



Corporate Performance Panel
Tuesday, 26th November, 2019 at 6.00 pm
in the Council Chamber - Town Hall, Saturday Market
Place, King's Lynn PE30 5DQ

Reports marked to follow on the Agenda and/or Supplementary Documents

1. **Urgent Business Under Standing Order 7 (Pages 2 - 19)**

To consider any business which, by reason of special circumstances, the Chairman proposed to accept as urgent under Section 100(b)(4)(b) of the Local Government Act 1972.

Contact

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CORPORATE PERFORMANCE PANEL REPORT

Wards Affected: All	Type of Report: Call-in
Author Name: Sam Winter	Consultations:
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OPEN	Portfolio: Development

Committee: Corporate Performance Panel
Date: 26 November 2019
Subject: Call-in of Cabinet Members Delegated Decision

**NORFOLK COUNTY COUNCIL MINERALS AND WASTE LOCAL
PLAN REVIEW (M&WLPR) – PREFERRED OPTIONS
CONSULTATION**

Summary

This report deals with the Cabinet Members Delegated Decision made on 12 November 2019,

The decision has been called-in and the Chief Executive has determined that the call-in is valid.

The report outlines to Members how the call-in process may be used in this case and what the issues are relating to the matter.

1 Introduction

- 1.1 A decision was taken as a Cabinet Members Delegated Decision on 12 November 2019 setting out proposed comments on the Norfolk County Council Minerals and Waste Local Plan Review. A copy of the report is attached at Appendix 1.
- 1.2 The decision made in respect of this matter is to submit comments to NCC on their Minerals and Waste Local Plan Review – preferred options consultation.

2 Grounds for Call-In

- 2.1 Standing Order 12.3 (d) requires grounds to be given for calling-in an executive decision, reasons given are set out in Appendix 2.

3 Call-in Requisition

- 3.1 Call ins were made by the following councillors, all who supported each other. The original call-in was proposed by Councillor Hipperson and indications of support were received from the following:

Councillor Ryves, who also submitted reasoning, and Councillors Howland, Moriarty and de Whalley who also submitted reasoning.

Call in made by Councillor Rust with reasoning

Call in made by Councillor Kemp with reasoning

In all 6 Councillors have supported call ins on the matter. Attached as appendix 2 to the report are the comments submitted by Councillors.

4 Validity of Call-in

- 4.1 The Chief Executive has made the following ruling:

The call-in is valid in respect of Standing Order 12.4(d):

12.4(d). (d) Have the views of Members requesting the call-in been fairly taken into account in arriving at the decision, so making a call-in unnecessary?

5 Call-in Process

- 5.1 Standing Orders 15.33 and 15.34 sets out the call-in debating procedure, as follows:

(a) The Proposer of the call-in and his supporters address the Corporate Performance Panel about the call-in and why it should be upheld;

(b) The Panel Members receive a submission from the relevant Portfolio Holder;

(c) The Panel Members receive submissions from Officers;

(d) The Panel Members receive submissions from Members and, at the discretion of the Chairman, other interested parties;

(e) The Panel debates the call-in (in accordance with Standing Order 15.33) during which they may question or seek further information from any of the four parties referred to in (a), (b), (c) and (d) above;

AGENDA ITEM 4

- (f) The proposer shall exercise a right of reply after the debate.
- 5.2 Following the debate, the Panel will decide (in accordance with Standing Order 12) either to support the Cabinet's decision, or to uphold the call-in.
- 5.3 If the Panel upholds the call-in it may then take one of three courses of action:
- (a) report to Council, Cabinet or the relevant Portfolio Holder requesting that they amend or substitute the recommendations or decision; or
 - (b) if the issue is considered urgent or straightforward, formulate a counter-recommendation or amendment; or
 - (c) investigate the matter further at another meeting within thirty working days beginning with the day after the issue of the notification of the call-in and then follow the same process as set out in paragraphs 5.2 and 5.3 above.
- 5.4 If the Corporate Performance Panel:
- (a) does not end the call-in within 30 days from the date of the decision which has been called in (and the decision remains in dispute); or
 - (b) refers the call-in directly to Council,

the Council shall determine whether to approve the recommendation that has been called-in or to revoke, vary, amend and/or remit it back to Cabinet for further consideration.

