

## **Breedon Haddiscoe Regulation 25 Response**

**Town and Country Planning Act 1990 (as amended) & The Town and Country Planning (Environmental Impact Assessment) Regulations 2017**

**Land off Crab Apple Lane, Haddiscoe, Norfolk, NR14 6SJ**

**Extraction of Sand and Gravel with low level restoration to meadow species rich grassland with an ephemeral water body.**

**Application Reference - FUL/2022/0056**



**Breedon Trading Limited**

## **Regulation 25 ES Addendums and Revised Application Plans Contents:**

**Addendum A – Updated - Highways Access Plan - J000279-01/SK101RevC**

**Addendum B – Updated Phasing Plans - Quarry Phasing Plans Excavation Only  
HADD001Rev.C- HADD008Rev.C**

**Addendum C – Tree Survey review, Arboricultural Impact Assessment and  
Arboricultural Method Statement - September 2023 – The Landscape Partnership**

**Addendum D - An Ecological Enhancement Plan - Crestwood**

**Addendum E – A Health Impact Assessment**

**Addendum F – Dust Management Plan**

**Addendum G – Revised Concept Restoration Plan - HADD009Rev.A August 2023**

**Addendum H – Landscape and Visual Assessment Addendum**

**Addendum I – Listed Building Noise Assessment**

**Addendum J – ES Appendix 12.6 Written Scheme of Investigation**

**Addendum K – Updated Site Plan**

## Introduction

This document forms the Regulation 25 Response to Norfolk County Council's letter dated 19 April 2023 in relation to the Environmental Statement submitted alongside the planning application (reference FUL/2022/0056) for the Extraction of Sand and Gravel with low level restoration to meadow species rich grassland with an ephemeral water body, under the Town and Country Planning Act 1990 (as amended) and the Town and Country Planning (Environmental Impact Assessment) Regulation 2017.

The submission includes revised application plans:

Revised Site Access - J000279-01/SK101RevC

Revised Phasing Plans – Quarry Phasing Plans Excavation Only - HADD001Rev.C-  
HADD008Rev.C

Revised Concept Restoration Plan - HADD009Rev.A

Revised Site Plan – 2022\_05-26\_H20\_002 A

In addition, additional mitigation measures are included in addition to the measures proposed in ES Chapter 16 – Mitigation Measures.

These additional mitigation measures include:

- A 100m excavation boundary stand-off from the boundary of sensitive residential properties.
- Moving the proposed access to further south on Crab Apple Lane and widening the road south of the access to 6.5m
- Planting the existing field access with native species.
- Including a permissive path to the NW corner of the site and providing a bench and information point to re-establish views of St Mary's Church or a resting point as part of the restoration scheme and as additional public benefit.
- Revising the Restoration Concept Scheme to ensure woodland blocks and hedgerow planting do not restrict views of St Mary's Church. Maintaining the proposed hedgerows within the restored site to 2-2.5m in height.
- A Dust Management Plan.
- Protective tree fencing to be installed prior to operations commencing in accordance with BS 5837(2012).
- *Not an additional mitigation measure, but an operational measure not previously mentioned which adds benefit-* to divert the existing cable and poles which cross the southern section of the site. These will be buried around the northern perimeter of the site and will not be reinstated on their existing route once extraction operations are

complete. From a landscape, Listed Building setting and visual perspective this utility change will result in a landscape benefit.

## **Norfolk Highways**

### **Reg 25 Question**

Norfolk Highway Authority considers that the site access should be relocated further south (closer to the B1136), and that Crab Apple Lane should be widened (to a minimum of 6.5 m) at the junction with the B1136 linking to the relocated site access.

### **Breedon Reg 25 Response**

Breedon agree to move the access further south along Crab Apple Lane closer to the B1136. The new position of the access and visibility splay is shown on drawing reference J000279-01/SK101RevC in ES Addendum A. Crab Apple Lane will be widened as requested by NCC Highways to 6.5m. The existing field access will be stopped up and tree planted. A new access will be created which will require the removal of a group of G1 trees, as shown in the Arboriculture Impact Assessment and Method Statement in ES Addendum C. This access will be retained post development for the purposes of agricultural access.

## **Norfolk Rights of Way Team**

### **Reg 25 Question**

Norfolk Rights of Way Team have identified that Haddiscoe Bridleway 5 BR5 crosses the application site and that the submitted documents refer to the temporary diversion of the bridleway for the duration of the works. However, they also note that no additional detail about the proposed temporary diversion.

### **Breedon Reg 25 Response**

Haddiscoe Bridleway 5 does cross the Application Site and this is shown in the application documents in the Planning Statement paragraph 6.20 and on the Rights of Way Plan Reference 022\_05-26\_H20\_007 May 2022. It is acknowledged that the Bridleway BR5 will require diversion during the proposed mineral extraction under Section 257 of the Town and Country Planning Act 1990, if planning permission is granted. Paragraph 7.2 of the PS describes the Bridleway diversion and when this would happen. Initially, if planning permission is granted for the bridleway would be left along its current alignment and fenced, whilst the diversion order is sought. The surface vegetation or soils would not be stripped and would be left in place.

Updated Phasing Plans HADD001-008Rev.C dated September 23 provided in ES Addendum B show that the soil bunds along the northern boundary of the site would be positioned and constructed in such that the bridleway BR5 can continue to pass safely between the bunds.

The positioning of the soil bunds will still afford visual and noise attenuation to the properties along Thorpe Road.

During the extraction of Phase 4, once a temporary consent order has been signed and agreed with Norfolk Council under Section 257 of the Town and Country Planning Act 1990 (the consent order process will be applied for during working of Phases 2 and 3) the bridleway will be moved onto its new temporary alignment moving north and then east along the site boundaries – around the western side of Phase 6, then the northern side of Phases 6, and 5 before re-joining the Thorpe Road. On completion of extraction and restoration of Phase 7 the bridleway will be re-instated on its existing route.

Timescales for Bridleway Diversion: It is thought that from when the bridleway is diverted during the later stages of extraction of sand and gravel from Phase 4 to when it is re-instated, following restoration of Phase 7, the timescale for diversion will be some 5 years in total. For the first three years during site set up and working of Phases 1, 2, 3 and the initial stages of Phase 4, the bridleway will remain on its existing alignment and be fenced, as necessary to ensure user safety. The diverted route will still enable users to cross the field between Crab Apple Lane and Thorpe Road. The diverted route will be some 200m longer in length for the duration of the diversion, but this is the shortest and safest diversion route achievable. The diverted route will still afford views of St Mary's Church – Grade I listed as discussed later in this response.

## **Norfolk Arboricultural Officer**

### **Reg 25 Question**

No tree report in line with BS 5837(2012): Trees in Relation to Design, Demolition and Construction has been submitted with this application.

