

Our ref: B92/1

Dear Sirs

We are instructed by Norfolk Gravel (part of the RG Carter Group) to prepare and submit representations on the Pre Submission consultation of the Minerals and Waste Local Plan Review.

Norfolk Gravel owns and operates the existing sand and gravel pit at Beeston Regis. The site benefits from an allocation for an eastern extension (site MIN69 under the adopted MSA). The company is promoting the same area of land under this emerging plan (retaining the reference MIN 69).

This representation is structured across two headings as follows: -

1. General policy comments; and
2. Comments on site MIN 69.

Addressing each in turn.

### I. General policy comments

Norfolk Gravel would support the **Vision** promoted by the council in section 4 of the document. However, the company would like to see emphasis placed on the value and significance of minerals and waste development in providing a diverse and affluent rural economy consistent with Paragraph 84 of the NPPF (2021).

In relation to the Minerals Objectives, whilst Norfolk Gravel recognise that the council have an objective to provide a steady and adequate supply, it is considered that this needs to also include the actual commitment (i.e requirement to maintain relevant landbanks).

Norfolk Gravel is pleased to see the council's commitment to **Sustainable Development**, but remains disappointed to note that the council haven't provided a clear policy in this regard. Such an approach is clearly not consistent with the NPPF nor the attendant Planning Practice Guidance. The council already has a policy in this regard (SD1 of the Mineral Site Allocations DOD 2017) which could be easily translated into this emerging policy document.

The company would support Policy **MW1**, but would suggest that in the final paragraph when considering potential environmental benefits this could clearly states geo-diversity benefits where applicable.

Regarding Policy **MW2** whilst the company supports the aspiration for the use of other transport modes, more often than not such avenues are not available, and as such the term "*Where appropriate*" should replace the word "*All*". Similarly, in relation to the last bullet point of the policy is it not always practical to access a site by alternative means, and often access by car is the only means, especially for mineral sites which tend to be located in the rural hinterland.

No comments are offered on the remainder of the **General** or the **Waste Management** policies.

As regards to the **Mineral** policies the contents of paragraphs MPI-MPI10 inclusive are supported in full, although at the outset when considering the sand and gravel landbank, Norfolk Gravel would question why when considering the sand and gravel landbank ten year sales doesn't include 2021, when the returns and data should be readily available at this time of the year?

No comments are offered on the remainder of the **strategic landbank** type policies for the other minerals.

Under paragraph **MP2.5**, the company would question the definition of a Main Town as this does not appear to list the town of Sherringham which is a clear development centre identified under local policy documents.

In respect of Policy **MP2**, paragraph 23 of the NPPF states “**Broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map.**” Can the council please confirm that when referencing “resource areas” within the policy they are actually referring to the “Mineral Safeguarding Areas” on the Key Diagrams as a “reserve area” is noted in the legend for those plans.

Paragraph **MP7.5** refers to Green Infrastructure mapping. It is suggested that a high-resolution copy of the map provided is either included as an appendix or a weblink, as the drawing provided is of low quality and cannot be easily used on an interpretive basis.

In respect of Policy **MP7**, the application of the wording “**exceptional circumstances**” is questioned as this creates an unnecessary barrier to change. Sometimes the reason for a change can be simple, and therefore applying a qualifying criterion seems unjustified and unnecessary. The test should be no diminishment in quality, as per the remainder of the policy.

The absence of drainage and flood risk wording under Policy **MP7** is also notable as these are key aspects when considering the design of any restoration landform under the modern day planning regime.

It is respectfully suggested that Policies **MP9** and **MPI0** could be expanded to include reference to precast blockworks to use indigenous materials and aggregate bagging plants, as both are viable forms of ancillary development at aggregates sites in principal.

## 2. Comments on site **MIN 69**

Norfolk Gravel has secured planning consent (ref FUL/2019/0001) to recover approximately half of the mineral resource identified in this allocation profile. This planning consent was granted by the members of the council’s planning committee, as it represented as a sustainable and logical extension to the current site utilising the processing and access infrastructure (including access arrangements) of the latter. As such 1 million tonnes of the 2 million tonne allocation already forms part of the sand and gravel landbank.

The planning consent was implemented in early 2021, and the extraction operations are within the allocation area. It is therefore proposed that the initial bullet points under the site specific content take this into account.

