

Our Ref: LW/NORFOLKCC/MWLPR/MM/L001

Date: 13th December 2024

Norfolk County Council
County Hall
Martineau Lane
Norwich
Norfolk
NR1 2DH

BY EMAIL ONLY

Dear Sir/Madam,

Norfolk Minerals and Waste Local Plan: Publication of proposed Main Modifications and Additional Modifications

Thank you for consulting Breedon on the publication of the above document. Please find enclosed our representation. Where we have proposed amendments to modifications, inserts are in **red** and deletions are ~~red and struck through~~.

Yours faithfully,

REDACTED

Lewis Williams

Planning and Estates Manager



MM01 Vision Page 19:

Insert the following text as the first paragraph:

"The policies within the Norfolk Minerals and Waste Local Plan will seek to deliver the economic, social and environmental objectives of sustainable development; the presumption in favour of sustainable development is set out in section 5 of this Plan."....

Amend the seventh paragraph as follows: "Minerals developments and waste management facilities will support the local economy, including the rural economy. [No changes to the first sentence] Opportunities to enhance such features will be supported. All developments will provide a minimum measurable 10% biodiversity net gain and wherever possible contribute to the delivery of the national Nature Recovery Network objectives."....

Amend the last paragraph as follows: "Mineral development and waste management within Norfolk will be undertaken in ways that minimise and mitigate their contribution to climate change, including reducing methane emissions and reducing carbon emissions to contribute to net zero carbon targets. The movement of minerals and waste will use sustainable transport methods where these are available, including low or zero emission vehicles. Mineral development and waste management facilities will, ~~and will~~ be designed and located to reduce the risk from and adapt to climatic effects, such as flooding."

Breedon has no objection to this Main Modification MM01.



MM03 - Minerals Strategic Objectives, Page 21

Amend objective MSO1 as follows:

"To provide a steady and adequate supply of aggregate minerals, by identifying adequate mineral extraction sites within Norfolk sufficient to meet the forecast need, based on the Local Aggregate Assessment; by maintaining a landbank of at least 7 years for sand and gravel and at least 10 years for Carstone; and safeguarding existing extraction sites and infrastructure."

Amend to the last sentence of objective MSO9 to state:

"The restoration scheme and aftercare will protect and enhance the environment, including landscape improvements, contributing to the delivery of the national Nature Recovery Network objectives and the provision of a minimum measurable 10% biodiversity net gains"

Breedon has no objection to this Main Modification MM03.



MM05 - Policy MW1. Development Management Criteria, Page 27

Amend policy point (h) as follows:

'The appearance, quality and character of the landscape, countryside and visual environment, including intrinsically dark landscapes, and any local features that contribute to its local distinctiveness'

Add new text at the end of the existing paragraph on the historic environment policy requirements in the NPPF as follows:

"Subject to the development proposal meeting the NPPF historic environment policy requirements, the preferred mitigation for developments affecting archaeological assets of less than national importance will be through the preservation of the archaeological remains in situ. Where in situ preservation is not justified, adequate provision must be made for excavation and recording including subsequent analysis, publication and archive deposition before or during development."

Amend the second bullet point as follows:

"providing biodiversity and geodiversity ~~net-gains~~, providing a minimum measurable 10% biodiversity net gain and contributing to the delivery of the national Nature Recovery Network objectives".

Breedon has no objection to this Main Modification MM05.



MM06 - Policy MW2. Transport, Page 37

Amend requirement (d):

"Unacceptable physical impacts on the highway network (e.g. road and kerbside damage) traffic movements along unsuitable sections of the highway network, taking into account the proposed level of traffic movements and provision of highway mitigation measures"

Add the following additional text to the end of the policy:

"In relation to sustainable transport, proposals are also required to comply with requirement (g) of Policy MW3."

Breedon has no objection to this Main Modification MM06.



