



CATSS

CAMPAIGNERS AGAINST TWO SILICA SITES | SHOULDHAM AND MARHAM

CATSS Objection to the Vision, Policies and Objectives of The Preferred Options M&WLP 2019.

Please process this letter as an objection to both AOS E and SIL 02 in the M&WLP Preferred Options due to various policies and objectives that would not be fulfilled if they remain in the plan for consideration for quarrying in the future.

The very first paragraph of the M&WLP (pg 7) states, *“The provision of a steady and adequate supply of minerals.....constitute essential infrastructure to support the economic development of the county”*. All of the silica sand quarried in Norfolk is taken out of the county for use elsewhere in the UK. Therefore, there is no argument that NCC can demonstrate that the extraction of silica sand is to ‘support the economic development of the county’. NCC is also unable to define what a ‘steady and adequate’ supply is since at pg 8 of the introduction section of the M&WLP it states the proposed plan is to extract 750K tonnes per annum of silica sand based on the average sales data. This is in conflict with the statement by Sibelco, on pg 245 at the 4th bullet point under ‘Site Characteristics’ of SIL 02, that they would intend to extract 800-900K tonnes per annum from SIL 02 alone. So what is an adequate supply? Which figure is correct? If it is the 750K tonnes quoted by NCC then what are Sibelco intending to do with the extra 50-150K tonnes per annum from SIL 02? (Coincidentally this is the amount used in fracking in the UK at this time) It throws doubt on Sibelco’s claim that the silica sand sole use is in the manufacture of clear glass.

Interestingly, we were told the area SIL 02 contained approx 16,000,000 tonnes of silica sand. Two thirds of SIL02 has been removed in the preferred Options Plan but the NCC notice for the preferred options phase of consultation attached to Wessex BLD telegraph pole on Spring Lane at grid ref; X:5698, Y:3110, indicates the same amount, 16,000,000 tonnes for extraction in the area which has only 1/3 of the original area remaining. How can that be?

The National Planning Policy Framework states that Mineral Planning Authorities should look to recycle before they start extracting raw materials. Norfolk (2014 figures) accounts for 20% of all silica sand extraction in the UK and 60% of the silica sand for clear glass manufacture. That is a huge amount of raw material being extracted yet the M&WLP does not make any mention of recycling glass, nor does it contain any figures of how much glass is recycled in Norfolk. The only figures available are for generic waste recycling of on average 46.7% (2016-17) described on the Norfolk Recycles web site. Norfolk Recycles is described as “the public facing brand of Norfolk Waste Partnership and Norfolk County, District, Borough and City Councils working together to improve waste and recycling services for Norfolk’s residents and visitors”. Therefore, when it comes to recycling glass before extracting raw materials the **M&WLP is not sound.**

We disagree with the following presumptions in the visions, policy and objectives and highlight our reasons in each case.

- Vision to 2036
 - Self-sufficient in sand and gravel whilst making important contribution to the national production of silica sand.
 - Progressive restoration and enhancement of Norfolk's biodiversity and creation of high quality, locally distinctive landscapes.
 - More responsibility of public and business for waste prevention, re-use and recycling.
 - Norfolk will aim to be net self-sufficient in waste management, where practicable.
 - Mineral development will be located, designed and operated WITHOUT adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk. They will also minimise the impact of climate change.