While it is appreciated that the impact on retained trees would be largely limited to a relatively young woodland belt around the site where more generalist tree protection could be applied, there appear to be other more established trees on site that may warrant specific protection measures. Notably a large individual tree on the northern boundary and a group of larger trees to the south east. These are evident as tree with height 10 – 20m as displayed on Norfolk Trees and Hedges ([arcgis.com](http://arcgis.com)).

*'3.3.15 All trees and hedgerows will be retained. Unexcavated margins will be left to tree and hedgerows around the site and tree protection fencing (post and wire fencing) will be erected at a distance of 3-5m from the tree belt, if 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’.*

It is not clear if the fencing is intended to be erected 3 – 5m from the stems of trees or from the extent of canopy spread and this does not take into account any larger trees that are present on or adjacent to the site.

It is also not clear that the proposed entrance to the site can be achieved without tree felling, tree work or reducing the offset from the tree protective fencing to achieve the 7.3m wide entrance proposed. Any tree work or removals necessary to achieve the required visibility splays and turning circles must be detailed and any mitigation for loss proposed.

Until an appropriate supporting arboricultural impact assessment, method statement and tree protection plan with associated landscaping plan for any tree losses required to achieve the proposals, an objection is raised.

#### **Breedon Reg 25 Response.**

An arboriculture assessment – “Arboricultural Impact Assessment and Arboricultural Method Statement” has been prepared by the Landscape Partnership and is included as ES Addendum C. They have undertaken a tree survey on site and provided arboricultural information in accordance with BS5837: 2012.

The assessment identifies that the northern, western and southern edges of the site are contained by a plantation tree belt comprised of mixed native species. These were trees planted by the landowner under the Woodland Grant Scheme 3. The plantation incorporates occasional fragmented hedgerow remnants on its roadside edges as well as a pair of mature oak trees within its northern section. The tree belts provide screening and enclosure and are recorded as ‘B2’ category (moderate landscape value). The mature oak trees have additional cultural/conservation value and are recorded as A2/3 category (High landscape /cultural value).

The eastern edges of the site are contained by vegetation located on the neighbouring quarry and farmstead land. The vegetation on the quarry edges appears to be naturally generated and includes a mixture of scrub and saplings, which are recorded as ‘C2’ category (low landscape value), and mature oak / mixed woodland recorded as ‘B2’ category (moderate landscape value).

The western edge of the neighbouring farmstead includes a mixture of mature trees and scrub relating to former hedgerows, together with plantings of poplar and mixed native species. Collectively this vegetation provides screening and enclosure and is therefore also recorded as 'B2' category.

The AIA considers the constraints posed by the trees and the potential impacts of site construction on the above and below ground parts of the trees. The AIA also considers potential future impacts relating to changes in site usage. Drawing E23822-TLP-602 within the AIA shows the relationship between the proposed development and existing trees on site.

The proposed new site access will require an opening to be made through the G1 plantation and for some of the trees on part of the western face of the plantation to be removed, or cut back, to accommodate highway visibility splays. These works do not affect any mature or substantial individual trees and will have no significant adverse impact on the overall contribution of the plantation. The loss of planting necessary to form the new access will be offset by the stopping up of the existing access with new planting - it will be planted with a native thicket mix of 16 plants. In addition, as part of the restoration works – as shown on the Concept Restoration Plan a small group of G1 trees will be removed from the north west corner of the site to enable views from the corner of Crab Apple Lane/Church Lane to St Mary's Church – Grade I listed.

In terms of tree protection, the arboriculture method statement drawing E23822-TLP-602 included within the AIA shows the protection fencing around the plantation tree belts and around the two oaks. It also shows that the bunds and extraction areas will be beyond the root protection areas of the two oak trees and plantation tree belts. The protective fencing around the trees by the entrance into the quarry will use protective fencing barriers in accordance with BS5837. The remainder of the site will be fenced with post and wire fencing and all-weather notices. The quarry manager and staff will be trained and will be familiar with root protection zones and so the ground will not be disturbed or used for storage etc. Post and wire fencing is more appropriate to a rural field setting than Heras style protection barriers of with BS5837.

## **Norfolk Landscape**

### **Reg 25 Question**

The landscape officer is concerned that suitable steps have not been put in place to effectively ensure the healthy retention of existing trees on the site, particularly at the proposed entrance, where it appears there may be tree losses in order to achieve the 7.3m entrance. They



therefore request that further details of the retention and protection of trees, and should there be unavoidable losses, suitable details of any replacement planting proposed.

### **Breedon Reg 25 Response**

As discussed above the existing field access will no longer be used. This will be planted up with a native mix of thicket plants. Approximately 16 plants will be planted in the old field access area. Instead of using the field access a new access will be constructed further south along Crab Apple Lane and the lane widened to 6.5m. The widening will take place on the western side of Crab Apple Lane and so will have no impact of the existing tree belt on the eastern side other than to create the access itself. To create the new access will involve the removal of a small number of the G1 type plantation trees. The two oak trees along the northern boundary of the site have been assessed as category A2/3 of high landscape and culture value and will be retained and protected. The AIA provides a detailed method statement, giving details of root protection areas for individual trees and tree groups, as appropriate, and how these existing trees on site will be protected by fencing.

**Additional Landscape Points** In addition, it will be necessary to remove and divert the existing electricity cable and poles which cross the southern end of the application site. This pole and cable are currently within the view of users crossing bridleway BR5 when looking south to St Mary's Grade I listed building. The cable will, prior to extraction operations commencing be buried around the northern perimeter of the site, beyond the root protection zone of the trees and not within the sand and gravel extraction area. It is considered that the permanent diversion and burying of this cable is a landscape and visual benefit of the scheme, and also creates an improved view to the setting of St Mary's church when viewed from the bridleway. This is discussed later in relation to English Heritage's comments.

### **Norfolk Ecology**

#### **Regulation 24 Question**

Ecology (See the attached Comments from Norfolk County Council - Ecology)

Further details of the stage(s) at which the restoration the hibernacula and bird and bat boxes will be installed on the site are requested. The additional information should include a drawing, or drawings, showing the proposed locations of the enhancement measures on the restoration plan and provide details of the installation timings for all of the enhancement measures.