MM07 - Policy MW3. Climate change mitigation and adaption, Page 39

Amend requirement (c) as follows:

" demonstrate how the proposed development will minimise and manage energy use (through the submission of an energy, climate change and sustainability statement) and set out how the proposal will make use of renewable energy, including generating the energy used on site from decentralised and renewable or low-carbon sources. Where on-site renewable or low-carbon energy generation is not practicable, evidence must be provided to the County Planning Authority and the applicant should source the electricity required from renewables through an energy supplier."

Amend point (e) to state:

"take account of potential changes in climate including rising sea levels, larger river flows and coastal erosion;"

Breedon has no objection to this Main Modification MM07.



MM29 - Paragraph MP1.3, Page 68

Amend the second sentence in this paragraph as follows:

"However, in the last 10 years (~~2011-2020~~)2013-2022 this has not been reflected in the actual sand and gravel production in Norfolk, which has not met the sub-national guidelines at any time in the last ten years and has only reached 2.57 million tonnes twice in the last 20 years."

Breedon has no objection to this Main Modification MM29.



MM30 - Paragraph MP1.4, Page 68

Update the data in the paragraph as follows:

"The average sand and gravel production on Norfolk over the last 10 years (~~2011-2020~~) was ~~1.369~~ (2013-2022) was 1.413 million tonnes per annum (tpa). Using the 10-year sales average to forecast the future need for sand and gravel would mean that sites for ~~40.134~~ 4.654 million tonnes of sand and gravel extraction would need to be allocated over the plan period. The 10-year sales average is higher ~~lower~~ than the 3-year sales average (~~2018-2020~~) of 1.384 (~~2020-2022~~) of 1.39 million tonnes. ~~Therefore~~ However, in order to plan for future growth, the 10-year sales average is considered to be slightly too low to use when forecasting future need for a steady and adequate supply of aggregate in Norfolk."

Breedon objects to this Main Modification MM30.

MM30 is not positively prepared and is not consistent with national policy.

Norfolk County Council ('NCC') has not taken into consideration Paragraph 226 of the National Planning Policy Framework (2024) ('NPPF') which states:

"Minerals planning authorities should plan for a steady and adequate supply of aggregates by:

- a) *preparing an annual Local Aggregate Assessment, either individually or jointly, to forecast future demand, based on a rolling average of 10 years' sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources)"*

t

Breedon maintain that the Plan needs to reflect NCC's own finding for future aggregate demand set out in its own Local Aggregate Assessment (2022) ('LAA'). The LAA identifies significant housing demand, economic demand, population growth and infrastructure requirements.

To remove this objection, Breedon suggest the last sentence of MM30 is amended to read:

"However, in order to plan for future growth in line with the LAA, the 10-year sales average is considered to be ~~slightly~~ too low to use when forecasting future need for a steady and adequate supply of aggregate in Norfolk."

This amendment will link the forecast to the LAA ensuring MM30 seeks to meet objectively assessed need so that it is positively prepared. It also ensures that MM30 is consistent with national policy. It avoids a scenario where NCC solely consider historic sales trends when considering future demand.



MM31 - Paragraph MP1.5, Page 68

Update the data in the paragraph as follows:

"The NPPG suggests the use of 3-year average figures to indicate recent trends in sales. The average sand and gravel production in Norfolk over the last 3 years (~~2018-2020~~) was ~~1.384~~ (2020-2022) was 1.39 million tonnes per annum. The three-year production average has remained stable for the last three years, and it has also been very similar to the 10-year production average during that period. Whilst this is lower than the previous 3-year average, it is still higher than each of the seven years from 2010-2017, therefore showing a general upward trend and production levels above the 10-year average."

Breedon has no objection to this Main Modification MM31.



MM32 - Paragraph MP1.6, Page 68

Update the data in the first sentence of the paragraph as follows:

"The permitted reserve of sand and gravel at ~~31/12/2020~~ 31/12/2022 was ~~14,511,385~~17.954 million tonnes."

Breedon has no objection to this Main Modification MM32.