- There is no definitive demonstration that the UK needs to be self-sufficient in silica sand. The UK is not self-sufficient in defence - we buy equipment from around the world at a cost of billions of pounds; we are not self sufficient in medicines; or food that we import at a cost of millions if not billions; we are not self-sufficient in energy production - gas, electricity and oil all imported from outside the UK. Yet somehow we have to be in sand and glass? Without this demonstration of the requirement to be self-sufficient in silica sand, extraction of minerals by quarrying is purely because there is no vision to change; it is a classic case of business as usual because it is the easy option for the County Council and profit-driven industry. If the UK was truly intent on maintaining its mineral reserves then Government, aided and guided by Mineral Planning Authorities, would be looking for ways to ensure the minerals are conserved. The National Planning Policy Framework (NPPF) states in (Ch 17, para 204.b) that authorities should 'take account of...recycled materials...before considering extraction of primary materials..'. NCC does not adhere to this as it does not have a glass recycling programme worthy of the name; NCC merely collects glass and transports it outside of Norfolk for processing. In the UK 28 billion glass bottles and jars end up in landfill each year; 14 billion from households (recyclingbins.co.uk). Bars, restaurants and clubs in the UK throw away 200 000 tonnes of glass every year to landfill. Overall it is estimated that the UK throws away 1.5 million tonnes of glass to landfill each year; conveniently approximately 1.5 million tonnes of sand go to the glass making industry. What happens to the collected glass once beyond the county borders seems to be of no consequence to NCC. Therefore, NCC is failing in its duty to look to recycle before extracting raw materials and their vision is not sound.

- How can it be logical to say that you will enhance biodiversity if at first you allow it to be destroyed for **decades** by allowing mineral extraction in an already biodiverse area. In our case locally, there are over 150 different bird, animal, fish and insect seen on or near The Fen at Marham and The Warren at Shouldham, not to mention

different plants, hedgerows and trees that support these diverse species. Sixty-four of the species are on conservation lists. We have birds that rely on farmland for foraging and nesting and some are already on the red or amber RSPB lists, these and other animals are protected by the Wildlife and Countryside Act 1981 (<http://www.legislation.gov.uk/ukpga/1981/69>).

Sibelco's record in the matter of post quarry restoration is appalling; one only has to look at Bawsey to see that their priority is not to enhance. It is not just Norfolk that has suffered, Sibelco has left behind a devastating legacy for the residents in and around Moneystone quarry, Staffs (this area has been a wasteland for many years). Sibelco, the owner and operator, when refused an extension to operate by the CC sold the land onto a property developer. The company, Laver Leisure's plans have been rejected by the CC, so the site is undeveloped. This is not opening up areas for the residents, this is about fee-paying amenities that are of no benefit to local people. The Mineral Products Association awards^{1,2,3} highlight how other mineral companies take restoration seriously. Not one of these awards were given to Sibelco. In addition, restoration of quarries in Norfolk is to man-made water-bodies which is hardly 'high quality, locally distinctive landscape'.

- If the public and business are to be expected to take more responsibility for their waste management and recycling and re-use of their waste, why are NCC not investing in high technology glass recycling facilities? In order to reduce the amount of silica sand extracted from Norfolk, the amount of clear glass recycled and reused in clear glass manufacture needs to increase; the M&WLP makes no mention of how NCC intends to make this happen in order to fulfil their vision of being net self-sufficient in waste management in respect of glass.
- NCC state mineral development will be located, designed and operated WITHOUT adverse impacts on communities and areas and will minimise the impact of climate change. This is impossible and NCC knows that. Every mineral extraction site will have adverse impacts on various parts of the communities and areas they are in. If NCC is truly wishing to minimise impacts and reduce the effects of climate change, they would be seriously involved in the vision of an improved glass recycling/ glass manufacturing loop that was joined up between Waste Management Authorities, recycling business partners, glass manufacturers, the public and food and drink producers. The outcome of such a vision would be less glass going to landfill, more clear glass being available for recycling and use in clear glass manufacture, less CO₂ emission in the glass making industry and more jobs in Norfolk in both waste management and high tech glass recycling plant. Without this, the M&WLP Vision 2036 is not sound.

¹ https://mineralproducts.org/restoration_and_biodiversity_awards_2013.htm

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<https://www.cemex.co.uk/-/eversley-quarry-restoration-plan-is-runner-up-in-mpa-quarries-and-nature-awards>

³ <https://mineralproducts.org/15-release28.htm>

- Without a sound glass recycling policy/plan NCC fails their own sustainability objectives SA1, SA3, SA4, SA5, SA6, SA8, SA9, SA11 and SA13 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pgs 15-16 of Part B (Jun 2019).

