

**FOLKES**  
**PLANT AND AGGREGATES LTD.**

**EXAMINATION OF THE NORFOLK MINERALS AND  
WASTE LOCAL PLAN**

**HEARING STATEMENT (REP 99101)**

**PROVISION FOR MINERAL EXTRACTION**

**ON BEHALF OF FOLKES PLANT &  
AGGREGATES LIMITED**

**MAY 2024**

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## **Hearing Statement (Rep 99101) :** **Policy MP1: Provision for Mineral Extraction**

### **Main Matter 3 – Whether the Plan makes adequate provision for the steady and adequate supply of aggregate and industrial minerals.**

#### **In response to Q7.**

1. As regards national policy, the NPPF gives no advice to mineral planning authorities when preparing Local Plans on the need to impose specific circumstances when planning permission can be given to unallocated sites. To the contrary, the NPPF puts considerable emphasis on maintaining supply; encouraging prior extraction of minerals, especially where that extraction can take place without unacceptable adverse impacts on the natural environment and human health.
2. As drafted the Plan seeks to impose three specific circumstances where extraction on unallocated sites can occur, i.e. agricultural irrigation reservoirs, borrow pits and where prior extraction would prevent mineral sterilisation.
3. The imposition of specific circumstances and especially so few and in such restrictive circumstances is unnecessary given national planning guidance and in particular the need to reduce carbon emissions. The NPPF (December 2023) gives guidance on achieving sustainable development which includes the environmental objective of ‘minimising pollution and ... moving to a low carbon economy’ (para 8c)). The Climate Change Act 2008 sets the goal of reducing greenhouse by at least 100% of 1990 levels (net zero) by 2050.
4. In the context of a climate emergency, it is therefore surprising to see the draft Plan on the one hand recognise the need to reduce carbon emissions but on the other fail to adopt a positive policy which would lead to a significant reduction in emissions resulting from the haulage of mineral in road vehicles.
5. This contradictory approach is exemplified in the draft Plan by comparing the County-wide basis taken in calculating the mineral landbank set against certain policies. To illustrate, paragraph MP1.29 states, ‘the MPA does not consider that information about mineral supply in specific County sub-areas ... to be relevant or material to its decisions in respect of unallocated Sites.’ So, a shortage of mineral supply in one part of the County is not to be met by granting consent to an unallocated site in another part but instead is to be met by transporting mineral from one part of the County to another part to make up the shortfall.

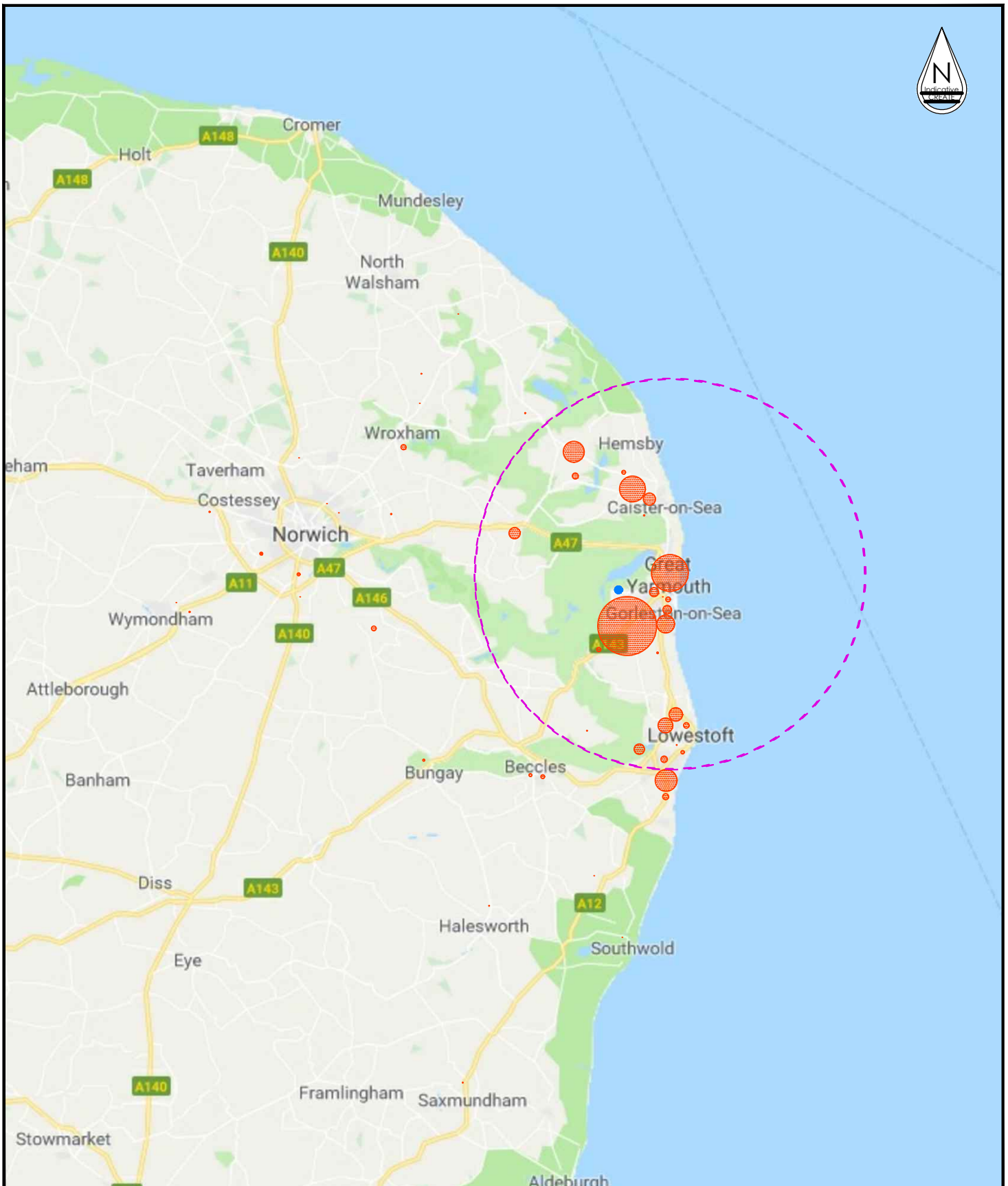
This approach runs contrary not just to national climate change policy in minimising transportation but is also contrary to policies set out in the draft Plan itself. For example, Minerals Strategic Objective MS08 seeks to ensure mineral development minimises its impact on climate change by minimising greenhouse gas emissions and providing for sustainable patterns of minerals transportation. Similarly, Strategic Policy MW3: Climate change mitigation and adaption, requires proposals for new mineral developments and extensions to set out how the transportation related to the development will help reduce carbon emissions and again Strategic Policy MP2. Spatial strategy for minerals extraction in reference to the Key Diagram, requires specific sites for sand and gravel extraction to be located within five miles of one of Norfolk's urban areas.