MM33 - Paragraph MP1.7, Pages 68-69

Update the data in the paragraph as follows:

"~~Due to the 3-year sales average being slightly higher than the 10-year sales average, In order to plan for future growth,~~ a 10% buffer (~~0.137 million tpa~~) (0.141 million tpa) has been added to the 10-year average in the calculation of forecast need during the Plan period. Over the ~~18-year~~ 16-year plan period to 2038, using the 10-year average plus 10% (~~1.506 million tonnes per annum~~) 1.554 million tpa, ~~27.108~~ 24.864 million tonnes of sand and gravel resources would be needed in total. Taking into account the existing permitted reserve, the remaining need for allocated sites is ~~42.597~~ 6.91 million tonnes of sand and gravel.

Calculation of forecast need for sand and gravel

The 10-year sales average for sand and gravel (~~2011-2020~~) is ~~1.369~~ (2013-2022) is 1.413 million tonnes per annum (tpa)

For flexibility an additional 10% of ~~0.137~~ 0.141 million tpa has been included for each year

This is a total forecast need of ~~1.506~~ 1.554 million tpa

The forecast need for sand and gravel from ~~2021-2038~~ is therefore ~~1.506 million tpa x 18 years~~ (~~27.108 million tonnes~~) 2023-2038 is therefore 1.554 million tpa x 16 years (24.864 million tonnes)

Sand and gravel permitted reserve at ~~31/12/2020~~ = ~~14.511~~ 31/12/2022 = 17.954 million tonnes

Total shortfall is the forecast need minus permitted reserve = 12.5976.91 million tonnes

The total shortfall and minimum quantity to be allocated is therefore ~~42.597~~ 6.91 million tonnes which is equivalent to a need for ~~9.2~~ 4.4 years further supply over the period of the Minerals and Waste Local Plan."

Breedon objects to this Main Modification MM33.

MM33 is not positively prepared and is not consistent with national policy.

NCC has updated its figures based on the note updating sand and gravel provision¹. However, NCC has failed to have regard to future demand for sand and gravel set out in the LAA, as discussed at the EIP and as Breedon set out in its Hearing Paper on Main Matter 3.

The 10% flexibility figure was discussed with the Inspector and regarded as a buffer against Specific Sites not coming forward for development. It was not regarded as a measure to meet future growth demand for sand and gravel, as is indicated by the housing allocations, economic growth, population growth and infrastructure projects outlined in the LAA. These indicators suggest growth beyond that experienced over the past 10 years.

Breedon contends that either a 20-year sales average or 10-years sales average plus a 20% buffer should be used in the calculations to ensure that the Plan meets future growth forecasts outlined in the LAA. This change is suggested as the Plan simply rolls forward historic demand. It does not plan or consider the scenario outlined in the LAA which indicates that growth will significantly increase.

This amendment will link the forecast need to the conclusions of the LAA ensuring MM33 seeks to meet objectively assessed need ensuring it is positively prepared. It also ensures that MM33 is consistent with national policy, noting Paragraph 226 of the NPPF.

¹ Update on the sand and gravel, carstone and silica sand provision within the Norfolk Minerals and Waste Local Plan



MM34 - New paragraph before paragraph MP1.8, Page 69

Insert a new heading of 'Secondary and Recycled Aggregates' before this paragraph.

Insert a new paragraph before existing paragraph MP1.8 as follows:

"In accordance with the NPPF (December 2023), minerals planning policies should, as far as practicable, take account of the contribution that secondary and recycled aggregates would make to the supply of minerals before considering extraction of primary aggregates. In construction, the use of secondary and recycled aggregates should be considered ahead of primary aggregates and Norfolk's Local Planning Authorities should have regard to the approach in the NM&WLP and the NPPF and include the use of secondary and recycled aggregates in relevant policies in their Local Plans. Policy WP4 in this NM&WLP applies to the determination of planning applications for facilities producing recycled aggregates."

Breedon has no objection to this Main Modification MM34.