CABINET MEMBERS DELEGATED DECISION

Open/Exempt		Would any decisions proposed:		
Any especially affected Wards	Mandatory/	Be entirely within Cabinet's powers to decide		YES/NO
	Discretionary/	Need to be recommendations to Council		YES/NO
ALL	Operational	Is it a Key Decision		YES/NO
Lead Member: Cllr R Blunt in consultation with Cllr I Devereux E-mail: cllr.lan.Devereux@West-Norfolk.gov.uk cllr.Richard.Blunt@West-Norfolk.gov.uk		Other Cabinet Members consulted: None other than RB and ID		
		Other Members consulted: None		
Lead Officer: Alan Gomm E-mail: alan.gomm@west-norfolk.gov.uk Direct Dial:01553 616237		Other Officers consulted: Management Team; Dave Robson		
Financial Implications YES/NO	Policy/Personnel Implications YES/NO	Statutory Implications YES/NO	Equal Impact Assessment YES/NO If YES: Pre-screening/Full Assessment	Risk Management Implications YES/NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s)				
Date meeting advertised: 5 th November 2019		Date of meeting decision to be taken: 12 th November 2019		
Deadline for Call-In: 19 th November 2019				

NORFOLK COUNTY COUNCIL MINERALS AND WASTE LOCAL PLAN REVIEW (M&WLPR) – PREFERRED OPTIONS CONSULTATION

Summary

Comments are provided in relation to the Minerals and Waste Local Plan Review - Preferred options public consultation (Regulation 18): August/September 2019.

They suggest consideration is needed in relation to:

- The locational strategy for waste.
- Areas of search for silica sand extraction.
- Comments on new sand and gravel / carstone extraction sites at Tottenhill and East Winch.
- Restoration and aftercare of extraction sites.
- Summary technical comments from Borough Environmental Quality and Community Safety and Neighbourhood Nuisance teams are given.

Recommendation

That the comments in sections 3 and 4 are sent to Norfolk County Council

Reason for Decision

To provide comments as part of the consultation and reflect the interests of communities in the Borough

1. Background

1.1 The current Norfolk Minerals and Waste Local Plan is made up of three documents:

- The Norfolk Core Strategy and Minerals and Waste Development Management Policies DPD
- The Minerals Site Specific Allocations DPD
- The Waste Site Specific Allocations DPD

These plans cover the period up to 2026. As the Core Strategy was adopted over five years ago Norfolk County Council (NCC) are now carrying out a joint review of these three plans to make sure that they are up-to-date, to extend the Plan to 2036 and to consolidate them into one Norfolk Minerals and Waste Local Plan (M&WLP). This process is the Minerals and Waste Local Plan Review (M&WLPR).

1.2 The M&WLPR Preferred Options Consultation document includes:

- A forecast of the amount of waste needed to be planned for up to 2036 and the policies proposed to be used to decide planning applications for waste management facilities. NCC are not proposing to allocate sites for waste management facilities.
- A forecast of the amount of sand and gravel (1,868,000 tonnes per annum), carstone (121,400 tpa) and silica sand (750,000 tpa) that should be planned for up to 2036 in order to provide a steady and adequate supply of minerals. It also includes the policies to decide planning applications for mineral extraction and associated development.
- Some specific allocations for mineral extraction including areas of search for silica sand.