Draft Waste Management Strategic Objectives

- WSO1 - To support the prevention and minimisation of waste generation in line with the Waste Hierarchy, NCC needs to have a plan that enables more glass to be recycled/processed more efficiently to push it up the Waste Hierarchy, and not just collected and sorted. This is required so that more recycled material is made available to the glass making industry which, in turn, reduces the need for raw materials and the need to quarry silica sand. Currently, NCC does not have this in their plan and this is out of step with the NPPF (Ch 17, para 204.b) and fails sustainability objective SA1 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 15 of Part B (Jun 2019).
- WSO2 - To support the amount of waste reused, recycled and recovered NCC need to have a plan that includes glass waste to recycle and reuse. Currently NCC does not have this in their plan and this is contrary to the NPPF (Ch 17, para 204.b) and fails sustainability objective SA11 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 15 of Part B (Jun 2019).
- WSO4 - To achieve net self-sufficiency in waste management by 2036 NCC needs to include a plan to ensure more efficient glass recycling and reuse. Currently NCC does not have this in their M&WLP.
- WSO6 - To support reduction of greenhouse gases, minimise landfill and minimise waste transport distances, NCC needs to invest/champion a policy to have the infrastructure to be able to collect and process clear and coloured glass in greater quantity and quality. NCC currently does not have a plan to do this and this is contrary to the Climate Change Act 2008. Also, without a glass recycling policy NCC fails their own sustainability objective SA1 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 15 of Part B (Jun 2019).
- WSO8 - Recognise the importance of waste sector in the local community as a generator of employment and its provision of infrastructure which supports business and communities. There are plans to do this for waste streams other than glass. NCC needs to plan for glass within this objective and currently it does not. A high tech glass recycling plant in Norfolk would not only go towards fulfilling WSO8 but would also facilitate fulfilling WSO 1, 2, 4 and 6. It would also increase the employment opportunities in Norfolk and mitigate any job losses from the current mineral extraction and ancillary industries. Currently without a glass recycling plan NCC is failing their SA4 and SA13 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pgs 15-16 of Part B (Jun 2019).

Draft Minerals Strategic Objectives

- MSO2 - To provide a steady and adequate supply of industrial minerals NCC & Gov need to quantify 'adequate' and not rely on the arbitrary figure of yesteryears' production of glass without consideration for the benefits of better recycling to produce high quality cullet to meet forecast need. NCC base the forecast need only on continuing to extract raw materials before considering better recycling of those raw materials, i.e. glass, which contravenes the NPPF (Ch 17, para 204.b). This objective also fails sustainability objective SA11 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 16 of Part B (Jun 2019).
- MSO3 - To encourage sustainable use of minerals by utilising secondary and recycled aggregates. This is the NPPF guidance that states mineral planning authorities(MPA) should look to recycle before extracting raw materials (Ch 17, para 204.b); however, NCC is failing in its duty in this respect with ref to silica sand for clear glass production. NCC does not currently consider increased and more efficient recycling of glass, particularly clear glass, in its plan in order to reduce the amount of extraction of raw material required from Norfolk. Nor is it considering a policy of glass reuse. Therefore, this objective fails ref the NPPF and NCC's own Waste Strategic Objectives and fails sustainability objective SA11 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 16 of Part B (Jun 2019).
- MSO6 - Expedient delivery of mineral extraction while..... positively contributing to the natural environment. NCC currently fails in this objective since the areas it plans to excavate silica sand from already have biodiverse natural environments and it is illogical to allow those to be destroyed if your Strategic Objective is to 'positively contribute to the natural environment'. MSO6 fails sustainability objective SA8 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 16 of Part B (Jun 2019). (In the case of SIL 02, (rebadged as part of AOS E) it cannot be described as expedient delivery since it is planned to leave this area in limbo until 2027; plus, mining for 20-30+ yrs followed by an unknown restoration is hardly 'positively contributing to the natural environment'). AOS E and that part of AOS E formally known as SIL 02 is a vast area. Whilst NCC says a small area could come forward, repeatedly after Sibelco gains a foothold in an area it continues to extend the area, aided by a county council who in its own plan and literature look positively at extending sites that have already been worked. We can forecast that Sibelco would be mining in this area for longer than the 20-30 years they promote.
- MSO7 - To ensure impacts on the amenity of those people living close to mineral developments are effectively controlled, minimised and mitigated. NCC cannot fulfill this objective without an unbiased health study data that shows the extraction of minerals, especially silica sand, does not have a health impact on people. With respect to the 1/3 of SIL 02 that remains within AOS E it cannot control, minimise or mitigate the impact on the view; residents of Upper Marham will have a clear view of