MM43 - Policy MP1. Provision for mineral extraction, Page 72

Amend the policy wording regarding sand and gravel as follows:

"The strategy for minerals extraction is to allocate sufficient sites to meet the forecast need for both sand & gravel and hard rock (Carstone).

For sand and gravel, specific sites to deliver at least ~~42.597~~ 6.91 million tonnes of resources will be allocated. The sand and gravel landbank will be maintained at a level of at least 7 years' supply (excluding any contribution from borrow pits or major construction projects).

Mineral extraction for sand and gravel outside of allocated sites will be ~~resisted~~ supported by the Mineral Planning Authority where ~~unless~~ the applicant can demonstrate:

a) There is an overriding justification and/or overriding benefit for the proposed extraction; and/or the landbank of permitted reserves of sand and gravel in Norfolk is below seven years; and

b) The proposal is consistent with all other relevant policies set out in the Development Plan

Amend the policy wording for silica sand as follows:

For silica sand, sufficient sites to deliver at least ~~40.34~~ 8.98 million tonnes of silica sand resources will be required during the Plan period."

The rest of the policy wording, regarding Carstone and silica sand, will not change.

Breedon objects to this Main Modification MM43.

MM43 is not positively prepared and is not consistent with national policy.

Breedon welcome the overall more positive approach and rewording to reflect that sand and gravel extraction will be supported and not resisted, however MM43 does not go far enough to ensure the steady and adequate supply of sand and gravel.

As already set out the use of 10-year sales plus a 10% buffer does not meet forecast growth outlined the LAA. Breedon suggests either a 20-year sales average or 10-year sales average plus a 20% buffer would better meet objectively assessed need.

The Council has an obligation to provide a steady and adequate supply of sand and gravel under Paragraph 226 of the NPPF which is defined as maintaining landbanks of at least 7 years for sand and gravel. As such supporting proposed extraction in a scenario where sand and gravel landbank is already below 7 years is in itself contrary to the NPPF. Policy MP1 must prevent this scenario from occurring rather than providing support where this important national policy is breached. Therefore, MM43 should be changed so that NNC support mineral extraction outside of allocated sites where the development is required to *maintain* a 7-year landbank.

Breedon also considers the criteria used in MP1 of overriding benefit, overriding justification and proposed extraction to *maintain* the landbank of permitted sand and gravel above 7 years should be met individually and therefore 'or' should be used rather than 'and/or' within the policy wording. Breedon suggests amending the wording such that it may be possible for development to meet one or more criterion with an overarching requirement to be consistent with all other relevant policies set out in the Development Plan.

Breedon suggest MM43 should be revised and amended as follows:



“Mineral extraction for sand and gravel outside of allocated sites will be supported by the Mineral Planning Authority where ~~the proposal is consistent with all other relevant policies set out in the Development Plan~~ and the applicant can demonstrate ~~one or more of the following~~:

- a) There is overriding benefit for the proposed extraction ~~and~~; or
- b) There is overriding justification for the proposed extraction ~~and~~; or
- c) ~~the landbank of permitted reserves of sand and gravel in Norfolk is below seven years; The proposed extraction is required to maintain the landbank of permitted sand and gravel above 7 years.~~

~~The proposal is consistent with all other relevant policies set out in the Development Plan.”~~

This is especially pertinent given the recent publication of the NPPF and the delivery of 1.5 million homes and increased growth and development aspirations. This is not considered by the current LAA (notwithstanding our concern that the Plan does not fully consider demand outlined in the LAA) therefore it is essential that increased flexibility is introduced into MP1 because demand for sand and gravel is likely to increase significantly.