1.3 In addition to the Preferred Options Consultation document, the following documents are published which provide information to support the M&WLPR:

- Draft Habitats Regulations Assessment - Test of Likely Significant Effects (2019)
- Silica sands AOS E and SIL 02 - Historic Environment Impact Assessment - Designated Heritage Assets (April 2019)
- Waste Management Capacity Assessment 2017
- Sustainability Appraisal Part A - Scoping
- Draft Sustainability Appraisal report - Part B
 - Appendix A - Sustainability Appraisal tables of policies
 - Appendix B - Sustainability Appraisal tables of proposed mineral extraction sites and areas of search
 - Appendix C - Sustainability Appraisal maps of mineral extraction sites and areas of search
 - Appendix D - Sustainability Appraisal maps and tables of proposed waste management facilities

1.4 Norfolk County Council are seeking our views on the Minerals and Waste Local Plan Review - Preferred Options (Regulation 18): August/September 2019 - The full document can be found at:

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/norfolk-minerals-and-waste-local-plan-review>

1.5 Any comments will be published on Norfolk County Council's website. Once the Preferred Options consultation closes they will take into account the comments made and prepare a Pre-Submission version of the M&WLP Review. They will then seek representations on this, before they submit the final M&WLP for examination by a Planning Inspector on behalf of the Secretary of State.

1.6 This current consultation closes at 5pm on 30 October 2019.

2. Minerals issues / sites

2.1 **Sand and gravel and carstone** - Below is a table giving detail of the sand and gravel sites considered and those ultimately proposed for allocation.

King's Lynn and West Norfolk			
MIN 45	land north of Coxford Abbey Quarry, East Rudham	700,000	Not allocated
MIN 204	land north of Lodge Road, Feltwell	720,000	Not allocated
MIN 19 & MIN 205	land north of the River Nar, Pentney	850,000	Not allocated
MIN 74	land at Turf Field, Watlington Road, Tottenhill	160,000	Not allocated
MIN 76	land at West Field, Watlington Road, Tottenhill	285,000	Planning permission granted 18/04/2019
MIN 77	land at Runns Wood, south of Whin Common Road, Tottenhill	630,000	Not allocated
MIN 206	land at Oak Field, west of Lynn Road, Tottenhill	780,000	Allocate
MIN 32	land west of Lime Kiln Road, West Dereham	560,000	Not allocated

Carstone

Site ref.	Location	Estimated resource (tonnes)	Conclusion
MIN 6	land off East Winch Road, Mill Drove, Middleton, King's Lynn	1,416,000	Allocate

2.2 In summary eight sites have been considered for sand and gravel extraction, and two are going forward, one with permission granted, and the other as an allocation. The allocation of MIN 206 is subject to a specific policy detailing constraints and assessments needed with any application. Six were excluded from allocation as unsuitable. A site at East Winch is allocated for carstone extraction; MIN06 contains appropriate policy constraints and detailed requirements. In both instances the policies cover environmental, transport and other considerations.

2.3 **Silica Sand** - The silica sand resource in Norfolk is only located in West Norfolk. Three sites have been proposed for silica sand extraction (by Sibelco UK Ltd), with an estimated mineral resource of 20,200,000 tonnes. However, only two of these sites with an estimated resource of 4,200,000 tonnes have been concluded to be suitable to allocate. These two sites would not meet the forecast need of 10,500,000 tonnes of silica sand during the plan period. Therefore, four areas of search will also be allocated for silica sand extraction. These four Areas of Search (AOS) are carried forward from the last consultation plan. It can be assumed that proposals to make up the need shortfall could come forward within these.

2.4 Site MIN 40 was an allocation carried forward from the current adopted Plan (2013 / 2017).

2.5 The assessments of the proposed sites and areas of search are included in the Review document.

Site ref.	Location	Estimated resource (tonnes)	Conclusion
MIN 40	land east of Grandcourt Farm, East Winch	3,000,000	Allocate
SIL01	land at Mintlyn South, Bawsey	1,200,000	Allocate
AOS E	land to the north of Shouldham	Not known	Allocate
AOS F	land to the north of Stow Bardolph	Not known	Allocate
AOS I	land to the east of South Runcton	Not known	Allocate
AOS J	land to the east of Tottenhill	Not known	Allocate
SIL 02	land at Shouldham and Marham	16,000,000	Not allocated

2.6 A site at Shouldham / Marham has been dropped as an allocation. (It should be noted that part of the previous proposal falls within AOS E, but the bulk of the previous allocation north-west of the RAF base is dropped).

