

Mr Nick Johnson,
Planning Services Manager,
Planning and Transportation Department,
Norfolk County Council,
Norwich.
NR1 2BR.

11 December 2009

Dear Mr. Johnson,

**Norfolk Minerals and Waste Local Development Framework
Consultation, Minerals and Waste Site Allocations - Preferred Options**

Thank you for contacting CPRE about the above Consultation and giving us the opportunity to respond to this important document.

In making this response to the consultation, CPRE Norfolk would like to state again that the level of growth planned for Norfolk and the six county East of England region is simply not sustainable in any sense of the word. The long term housing provision planned, and the associated development, is predicated on large increases of population through net in-migration to the region. This will put a huge strain on our natural resources, and the physical and social infrastructure required to meet this. The proposed Norfolk minerals and waste plan is an example of the collateral damage that would result.

Turning to the current consultation, it is not possible for CPRE to object/support/comment on all 104 sites and deal with local issues for each. Indeed we believe that local communities are much better placed to do so and we have encouraged individuals and groups to write to the County Council on specific sites. Nevertheless, we remind you of our set of principles for site selection, as previously detailed in our response to the Issues and Options consultation in March 2008 and give specific comment on some of the proposed allocations in local areas.

Principles of Site Selection

1. Allocation Sites vs Areas of Search

Consider only Allocation Sites, that is sites which have some firm evidence and estimate of the resource, at this stage; although some Areas of Search might be brought into play at a later stage as alternatives if they meet the criteria below (many are difficult to access and in sensitive countryside, albeit not necessarily designated for landscape or wildlife value). A higher priority should go to Allocation Sites with reserves of a minimum of 0.5 million tonnes, unless perhaps an extension to an existing site, and/or a strong candidate for restoration as a habitat creation site.

2. Site Location and Proximity Principle

We would give a higher priority to sites within a reasonable distance to Growth Points (Norwich, Thetford) (regional/national), and Key Centres of Development (King's Lynn, Yarmouth) (regional); and at a lower level to the larger market towns as identified in Local Development Frameworks as Principal Settlements.

3. Status of Land.

We avoid sites in areas of national importance for wildlife or landscape, and County Wildlife Sites; and also sites adjacent to them which would result in an adverse impact on their integrity.

4. Type of Land

As a general principle arable land will become a preferred candidate over other scarcer habitat and landscape types. This is because at the end of the working period it can be restored to arable use. Secondly, as an alternative option and condition on a planning permission, it can be used for habitat creation.

5. Habitat Creation

Indeed some sites could be selected with the driver of the intention to create a different habitat and landscape feature. For example, heathland, grassland, woodland, freshwater reed beds, etc. The type of creation, and of course the technical feasibility of this, would depend on the geology and hydrogeology of the site, and how best it would fit into the enhancement and development of ecological networks for the county and region.

6. Access and Highways Implications

An important consideration is the ease or lack of it in accessing the main distributor road network. The longer and more difficult it is to achieve this access without having a major impact on the countryside, the less reason for accepting a site.

7. Amenity

CPRE would not want to see sites selected which are close to a major settlement or on top of a village. Local residents are in the best position to comment on the potential impact in terms of noise and light pollution, HGV movements and the loss of valued countryside, walks, etc. They can make a response to the consultation with a strong emphasis on how their community would be affected. We welcome the recognition by the Council that lighting at mineral and waste sites causes problems and that the NCC Environmental Lighting Zones policy gives guidance on this.

Comment / Objection on Specific Sites

Specific comment on selected sites are below. This is representative of the importance of the site and its potential impact on the landscape, but also reflects access to local knowledge and our own resource base, which is stronger in some areas of the county than in others. All comments on site allocations are based on our response to the previous consultation of March 2008.