any mineral workings from their elevated position. The local school overlooks this site; this is not an enhanced learning environment for the children of the area. NCC cannot control, minimise or mitigate for the imposed additional noise from HGV traffic and dredging, even if electric dredged, nor from a pipeline with wet sand being pumped over 6-8 km. Neither can NCC control the prevailing winds being towards Marham on which any noise and dust will travel. NCC cannot mitigate the loss of footpaths (PROW in our area). NCC cannot mitigate against loss of biodiversity for 20-30+ yrs. NCC cannot mitigate against the fact that important yet uninvestigated archaeological sites lie within SIL 02/AOS E that wet dredging will disturb and lose forever. Although SIL 02 is not to be allocated in the M&WLP approximately ⅓ of its geographical area is remaining as part of AOS E; therefore, the comments of the Sibelco representative stated at public meetings remain relevant, that “the site (SIL 02) will be minimally manned”; so any mitigation that Sibelco proffer to say they will stop excavation if important areas are found is just wishful thinking and disingenuous by the operator, based on the lack of manning and the dredging is underwater and out of sight. If any quarry had to be dry worked the area that NCC would permit is a well loved and well used area known as the Warren and Sincks. The health implications then are not just physical and mental wellbeing; they would include risks of respiratory problems as well as certain cancers and will be at the forefront of residents concerns. NCC would be failing in its duty of care to the council taxpayer to ignore the evidence from other countries who have studies linking serious diseases to silica sand - see <http://www.hazards.org/dust/silica.htm>.

- The road network is already under strain; off-road haulage routes will still end up on rural roads to get to the Leziate plant, and NCC cannot mitigate against the increase of CO₂ in this scenario. MSO7 fails sustainability objective SA2, SA8 and SA9 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pgs 15-16 of Part B (Jun 2019).
- MSO8 - Address and minimise impacts on climate change. Only by reducing the amount of mineral extraction can NCC fulfill this objective. In order to do this NCC needs to plan to recycle glass more efficiently and to a better quality within Norfolk. This will comply with the NPPF directive on recycling first, plus comply with the Climate Change Act and the UK’s legal obligations to reduce greenhouse gas emissions. Currently NCC has no plans in place to fulfill this legal obligation with respect to quarrying for silica sand. (However, if Sibelco were to plan for an up to date glass recycling facility at Leziate then the railhead existing there could be used to deliver glass for recycling and take away the processed cullet for use in glass manufacturing, thereby reducing the carbon footprint of HGV to the plant). Sibelco are in partnership with leading glass recycling companies in Europe, why not the UK?. MSO8 fails sustainability objective SA1 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 15 of Part B (Jun 2019).
- MSO9 - Restoration. In respect of silica sand extraction within Norfolk to date NCC has failed in this objective by allowing Sibelco to operate within Norfolk. Sibelco’s

historical record for restoration of quarries it has operated is extremely poor⁴. Add the fact that the proposed areas are already extremely biodiverse, then making a statement about after use enhancing biodiversity is illogical if you need to destroy it for decades prior to any 'possible improvement'⁵. Due to Sibelco's proven poor record for restoration of previous worked sites, in reference to silica sand extraction MSO9 fails sustainability objective SA6, SA7 and SA8 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 16 of Part B (Jun 2019).