2.7 There are policies elsewhere in the Plan Review to control the way in which sites are brought forward. Appendix 1 details summary technical comments from Borough Environmental Quality and Community Safety and Neighbourhood Nuisance teams about the noise / dust issues from mineral extraction proposals. The detail comments will be forwarded to the County Council separately as part of the consultation.

2.8 It is noted that there is general policy re-wording from current adopted plan. This updating to reflect the current situation is broadly accepted, **except** with reference to waste management facility location (WP2 see section 4 below).

3. Implications for the Borough from sand and gravel and silica sand policies / areas

3.1 **Tottenham (Site 206 – West of Lynn Road)** This is an extension of existing works. The Tottenham sites would be worked sequentially to mitigate any cumulative impacts. Potentially acceptable subject to the requirements in the policy.

3.2 A site at **East Winch** (Site MIN06 Mill Drove, Middleton) is allocated for carstone extraction. Potentially acceptable subject to the requirements in the policy.

3.3 Silica sand – AoS's (E, F, J and I) and SIL01. The County Council concludes that Site SIL01 is suitable to allocate for silica sand extraction. Development will be subject to compliance with the relevant Minerals and Waste Local Plan Policies and Specific Site Allocation Policy SIL01. There are reasonable safeguards for the locality.

3.4 The AoS are the same as previously expressed in the Initial Consultation document. Silica sand is a nationally important industrial mineral, and as such, the County Council must make adequate provision for its extraction. However they are not able to find suitable sites for the quantity of sand required, especially having dropped a site at Shouldham. The AoS are large and the expectation is that a suitable location could be found within one of the areas. Without detailed further information or operator preferences it is not possible to pinpoint a site and therefore assess the localised impacts. Whilst this may be unsatisfactory for local communities who fear the consequences of extraction, it does give a positive indication that the County Council is safeguarding land and narrowing down suitable sites. It would be unrealistic to seek to have no areas of search at all, and the Plan could be found 'unsound'.

3.5 Adequate safeguards are considered to exist to assess detailed proposals should they come forward within areas of search. Development will be subject to compliance with the relevant Minerals and Waste Local Plan Policies and the Areas of Search Policy (MP13).

3.6 **Policy MP7 (relating to restoration and aftercare)** suggests that preference will be given to enhancing biodiversity, green infrastructure, and high quality local landscapes. This approach is supported. Whilst not necessarily appropriate in all circumstances, tree planting on restored sites would be a useful additional boost to mitigate for climate change. It is proposed that an additional clause is added to this effect as a fifth bullet point in paragraph four to the policy.

4. Implications for the Borough from the NCC approach to proposed waste policies

4.1 NCC have reviewed the policies in the current plans and as with Minerals moved them on to an end date of 2036. One particular item is relevant to West Norfolk. This is the overall locational strategy for waste management facilities.

4.2 Main points:

- From **Policy WP2** in the Preferred Options it would seem possible to locate waste management facilities away from the broad location that generated the waste. Thus necessitating potentially significant transport movements, and possibly generating resentment from recipient communities.
- Whilst not necessarily inappropriate for all types of waste where specialist facilities are needed, extremely careful thought should be given to general waste or significant quantities requiring movement.
- A better approach would seem to be one where the policy encouraged waste to be dealt with as near to the generating source as possible.
- It is suggested our original comments are still appropriate to make.

4.3 There are policies elsewhere in the Plan Review to control the way in which sites are brought forward for waste purposes. Appendix 1 details summary technical comments from Borough Environmental Quality and Community Safety and Neighbourhood Nuisance teams about the noise / dust issues from proposals. The detail will be forwarded to the County Council separately as part of the consultation.

