ensure that sufficient information has been submitted to demonstrate that the proposal is acceptable.

Informatives

Highways

This development involves works within the public highway that can only be carried out by Norfolk County Council as Highway Authority unless otherwise agreed in writing.

It is an OFFENCE to carry out any works within the Public Highway, which includes a Public Right of Way, without the permission of the Highway Authority. Please note that it is the Applicants' responsibility to ensure that, in addition to planning permission, any necessary consents or approvals under the Highways Act 1980 and the New Roads and Street Works Act 1991 are also obtained from the County Council. Advice on this matter can be obtained from the County Council's Highway Development Management Group.

Please contact developer.services@norfolk.gov.uk

If required, street furniture will need to be repositioned at the Applicants own expense.

Public Utility apparatus may be affected by this proposal. Contact the appropriate utility service to reach agreement on any necessary alterations, which have to be carried out at the expense of the developer.

If required, street furniture will need to be repositioned at the Applicants own expense.

Please be aware it is the Applicant's responsibility to clarify the boundary with the public highway. Private structures such as fences or walls will not be permitted on highway land.

The highway boundary may not match the applicants title plan. Please contact the highway research team at highway.boundaries@norfolk.gov.uk for further details.

Archaeology

A brief for the archaeological work can be obtained from Norfolk County Council Historic Environment Service. Please note that the Historic Environment Service charges for its services.

12. Background Papers

- 12.1 Planning Application Ref. FUL/2022/0021:
<https://eplanning.norfolk.gov.uk/Planning/Display/FUL/2022/0021#undefined>
- 12.2 NM&WDF: Core Strategy and Minerals and Waste Development Management Policies and Development Plan Document 2010-2026 (2011)
<https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning/core-strategy-and-minerals-and-waste-development-management-policies-development-20102026.pdf?la=en>
- 12.3 NM&WDF: Minerals Site Specific Allocations Development Plan Document (2013) (with amendments adopted December 2017)
<https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning/minerals-site-specific-allocations-development-plan-document.pdf?la=en&hash=B0621E624FBE458ACA0544474E6F22BDCE320E4A>
- 12.4 Norfolk Minerals and Waste Local Plan: Pre-Submission Publication
<https://norfolk.oc2.uk/docfiles/59/A1%20Minerals%20and%20Waste%20Local%20Plan%20Pre-Submission%20Publication%20May%202022.pdf>
- 12.5 Norfolk County Council Environment Policy (2019)
<https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/environment/norfolk-county-council-environmental-policy.pdf>
- 12.6 South Norfolk Local Plan Development Management Policies Document (Adoption Version October 2015)
<https://www.southnorfolkandbroadland.gov.uk/downloads/file/245/development-management-policies-document>
- 12.7 Greater Norwich Local Plan (GNLP) Adoption documents
<https://www.gnlp.org.uk/local-plan-examination-local-plan-examination-document-library/j-inspectors-report-and-adoption>
- 12.8 National Planning Policy Framework (December 2023)

https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/N_PPF_December_2023.pdf

12.9 Planning Practice Guidance: Minerals (2014)

<https://www.gov.uk/guidance/minerals>

12.10 Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings (2021)

<https://885685.fs1.hubspotusercontent-na1.net/hubfs/885685/Soils%20Guidance/IQ%20Soil%20Guidance%20full%20document%20including%20all%20practitioner%20advice%20updated%20May%202022.pdf>

12.11 Royal Town Planning Institute Practical Advice, Mental Health and Town Planning (October 2020)

<https://www.rtpi.org.uk/media/6550/mentalhealthtownplanning2020-final.pdf>

12.12 Planning Practice Guidance: Planning Obligations (2019)

<https://www.gov.uk/guidance/minerals>

Officer Contact

If you have any questions about matters contained within this paper, please get in touch with:

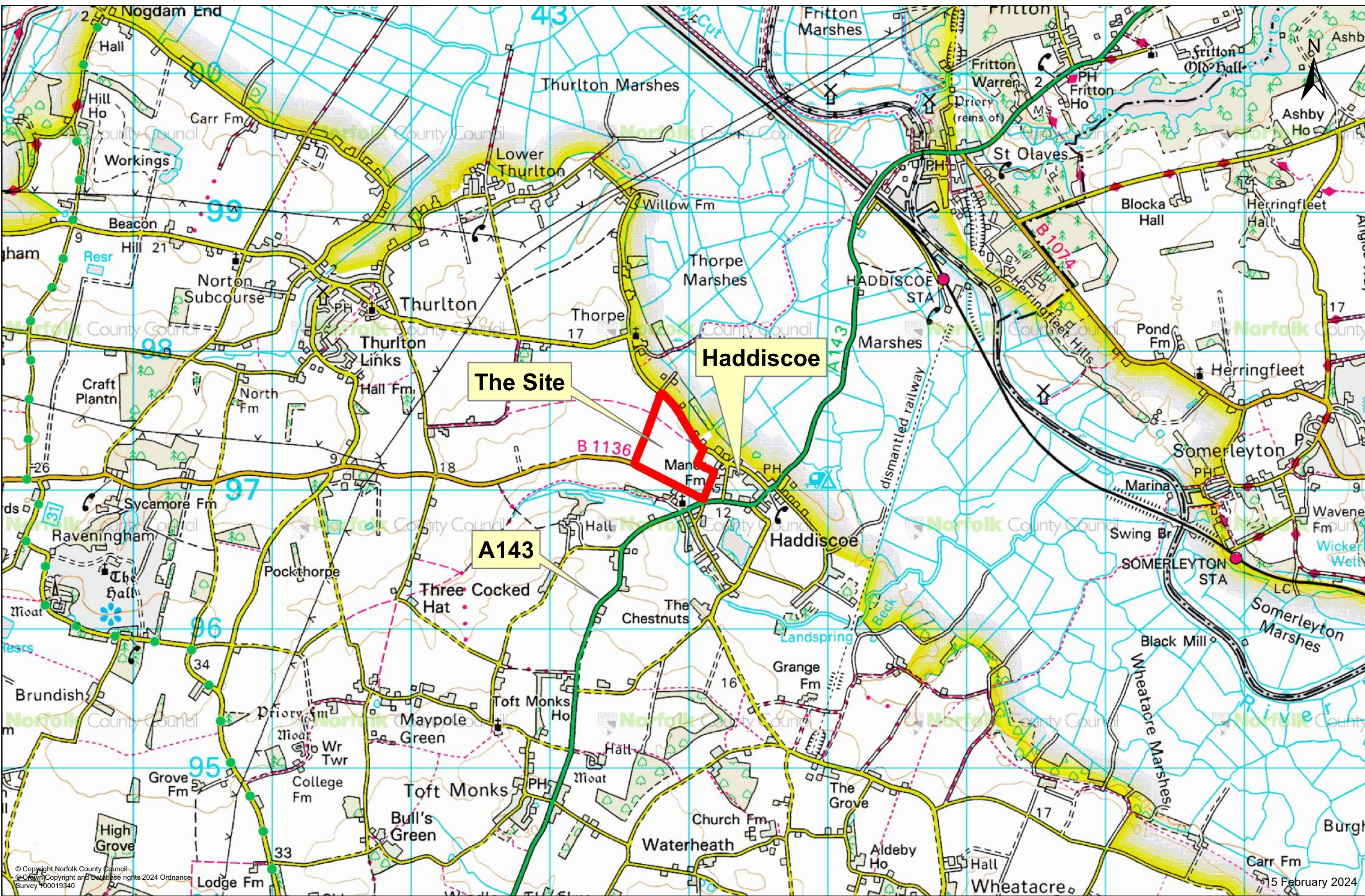
Officer name: Andrew Sierakowski

Telephone no.: 01603 223107

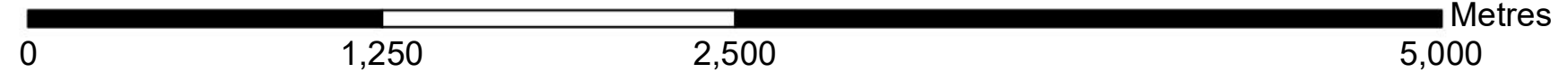
Email: andrew.sierakowski@norfolk.gov.uk