MM44 - Paragraph MP1.25, Page 72

Amend the paragraph as follows:

"Paragraph 15 of the NPPF (December 2023) states that the planning system should be genuinely plan-led and provide a framework for addressing need and other economic, social and environmental priorities. To ensure future sand and gravel extraction is clearly focused on the Spatial Strategy and identified allocated sites in this Plan, whilst enabling flexibility for changing circumstances during the Plan period, other proposals for sand and gravel extraction at locations situated outside of the areas identified for future working will be supported normally ~~be resisted~~ by the Mineral Planning Authority (MPA). ~~There may, however, be circumstances~~ where an 'over-riding justification and/or overriding benefit' for mineral development can be demonstrated by the applicant. Examples of potential overriding planning reasons for mineral extraction to occur on unallocated sites may occur include, but are not limited to in relation to:

Agricultural irrigation reservoirs - where mineral is extracted and exported to create the reservoir landform,
 Borrow pits - where extraction takes place over a limited period for the exclusive use of a specific construction project such as for a specific road scheme,
 Prior extraction to prevent mineral sterilisation - this may be required on occasions where significant development takes place (on a site of over 2 hectares) and where a workable mineral resource could otherwise be permanently lost through sterilisation."

Breedon objects to this Main Modification MM44.

MM44 is not positively prepared and is not consistent with national policy.

Breedon has set out that further flexibility is required to respond to increasing demand for sand and gravel. Indeed the Inspector asked NCC at the EIP to add examples of overriding planning reasons to provide flexibility to respond to changes in demand. MM44 does not provide examples of scenarios where there would be overriding planning reasons due to increase growth or demand rather isolated examples which might coincidentally increase supply. Breedon does not consider that NCC has met the Inspector's request. The NCC examples given, agricultural irrigation schemes and extraction prior to sterilisation are windfall sites, where prior extraction can take place rather than the mineral extracted to meet overriding need or public benefit.

To reflect Paragraph 226 of the NPPF and Footnote 79 Breedon suggest MM44 is amended as follow to include additional overriding planning reasons:

"Examples of potential overriding planning reasons for mineral extraction to occur on unallocated sites may occur include, but are not limited to in relation to:

- Agricultural irrigation reservoirs - where mineral is extracted and exported to create the reservoir landform,
- Borrow pits - where extraction takes place over a limited period for the exclusive use of a specific construction project such as for a specific road scheme,
- Prior extraction to prevent mineral sterilisation - this may be required on occasions where significant development takes place (on a site of over 2 hectares) and where a workable mineral resource could otherwise be permanently lost through sterilisation,
- **Conclusions of the latest annual local aggregate assessment identifying a shortage of sand and gravel supply,**
- **Significant forecasted growth due to levels of planned construction and house building,**
- **Insufficient production capacity of other permitted sites."**



This is especially pertinent given the recent publication of the NPPF and the delivery of 1.5 million homes and increased growth and development aspirations. This is not considered by the current LAA (notwithstanding our concern that the Plan does not fully consider demand outlined in the LAA) therefore it is essential that increased flexibility is introduced into the supporting text of MP1 because demand for sand and gravel is likely to increase significantly.



MM45 - Paragraph MP1.26, Page 72 / 73

Amend the second sentence of the paragraph as follows:

"The MPA must be satisfied that there are overriding planning ~~exceptional~~ reasons for permitting such applications, after having considered all the relevant circumstances so as not to prejudice the overall strategy of the document."

Breedon has no objection to this Main Modification MM45.



MM54 - Policy MP7. Progressive Working, Restoration and Afteruse, page 82

Amend the second bullet point as follows:

"contributes positively to identified strategic green infrastructure corridors, and known ecological networks, the Local Nature Recovery Strategy and the Nature Recovery Network."

Amend the third bullet point to state:

"creates ~~high-quality, locally distinctive~~ landscapes which are informed by and consistent with the relevant local Landscape Character Assessment"

Amend the 7th bullet point to state

"The scheme provides for a minimum 10% measurable biodiversity net gain, primarily through the creation or enhancement of priority habitats and linkages to local ecological networks and green infrastructure corridors."

Amend the last bullet point of the policy as follows "the scheme has been informed by the historic environment, historic landscape characterisation and landscape character assessments and the restoration enhances the historic environment."

