

Independent Examination of the Publication Draft Norfolk Minerals and Waste Local Plan

Matters, Issues and Questions

Hearing Statement on behalf of the Longwater Gravel Company

Main Matter 4 – Whether the Mineral Extraction Sites proposed for sand and gravel, carstone and silica sand extraction are acceptable in planning and environmental terms and are deliverable.

Question 5 - Specific Site Allocation MIN 64 – land at Grange Farm, Buxton Road, Horstead – Is the extent of the allocation sufficient to contribute to sand and gravel supply for the Plan period?

No - The existing planning permission and allocated reserves will both expire in 2036. This was not a problem at Horstead Quarry until the plan period was extended to 2038.

Reason:

Norfolk County Council commenced the Minerals and Waste Local Plan Review in February 2017 by first asking for confirmation that sites which were already allocated could continue to be included as a preferred sites for an extended plan period up until 2036. At this time, Horstead Quarry had allocated reserves of approximately 900,000 tonnes in two extension areas, both of which formed MIN64. The first extension area had been granted planning permission in 2013 and around 250,000 tonnes of reserves in this area remained. The second extension area, which had estimated reserves of 650,000 tonnes was proposed to be carried forward as an allocated site.

Based on a start date of 2020 and a maximum output of 50,000 tonnes/year (limited by planning condition) over the extended plan period to 2036, we believed that we would have sufficient minerals allocated in the plan without the need for any additional allocation. We assumed, perhaps wrongly, that if we did exhaust mineral reserves well before 2036, we would still be able to apply for planning permission for an additional extension, even though the land wouldn't be allocated as the adopted Core Strategy policies did not preclude this.

However, since the review of the minerals and waste plan commenced in 2017, a number of changes to the mineral plan have changed this position:

- In October 2019, the 'preferred options' document was published for consultation. It was noted that Policy MP1 now included a paragraph which stated that applications for planning permission for sites not allocated would not be considered by NCC unless there was an 'overriding justification and/or overriding benefit for the proposed extraction'. At the time this did not concern Longwater as we still believed that we had sufficient reserves to last the plan period and, in any case, there was nothing that we could do as the opportunity to submit another area at Horstead Quarry for allocation had closed at the end of the call for sites period in August 2017.
- In September 2022, the 'pre-submission' document was published for consultation. This stated that the plan period would now be 2026-2038. This creates the problem as there were only enough allocated reserves to last until 2036. To continue to operate until 2038, Horstead Quarry will need additional reserves to be allocated.

Whilst we appreciate that any proposed allocation at Horstead Quarry may not have been successful, but if we had known in June 2017 that the plan period would be 2026-2038, and that mineral planning policies would be changed to prevent applications for non-allocated sites would from being considered, then we would have submitted another potential extension area of land for consideration.

Simon Smith

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