

Norfolk Minerals and Waste Local Plan Pre-Submission Document
Reply from Haddiscoe Parish Council
MIN 25 land at Manor Farm, Haddiscoe

As our Parish Council members are not legally qualified, we cannot comment on the legality of the document however we would like to express our opinion on the different points raised as they are unsound and not effective. This area has previously been designated and had planning permissions applied for. After a great deal of expense and upset to our parishioners planning was refused. Even before the closing date of this pre-submission document Norfolk County Council have again validated a planning application from Breedon and consultations on this will start this week (Ref FUL/2022/0056).

Please take into account the views of the households who live and work in this area.

M25.1 Of all the allocated sites, MIN25 has by far and away the highest number of residential properties within 250 m of the proposed workings at 55 properties (with the exception of MIN40 which is an extension of an existing quarry). All of the other sites have less than 20 residential properties within 250 m of the proposed working area. The MIN25 site, unlike more suitable locations, is right in the middle of a village. This is quite contrary to your own Minerals Strategic Objectives, in particular MSO7 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". Air Quality: 3.18 states that "Mineral extractions and associated development should be located, designed and operated to ensure no unacceptable impacts on Air Quality". This is unsound and not effective.

M25.1 does not address light pollution in the winter months, at one of the highest elevations in the village. This is contrary to Section 2.4 of this document. This is unsound and not positively prepared

M25.2 describes 80 HGV movements per day but if the processed gravel is to be transported from Norton to Gt Yarmouth or Lowestoft, further HGV movements through Haddiscoe will add considerably to the overall traffic count. Inevitably, not all of these 80 plus HGV movements will be directly between the Breedon Quarry at Norton Subcourse and Crab Apple lane in Haddiscoe (e.g. HGVs on route from other drop offs to Gt Yarmouth or Lowestoft). The roads through the village of Haddiscoe are single track and already heavily used. Without restrictions on the 80 plus additional Breedon HGVs travelling through the village of Haddiscoe, the approval of the Crab Apple Lane site will adversely impact the safety of villagers. Additionally, Crab Apple Lane itself is a single track road, with no way to pass a lorry and no option to reverse onto the busy B1136. Last week there was an accident on this road junction as a lorry was unable to stop driving straight through a fence and hedge. This is unsound and not positively prepared

M25.8 describes "a small disused mineral working" on the Eastern boundary. This piece of land belongs to the Parish of Haddiscoe and is used as a recreational ground for children playing and dog walkers. Apart from the nuisance of noise and dust to these parishioners, children play unsupervised and although they may stray out of the pit onto agricultural fields it would be a quite different matter if they fell into a working quarry. This is quite contrary to your own Minerals Strategic Objectives, in particular MSO7 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". It is also at odds with your own Policy MW1 which is supposed to protect "Public Open Space, Local Green Space, the definitive Public Rights of Way network and outdoor recreation facilities". This is unsound and not positively prepared.

M25.9 is misleading in that it infers that the only reason Planning was refused and the appeal in 2014 was rejected, was the part of the proposed development south of the B1136. This is not the case. In his proof of evidence in 2014, Simon Smith (Planning NCC) quotes the original grounds for refusal, including "The landscape and visual impacts of the proposed development, including the construction of artificial bunds and land-raised areas would be detrimental to the appearance and rural character of the area" and "The proposed development would adversely affect the amenities of nearby residents due to increased noise, dust and traffic that would arise from the proposed quarry" which applies to the area as a whole, not just in the proximity of St Mary's church. This is unsound and not positively prepared

MP1 states that the shortfall of 12.6m tonnes is less than the estimated resource bank at 15.4m tonnes (appendix 1), so the Haddiscoe site (MIN 25) could be removed altogether and there would still be an excess of 1.5m tonnes (15.4m – 1.3m= 14.1m less 12.6m), assuming that all other sites are approved. The inclusion of recycled aggregates in the methodology would further increase the excess supply. This is unsound and not justified

M25. The Haddiscoe site is included at 1.3m tonnes. The Breedon presentation on the 16.06.22 estimated that the Haddiscoe site will only produce 0.65m tonnes, so its removal would have even less impact on the plan. We would also argue that the inclusion of recycled aggregate removes the need for the Haddiscoe site entirely. This is unsound and not justified

MSO6 states “To ensure the sustainable and expedient delivery of mineral extraction while protecting people from harm, positively contributing to the natural, built and historic environments and mitigating against unacceptable adverse cumulative impacts”. One such cumulative impact is the call for sites for housing allocation in the Greater Norwich Development plan, which includes four 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. This is unsound and ineffective.

M25. S4.1 states that “Mineral development and Waste Management within Norfolk will be undertaken that minimise and mitigate their contribution to climate change”. The plan acknowledges that gravel extraction is climate heavy. MS08 states “to ensure that mineral development addresses and minimises the impacts it will have on climate change by minimising greenhouse gas emissions during the winning, working and handling of minerals, providing for sustainable patterns of minerals transportation where practicable, and integrating features consistent with climate change mitigation and adaption into the design and restoration and aftercare proposals”. Min 25 is particularly climate change heavy as the sand and gravel is quarried, which releases the 100% carbon, but only the gravel is required and transported to the Breedon Norton Subcourse Quarry. Additionally, the Breedon proposal is to return the land to the land owner for an unspecified use, this is inconsistent with a positive climate change aftercare proposal. This is unsound and ineffective.

M25. States “The site will need to be worked without dewatering, unless a Hydrogeological Impact Assessment identifies either no unacceptable hydrogeological impacts or appropriate mitigation is identified to ensure no acceptable impact to hydrogeology”; The site is the highest point in the village and in close proximity to dwellings. 6.44 states that “mineral development must also ensure that there will be no significant change in the ground water or surface water levels, including monitoring of dewatering operations to ensure no adverse impacts on surrounding water availability and/or the water environment”. The excavation will have an unspecified impact on the water tables of the dwellings in the village, which have already been materially impact by a combination of heavy rainfall and prolonged drought conditions. This is unsound and ineffective.