Add a new bullet point to the end of the policy to state:

"there will be no increase in flood risk from the pre-development scenarios and opportunities for betterment are sought."

Breedon has no objection to this Main Modification MM54.

It should be noted that measurable 10% biodiversity gain will not need to use the biodiversity net gain matrix calculator where the development proposal is exempt from BNG under the BNG Regulations.



MM55 - Paragraph MP8.1, Page 83

Delete the following text from the paragraph and move it to the start of paragraph MP8.2 instead:

~~“For an arable agriculture after use this can entail a particular pattern of cultivation over the five year aftercare period.”~~

Breedon has no objection to this Main Modification MM55.



MM56 – Paragraph MP8.3, Page 83

Add the following new text after the first sentence in the paragraph to state:

“The approved aftercare would be secured by planning condition or a legal agreement as appropriate. Planning conditions and/or longer-term planning obligations will be used to ensure that an aftercare strategy of greater than five years and/or longer-term management is secured where required and that an annual management report is provided for the duration of the aftercare period. Examples of afteruses that would be likely to require aftercare beyond 5 years include forestry and amenity (including biodiversity), such as restoration to heathland habitat or to species-rich grassland.”

Breedon has no objection to this Main Modification MM56.



MM57 - Policy MP8. Aftercare, page 83

Amend the policy as follows:

"Where the proposed restoration following mineral extraction is to agriculture, an outline aftercare strategy for five years is required, prior to the determination of the planning application. Where the proposed restoration is to forestry, amenity or ecology after-use; or includes a geological exposure, an outline aftercare strategy for at least five years is required, prior to the determination of the planning application. The outline strategy should set out the land management proposed to bring the restored land up to the required standard for the proposed afteruse.

Planning conditions and/or longer-term planning obligations will be used to ensure that a detailed annual management report is provided for the duration of the aftercare period, where required. The annual management report must include any measures required, following the annual aftercare inspection, to achieve the outline aftercare strategy."

Breedon has no objection to this Main Modification MM57.



MM58 - Paragraph MP11.4, Page 85

Add the following new text before the last sentence of the paragraph:

"The justification for the 250m consultation area is that 250m represents a distance at which amenity impacts (such as noise and dust) could be mitigated to acceptable levels with the minimum of controls. The Institute of Air Quality Management's 'Guidance on the Assessment of Mineral Dust Impact for Planning' (2016) states that adverse dust impacts from sand and gravel sites are uncommon beyond 250m measured from the nearest dust generating activities and it is commonly accepted that the greatest impacts will be within 100m of a source."

Breedon has no objection to this Main Modification MM58.



**MM60 - Mineral extraction sites - sand and gravel table, Pages 100 and 101
Amend the table of allocated sand and gravel extraction sites as follows:..**

Breedon has no objection to this Main Modification MM60.



MM68- Paragraph 25.1, Page 180

"The nearest residential property is 19m from the site boundary. There are 55 sensitive receptors within 250m of the site boundary and 15 of these are within 100m of the site boundary. Many of these properties are within the settlement of Haddiscoe, which is 55m away. However, the site proposer has stated that land within 100 metres of the nearest sensitive receptors will not be extracted. Therefore, there are 47 sensitive receptors (buildings) within 250m of the proposed extraction area and none within 100m of the proposed extraction area. Even without mitigation, adverse dust impacts from sand and gravel sites are uncommon beyond 250m from the nearest dust generating activities. The greatest impacts will be within 100 metres of a source, if uncontrolled. ~~The operational area of the site would need to be set back approximately 100 metres from the nearest residential properties.~~ A planning application for mineral extraction at the site would need to include noise and dust assessments and mitigation measures to deal appropriately with any amenity impacts."

Breedon objects to this as a Main Modification MM68.

MM68 is not justified and is not consistent with national policy.