SITES IN NORTH NORFOLK

AYLMERTON	MIN 69	COMMENT
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		The major advantages of this site are the large reserves (3.2m tonnes), with access to the A148 on a relatively short existing haul route, and potential for sensitive restoration. The restoration should embrace the existing 'historic' Briton's Lane Pit, and could also include geodiversity features of the Cromer Ridge.
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The major disadvantages are that the site lies within the AONB (at the southern limit, and alongside the A148). The site is quoted as being in an area of moderately tranquil landscape by CPRE, and area of dark landscape on the county map - but many other sites rate better on both counts. The greatest concern is the potential impact on the Beeston Regis Common Site SSSI, part of the Norfolk Valley Fens SAC, and it is essential that an Appropriate Assessment is carried out.

CPRE agree with the Conclusions statement that this is an acceptable site, given the qualifications and conditions set out. It is important that an opportunity should be taken to improve both proposed and existing sites by a high quality restoration, to the clear benefit of the AONB.

EAST BECKHAM MIN 84 COMMENT

CPRE would draw up a 'balance sheet' which would be similar to MIN 69. The text, in comparison with other sites, seems more severe in dealing the landscape and ecology issues. The deciding factor on the 'unacceptable' rating on this site may be influenced by concerns on viability on the grounds of poor mineral quality.

EDGEFIELD & HEMPSTEAD MIN 43 OBJECT

CPRE object to this site, and note the comments made by the Environment Agency, Natural England, Norfolk Wildlife Trust, English Heritage and North Norfolk District Council; namely the site sits above a major aquifer; the potential adverse hydrological impact on the Holt Lowes SSSI, part of the Norfolk Valley Fens SAC; the concern on nearby County Wildlife Sites; it lies within the boundary of the Glaven Valley Conservation Area; and other biodiversity concerns.

In addition, we emphasize the following points:

1. This is an attractive landscape, with a high degree of tranquillity, both as regards lack of noise and light pollution. Noise pollution from a working quarry would have a profound adverse effect on the area. This is not just a matter on concern to local residents, but would spoil the enjoyment of others walking or cycling. The area that surrounds the site is well served by lanes which are lightly trafficked, which provide views of unspoilt countryside. Noise and light pollution are an increasing, cumulative and insidious erosion of the character of the countryside, and we should make every effort to preserve the tranquillity that remains.
2. CPRE has concerns how mineral extraction might impact on the River Glaven. Springs in the area flow as a stream into the main river. The Glaven is a chalk stream, and as such a BAP habitat; protected species present include otter, water vole, brook lamprey and white-clawed crayfish.
3. There will be an adverse impact of HGVs on the lanes/haul route in accessing the B1149; and in traffic movements through Edgefield.
4. We accept the need for some mineral works within North Norfolk on the proximity principle, and supporting local small builders. However there are a number of other existing and potential pits, with reserves considerably greater than the 0.5 tonnes here.

We therefore disagree with the Conclusions presented that this site could be potentially acceptable, and make an objection.

EDGEFIELD AND STODY**MIN 44****COMMENT**

Part of the site lies within the Glaven Valley Conservation Area, but the site itself is quite well contained. It lies above a major aquifer, but there is no direct contact with the River Glaven by water course. There is good potential for the site restoration to be a landscape and ecology gain with a good scheme.

The haul road leads to B1354, which is not ideal for aggregate HGV. There will be a loss of tranquillity in the wider area, but there is some significant existing background noise from farming operations and the landfill site at Edgefield.

In balance the site could be acceptable, but much depends on the restoration plans put forward and implemented, and these being in accordance with the Glaven Valley Conservation Area interests.

HOLT	MIN 82	COMMENT
HOLT	MIN 71	OBJECT
HOLT	MIN 16	OBJECT

The sites MIN 82, MIN 71 and MIN 16 together form one block. All are within the Glaven Valley Conservation Area. MIN 71 and MIN 16 are both closer to Holt, and would impact to a considerable extent on the town. All three could have an impact on Holt Lowes SSSI, part of the Norfolk Valley Fens SAC, but MIN 16 being the closest and most likely to cause damage, either by affecting the hydrogeology or by direct contamination in the working operation. MIN 16 is closest to Holt Country Park, where people go for quiet recreation.