- MSO10 - Increase public access to the countryside through enhancing the amenity value of the land when restoring excavation sites. In terms of AOS E and the 1/3 of SIL 02 which remains in the plan as the eastern edge of AOS E, this objective is not in NCC's gift as it does not own the land. After allowing the land to be quarried by profit making developers who are only leasing it anyway, it will revert to the landowners who will in all likelihood sell it onto a developer as they will be unable to farm the land or replant it as a forest since it will not be restored, as it should be, back to the type of land it was previously. Sibelco have stated their intention would be to leave any quarry sites in SIL 02, and by extension now to the eastern edge of AOS E, as water bodies. Property developers akin to those at Moneystone⁶ whose legal wranglings take many years to resolve will not increase public access to the countryside; it will in fact reduce it. So how does NCC plan to fulfil this objective in respect to the proposed remaining portion of the 'Preferred Area' of SIL 02 that remains within AOS E and any other area of AOS E? MSO10 fails sustainability objective SA4 and SA9 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pgs 15-16 of Part B (Jun 2019).

General Policies

Presumption in favour of sustainable development as per Pg 6 para 11 NPPF

- The NPPF has 3 dimensions to sustainable development - economic, social and environmental.
- NCC's plan does not consider the infrastructure required for ensuring that the economic, social and environmental dimensions of sustainable development are accounted for in Norfolk with regard to glass recycling and the associated reduced mineral extraction. Therefore, the plan does not contribute to a strong, competitive economy (in Norfolk); support the health, social and cultural well-being of communities; and contribute to protecting and enhancing our natural environment, biodiversity, use of natural resources prudently, minimise waste and pollution and

⁴ <https://www.bbc.com/news/uk-england-norfolk-23354729>

⁵ https://mineralproducts.org/restoration_and_biodiversity_awards_2013.htm

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<http://moderngov.staffordshire.gov.uk/documents/s47001/Planning%20Cttee%2006%2003%202014%20Moneystone%20Quarry%20rept.pdf>

mitigate against climate change by moving to a low carbon economy through an innovative and technologically advanced glass recycling policy. Without this the plan fails sustainability objective SA1, SA4, SA6, SA8, SA9, SA11 and SA13 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015).

- There are no sustainable economic or social benefits to be had for the local areas around Marham and Shouldham from any quarrying in Shouldham Warren or Marham Fen. There would only be a couple of jobs created but the siting of a quarry will deter people visiting the area for recreation and tourism and will also stop any local growth, such as that being planned by the Borough Council of King's Lynn and West Norfolk in their Local Plan. Quarrying these areas will remove the social benefits currently enjoyed by residents and visitors to Shouldham Warren and the Nar Valley Way; this is hardly following the NPPF.
- MW2 - Development criteria. The policy lists 13 subjects, listed as a-m, that mineral development or waste management development should not have an unacceptable impact upon, including cumulative impact. In the case of AOS E and the area of SIL 02 that it still contains, only the subjects in points c. and j. may be able to be mitigated against. The other 11 points could not be mitigated against satisfactorily, especially the bird-strike risk already highlighted by the MOD (DIO) objection, and they would amount to a cumulative impact that isn't acceptable in any situation.
- MW3 - Transport. We agree with the NCC policy on transport in regards of mineral and waste developments. However, we fail to see how any mitigation measures would be sufficient to not generate all of the unacceptable outcomes listed in MW3 if any mineral development were to be granted permission in AOS E and the area of SIL 02 that it still encompasses.
- MW4 - Climate change mitigation and adaptation. NCC has no plans in place to account for reducing CO₂ emissions from the quarrying of silica sand. It should put in place a plan that increases the quantity and quality of glass recycling; this will reduce the amount of raw material (silica sand) required to be quarried, which reduces the CO₂ emissions from both quarrying and glass manufacturing (more recycled glass used in manufacture reduces CO₂ emitted and the energy required). MW4 fails sustainability objective SA1 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 15 of Part B (Jun 2019).
- MW5 - The Brecks Protected Habitats and Species. We note here that birds are afforded a greater buffer zone than that considered acceptable for people close to any proposed or actual mineral development. That is unacceptable. However, there are breeding pairs of Nightjars within The Warren (AOSE) and possibly Woodlarks too, therefore, the Warren should be afforded a 400m buffer as per MW5.
- MW6 - In respect of the remaining ⅓ of SIL 02 that is within AOS E, this objective cannot be met since Sibelco (the company proposing the site) state the site would be restored to a lake and not returned to grade 3 agricultural land. In that case MW6

fails, in respect of the geographical area SIL 02 that remains as AOS E. MW6 fails sustainability objective SA10 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pg 16 of Part B (Jun 2019).