Norfolk Gravel would also question the need to cover the northern part of the allocation area as this is now operable. Norfolk Gravel would be happy to provide further plan work to support this aspect should the council requires

Norfolk Gravel would not disagree with the wording of paragraph **M69.1** which is factual in nature but would suggest that for context the influence of the A148 on local amenity is clearly indicated as this forms part of the baseline consideration of any scheme.

Regarding paragraph **M69.2**, this matter was subject to detailed consideration as part of the determination of application ref FUL/2019/0001, with the Local Members agreeing at the point of determination that no such upgrades were required to the junction with the A148. Norfolk Gravel would maintain that there is no need or requirement for any upgrades to this junction which has continued to operate without incident even after the recommencement of extraction activities at the site in 2021. Thus, consistent with Paragraph 110 of the NPPF 2021 it can be readily demonstrated that a “**safe and suitable access to the site can be achieved for all users**”, and as such it is proposed that it is not justified or necessary to include the recommendations for right turn lanes etc.

Norfolk Gravel will continue to challenge the inclusion of such wording through all phases of the plan making process.

Reference paragraph **M69.5**, as part of the recently determined planning application Norfolk Gravel, have provided geophysical investigation and trial trench evidence which has identified that whilst there are finds and features on site these are indicative of the surrounding area and as such would only have a local value or significance. These investigations have been set out in a publication report as required under planning conditions. Again, this could be added to provide context, as the report has been published.

Norfolk Gravel would wholly support the wording of paragraph **M69.7** although again would ask if this content needs to be updated to reflect the grant of consent FUL/2019/0001, and the issue of consent FUL/2019/0000 which related to the older area of working. It may also be worth identifying that the concrete production relates to ready-mix only, as the site no longer has the ability to manufacture precast or other block work products (same comment applying to paragraph **M69.9**)

Norfolk Gravel would wholly support the wording of paragraphs **M69.9 to M69.13** inclusive and would reaffirm that as part of the current planning application the company is developing long term plans to sustainably manage the biodiversity and geo-diversity. In relation to paragraph **M69.11**, however Norfolk Gravel would point out that rights of way diversions will be required, and some of these have already been secured as part of the working of the minerals consented under FUL/2019/0001.

In relation to Paragraphs **M69.14 - M69.16** inclusive there is no justification for the inclusion of criteria specific to these designated sites. The operations (current or proposed) have no potential whatsoever to impact on the identified SSSI's (a point recognised in the draft wording itself), and therefore it is proposed that the inclusion of such matters is neither justified nor effective. The same comments also apply to Paragraph **M69.18**.

Paragraph **M80.19** relates to matters of geodiversity, and whilst Norfolk Gravel are under a current obligation for a watching brief for the current extension, it does not follow that this would be required for the remainder of site M69. If the current watching brief and annual reporting requirement doesn't identify any features of particular merit or significance, then there may be no need to continue arrangements. Instead of using the word "**essential**" in the ninth sentence, Norfolk Gravel would merely suggest that the wording "**potentially be required**" to take account of this occurrence.

No comments are offered on the remainder of the numbered paragraphs.

On the wording of Specific Site Allocation Policy **MIN 69** (land north of Holt Road, Aylmerton) Norfolk Gravel would re iterate the same points as above, and would comment as follows:-

- **criteria d** is proposed to be simplified, with any requirements to upgrade the nearby highway removed;
- the need for **criteria e** is questioned as the stand off is already significant due to the provision of advance planting that would remain in situ;
- under **criteria j** instead of using the word "**necessary**" the council could use the wording "**need to be maintained**" as the advance planting is already installed;
- it is suggested that **criteria o** be split into two, one aspect related to footpaths and the other related to interpretation boards. Again, however it is questioned why such content needs to be included when it already forms part of the conditions and obligations under consent ref FUL/2019/0001.

A key aspect for the remainder of the allocation area would be to continue to maintain a very high quality restoration scheme for both the existing site, and proposed extension, with an emphasis on nature conservation habitat (specifically heathland), with improved public access, better access to geo-diversity and retention of exposures wherever possible; together with information boards (conveying information about the ecology, geology and geomorphology of the site). The provision of permissive routes through the restoration landform would also be continued to be considered by Norfolk Gravel as part of any future development scheme.

In general terms the company supports the allocation of site MIN69, with the above intended to provide greater context and content for the allocation profile.

In the event that written reps and or a hearing is required as part of the examination process Norfolk Gravel would reserve the right to make further representations either to reinforce the above or provide new content where applicable.

I trust this is satisfactory, however should you have any queries or need any clarification on the above please do not hesitate to contact me.