



via e-mail

[REDACTED]
Norfolk County Council
Planning Services
County Hall, Martineau Lane
Norwich, NR1 2SG

NCC contact number: 0344 800 8020
Text relay no.: 18001 0344 800 8020

Your Ref: FUL-2024-2022
Date: 19 August 2024

My Ref:
Tel No.: [REDACTED]
Email: [REDACTED]@norfolk.gov.uk

Dear [REDACTED]

Re: Proposed development of approximately 6km of the Norwich Western Link Road connecting the A1067 with the new A47 North Tuddenham to Eastern Scheme and associated development (Full)

This response is made without prejudice by Norfolk County Council in its capacity as the Mineral and Waste Planning Authority for Norfolk.

The proposed roadway overlies some areas of safeguarded sand and gravel resource (Mineral Safeguarding Area) but is not within the consultation area of any existing safeguarded mineral extraction site or waste management facility.

Environment Statement - Chapter 14: Material Assets and Waste

The Mineral and Waste Planning Authority (MWPA) is pleased to note that in paragraph 14.5.4 it is estimated that the project will achieve a cut and fill balance, with a commitment that the surplus will be recovered and reused in other (off-site) construction schemes. Those (off-site) construction schemes will need to assess any potential import of material and ensure that any resultant planning permission includes the need for the import of material.

Paragraph 14.5.12 provides information on the extraction of sand and gravel resources and their reuse within the scheme. It is noted that extraction of sand and gravel resources will be limited to the depth of the road despite mineral resources sometimes extending to a considerable depth below this level due to the need to import and consolidate any infill beneath the roadway to find a suitable founding. If infill was required it would likely be a primary mineral, similar to mineral extracted. Therefore, it is considered by the MWPA that limiting extraction to the depth of the roadway is a suitable and pragmatic course of action and will not result in needless sterilisation of the mineral resource.

The MWPA further welcomes the commitment that a Materials Management Plan (MMP) will be produced to manage the reuse of excavated onsite arisings.

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The preparation and implementation of a Materials Management Plan with a specific objective to maximise the potential for the reuse of extracted materials should be conditioned as part of any future grant of planning permission. The MMP should estimate the quantities of material which could be extracted from the scheme and reused.

The MWPA does continue to have concerns regarding the evidence base supporting Chapter 14 regarding the granularity of the data. Data is provided in the ES at a regional (East of England) level in several cases and at a national level in some cases, when published data is available at a county level.

An example of this is in Table 14-5 where it states that 'Permitted crushed rock' is nil in the East of England (EoE). Whereas the East of England Aggregates Working Party Annual Monitoring Report (AMR) 2022 [Final-EEAWP-Report-2022.pdf \(davidjarvis.biz\)](#) states that for the monitoring year 2021-2022 permitted crushed rock reserves in the EoE were 4.4mt. Furthermore, the MWPA carries out an annual Local Aggregate Assessment (LAA) which also includes data on crushed rock (Carstone). The Norfolk LAA 2022 [Annual Monitoring Reports - Norfolk County Council](#) contains data for the monitoring year 2021-2022. This contains in section 3 details of the permitted reserves of Carstone in Norfolk which were 1.4mt.

For sand and gravel, data is available in the Norfolk LAA, to provide a greater detail than the EoE figures. For Secondary and Recycled aggregate, data is published in the EoEAWP AMR, and in the Norfolk LAA, as opposed to the 'No data' stated in Table 14-5.

Table 14-7 gives a summary of permitted waste recovery management sites in the East of England. However, the scheme should have given greater consideration to the locations and availability of facilities to deal with construction, demolition and excavation waste; the EoEAWP AMR (appendix 3) and Norfolk LAA (Table 11) both contain lists of sites for recycled aggregate sources.

The above examples illustrate a general tendency within the ES to provide information at a regional or national level, when more detailed information is available and would allow assessment of potential effects and mitigation measures to be provided at a county level or in some cases with even greater granularity. **Therefore, the Mineral and Waste Planning Authority requests that further information on potential county level impacts on the supply of construction aggregates and landfill capacity be provided, as indicated above, prior to the determination of the application.**

Norfolk County Council as the statutory authority for Mineral Planning in Norfolk wishes to be kept informed as this proposal is progressed through the application process.

If you have any queries, please contact [REDACTED] (Senior Planner, Minerals and Waste Policy) by email at [REDACTED]@norfolk.gov.uk or telephone [REDACTED].

Yours sincerely,

[REDACTED], Principal Planner (Minerals and Waste Policy)