Waste Management Specific Policies

National Planning Policy for Waste

- WP1 - NCC states that 'new facilities.... which help to achieve the targets for recycling.....will be encouraged'. This is a policy that NCC should be pursuing itself and not relying on the private recycling companies to come forward with solutions. Also, the policy mentions that 'initiatives to reduce waste and improve recycling are largely outside the scope of this Plan', however, whilst individual initiatives **may** be outside the scope they are not exclusive from the Plan. NCC currently ignores the fact that recycling glass more efficiently would not only reduce the amount of CO₂ emissions in Norfolk and lessen the requirement for quarrying silica sand and destroying the Norfolk landscape, but would also vastly increase the local economy through the number of jobs created. This is a dereliction of duty to the taxpayers of Norfolk and not fulfilling the UK legal obligation to reduce CO₂ emissions. WP1 fails sustainability objective SA1, SA11 and SA13 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pgs 15-16 of Part B (Jun 2019).
- WP4 - NCC should also be planning to recover the glass from construction sites for recycling to improve the quality of cullet available for the manufacture of new flat glass. This would reduce the amount of raw material (silica sand) required to be quarried from the Norfolk countryside for use elsewhere. By not planning for this glass recovery and recycling NCC is not mitigating to reduce CO₂ emissions from quarrying the extra raw minerals and the reduction of CO₂ in glass manufacture from the inclusion of better quality glass cullet. In addition, NCC should also remind itself of the bullet points in para W0.8 about ensuring residents and businesses understand the importance of recycling, reuse etc, and its objective to increase the availability of waste reduction, reuse, repair and recycling centres - both of these are vital alongside an innovative glass recycling strategy as described at para W0.11, " a flexible approach to waste technologies so that innovation within the market is encouraged". WP4 fails sustainability objective SA1, SA11 and SA13 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015) and pgs 15-16 of Part B (Jun 2019)..

Mineral Specific Policies

Forecast need for 13.5M tonnes of silica 2019-36; permitted reserves 3.0M tonnes, therefore, 10.5M tonnes required. All of this is based on no increase in the recycling of clear glass than is already happening

- MP1 - Flawed in respect of silica sand as it assumes that clear glass recycling will not improve, which would reduce the amount of CO₂ produced to extract silica sand and during the manufacture of new glass with use of additional high quality cullet. This conflicts with MSO3 and NPPF Guidance (Ch 17, para 204.b) that states to look to recycle before extracting raw material. MP1 fails sustainability objective SA1 and SA11 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015).
- MP2 - The area of 250m around sensitive receptors, etc is completely arbitrary and has no basis in research. In fact, data from research in other countries ref silica sand and its effects show that the dust particles that are of a size that can be inhaled deep into the respiratory system can be detected up to a mile away. There has been much talk from the Sibelco representative about the 'wet dredge' and how this mitigates any worries the public should have on the matter of particulates in the air and breathable silica sand dust. There is no information from Sibelco on the effects that stripping the top layers (overburden) has when it is removed. To be able to 'work' the mine the top layers will be removed to a depth of approximately 8m to expose the silica sand. The 'window' of deadly quartz particulates in the air from the disturbance of the soil is worst in the first six hours of removal. So this will directly affect those living in close proximity, i.e. those in a 1 mile radius. There have been no studies conducted in the UK, therefore, a 250m zone to mitigate against respiratory dust is unsound. MP2 fails sustainability objective SA2 and SA9 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015). In addition it is noted that in policy MW5 a buffer of 1500m from a mineral site is mandated for areas supporting a bird (Stone Curlew) yet a buffer of merely 250m, or less, is deemed acceptable for humans. This also makes the M&WLP unsound.
- MP5 - There needs to be a specific time scale added to this statement as to destroy biodiversity for profit under the guise of enhancing it later (20-30+ years hence) through restoration is an illogical step and unacceptable. Also the M&WLP at section MP5 on page 76 describes Core River Valleys in Norfolk as *'vital ecological habitats and corridors, supporting a variety of biodiversity habitats and species. In this respect, Core River Valleys are a key component in the development of Norfolk's identified Green Infrastructure corridors. Sand and gravel resources are commonly found in river valleys and many of Norfolk's river valleys have therefore been quarried for aggregate extensively over many years. This has led to many large bodies of open water left on restoration of past mineral workings which are not in keeping with the general character of Norfolk's river valleys. Although not formally designated, safeguarding the Core River Valleys will help preserve the unique and rich quality of Norfolk's landscape and natural heritage'*. With ref to AOS E, including the overlap area that includes a part of SIL 02, with a water bodies already at Pentney and at the Middleton aggregate works just to the north of the river Nar SSSI, then the addition of a much larger water body (e.g. such as the aftermath of SIL 02 as described by Sibelco previously) so close would be exactly what this paragraph explicitly says we shouldn't be doing. Therefore, to continue to include AOS E and its overlap with SIL 02 in the M&WLP would be a flawed decision by NCC. For AOS E and the overlap of SIL 02 that it includes, MP5 fails sustainability objective SA5 on pg 9 of the