### **Breedon Reg 25 Response**

An Ecological Enhancement Plan has been produced as Addendum D to the ES by Crestwood Environmental Limited. The aim of the report is to provide detail to the ecological

enhancements set out in the ES Chapter 14. The location of the enhancements is shown in Figure 1 of Appendix 1 of the Ecological Enhancement Report. The report then details the bat boxes to be installed – the number, type and location. Similarly, the report identifies the number, type and location of the bird boxes to be installed. Finally, the report details the hibernacula that will be created for invertebrates and reptiles and how they will be constructed and where they will be located. In summary the report identifies the following enhancements set out in the table below:

**Table 1: Ecological Enhancements**

Enhancement	Number	Timing
Bat boxes	Four boxes open at the bottom	Any time of year, after Phase 5 and Phase 6 have been restored.
Bird boxes	Two 32mm hole boxes and two open fronted boxes	Any time of year, after Phase 5 and Phase 6 have been restored.
Hibernacula	Four log/stone/rock/rubble piles	March to October upon final completion of restoration.

## Norfolk County Council Public Health

### Regulation 25 Question

Submission of a Health Impact Assessment (HIA) is requested. Public Health advise that this should use an appropriate methodology carried out for the proposal to cover the extraction phase of the project, and to set out appropriate mitigation measures if required. The assessment should identify costs and benefits to vulnerable communities both immediately adjacent to the proposal and those in the surrounding area. It should consider both 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, for example, and consider both physical and mental wellbeing amongst local populations.

### Breedon Regulation 25 Response – Public Health

Breedon has prepared a Health Impact Assessment as an addendum to the ES - Addendum E. It has followed an appropriate methodology by screening, scoping and assessing the impacts of the proposed development on the existing health and well-being baseline of the Haddiscoe Parish and South Norfolk District and comparing this to the Regional and National health where appropriate. The HIA has applied a rapid health impact assessment methodology and followed established HIA processes as set out in the Wales Health Impact Assessment Support Unit, Worcestershire County Council Health Impact Assessment Toolkit, London Health Development Unit and Norfolk Health and Wellbeing Strategy.

The HIA has indicated where health and well-being has been considered within the submitted ES topic chapters and appendices their findings. The direct effects of these effects have been considered but also the indirect effects on the population in terms of the right of way diversion and on the well-being of the local population.

The Health Impact Assessment concludes that that the proposed development is not predicted to give rise to any significant adverse health-related impacts, which would change the health and wellbeing baseline of Haddiscoe Parish or South Norfolk District. There will be continued benefits to the wider District and County from the extraction of needed aggregate construction materials. There will also be long term benefits from the increased biodiversity value of the restoration scheme and improved views of St. Mary's church. As a result of mitigation measures designed into the operation of the proposal and measures to be applied to operations if the proposal is granted planning permission, the scheme is not predicated to give rise to significant adverse health or well-being effects.

The public has raised concern about the health impacts of dust particularly in relation to silicosis. The Health and Safety Executive report on silicosis states "It usually takes a number of years of regular daily exposure before there is a risk of developing silicosis. Silicosis is a disease that has only been seen in workers from industries where there is a significant exposure to silica dust, such as in quarries, foundries, the potteries etc. No cases of silicosis have been documented among members of the general public in Great Britain, indicating that environmental exposures to silica dust are not sufficiently high to cause this occupational disease."

The proposal at Manor Farm, Haddiscoe is to extract sand and gravel for a temporary period over a period of seven years. The exposed minerals will be coarse sand/gravel with a low dust potential, there will be no processing on site. The phased extraction would ensure that no more than 2.5ha of mineral surface is exposed at any one time. Bunding and dust management practices will be in place – See Dust Management Plan. The Air Quality Assessment (AQA) has considered the environmental conditions of the area, the extraction distance and the operational and dust management practices into consideration, it is concluded that air quality levels as a result of the proposal will be acceptable. The AQA reports "With regard to health effects, the IAQM minerals guidance 2016 takes the approach that, if background ambient PM10 concentrations are below 17µg/m<sup>3</sup>, there is little risk that a process contribution from a dust source would lead to an exceedance of the objectives. For this assessment, should the background PM10 concentration at the application site be less than 17µg/m<sup>3</sup>, the impact from the proposed development on health will be deemed as not significant. It concludes annual mean PM10 concentrations at receptors that may be affected by emissions from the proposed development would be close to background levels, i.e., 13.0-15.2µg/m<sup>3</sup>. IAQM minerals guidance takes the approach that there is little risk that a process

contribution from a dust source would lead to an exceedance of the objectives where background ambient PM10 concentrations are below 17µg/m<sup>3</sup>; therefore, the proposed development will have an insignificant effect on health due to fugitive emissions of PM10.

Breedon Trading Limited do recognise health and well-being concerns of individuals and the community. All operations and effects are mitigated to acceptable levels in relation to noise, dust and traffic. In addition Breedon has amended the extraction boundary to 100m from sensitive residential property boundaries to address public concern even though noise and air quality levels can be met at a smaller extraction distance than this. Breedon will establish a Local Liaison Group with representatives of the local community, if permitted, to ensure communication about operational start dates and stages and to address any particular issues. The proposal is not predicted to have a significant adverse or positive impact on the health or well-being of the community. The proposed scheme if permitted includes appropriate mitigation measures within the design and operation to minimise adverse effects of health and well-being on the community.

### **Dust Risk Assessment - Public Health**

#### **Dusk Risk Breedon Response –**

The national Planning Practice Guidance (nPPG) for England states that: *“Where dust emissions are likely to arise, mineral operators are expected to prepare a dust assessment study, which should be undertaken by a competent person/ organisation with acknowledged experience of undertaking this type of work”*.

Breedon has undertaken such an assessment and included it in the ES. The Air Quality Assessment has been undertaken by Air Quality Assessments. The Air Quality Assessment in the ES Chapter 10 has determined and concluded that baseline PM10 concentrations, including road traffic emissions, are less than 17ug/m<sup>3</sup>; therefore, more detailed consideration should not be required – see paragraphs 10.3.46-10.3.47 and Table 10.11 of ES Chapter 10. This is in accordance The IAQM guidance which states that where there is a baseline of PM10 concentration of 17ug/m<sup>3</sup> or less that there is no chance of an adverse health impact.

As such it is concluded by Breedon Air Quality Consultant that PM10 concentrations in a rural area such as Haddiscoe are not likely to reach the PM10 objectives of 40 ug/m<sup>3</sup> as a result of the proposed development. Any baseline monitoring of PM10s would likely only confirm concentrations are below 17ug/3.

Public Health has not provided any evidence as to why levels are likely to exceed 17ug/3 as a baseline at this site.

The nPPG for Minerals is clear that, where PM10 concentrations are not likely to exceed the air quality objectives, good practice measures should be sufficient to control dust emissions, without the need for monitoring and specific controls on PM10 emissions.

South Norfolk Council does not operate any PM<sub>10</sub> automatic monitoring sites, and no monitored PM<sub>10</sub> data is available. The Air Quality Assessment in the ES Chapter 10 identifies that the estimated annual mean PM<sub>10</sub> background concentrations in 2022 across the study area are well below the objectives i.e., 40 µg /m<sup>3</sup>. See Table 10.11 in the chapter.