5. Overall conclusion

5.1 Comments are set out above (sections 3 and 4) on the main new proposals as they could affect West Norfolk. Given the timescale for responses the comments have been sent to NCC as 'officer comments', with the caveat that additional points may need to be incorporated following this delegated decision.

6. Options Considered

6.1 The NCC consider various options for the policies and allocations in the Plan, and these are assessed in the Sustainability Appraisal for it. However, as the Borough Council we are requested to comment on the draft proposals as presented.

7. Policy Implications

7.1 None specifically for the Borough Council.

8. Financial Implications

8.1 None for the Borough Council.

9. Personnel Implications

9.1 None for the Borough Council.

10. Statutory Considerations

10.1 The Minerals and Waste Plan will ultimately become part of the Development Plan for West Norfolk, to which we will need to give appropriate weight in considering planning applications.

11. Equality Impact Assessment (EIA)

11.1 A Pre-screening EIA is not required. The Minerals and Waste Plan is a Norfolk County Council policy document and accordingly will be assessed by the County Council.

However, it would be useful to feed into the NCC Equalities considerations by identifying that the extraction of minerals may contribute to air pollution and therefore impact upon particular equality groups such as age, pregnancy and maternity, and those with disabilities.

12. Risk Management Implications

12.1 None specifically for the Borough Council.

13. Declarations of Interest / Dispensations Granted

13.1 None advised.

Background Papers

Minerals and Waste Local Plan Review - Preferred options public consultation (Regulation 18): August/September 2019 - The full document can be found at: <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/norfolk-minerals-and-waste-local-plan-review>

**Environmental Quality and Community Safety and Neighbourhood Nuisance
Summary Comments on
Waste Site Specific Allocations October 2019**

Summary:

If sites have to be progressed to the planning application stage, we would hope that sites furthest from residential dwellings are looked at primarily, as this could ensure that the impact on residential health and amenity is negligible. Clearly these sites would be preferred by us, if needed at all.

Any future applications for waste sites should be accompanied by noise, odour, dust, and air quality management schemes, which should identify potential sources and mitigation/control measures to prevent nuisance issues and health impacts (e.g. emissions from as gas flaring).

Where sites are likely to be illuminated for safety/security, lighting plans and details should also be submitted which should include where lights will be located, their heights and angle/orientation, the type of lighting and the throw and spill of light across the site, and measures to ensure light spill is contained within site boundaries.

These allocated sites have been reviewed in line with Development Management Policies DM12, DM13, and DM15 as detailed within Norfolk Minerals and Waste Development Framework

Existing Waste Site Specific Allocation Policies:

We note that WAS 05, WAS 25, WAS 36, WAS 40, WAS 37, WAS 45 and WAS 65 are no longer required and would therefore be deleted. There is therefore no risk to residential amenity from these sites.

Odour:

An odour impact assessment should be included within any future planning applications for allocated waste sites, along with suitable mitigation measures where appropriate.

Climate Change:

Climate change mitigation should be considered with regards to methane emissions (a greenhouse gas) released from allocated landfill sites.

**Environmental Quality and Community Safety and Neighbourhood Nuisance
Summary Comments on
Mineral Site Specific Allocations October 2019**

Summary:

If sites have to be progressed to the planning application stage, we would hope that sites furthest from residential dwellings are looked at primarily, as this could ensure that the impact on residential health and amenity is negligible. Clearly these sites would be preferred by us, if needed at all.

Submitted noise assessments and air quality/dust assessments should consider and include mitigation measures to deal appropriately with any potential health impacts, such as operational practices, separation/standoff areas and screening and/or bunding in line with Development Management Policies DM12 and DM13.

These allocated sites have been reviewed in line with Development Management Policies DM12, DM13, and DM15 as detailed within Norfolk Minerals and Waste Development Framework.

