Representations on [Initial Consultation document - Question 61: Proposed site MIN 19 & MIN 205](https://norfolk.jdi-consult.net/localplan/readdoc.php?docid=46&docelemid=d3999#d3999)

**Representation ID:**[**93093**](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=93093)

**COMMENT** Norfolk County Council - Natural Environment Team (Ms E Smith)

Summary:

Whilst the removal of the plant is now not a consideration in the issue of landscape gain, with the right restoration these sites could provide other landscape gain.

[More details about Rep ID: 93093](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=93093)

**Representation ID:**[**92931**](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92931)

**COMMENT** Environment Agency (Miss E Stewart)

Summary:

Sites MIN 40, MIN 19, MIN 205, MIN 201, MIN 35, MIN 51, MIN 13, and MIN 32 propose low level restoration using inert material to restore the site. Whilst these sites do not lie within an SPZ we would expect groundwater to be sufficiently protected. This would involve a robust waste acceptance criteria. We would expect diligence is maintained to ensure non-inert wastes are not accepted at this site. If deposition will be sub-water table, as at sites MIN 200 and MIN 102, the applicant should refer to the EA technical guidance note 30\_18 'Compliance with the Landfill Directive when depositing inert waste into water'.

[More details about Rep ID: 92931](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92931)

**Representation ID:**[**92410**](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92410)

**COMMENT** Norfolk Wildlife Trust (Mr M Jones)

Summary:

We support the Council's proposed to remove the following sites from further consideration in the plan on the grounds of adverse impacts on wildlife sites, namely MIN 102, MIN 201, MIN 48, MIN 45, MIN 19, MIN 205, MIN 74 and MIN 77.

[More details about Rep ID: 92410](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92410)

**Representation ID:**[**92341**](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92341)

**COMMENT** Ministry Of Defence (Defence Infrastructure Oranisation) (Ms L Dale)

Summary:

DIO Safeguarding main concern when reviewing Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme.  
The county of Norfolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall and RAF Marham.  
On reviewing the proposed mineral sites the following occupy statutory birdstrike safeguarding consultation zones for RAF Marham: MIN 19 & 205;76;77;40; SIL01 SIL02; AOS E &J.  
Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety. Therefore, we would recommend dry restoration and dry phased working.

[More details about Rep ID: 92341](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92341)

**Representation ID:**[**92141**](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92141)

**COMMENT** Middleton Aggregates Ltd represented by Stephen M Daw Limited (Mr Stephen Daw)

Summary:

The Site (MIN 19 & MIN 205) is suitable for Allocation for the following reasons:  
  
(i) Historic Environment -  
The fenlands along this section of the River Nar were enclosed, allotted, drained and improved following a series of Acts passed in the 25 years after 1790. The present landscape, a grid-like network of fields now largely under arable cultivation, was created at that time. The boundaries of the proposed allocation area are formed by die-straight boundaries. They were almost certainly laid out when the parish was enclosed in 1809. This new landscape was still under construction when mapped in 1813 by the Ordnance Survey Clearly, between 1796 and c.1815, this was a landscape which saw radical transformation.  
  
Aerial photographs clearly show that the Priory ruins stand within a roughly oval land unit defined by tracks and hedge boundaries extending north-east from the River Nar for c.1 km. The southern half is scheduled. These curving boundaries are very different from those of the late, straight-edged fields, which surround it and which would, of course, not have existed at the time of the Priory's occupation. The simple reason is that beyond the oval land unit - in essence the Priory's outer precinct - the land was wet and seasonally under water. This would have formed an important resource for the Priory, for fish and water fowl, and the River Nar, now embanked, could have provided access and opportunities for trade.  
  
Visually, and as appreciated on a recent site visit with Norfolk CC Officers, the proposed allocation area is sufficiently distant in a flat landscape to avoid harm to the setting of the scheduled monument and listed gatehouse.   
  
In conclusion, a water-based restoration would represent a return to a more authentic monastic landscape than the current, early 19th-century, fieldscape. This would be of benefit to the historic setting of the monastic complex. Visual setting would not be affected.  
  
(ii) Landscape -  
Supporting text gives the impression that the Allocation of MIN 19 was allowed, in no small part, to bring the asphalt plant under planning control. This is misleading as the plant has only ever operated under a time-limited planning consent and so planning control has always been in place. Indeed it is understood the plant is to be dismantled and removed next year (2019).   
  
Notwithstanding removal of the asphalt plant, the MIN 19 Allocation contains sand and gravel processing plant/stockpiles and so it is therefore incorrect to say that the whole of the MIN 19 area could be restored at the time of the asphalt plants removal.   
  
The approved afteruse of the MIN 19 plant site is woodland. The proposed mosaic of pools and wet woodland will be more appropriate to the Fenland landscape that might once have occurred in the area.  
  
The MIN 205 area is not grazing marsh as stated but has been in an arable use for several decades, this year growing sugar beet.   
  
Supporting text suggests that the proposals are to restore the site to open water. This is not the case, the proposals are to restore the site to a the mosaic of wetland/fenland habitats. Areas of open water will not be visible within this landscape as the water bodies will be on a much smaller scale than the majority of the open water lakes in the area (to which supporting text refers). The proposed mosaic will consequently offer a considerable landscape and ecological enhancement over the open arable field that currently exists and so is entirely consistent with the aims of Core River Valley Policy.

[More details about Rep ID: 92141](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92141)

**Representation ID:**[**92109**](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92109)

**SUPPORT** Natural England (Ms Louise Oliver)

Summary:

Agree that there would need to be detailed investigations regarding potential impacts on the River Nar SSSI.

[More details about Rep ID: 92109](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92109)

**Representation ID:**[**92021**](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92021)

**SUPPORT** CPRE Norfolk (Mr Michael Rayner)

Summary:

We agree that these sites are unsuitable due to their substantially harmful impacts on the River Nar and the Abbey Gatehouse and its setting.

[More details about Rep ID: 92021](https://norfolk.jdi-consult.net/localplan/viewrepfull.php?repid=92021)