As such Breedon submit a Dust Management Plan for the Site – this is included in ES Appendix F of the Regulation 25 Submission.

### **Norfolk Wildlife Trust**

#### **Regulation 25 Question**

Norfolk Wildlife Trust have commented that Chapter 14 of the Environmental Statement, which is concerned with Ecology, states in paragraph 14.7.5 that the Devils End Meadow County Wildlife Site (CWS) which is located 140m south of the Application Site is ‘unlikely to be greatly impacted as it is located over 100m away’.

However, they comment that this conclusion is unsupported by evidence and have therefore requested that evidence to support this conclusion is provided.

It is requested that the Dust Risk Assessment (as set out above) also considers the impact on e the Devils End Meadow County Wildlife Site (CWS)

### **Breedon Response**

Breedon has reviewed the CWS in relation to the potential impact of dust on the ecology of the site. The CWS is comprised of grassland with wet ditches, a small area of wet woodland and an area of dry woodland, lying along the Landspring Beck. The CWS lies due south of the proposed Haddiscoe Quarry Site some 140-170m away. The CWS is assessed as being of medium sensitivity to the impacts of dust.

Wind rose data has been reviewed from the Norwich area as part of the Air Quality Assessment submitted as part of the ES. A 10-year average wind rose from Norwich meteorological station shows that the prevailing wind direction is from the southwest which would transport any potential emissions from the proposed Haddiscoe north eastwards.

Within the Dust Management Plan a table has been produced which below identifies representative potential dust sensitive receivers and their bearing from the proposed quarry along with the resultant likely wind frequencies are detailed below. The prevailing wind data show that, for approximately 67% of the time, wind speeds are likely to be below 5 m/s, when dust is unlikely to become suspended in the air.

Analysis of average rainfall data for the area shows that, over the 30-year period from 1981 to 2010, an average of 160-170 days will be wet days, i.e., rainfall will be greater than 0.2 mm (Met Office, 2022). Therefore, for approximately 45% of the time, daily rainfall will be greater than 0.2 mm, when there will be natural dust suppression.

For the receptor R9 which is St Mary's Church which also lies some 140m south of the proposed site. This was assessed as having a 6% frequency of wind >5m/s towards receptor (percentage of time) and a 3% frequency of wind >5m/s towards receptor on dry days (percentage of time). This percentage frequency will be the same for the Devils End Meadow County Wildlife Site (CWS) which lies a similar distance from the site and in the same direction. Overall, the Air Quality Assessment concludes that dust will have a negligible impact on R9. In addition to R9 which is assessed as medium sensitivity even receptors R10 and R8 which are residential receptors and lie 100m south of the proposed quarry site. The Air Quality Assessment concludes that the impact of dust with the dust management mitigation measures in place will be negligible.

In addition an Ecological Assessment (EcIA) was produced as part of the ES and submitted. Section 14.7.5 of the EcIA states that the CWS is 'unlikely to be greatly impacted as it is located over 100m away.' In the EcIA it was stated that the greatest impacts of dust are within 100m of a source based on IAQM guidance. The IAQM guidance is relied on as evidence. This evidence is supported by the Air Quality Assessment and the results for St Mary's Church R9, which is the same distance and location south of the proposed Haddiscoe Quarry. This together with the dust suppression measures set out in the Dust Management Plan presented in ES Addendum F mean that it can be concluded that there is unlikely to be significant dust on the CWS.

Overall, it can be concluded from the IAQM evidence and the Air Quality Assessment that the CWS won't be impacted adversely.

## Historic England

### Regulation 25 Question

While the temporary and permanent changes to the landscape resulting from the proposed quarry would affect the setting of a number of listed buildings, Historic England is principally concerned with the potential harm that would be caused to the significance of St Mary's Church, a Grade I listed building approximately 100m to the south of the site boundary. St Mary's slightly elevated position on an escarpment lends it to a dramatic presence in the rural landscape.

To the north, including the proposed quarry site, the land is quite different, being typically flat, open, arable land. This working agricultural landscape allows the parish church to be experienced in its important historic agricultural setting.

The proposal would result in loss of views from the north where the church tower is seen rising above the agricultural landscape of the parish. The bridleway is particularly important in allowing public access to these views. Access to these views would be lost during operation, and their significance degraded by first the quarry and then by the permanent alteration of landform and character after low level restoration.

The quarry between St Mary and St Matthias would diminish their high group value – including but not limited to featuring prominently in connecting views. It is unclear why the Grade I listed church 100m from the site was not selected as a sensitive receptor in the noise assessment.

### Breedon Response

Historic England recognise the application site is entirely to the north of Loddon Road and so would have a lower impact than the scheme refused ten years ago in the appeal. They also identify in NPPF terms, the harm to the significance would be "less than substantial" and this should be weighed against the public benefit in accordance with the NPPF (2023) paragraphs 194-208. Breedon undertook this weighing exercise in paragraphs 12.45 and 12.46 of the submitted Planning Statement which concluded that the mineral benefit, net biodiversity gain (greater than ten percent) and landscape improvement tilts the public benefit balance and outweighs the less than substantial and temporary harm to the designated heritage assets.

Since, this balance was undertaken in 2022, Breedon has reviewed the Concept Restoration Plan (now HADD009Rev.A August 2023) and added additional public benefits in terms of a permissive path, opening up the view of St Mary's Church from the junction of Crab Apple Lane and Thorpe Road, a viewing /resting and information point in the NW corner of the restored site and the removal and burial of existing overhead cables.

However, to address the particular issues raised by Historic England Breedon has reviewed the Heritage Assessment and undertaken additional Landscape and Visual Assessment field work, particularly to understand the contribution that the application site makes to the setting of St Mary's Grade I Listed Church. St Mary's Church is a Grade I listed building and has a round tower.

Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires local planning authorities 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. The proposed development at Manor Farm is some 100m north of St Mary's Grade I listed church and there are two other listed buildings within its churchyard. The application site lies on the other side of the Loddon Road and as such the relatively shallow sand and gravel extraction, with no dewatering will have no physical impact of St Mary's Church, its features of special architectural and historic interest or the other listed buildings within the churchyard. They will be preserved, if planning permission is granted for the sand and gravel operations and restoration proposals.

The question of the proposal in relation to Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 is that special regard should be had to the desirability of preserving their setting.

