



Caroline Jeffery  
Norfolk County Council  
Environment, Transport and  
Development  
County Hall Martineau Lane  
Norwich  
Norfolk  
NR1 2DH

**Our ref:** AC/2024/132472/01-L01  
**Your ref:** Norfolk M&W  
**Date:** 27 December 2024

Dear Caroline

## **NORFOLK MINERALS AND WASTE LOCAL PLAN: PUBLICATION OF PROPOSED MAIN MODIFICATIONS AND ADDITIONAL MODIFICATIONS**

### **NORFOLK COUNTY**

Thank you for consulting us on the amendments to the mineral and waste local plan. We have provided some comments below.

#### **Ground Water and Contaminated Land (GWCL)**

We note that the main policy changes relevant to GWCL are around the changing of position to one of supporting new sites not currently allocated in the waste and mineral plans. Whilst we recognise that this gives flexibility within the planning regime to increase the reserves of minerals going forward, the risk that we will not have a chance to comment on the suitability of the site via the waste and mineral plan site allocations consultation will exist. We would question if any sites put forward for planning approval that are not allocated within the waste and mineral plan carry the same weight of 'presumption of being granted planning permission' as those currently allocated.

Most of the relevant change in policy wording link to Carstone and Silica sand reserves rather than the sands and gravels. It would appear that the sands and gravel reserves are 'healthy' i.e above target, whereas the carstone reserves are about on target with the silica sand reserves being below target based on currently allocated sites. Pressure to grant planning permission potentially on unseen sites for carstone and silica sands production is of concern, especially as these sites, given their limited geographical extent, tend to require substantial amounts of de-watering within the principal aquifer and can be associated with sensitive surface water receptors. This point mentioned is just to be highlighted for yourself and does not

Environment Agency  
Iceni House Cobham Road, Ipswich, IP3 9JD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..

form any opposition to the plan.

We note there is lack of reference to Groundwater in Main Modification 07 relating to Climate Change Mitigation and Adaptation and advise this be included. The inclusion of increased river flows is a sensible addition, particularly relating to flood risk. As mineral developments have the potential to impact groundwater resources, we suggest the addition "increasingly variable groundwater levels" or something similar to reflect the predicted climate impacts to groundwater due to Climate Change, inclusive of flood risk caused by high groundwater levels and droughts associated with low groundwater levels.

Generally, the inclusion of conditions that certain sand and gravel minerals sites are to be worked above the water table are something we support, as impacts to groundwater by quarried sites can be detrimental to groundwater dependent sites and watercourses in an already water-stressed area.

This is unlikely to be the correct time to suggest inclusion of additional changes, but the lack of reference to subsurface conditions in MP7 could be considered for inclusion at the next review. Post-works remediation needs to consider the subsurface and groundwater environments in that it should be restored to reflect the pre-works hydrogeological conditions.

### **Review of the HRA**

- **“Policy WP15: Whitlingham Water Recycling Centre”** – This is unlikely to cause a LSE, as this is refining plans in the mid-term. The long term “masterplan” should not be scoped out entirely so as not to affect the HRA assessment. Given this is at such a high level, I would suggest it is likely that this hasn’t been scoped out, but the wording made this a little unclear
- **“Policy MP2: Spatial strategy for minerals extraction”** – New routes to gain access to existing processing plant must not cause further detriment to the surrounding environment, and thus affect the conclusions of the HRA. This change must adhere to policy MW1, because of this no LSE should occur
- **“MIN 200 in Carbrooke Extraction of sand and gravel: 4.47km to Norfolk Valley Fens SAC”** – This sand and gravel extraction is an increase of 100,000 tonnes (300,000 tonnes to 400,000 tonnes). This is an increase of 25%, and therefore this may have the potential to cause some impact. This increase may have potential implications for terrestrial habitats, and/or impact on the water table, and subsequent aquatic/wetland habitats, if this extraction extends beneath the water table or expands across a wider area. This is not in my area, and I do not have bespoke knowledge of the habitats that may be impacted. Other teams may be able to provide further information if this will cause a LSE
- **SIL 01 in Bawsey Extraction of silica sand 2.74km to Roydon Common Ramsar and Roydon Common and Dersingham Bog SAC** – This section

states “A modification is proposed to the policy wording regarding the information to be provided in a heritage statement. The modification does not change the site assessment in the HRA”. The changes to the wording in this section of the policy are not given, so determination of the impacts cannot be made. As this change in the policies wording is in relation to the heritage statement, this shouldn't impact the conclusions of the HRA and no LSE should occur to the designated conservation areas/protected species etc.

We trust that this advice is useful.

Yours sincerely

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SIGNATURE

**Mr Harry Skinner**  
**Sustainable Places - Planning Advisor**

Team e-mail [Planning.Eastanglia@Environment-agency.gov.uk](mailto:Planning.Eastanglia@Environment-agency.gov.uk)  
Team number 02084 745242