It would not be acceptable to have two or three working pits in the same area, due to the individual and combined effects on Holt, the wider tranquillity of the area and the potential impact, and possible cause and effect if adverse, on Holt Lowes. However, it is not practical to propose to three different major companies that they agree on some kind of sequential or part-time operation.

It is our view that there is a clear order of preference between the three sites. That is MIN 82 is better than MIN 71, which in turn is better than MIN 16. As such, MIN 71 and MIN 16 should not be progressed further, due to the differing levels of acceptability and the cumulative and less predictable effects by interaction, if more than one site were progressed at any one time.

For MIN 82 there is the option of an integrated restoration of existing and extended sites, working in phases from the first to the second. The restoration could be to arable, grassland, hedges and woodland; or some combination of them all. The scheme should be of clear benefit to the aims for the Glaven Valley Conservation Area. This site would then, subject to an Appropriate Assessment being carried out; MIN 71 and MIN 16 are not acceptable.

KETTLESTONE	MIN 52	OBJECT
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We note and accept the landscape assessment; also the comments of the Environment Agency, Natural England, Norfolk Wildlife Trust and North Norfolk District Council.

We agree with the Conclusion that this site is unacceptable, while also raising a higher level of concern on the adjacent Wensum SAC and County Wildlife Sites than is expressed in the text.

NORTH WALSHAM, WESTWICK, SW. ABB., WORSTEAD MIN 115 OBJECT

CPRE agree with the assessment, and with the 'Conclusions'.

SITES IN WEST NORFOLK

MIN 40 - East Winch - Concerned not necessarily for landscape impact but for proximity to East Winch village; new access road will have to be built to connect to A47 onto which will be an additional 400 daily HGV movements.

MIN 31 - East Winch, Middleton & Wormegay - Although this is a 'potentially acceptable' site, it will have an unacceptable landscape impact on the setting of Blackborough Priory if whole site is developed - also ecology and highway impacts.

WAS 39, 89 - Agree that site should not be considered on landscape and amenity grounds.

WAS 05, 51, 65 - Site acceptable but much public concern about the methods of waste disposal, ie. thermal treatment plants, escape of fine particles and bio-aerosols. (Westerly winds would take these and the odour towards South Lynn.)

WAS 56 - Agree that site should not be considered on landscape grounds.

WAS 44 - Agree that site should not be considered for highways and landscape reasons.

SITES IN SOUTH NORFOLK

MARLINGFORD MIN 54 OBJECT

CPRE Norfolk has strong reservations about this site being developed for mineral extraction. Research by CPRE on tranquillity has shown the site to be in a tranquil area and the village's choice to remain without street lighting supports CPRE's campaign on dark skies. Many residents of the area have contacted us to express concerns about dust, drainage, noise and flooding. We hope the Council will heed the level of objection concerning this site.

SITES IN BRECKLAND

BINTREE MIN 97 OBJECT

We made detailed objections to this site as part of the original consultation and are dismayed to see it listed again. Although we recognise that the boundary has been changed, the site will still impact greatly on the landscape and ecology and, in our view, not satisfactorily overcome the issues earlier raised. Appendix I contains a copy of our original objection, for reference.

SITES IN BROADLAND

FRITTON MIN 38 UPHOLD OBJECTION

Min 38 at Fritton near Yarmouh is described as not acceptable. We back the conclusions behind this. We note that the Environmental Agency have objected and Norfolk Wildlife Trust and Natural England have expressed concern. Part of the site is in the Broads Authority National Park area. The closeness to Yarmouth is not an excuse to spoil this local amenity and we note that the Ramblers Association have also objected because of footpath impact.