Lighting:

Lighting is not included in the document as this is generally something which can be considered at any proposed planning application stage; however we would hope that any proposed lighting for site security and worker safety would be carefully considered prior to the planning stage so details can be submitted with any planning application. We would assume lighting would be pole mounted in elevated positions, and therefore the throw and spread of this should be assessed to ensure that there is no impact on residents. Light should be contained within the confines of sites and positioned appropriately. If necessary lighting is located near dwellings, this should be angled away and hooded/cowled to prevent any adverse impact on residents.

Vibrations:

The potential impact from vibrations should also be considered at any future planning stage, if sites are chosen close to residential receptors – including vibrations from site operations and associated transportation of extracted materials.

Soil Stripping:

Soil stripping operations must be effectively controlled through mitigation methods (e.g. buffer zones and bunding) to reduce fugitive emissions, which pose short term health impacts on nearby residents. These mitigation measures must be included in any future planning application.

Haul Roads:

Fugitive emissions from haul roads need to be addressed in any future planning application, with mitigation planned where necessary such as wheel washing.

Appendix 2

Call In information received from Councillors making the call in and other supporters.

Cllr Geoffrey Hipperson

17 November 2019 07:13

Dear Lorraine,

I would like to call in the cabinet decision on the Consultation regarding the Norfolk Waste and Minerals Plan because it raises issues of wider concern.

One of the reasons for wider concern is that although Shouldham Warren is only, at present, designated an “area of search” the area proposed includes part of a site that was previously part of a “preferred area” for sand extraction. This indicates that even without further survey part of the proposed area of search is already considered suitable for use.

The site ,although privately owned and let for forestry, is used to a wide extent as an amenity area for walkers, a safe cross country running place for both children and adults, and many other outdoor activities. In addition it is an environmentally beneficial area for both plants and wildlife, and the impact of disturbance by quarrying needs further study.

Cllr Michael Howland – supporting Cllr Geoffrey Hipperson

14 November 2019 12:15

Hello Lorraine,

Please accept this e-mail as confirmation of my support for Cllr. Hipperson calling in the above Preferred Options Consultation Decision regarding the NCC Minerals and Waste Local Plan Review Cabinets Decision.

I am supporting Cllr.Hipperson because we both share the same Ward and have issues of wider and greater concern.

Cllr Alun Ryves – supporting Cllr Geoffrey Hipperson

18 November 2019 10:05

I would like to call this decision in for the following reasons

1. This is an issue that effects Rural Parts of the Borough and a number of my constituents have commented to me that The Borough is really only about Kings Lynn., I understand why they sometimes might think that and believe that an issue such as this which effects these rural wards should be called in, not least so constituents can have access to detailed discussion by members of the matter.

2. Specifically, I am concerned that this document does not specifically rule out the future use of incineration as stated in WP10 below

“Policy WP10: Residual waste treatment facilities Residual waste treatment facilities will only be acceptable within a purpose designed or suitably adapted facility on the types of land identified within Policy WP3, and where the proposals meet the development management criteria set out in Policy MW2. The treatment of waste that could practicably be recycled or composted will not be acceptable. Conditions will be placed on planning permissions to ensure that only residual source-separated or pre-sorted waste is treated. Facilities that include thermal treatment of waste must provide for the recovery of energy and, where practicable, heat; and the use of combined heat and power will be encouraged”

I think new councillors should be given the opportunity to discuss the pros and cons of incineration in the County.

3. MIN74, 77, 206. Of particular concern to my constituents, as expressed in the public meeting attended by Councillor Long In Tottenhill, is the proposed extension of quarrying in that area, with the associated noise and transport issues. This is particularly so as there are plans to establish a Safari Park in this area and it is difficult to see how intensified quarrying will assist a project that might be a major tourist facility in West Norfolk. The disruption from these proposals also needs to be considered within the context of the planned growth of Watlington. In the view of residents, this area is over quarried.
4. Additionally, There is deep public concern at the threat posed to SHOULDHAM WARREN by AoS E which covers a wide area. Quite apart from the problem of transporting silicone sand to the reprocessing facility, this site is a valuable Borough amenity. Our local MP Ms Truss has participated in protests against this plan. A theme of this protest is that resources could be directed more towards recycling glass than extracting silicone sands to make more of it, and additionally, whilst West Norfolk is the only part of Norfolk with this resource there are more accessible deposits and infrastructure in other parts of the country and we would like NCC to challenge the strategic assumption that Norfolk should supply this material when there is no obvious advantage to the County from so doing. This is especially so as the assumptions underlying the need for silicon sand include a requirement for fracking (now on hold) and ignore the fact that considerable amounts are exported.