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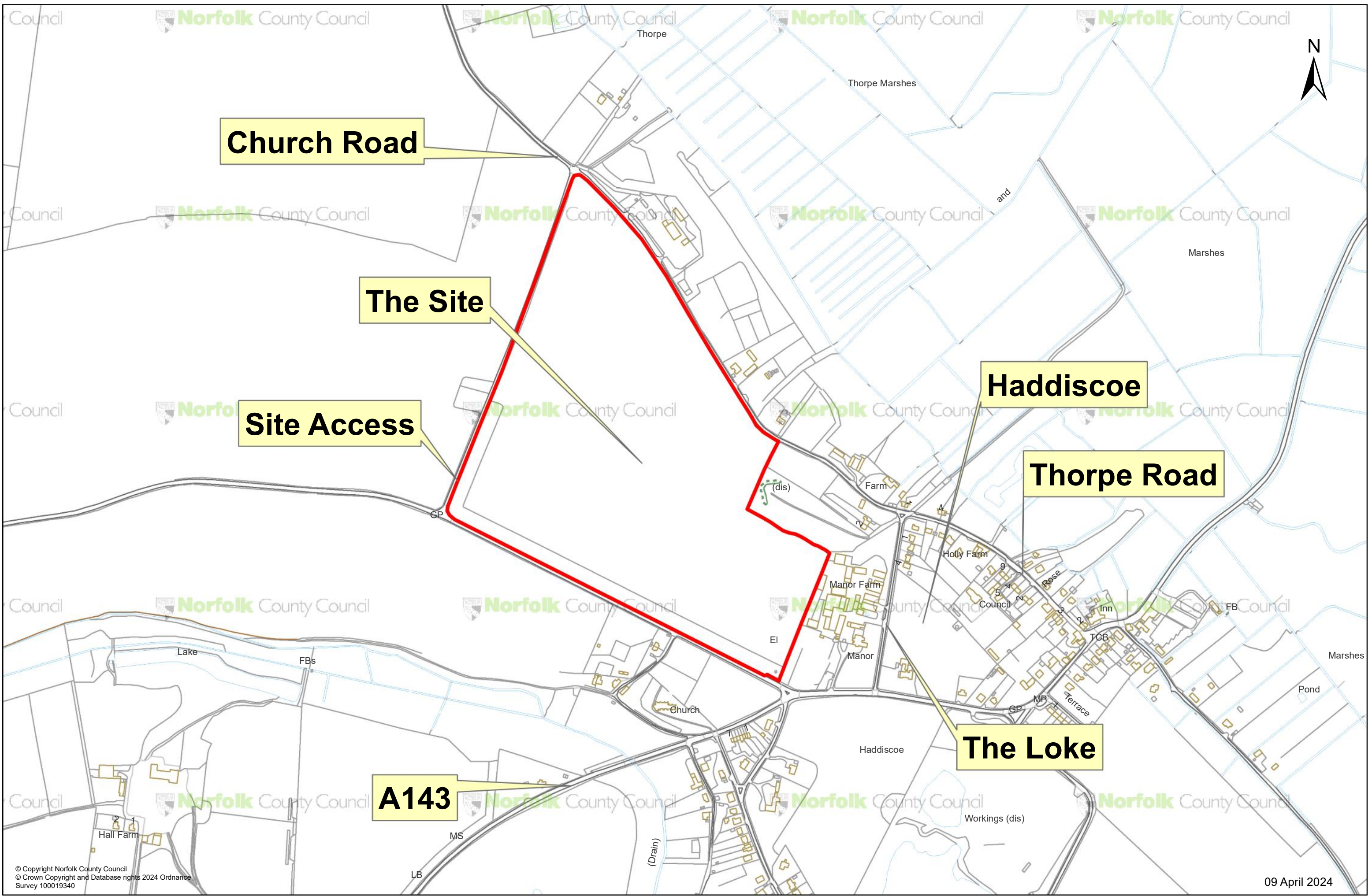


**Haddiscoe
Location Plan**



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Haddiscoe Site Plan