Sustainability Appraisal Report - Part A- Scoping (Oct 2015) for the amount of time it is a visual intrusion; fails SA8 because of the excessive time-scale involved and the after use proposed; and SA9 due to the time-scale involved.

- MP6 - Whilst MP6 is about cumulative impacts from other concurrent mineral extraction sites, (we are surrounded by mineral sites and plants in West Norfolk already), and Middleton aggregates is just across the river Nar, it fails to address the other potential cumulative impacts in an area, e.g. a close military airbase with the comings and goings of HGV in the build up of the base to support the new F35 and the daily deliveries needed to support our national security or other industrial process, plus the persistent jet noise. Neither does it mention the cumulative impacts mentioned on pg 31 at 8.46 - amenity, the economy, the natural and built environment, the local road network and the period of time for working an area if it is to be prolonged. This policy requires a complete rewording to include the points missed from pg 31. For AOS E and the overlap of SIL 02 that it includes, MP6 fails sustainability objective SA3, SA4 and SA9 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015).
- MP7 - Restoration of a site relies on the operator being the owner. Where this isn't the case then MP7 does not account for the landowner denying opportunities for greater public access after gleaning the financial benefits from the mineral extraction whilst the local community suffer the losses of amenity involved with a mineral extraction site for many years and even generations. Neither does it address the timescale that some sites may be actively quarried before greater public access is potentially achievable. Finally, it does not specify that the restoration will be for the benefit of the local community and not a fee paying public for a development by a private company. MP7 fails sustainability objective SA4, SA8 and SA9 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015).
- MP11 - States on pg 83 of the M&WLP that minerals are a finite natural resource; therefore, NCC's M&WLP is flawed without plans to extend the life of the silica sand resources in Norfolk through an advanced glass recycling policy and plan. MP11 fails sustainability objective SA11 on pg 9 of the Sustainability Appraisal Report - Part A- Scoping (Oct 2015)
- Finally, comment on **Sustainability Appraisal Report (SAR) Part A - Scoping (2015)**. I specifically include here section **2.2 Approach to the SA/SEA Process**
 - In applying SA/SEA to the Silica Sand Review of the Minerals Site Specific Allocations DPD and the Minerals and Waste Core Strategy Review, Norfolk County Council aims to:
 - Identify alternative options for delivering sustainable minerals development in Norfolk;
 - Identify alternative options for delivering sustainable waste management facilities in Norfolk;

- Further enhance positive environmental, social and economic effects of the plan; and
- Reduce and minimise the negative environmental, social and economic effects that may result from the implementation of the plan.

Nothing in the NCC Silica Sand Review addresses the aims stated in section 2.2 with respect to 'alternative options for delivering sustainable minerals development in Norfolk, or 'further enhance economic effects'. As discussed throughout this paper only an up to date, efficient glass recycling programme for Norfolk will address the aims stated in the SAR section 2.2. At this moment the M&WLP fails this section.

CATSS - Campaigners Against Two Silica Sites