The Inspector requested an additional amendment (AM) was made to paragraph 180 to take account of the distance of the proposed extraction area from the dwellings (as set out in application FUL/2022/0056). In the EIP it was agreed that a buffer distance is not an appropriate measure and that the distance that extraction takes place from a sensitive receptor should be set out in accordance with the noise or air quality assessments and any mitigation measures. Continuing use of arbitrary buffers is not justified and not consistent with the NPPF. The proposed MM70 wording of Site Specific Policy MIN 25a below reflects this as the buffer distance has been removed. MM68 should be amended in a similar fashion.

In addition, Breedon considers that the Council should remove reference to numbers of sensitive receptors as this will vary according to the planning application submitted and the design of the scheme.

As such Breedon request that MM68 is further amended as follows:

"The nearest residential property is 19m from MIN 25 site boundary. There are 55 sensitive receptors within 250m of the allocation site boundary, as shown on MIN25 Proposals Plan, and 15 of these are within 100m of the site boundary. Many of these properties are within the settlement of Haddiscoe, which is 55m away. ~~However, the site proposer has stated that land within 100 metres of the nearest sensitive receptors will not be extracted. Therefore, there are 47 sensitive receptors (buildings) within 250m of the proposed extraction area and none within 100m of the proposed extraction area.~~ Even without mitigation, adverse dust impacts from sand and gravel sites are uncommon beyond 250m from the nearest dust generating activities. The greatest impacts will be within 100 metres of a source, if uncontrolled. ~~The operational area of the site would need to be set back approximately 100 metres from the nearest residential properties.~~ Any planning application for mineral extraction at the site would need to include noise and dust assessments and mitigation measures to deal appropriately with any amenity impacts."



MM69 - Paragraph M25.23 Restoration, page 184

Add the following new sentence to the paragraph:

"Restoration shall include the retention of boundary hedgerows and trees and the reinstatement of historic hedgerows and field boundaries informed by Historic Landscape Characterisation."

Breedon object to this Main Modification MM69.

MM69 is not justified this is because as the supporting text makes clear the allocated site is part of a 20th-century agricultural landscape. Indeed, the boundary hedgerows which the text seeks to retain under historic field boundaries were planted in the last 30 years. NCC need to clarify with Historic England, whom are behind the suggested modification, from which century they wish to see hedgerows re-established within the site. NCC needs to identify and understand which historic landscape hedgerows they want reinstated and what the benefits would be, before including the above wording. Breedon considers reinstatement of certain historic hedgerows may have disadvantages, that have not been considered by the council, such as blocking views from Bridleway BR5. Breedon suggests that the paragraph text is amended and replaced with the following to read:

"Restoration shall include the retention of boundary hedgerows and trees and ~~the reinstatement of historic hedgerows and field boundaries informed by Historic Landscape Characterisation~~ shall include additional hedgerows and planting. Any restoration planting shall be informed by national and local biodiversity strategies, local landscape and historic landscape characterisation, where appropriate."



Main Modification MM70 – Policy MIN25 land at Manor Farm, Haddiscoe, Page 184

Amend policy requirement (a) as follows: "The submission of acceptable noise and dust assessments and a programme of mitigation measures to deal appropriately with any amenity impacts; including a standoff distance between the working area and sensitive receptors to air quality, noise and other amenity impacts, based on the findings of these assessments and proposed mitigation measures"~~mitigation measures should include setting back the working at least 100 metres from the nearest residential properties;~~"

Amend policy requirement (c) as follows: "The submission of an acceptable phased working and progressive restoration scheme to a nature conservation after use, including retention of boundary hedgerows and trees, to provide landscape and biodiversity gains and the reinstatement of historic hedgerows and field boundaries informed by Historic Landscape Characterisation".

Breedon does not object to this Main Modification MM70 but suggests "where appropriate" is added after "Historic Landscape Characterisation", such that the policy requirement (c) reads as follows:

"The submission of an acceptable phased working and progressive restoration scheme to a nature conservation after use, including retention of boundary hedgerows and trees, to provide landscape and biodiversity gains and the reinstatement of historic hedgerows and field boundaries informed by Historic Landscape Characterisation **where appropriate**".

End.