END OF COMMENTS

If you would like any further comment from CPRE or would like to meet in person to discuss our views on the emerging documents, then please contact me directly on jamesf@cprenorfolk.org.uk

Yours sincerely,

James Frost
Director

APPENDIX I: COPY OF BINTREE WOODS OBJECTION - APRIL 2008

Aaron Brown
CPRE Breckland
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Thursday 24th April 2008

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Dear Sir or Madam

**Norfolk Minerals and Waste Local Development Framework
Norfolk Minerals and Waste Site Allocations Development Plan Documents, Site reference
97**

I am writing to object to the inclusion of site reference 97 (Bintree woods) within the above documents on a number of points as the site constitutes and lies adjacent to areas of ecological importance.

Landscape

The site sits atop a gentle rise of land forming a flat plateau and is most prominent within the surrounding landscape. The woodland also has a very interesting topography being transected by 2 main valleys which afford fine views within the woodland. The woodland also provides some exceptional views of the surrounding countryside and of the Wensum valley which it borders. One is struck by the special and unique qualities of this landscape and how closely it epitomises the Targeting Statement and Joint Character Area 084: mid Norfolk drawn up by Natural England which reads as follows "Gently undulating with flat plateau incised by shallow river valleys with wooded valley slopes. Predominantly arable with remnant ancient countryside of patchwork field system".

Ecology

1. On the northern side of the wood there is an avenue of mature Oak trees on average approximately 150 years but some far older than this which runs for approx 1/3 of a mile.

2. Far from being a monoculture of Conifers, the wood is fringed on its northern perimeter with a wide bank of broadleaf trees mainly composed of Oak and Beech of approx 50-100 years. There are also many blocks of broadleaf plantation of approximately 10-15 years in age within the wood, mainly composed of Oak, Hazel and Beech. There is also natural regeneration of broadleaves mainly of Birch across the wood and from my own observation, together with plantation blocks of broadleaf trees, their cover amounts to approximately 25-35 per cent and given that the wood is 130 hectares, this constitutes a considerable stand of broadleaf woodland. The woodland therefore has much potential for continued conversion to broadleaf woodland through colonisation and restoration. It presently has considerable ecological value with the main self colonising stand type being Silver birch, this tree supporting a large community of insects and other invertebrates, with 334 known to feed on the tree.

3. There are also many wide grassy rides and open areas of grassland, Gorse and Bracken in the northern section. It is regrettable that a vegetation survey has not been undertaken to ascertain the species present on the site especially on the areas of grassland and one would hope that this will be carried out in the future. This open area also provides an ideal hunting ground for predatory birds such as Barn Owls, I observing them on 3 occasions when I visited on the 26th of March. Through consultation with local residents I was informed that Woodlark and Nightjar have been observed in the wood. Their presence really needs to be officially confirmed, but if they are present, given that they are both Red List Species of high conservation concern the loss of the woodland would be devastating for the local population as no similar habitat exist for a considerable distance. The site has excellent potential for restoration into a mosaic of habitats including heathland, grassland and broadleaf woodland. The northern section has great potential for the creation of heathland in view of the sparse tree cover and the shallow nutrient poor acidic soils. This habitat is scarce especially in Norfolk and vital to so many Biodiversity Action Plan fauna. Through consultation with the 1st edn OS Map of Norfolk of 1882-5 it can be seen that part of the northern section was previously heathland/grassland.

The Wensum valley

The proximity of the wood to the river Wensum SSSI and SPA is highly significant. It joins the river on its NW side providing important connectivity for wildlife and the remainder of its Western side adjoins the floodplain and is no more than 500 yards away from the river, and it is here where the local landscape is at its most scenic with the wooded slopes of the wood rising from the river valley. If the woodland site is used for landfill it will have severe implications as although it will be sealed, the leaching of toxins into the floodplain will be almost inevitable, having implications for the quality of both groundwater and that of the river Wensum.

Thank you for your time in considering my points which I hope have helped illustrate the significant ecological importance and potential of the woodland which in my view are too great for it to be lost.

Yours faithfully

Aaron Brown