St Mary's Grade I listed church is thought to date back to the 11<sup>th</sup> century. The Heritage Assessment submitted as part of the ES, Chapter 12 considers whether the landscape and setting around the church has changes over the last 1000 years. It identifies that since the medieval period the landscape of the proposed development area (PDA) has been in agricultural use. [This is supported by the earliest maps of the broader area which show an agricultural landscape dominated on the higher plateau land by arable with smaller enclosures of pasture and extensive grazing marshes on the low-lying land.] It identifies that the agricultural landscape of the Application Site and the land between St Mary's Church will have changed overtime due to different agricultural practices and boundary treatment of the Application Site and changes to the church land to the south of Loddon Road.



The Heritage Assessment reports that the Application Site has changed over time. It identifies that Faden's Map of Norfolk, 1797, is the first to show the Application Site in any detail (Figure 12.13 of the Heritage Assessment ES Appendix 12.5). *“Land use and settlement pattern is similar to today, but field boundaries, roads and tracks have changed. Crab Apple Lane is not shown, and two tracks cross the Application Site.”* The Heritage Assessment points to the current straightness of Crab Apple Lane and the straight field boundaries within the Application Site and that these indicate a reorganisation of the landscape here at, or soon after enclosure in 1809. *“The tithe map of 1840 (Figure 12.14) shows the reorganisation in place, with the parish boundary between Haddiscoe and Thorpe crossing the centre of the PDA in a broadly east – west direction, and again apparently straightened.”*

In addition, it identifies further change with the field boundaries around and across the Application Site having initially changed from unplanted to enclosed as a result of the Enclosure Act, but then back to unplanted post 1945 and then to enclosed again in the 2000s. Figure 12.15 of the Heritage Assessment ES Appendix 12.5 is taken from 1875 and shows the field boundaries planted with individual standard trees, including the southern boundary of the site and the southern boundary of the northern field. The boundaries appear to have been unplanted post 1945 and more recently the western, northern and southern boundary of the site have become more enclosed when the owner of the site, was awarded a woodland granted scheme in the early 2000 to plant these field boundaries.

The Heritage Assessment also identifies that the land to the north of the church and to the south of Loddon Road has changed with the addition of hedgerow planting along the southern side of the Loddon Road and that between the Church's ancient boundary wall and the Loddon Road is an 80m buffer of recent cemetery.

### **Setting of St Mary's Church-Grade I listed**

The setting of St Mary's Church is assessed in the Heritage Assessment. The boundary treatment influences the contribution that the Application Site makes to the setting of St Mary's Church. Paragraphs 12.4.7- 12.4.14 of the Heritage Assessment appraise the setting of St Mary's Church.

Two views of the church are considered of importance to the setting. Firstly, the view from the south – “the south it can be viewed sitting on a topographical eminence on the northern bank of the Landspring Beck valley. This view has attracted artists, including John Alfred Arnesby Brown (1866–1955) (Figure 12.20).” and secondly the view of less prominence but

nevertheless of importance, is from the west and along the Loddon Road when driving or walking towards Haddiscoe. The road gradually rises up towards the Church in a landscape of gently rolling agricultural land (Figure 12.21). Both these views enhance the significance of the Church in its landscape and since its construction these views have changed little, except for the introduction of some field boundaries. Neither view will be affected by the proposed development and the development will not be visible in the same visual 'envelope'. This second view of the Church and impact on setting formed a key issue in the Appeal, which involved not only the land to the north of Loddon Road, i.e., the current application site, but also land to the south of Loddon Road and to the west of St Mary's.

The Heritage Assessment, as discussed above, acknowledges that to the north of the Church (towards the Proposed Development Area - PDA) the landscape has the character of open countryside in agricultural use, but one that has changed both since the Church's construction (by enclosure) and again in the 20th century through field boundary loss. It states that the Church sits in the fork of two roads, including the busy A143 (50m to the south east) and the B1136 (Loddon Road), 90m to the north. These roads affect tranquillity, and the vehicular movement is intrusive. Also as discussed above the Heritage Assessment identifies that between the Church's ancient boundary wall and the Loddon Road is an 80m buffer of recent cemetery and views of the PDA from the Church at ground level are entirely blocked by tree planting along the Loddon Road. It concludes that this is a wide and substantial screen, with a depth of about 20m, which means that even in winter, there would be no views of mineral extraction. This can be seen on Figures 12.22-12.24. The locations of Figures 12.20-12.23, and the current context of the Church is shown on Figure 12.25.

The Heritage Assessment identifies that there would be views northwards over the PDA from the Church tower, but this is not a view enjoyed by the public. In future, and after restoration, this tower view whilst slightly altered due to lowering of the land surface, would not be perceptible as a post-industrial landscape. The view (from St Mary's Church tower) to St Matthias Church, Thorpe, whilst not a designed view, does hold historical significance given the near contemporary date of the two churches. This will be unaffected by the proposed development.

As discussed in the Heritage Assessment and above the Application Site itself does not currently contribute to the agricultural setting of St Mary's Grade I Church as the use and topography of the site is not visible from St Mary's Church or the land around the site. The Application Site is physically separated from the setting of the church by the existing boundary vegetation along both sides of the Loddon Road. As such, when the site is restored to meadow

grassland, at a lower topographical level, it will not be visible either. (Views from the tower have already been discussed above). The tree belts around the application site were planted in 2001 as part of the Woodland Grant Scheme 3 and these will continue to be retained.

Table 12.8 within the Heritage Assessment appraises the current setting of the listed buildings (that were scoped into the assessment) and identifies the following in relation to setting:

**Table 12.8: Assessment of setting in relation to PDA and magnitude of change in significance (from ES Heritage Assessment Chapter 12.)**

Asset	Current Setting	Change and Magnitude
Church of St Mary	Separated from PDA by 20m deep tree belt, Loddon Road and 80m of modern cemetery land. Intrusion from traffic (movement and noise). No views of PDA at ground level	No change at ground level. Views from church tower over PDA, but not accessible to public. No change in views towards the Church from key directions (south and west) Negligible adverse effect of slight magnitude due to change in view from Church tower during operations and after restoration. No change in view towards Church of St Matthias.
Church of St Matthias	Contained within a wooded environment. No views of PDA from ground level or tower.	No change. Key views to and from church unaffected.
White House Farmhouse	Set below the level of Thorpe Road. No views of the PDA at ground level due to topography, vegetation and development.	No change to views. Potential effects of noise and dust considered in other reports

The conclusion from the Heritage Assessment of the setting of St Mary's Church Grade I Listed is that there will be no change in views towards the Church from key directions (south and west). There will be no change at ground level and so the setting will be preserved. There will be views from church tower over PDA, but these views are not accessible to public. If the tower was opened up and views achieved there would be a negligible adverse effect of slight

magnitude due to change in view from church tower during operations and after restoration, but overtime as restoration planting matures, this tower view whilst slightly altered due to lowering of the land surface, would not be perceptible as a post-industrial landscape. The low grassland meadow, with peripheral woodland would be appropriate in the wider landscape setting of agricultural land, intermingled with woodland blocks and lowland Broads marshland in the distance to the north. There would be no change in view towards Church of St Matthias.