I would like these issues to be discussed and if found of merit be included in the response by the Borough to the NCC minerals and Waste Local Plan Review.

Cllr Jim Moriarty – supporting Cllr Geoffrey Hipperson

18 November 2019 22:38

Hello Lorraine

I believe you have had a number of requests to call in the above. I can already count more than four but to ensure Cllr Hipperson's is taken into consideration as his fellow ward councillor is away, I will add my name to his call-in.

Cllr Alexandra Kemp

18 November 2019 14:51

1. Draft Waste Plan leaves West Norfolk vulnerable to Incineration

I would like to call in this response because it does not do what it should do to protect West Norfolk and it has not considered the fact that the policies in the plan review are criteria-based and could leave West Norfolk open to speculative planning applications for large waste incinerators, like autoclave and pyrolysis, on any piece of ground permitted for waste or business use. This is clearly unacceptable.

The Cabinet's response does not consider the distress this would cause to West Norfolk residents, 65,000 of whom voted no to incineration in the Borough Poll.

Norfolk has a No-Incineration in Norfolk Policy, this is a material planning consideration but only applies to Norfolk County Council as Waste Disposal Authority, but not to third-party developers.

"The Criteria In Policy WP3: Land potentially suitable for waste management facilities – STRATEGIC POLICY state that Waste management facilities (other than landfill sites and water recycling centres) will be acceptable only on the following types of land:

- a) land benefiting from a permanent permission for an existing waste management use;
- b) land in existing general industrial use (B2 use class) or in existing storage or distribution use (B8 use class) (excluding open air composting);
- c) land allocated for B2 and B8 uses in a local plan or development plan document (excluding open air composting);
- d) land within or adjacent to redundant agricultural and forestry buildings; e) previously-developed (brownfield) land (excluding open air composting); f) former airfields (open air composting only);
- f) water recycling centres (composting and anaerobic digestion only)."

These criteria are much too wide.

Policy W10 in The Preferred Options Plan at Page 56 clearly leaves all forms of thermal treatment permissible under the plan. This places West Norfolk at risk. The Willows site does not yet have a definite future outcome. EP Energy have an option to build a Power Station but this is not a certainty as they have not yet been awarded the Energy Credits.

The Borough's response should state that the plan must state that incineration as a form of residual waste facility is not acceptable in West Norfolk where 65,000 residents voted against incineration in the Borough Poll.

2. Extraction of Abnormal Hydrocarbons - Fracking

The Borough's response does not mention material considerations of the risks relevant to West Norfolk of fracking and should say that the plan should exclude fracking certainly in West Norfolk.

King's Lynn is the only town in Norfolk vulnerable to applications from fracking as there is shale gas in West Winch.

The Government's current halt to fracking due to its causing earthquakes may not last due to industry pressure.

The draft policy MP12 at page 90 says that fracking would only be allowed where it would not cause unacceptable environmental impacts.

However, everywhere that prospecting for fracking, or fracking itself has happened has cause earthquakes and risks damage to people's homes and creates boreholes in the landscape.

Cllr Alun Ryves – supporting Cllr Alexandra Kemp

18 November 2019 15:01

I have already supported the proposal put forward by the mayor in respect of shouldham Warren which is being put forward as AoS e, and having read your concerns am pleased to put my name to your presentation.

MdW is also working on something I think....

Cllr Jo Rust

18 November 2019 15:09

I'd like to call this in too please?