6. It is well understood that the transportation of mineral by road results in significant carbon emissions and it follows the further the distance travelled the greater those emissions will be. Transportation of a heavy product such as aggregate results in particularly high emissions per mile travelled.
7. The Respondent operates a quarry (Welcome Pit), in Burgh Castle which lies some 3 miles west of Great Yarmouth one of six settlements classified as main urban areas in the County. Surprisingly Welcome Pit is not shown as an existing sand and gravel extraction site on the Key Diagram despite it being in continuous production since the early 1950's and serving the Great Yarmouth sub-area (refer to Appendix A). The Key Diagram does, however, show sand and gravel extraction allocations and examination of the Diagram shows only a single allocation some 9.2 road miles from the centre of Great Yarmouth (Haddiscoe MIN 25). At the time of writing, this allocation is subject to an undetermined planning application for a new quarry. Notably the application proposal, other than for dry screening of the raw aggregate at source, instead looks to transport the dug mineral to an existing quarry operated by the Applicant at Norton Subcourse some 4 miles to the west, i.e. in the opposite direction to Great Yarmouth. Transportation of processed aggregate from Norton Subcourse Quarry to Great Yarmouth would then involve travelling a distance of some 13 road miles. From the design of the proposal, it appears the destination for the aggregate is more aimed at Norwich rather than serving the Great Yarmouth market.
8. Given the Plan is due to run until 2038, there is a clear lack of provision for aggregate in the Great Yarmouth urban area unless that mineral is transported by road over distances considerably in excess of five miles. The alternative would be sea dredged aggregate imported into the port of Great Yarmouth, something which is not currently happening although significant quantities of crushed rock are (Norfolk Local Aggregate Assessment, dated May 2022).
9. This lack of provision in the Great Yarmouth sub-area or indeed in the case of another sub-area where a shortfall occurs, should be addressed by introducing a greater degree of flexibility in the circumstances where planning permission can be granted to unallocated sites.

10. The imposition of specific circumstances is notably contrary to the approach taken in Local Plans prepared by other mineral planning authorities. For example, the Suffolk Minerals & Waste Local Plan, adopted in July 2020, does not discourage applications and the granting of consents for unallocated sites where all other policy requirements are met.
11. Ideally, the Respondent would wish to see the Plan amended to no longer impose specific circumstances but instead be willing to allow extraction on unallocated sites. Alternatively, an additional circumstance should be added whereby consent can be granted to an unallocated site where there is a proven shortfall of supply within a sub-area. Either approach would enable the mineral planning authority to react to a landbank shortfall in a sub-area and thus avoid the need for lengthy transportation with its associated carbon emissions. The amendment would also bring the Plan more into line with national climate change policy and the reality of the climate emergency.
12. On behalf of the Respondent, I would request a strong preference for the draft Plan to be amended to allow extraction on unallocated sites where all other policy requirements are met. Alternatively, the Respondent would request the draft Plan is amended to include the additional circumstance requested by the Respondent where extraction can take place on an unallocated site, i.e. a shortfall of aggregate supply in a sub-area.

## **APPENDIX A**

### **Great Yarmouth Sub-Area – Welcome Pit Mineral Sales**



**KEY:**



WELCOME PIT QUARRY DELIVERIES BY POST CODE  
CIRCLE SIZE REPRESENTS NUMBER OF ORDERS, TIMEFRAME 01 JULY 2018 TO 30 JUNE 2019



10 MILE RADIUS FROM CENTRE OF GREAT YARMOUTH

● WELCOME PIT

Mapping sourced from Google Maps.


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REV	DATE	AMENDMENT DETAILS	DRAWN	APPROVED

**Telephone: 01603 877010**

PROJECT WELCOME PIT, BUTT LANE, BURGH CASTLE	DATE 18.07.19	DRAWING STATUS INFORMATION	
DRAWING TITLE GREAT YARMOUTH URBAN AREA - MINERAL SALES BY POST CODE (APPENDIX I)	SCALE(S) NTS	DESIGNED MDA	DRAWN MDA
CLIENT FOLKES PLANT & AGGREGATES LTD	JOB No 1112	CHECKED MDA	APPROVED MDA
DRAWING No 06/201		REVISION -	



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ORIGINAL SHEET SIZE - A3 Portrait  
DO NOT SCALE