Historic England are concerned about the setting of St Mary's Church. When looking north from the church Historic England are concerned about the loss of the agricultural setting to the north of the church, where the Application Site is located, and sand and gravel operation proposed. As discussed above, the Application Site lies on the north side of the Loddon Road along the southern boundary of the application site is a 20m wide tree belt. The southern side of the Loddon Road is also planted with a substantial hedge. From St Mary's Church there is no contribution of the arable field to the setting of the Grade I listed church because of the intervening vegetation on both sides of the Loddon Road, even in the winter time. This is set out in the ES Heritage Assessment and repeated below. The only opportunity to see the agricultural fields to the north and the Application Site is from the church tower, which is not open to public view.

**Loss of Views of St Mary's Church – Grade I Listed Building** - Historic England is concerned that the application would result in loss of views from the north where St Mary's church tower is seen rising above the agricultural landscape. They are concerned that views of St Mary's tower would be lost during operation of the quarry and their significance permanently downgraded by first the quarry and then by permanent alteration of landform and character after low-level restoration.

The Application Site is in private ownership and so the only viewpoints are from bridleway BR5 which crosses the site from Crab Apple Lane in the west to Thorpe Lane in the north east. The application site is in arable agricultural use, but this is only apparent when:

- viewed from within the site on bridleway BR5, which crosses the site.
- when standing at the field access at Crab Apple Lane
- when standing at the entrance to the bridleway on Thorpe Lane. The perimeter tree belt screen nearby views of its agriculture use and topography.

The views of St Mary's Church from the Application Site from BR5 are discussed in the ES Landscape and Visual Assessment - Addendum H. The Addendum considers 4 existing viewpoints looking south towards St Mary's Church from within the Application Site. Three

viewpoints along BR5 (which are accessible to the public) and one viewpoint along the northern boundary of the site at the lowest point above ground level approximately 9.5m AOD. The Addendum assesses existing views of St Mary's Church from the application site, views when the bridleway is diverted, and extraction operations are in progress and then views when the bridleway is reinstated, and the Application Site is restored to low level meadow grassland.

The LVIA addendum concludes that currently when the arable crop is mature, the upper part of the church tower is visible from all four locations, although the crop height and boundary tree belt does screen the lower part of the tower and church itself. In addition, the views vary along the bridleway due to the different heights of the boundary tree belt and site angles.

The LVIA Addendum identifies that if planning permission is granted for the mineral extraction operations at Manor Farm, when the bridleway is diverted around the northern perimeter of the site, some views of the church tower will be hidden behind the soil bunds, but that there are gaps between the north western and north eastern bunds where users of the diverted right of way, will be able to continue to see the round tower of the church above the treeline. The bridleway will be temporarily diverted for some 5 years of the mineral extraction operation. It is acknowledged that during this time the foreground of the views from the bridleway will change to an active quarry, but this change will be phased and temporary. The LVIA Addendum assesses the visual effect of the operational quarry as large in magnitude and of moderate/major significance, but this would be in the context of a temporary development lasting seven years, with one additional year to finalise restoration and complete planting.

When the Application Site is restored – it will be restored at a lower level as shown on Concept Restoration Plan 2308\_037.004\_HADD009Rev.A August 2023 provided in ES Addendum G. The Application Site would be restored to species rich, lowland meadow grassland, with areas woodland at the field edges and native hedgerows with trees and an ephemeral water body. English Heritage have raised concern that once restored to the lower-level St Mary's tower would no longer be visible and the planting would screen the views. Question 2 of the LVIA Addendum considers the views from the restored Application Site to St Mary's Church once the bridleway is reinstated on its original route. The assessment considers the new levels that the bridleway would be reinstated on and the differences this would have on the views towards St Mary's Church tower. The LVIA Addendum provides sightline sections to demonstrate sightline views of the tower from the bridleway before and after reinstatement. These sections show that at most vantage points along the reinstated, lower-level bridleway, the upper parts of St Mary's church tower would remain visible, although there would be short sections where the bridleway views would be screened by the proposed planting.

The assessment shows that post restoration the views of the church tower will still be available. At point A1 at the western end of the route, closest to Crab Apple Lane, the level of existing and proposed landforms would almost be identical and so the view towards St Mary's Church tower would remain virtually the same. At point A2, where the reinstated bridleway route would be at its largest difference from the existing route height, at 4.3m below existing levels, at a height of 8.4m AOD the Parts of the bridleway will be at a slightly lower level, but the drawing and viewpoints show that despite being at a slightly lower AOD this will not disrupt site lines of St Mary's Church tower which will still be visible above the treeline.

The Restoration Concept Plan has been amended as part of this LVIA Addendum, with the woodland planting blocks and hedgerows repositioned to the edges of the site and away from the bridleway to minimise effects of future screening. A mitigation measure arising from the LVIA Addendum is that in the future the hedgerows height on site is managed, and that they are kept to a height of 2-2.5m, in order to maintain views.

In terms of setting and appearance of the restored site, the restoration scheme will result in a change in vegetation and planting from arable crop/bare ground to low level meadow grassland with areas of woodland planting and hedging. It is considered that overall the change in foreground views from the bridleway will not distract from the distant setting views of the St Mary's Church or the other listed buildings in the vicinity of the churchyard. The electricity cable and poles will no longer be within the view as these will have been diverted and buried as part of the development. The views of the tower from BR5 are on the distant horizon and its setting are of the upper round tower appearing above the treeline as you cross the bridleway, whether the foreground is set in the context of a ploughed field, newly planted crop, mature arable crop or restored meadow grassland, is not considered to be significant. The LVIA Addendum assessment concludes that at the post restoration stage "arable land would be replaced with grassland with woodland, scrubby planting and hedgerows which would offer vertical interest would visually break up the open expanse of grassland while also offering long terms benefits to nature conservation. The view of St Mary's tower would remain as existing, subject to the natural growth rates of the existing boundary tree belt." The LVIA Addendum H, Table – "Assessment of Visual Effects Tables for Additional Viewpoints A – \_C" considers that view across the bridleway once the Application Site is restored would be assessed as of small beneficial value in terms of magnitude and minor/moderate beneficial in terms of visual effects. As such the proposed restoration to grassland at a lower level will not conflict with the preservation of the setting of the Grade I listed church and its features or of the other listed buildings within the churchyard.

