

**CATSS****CAMPAIGNERS AGAINST TWO SILICA SITES | SHOULDHAM AND MARHAM****CATSS – Objection to Quarrying in AOS E and SIL 02
on the grounds of poor process conducted by NCC**

The process of public consultation conducted by NCC was conducted poorly, lacked transparency and inclusivity, and failed to reflect the views of residents. Specific deficiencies in the management of the Silica Sand Review and the Consultation on the Norfolk Minerals and Waste Local Plan Review are:

- 1) Despite NCC's commitment to consult with the community as set out in their Statement of Community Involvement (SCI), the process to date has lacked transparency and was executed so poorly, that communities of Marham and Shouldham were denied a fair and reasonable chance to be involved and most people had no knowledge of the on-going process and had little or no time to respond – despite the process starting before 2015.
- 2) The SCI sets out four “key principles” by which any consultation process should be judged: Accountability (taking citizens' views into account), Accessibility (consultation is clear and genuinely accessible), Inclusivity (groups of the community are not excluded), and Efficiency (ensuring methodology delivers results). NCC failed on all four principles. An accessible consultation should not require 1000s of hours of effort to understand and participate. It should not rely on concerned members of the public informing the wider community or rallying various consultee groups to respond. It should not require the public to defend and ensure existing government policies are not violated. It should not require an MP's involvement to ensure that public concern is registered and addressed.
- 3) Some specific examples of the shortfalls in the consultation process are: a) NCC deemed it reasonable to only send 10 letters to residents within an arbitrary 250m boundary of the site, despite the proposed silica mine being the largest in the country and affecting thousands of people; b) using the same ineffective methodology for consultation: in the 2015 consultation, AOS E received 7 responses; in the 2018 consultation, due to the efforts of CATSS, AOS E and SIL02 received 460 responses. Other areas resulted in the same low level response (SIL01 – 8, AOS F – 3, AOS I – 4, AOS J – 6), because NCC continues to use ineffective methods of engagement with the residents of Norfolk.
- 4) Concerns raised in the 460 responses to the first consultation in August 2018 have been ignored. Residents raised concerns about impact on health, wellbeing, environment, biodiversity, their rights to peaceful enjoyment of their properties, no benefit to local communities, failure to improve recycling of glass already in circulation, lack of restoration plans, and failure to conduct an effective and transparent process by NCC. The August 2019 Mineral Plan states that the “responses received have been considered in the production of the second public consultation document, the Preferred Options”, however the ‘Preferred Options’ only reflected the concerns of the MOD and Historical Environment Services. None of the concerns of residents were taken into account.
- 5) Despite NCC announcing that SIL 02 has not been allocated, a third of it is now/still included in AOS E. The overlap of the two sites is entirely misleading to residents and statutory consultees, created unnecessary confusion and wasted people's time in trying to understand the boundaries and consequences for consultees.

It is clear that NCC needs to do a lot more beyond merely satisfying the minimum legal obligations in this process, to ensure public participation given the magnitude, longevity, and detrimental impact of the projects proposed.