For the following reasons

There is wider concern is that although Shouldham Warren currently designated an "area of search" the area proposed includes part of a site that was previously part of a "preferred area" for sand extraction . This indicates that even without further survey part of the proposed area of search is already considered suitable for use.

And also, although the site is privately owned and let for forestry, it is widely used as an amenity area for walkers, a safe cross country running place for both children and adults, and many other outdoor activities. At a time when our health and activity is an area of concern, this proposal could end this. In addition it is an environmentally beneficial area for both plants and wildlife, and the impact of disturbance by quarrying needs further study.

Cllr Michael de Whalley – supporting Cllr Alexandra Kemp and Cllr Jo Rust

18 November 2019 16:50

Dear Lorraine

I write to support both Alexandra Kemps' and Jo Rust's call-ins. I intend to write some additional points tonight after the hustings.

Cllr Alexandra Kemp – supporting Cllr Jo Rust

18 November 2019 17:03

Dear Lorraine and Lorraine,

I support Cllr Rust's call-in below about Shouldham.

Cllr Michael de Whalley

19 November 2019 11:34

Dear Lorraine,

Please accept this as my call-in for the council's delegated response to NCC's Mineral and Waste Strategy.

Policy WP10

In the local poll undertaken by the Borough Council of King's Lynn and West Norfolk regarding incineration, an overwhelming majority (65,516 voters – 93%) clearly demonstrated the public's rejection of incineration.

It is inconceivable that this same Borough Council now misses the opportunity to make any on residual waste thermal treatment. Rejection of this technology must be unambiguously stated by this council in the final definitive response to the minerals and waste consultation.

If the Council insists on not responding, at the very least it should explain why. This is particularly important due to the growing concerns that Norfolk may have secretly agreed to provide residual waste to the proposed Wisbech incinerator less than a kilometre from the Norfolk border. Incineration and air pollution does not recognise county boundaries. Generally, pollution from incinerators starts to reach the ground and is at its highest concentration one kilometer downwind of the stack. With prevailing southwesterly winds this means that the vast bulk of the pollution will fall in and across Norfolk. Cambridges' mineral and waste plan is its affair, how our waste is treated and where is ours.

Policy MW4 b)

Thermal treatment facilities fail the criterion to minimise carbon dioxide emissions. Combustion by its very nature produces carbon dioxide. The proposed Wisbech incinerator, with a 50MW generating capability, burning 500,000 tonnes of waste each year will make a substantial contribution to global warming. With 42% of the UK's residual waste being burnt in 44 operational incinerators any additional incineration capacity will harm recycling and increase carbon emissions.

SIL01 forms part of a valuable wildlife corridor on the edge of King's Lynn serving the Gaywood River, Roydon Common SAC, Sugar, Leziate and Derby Fen SSSIs. These important ecological assets cannot thrive if they are increasingly isolated by development and quarrying. The extraction sites worked by Silbelco and/or their predecessors, located to the North West, have been left in an appalling state with NO RESTORATION. The water in the resulting lakes is badly discoloured from low pH/contamination and therefore significantly detracts from the natural environment. Planning was recently granted for the development of housing on Leziate Sailing Club land with the loss of community assets. There is local concern that the site will not be appropriately restored and, if it is, that it will not be sufficiently protected long-term. This is typical of what can happen at extraction sites therefore West Norfolk deserves a much more robust and environmentally constructive response to these policies. The council's attention is drawn to the introduction in Breckland of protective buffer zones around Special Areas of Conservation (SAC) as an example of the kind of

measures that can be introduced. Such zones would be of value around for example Roydon Comman and Dersingham Bog SAC. The council is encouraged to include such provision in its response to policy MW5.

Cllr Alexandra Kemp – supporting Cllr Michael de Whalley

19 November 2019 11:35

Dear Lorraine,

I support this call-in from Cllr de Whalley.

Cllr Alun Ryves – supporting Cllr Michael de Whalley

19 November 2019 11:52

I support this call in by cllr de Whalley