The LVIA Addendum also identifies that there are no existing viewpoints of both St Mary's Church and St Matthias Church from the bridleway or in the vicinity of the Application Site. Historic England suggested that there is a visual connection across the Application Site between the two grade I churches. The LVIA Addendum proves there is no visual connection available across the Application Site.

In addition, as part of the restoration scheme, the Concept Restoration Plan has been revised (see Addendum G) and it is proposed to provide a permissive path to the north west corner of the site, to one of the highest parts of the site (13-14mAOD), at this point a bench and information point will be provided for use by individuals and the local community. At this point views of the tower have a good sightline and are better than some of those views achieved along the existing bridleway. The information point could be a QR code on the bench or a board could be provided, which could provide information about the church, restored quarry planting and biodiversity or other information about the village.

#### **Impact of Operational Noise setting of the St Mary's Church Grade I listed.**

Historic England have raised concern that the Noise Assessment did not assess the impact of the proposed sand and gravel extraction on the noise environment and setting of St Mary's Church or indeed the other listed buildings.

As part of the Regulation 25 Response Breedon has commissioned Enzygo Noise Consultant's to extend the ES Noise Assessment (Chapter 8 and Appendix 8) to include assessment of the listed building assets. Enzygo have produced a Technical Note which is included as ES Addendum I. In summary their findings are that noise from the quarry operations would not adversely impact upon, or cause damage to, the listed assets themselves. Therefore, the noise assessment update has focused on the potential impact on users and visitors only to the assets. This assessment would identify whether the noise environment and as such setting for users/visitors to the assets is diminished.

The existing noise environment of St Mary's Church is an elevated position, in the village of Haddiscoe, with the A143 to the south of the church and the Loddon Road, the B1136 to the north. To determine the potential noise impact to users or visitors of the identified listed assets, additional baseline noise monitoring has been undertaken where required and predicted noise levels at existing receptors, undertaken by Spire Environmental Consultants Ltd, extrapolated to the listed assets. The updated Noise Assessment concludes that overall, the predicted change in ambient noise levels due to the introduction of the proposed satellite

extension would have no or a 'not significant' impact at any of the listed assets. The Noise Assessment and Addendum considers a worst-case noise scenario and based on a worst-case scenario the noise levels at St Mary's Church would increase by +2.7dBA. This level of increase is assessed as not significant. As such it can be concluded that even under the worst-case noise scenario (all equipment operating at the same time at maximum power levels) the proposed quarry extension operations would not affect the setting of the listed building assets, or St Mary's Church Grade I listed Building or impact on visitors to the churchyard. The proposals are for a temporary period of up to 7 years (including 1 year's final restoration and planting). The setting would be preserved from a noise perspective.

### **Preservation of Setting - Overall Conclusion**

Based on the existing and updated Heritage, Landscape and Visual and Noise Assessments and referring to the existing Air Quality Assessment and Dust Management and Mitigation Plan, it can be concluded that the proposed Satellite extension quarry will not have an adverse impact on the setting of St Mary's Church or indeed St Matthias Church, White House Farmhouse or the other listed buildings around St Mary's Church.

There are no existing ground views of the proposed Satellite extension quarry site or the current arable agricultural land. The boundary tree belts, even in winter, contain the Application Site and any contribution it could make to the wider landscape. The tree belts are planted under the Woodland Grant Scheme and there is no intention to remove them. The proposed Satellite extension quarry site and its agricultural land use do not contribute to the setting of St Mary's Church from the ground. The only views of the Application Site would be from St Mary's Church tower, but this is not open or accessible to the public. The views obtained from the tower have been identified by the Heritage Assessment as a negligible adverse effect of slight magnitude due to change in view from the tower during operations and after restoration. However, overtime the restoration view would soften, as the meadow grassland and woodland planting matures. This mature planting would additionally disguise the changes in the topographical level of the site when viewed from the tower, should it become open to public view in the future. Over time as restoration planting matures any tower view (if opened up) whilst slightly altered due to lowering of the land surface, would not be perceptible as a post-industrial landscape and would be appropriate in the wider landscape setting of agricultural land, intermingled with woodland blocks and lowland Broads marshland in the distance to the north. There would be no change in view towards Church of St Matthias.

The proposed Satellite extension quarry site is private agricultural land and only accessible to the public via bridleway BR5. Existing views of St Mary's Church are intermittent of the tower



above the southern boundary treeline of the site, with the arable crop and electricity poles and cables crossing the view. During operation the bridleway would be diverted for five years, views of St Mary's Church tower would still be obtained, in the context of an operational quarry. Following restoration views of St Mary's Church tower would continue to be available to users of the reinstated bridleway. The vegetation in the foreground will have changed to a low grassland meadow and the electricity cables and poles removed from view. Additional viewing opportunities would be provided by the permissive path and bench.

There is no impact on the setting between St Matthias and St Mary's Church as there are no viewpoint of both churches or towers available from within or just beyond the site.

Overall, the setting of St Mary's Church Grade I listed building would be preserved by the proposed temporary development. This is supported by the Heritage Assessment which concludes that the setting of St Mary's Church will be preserved including the setting of the features of special architectural or historic interest identified within its listing. As such, Norfolk County Council in determining the application in relation to its statutory duty under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 can have special regard to the desirability of preserving the listed buildings of St Mary's Church – Grade I, St Matthias Church Grade I and White House Farmhouse Grade II and the other listed buildings within the church graveyard of St Mary's Church and conclude that the proposed satellite quarry will preserve these listed buildings and that in addition their setting and any special features or any features of special architectural or historic interest which they possess.

### **Haddiscoe Parish Council**

#### **Regulation 25 Questions**

Haddiscoe Parish Council is concerned for our parishioners' mental health and other real health implications. Employees on site are given specialist protective equipment to protect them from the working environment. Local residents within 100m, many much closer, include elderly, young children and those with severe health conditions.

### **Breedon Response**

Breedon take health and safety issues seriously for staff and the local community around any of their sites. Breedon has tried to allay the concerns of individuals and the community regarding the health and well-being impacts of the proposal at Manor Farm, Haddiscoe. A public exhibition was held prior to the application being submitted, to set out what the mineral development and extraction operations involve and to answer questions. A site visit was arranged to Norton Subcourse. It is proposed that if permitted a Local Liaison Group would

be set up to hear local concerns and answer questions. The Liaison Group would meet no less than twice yearly to address and issues.

The quarry would operate within strict planning, environmental and health and safety controls and levels which are set out in the Planning Application and assessed as part of the Environmental Impact Assessment.

A Health Impact Assessment (HIA) has been prepared and is submitted as part of this Regulation 25 Response. The HIA concludes that overall, the proposed development is not predicted to give rise to any significant adverse health-related impacts, which would change the health and wellbeing baseline of Haddiscoe Parish or South Norfolk District.

Breedon also understand the perceived concerns of residents in relation to the operation, and whilst it is safe and acceptable from a noise and air quality perspective to work the sand and gravel at a distance of less than 100m from the boundary of sensitive properties and have demonstrated this. They have amended the proposal and moved the extraction boundary to a distance of 100m from sensitive properties to address perceived concerns about the proximity of the extraction boundary. This is shown in the updated phasing plans in Addendum B. This will result in a small decrease in the amount of mineral extracted by 20,000 tonnes. This stand-off distance has also been requested by other consultees and is suggested as a margin in the draft Norfolk Minerals Plan policy review.

**Out of Date Technical Assessments** – Haddiscoe Parish state that the Application documents are based on studies and reports are based on desktop evaluation and not recent studies.

### **Breedon Response**

The Heritage Chapter and Soils Chapter of the ES have used existing desktop and field assessment work from the larger and previous planning application reference C/7/2011/7020 and was submitted in October 2011. The previous application consisted of two parcels of land - one to the north (Manor Farm) and one to the south of Loddon Road. It is acknowledged that the soils and archaeological fieldwork and assessment are based on earlier studies supplied as part of a larger previous application. This soil and archaeological field information was comprehensive and has not have changed since it was last undertaken. This previous fieldwork data has been reviewed to ensure it meets current EIA assessment standards. Breedon consider no additional mitigation benefit would be gained in digging additional soil pits or additional trial trenches in the field as part of the updated assessments.

## Lighting

Breedon can confirm that given the proposed Satellite nature of the extension site, with no on-site processing, there will be no need for fixed lighting to be installed. The quarry will operate within the hours set out in the Planning Statement and any lighting will be provided by the vehicle lights on the excavator and other vehicles or machinery on site as required. There will be no night-time working and no working beyond 17.00 during the weekdays.

## Bridleway Diversion – What is the validity of rerouting a bridleway?

### Breedon Response

Section 119 of the 1980s Highways Act allows existing public rights of way to be diverted to allow development and if the diversion benefits the landowner/occupier or the diversion benefits the public. In addition, Town and Country Planning Act 1990, Section 257 allows the diversion or extinguishment of a public right of way for a development that has planning consent to take place.

## Dust Suppression

Concerns about the amount of water used for dust suppression would cause flooding and the water table to rise. Also concerns of silica laden water.

### Breedon Response

The water used for dust suppression would be imported into the site in a water bowser and so there would be no impact on local supply. The water bowser used would not increase traffic movements as it would access water supplies from Manor Farm. The amount of water required to damp down the site and control dust would not result in rises in the water table or flooding. The water would be discharged in a fine spray to keep surfaces damp at times of dry and windy weather conditions. The Application Site contains sand and gravel, any existing water percolating through the site travels through the sand and gravel deposit. Any water from the water spray on site would act in a similar manner to rain water percolating through the site.

## Other Comments

### Broads Authority Comments

*“Providing that the specified mitigation is followed, and restoration is undertaken as suggested, we do not feel that this development will have significant impacts on the National Park.*

*However, Habitats Regulations Assessment screening, and Appropriate Assessment if required, should be completed by the competent authority to assess and mitigate any likely significant effects on the local Natura 2000 designations.”*

### **Breedon Response**

The Broads National Park Boundary is 10m from the site, but the Natura 2000 designations are over 4.5km from the site. In the ECiA it has stated there would not be any impacts. An HRA if produced would reflect this assessment in the ECiA.

### **Waveney, Lower Yare and Lothingland IDB Comments**

We request that any discharge that may subsequently be proposed is facilitated in line with the Non-Statutory technical standards for sustainable drainage systems (SuDs) specifically S2 and S4.

### **Breedon Response**

The application site will not be dewatered and there will be no processing plant on site and so there will be no operational discharge of water.

### **Traffic and Road Safety - Thurlton Parish Council, Toft Monks Parish Council, Hales and Heckingham Parish Council**

All have raised concerns regarding increased HGVs.

### **Breedon Response**

The HGVs will travel out of Crab Apple Lane onto the Loddon Road and head west to Norton Subcourse haul road. There will be no Breedon HGVs travelling through Thurlton to access Norton Subcourse. The drivers of the HGVs between Manor Farm and Norton Subcourse will be employed by Breedon and made aware of the route between the two sites.

The proposed development will not result in an increase in traffic on the A143. Norton Subcourse has planning permission for some 100 movements. The materials extracted from Manor Farm, Haddiscoe will be processed at Norton Sub-course and fall within these existing permitted movements. There will be no increase in HGVs movements on the A143.

Norton Subcourse sands and gravels and would be produced and exported on the same annual rate as assessed for the 2017 approved Application Reference - C/7/2012/7017 - i.e., around 200,000 tonnes per annum of aggregate exported off site. The importation of the Haddiscoe gravels would not extend the lifetime of the permitted Norton Subcourse quarry -

which is permitted until 2036. The gravels would just enable the quarry to be worked to its potential as previously assessed, and for the higher quantity of extracted sands to be made into saleable aggregate product. Norton Subcourse Quarry was assessed, when planning permission was granted, in terms of traffic to be able to export 200,000tpa material - this equates to circa 50 HGV vehicles (or 100 movements i.e., 50 in + 50 out) on average.

### **Norfolk Historic Environment**

NCC Historic Environment Officers have commented that if planning permission is granted that the proposal be subject to a programme of archaeological mitigatory work. They have suggested wording for a suitable condition including that *“No development shall take place other than in accordance with a Written Scheme of Investigation under condition A and any other addenda to the WSI covering subsequent phases of mitigation.”*

### **Breedon Response**

Breedon are content to accept a suitably worded archaeological condition but would like to draw NCC Officers attention to the Written Scheme of Investigation submitted as Appendix 12.6 to the ES. For ease of reference this WSI is submitted as part of this Regulation 25 updated as ES Addendum J.

### **South Norfolk District Environmental Health**

The Environmental Health Officer has requested a condition to control the hours of operation on site and also requested the submission of an Operational Management Plan covering communication with neighbours and detailed management arrangements to control noise and dust.

### **Breedon Response.**

Breedon will accept a condition on hours of operation. The Planning Statement should be referred to for the proposed hours of operation which during the weekday would be 0800-1700. This is earlier than that proposed by the District Environmental Health. Breedon consider an Operational Management Plan is not necessary. A Local Liaison Group will be set up to communicate operations with the local community and can address complaints. A Dust Management Plan – Addendum F has been submitted to manage and mitigate dust. If planning permission is granted the proposed development would be subject to normal operation and temporary operation noise limits. This is acceptable planning practice for minerals development and in accordance with minerals noise planning guidance.