



via e-mail

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Dear Ms Belding

Response by Norfolk County Council as the Mineral Planning Authority to follow up work for the SADMP examination: document FW10: West Winch – paragraph E2.73

Norfolk County Council in its capacity as the Mineral Planning Authority makes the following response to the publication of follow up work document FW10 on paragraph E2.73 of the SADMP.

The Mineral Planning Authority wishes the Inspector to also consider our pre-submission representation, our response to the question in the Matters and Issues and our statement at the hearing session in relation to Policy E2.

The Mineral Planning Authority welcomes the proposed inclusion of the wording to explicitly recognise that Norfolk Minerals and Waste Core Strategy (NMWCS) Policy CS16 is the appropriate policy to be used in determining the potential viability of the silica sand resource at West Winch.

However, the Mineral Planning Authority still considers that paragraph E.2.73 requires further modification to clarify how the assessment of mineral resources using NMWCS Policy CS16 should be carried out.

NMWCS Policy CS16 takes a holistic view of the assessment of mineral resources and non-mineral development. A mineral safeguarding assessment prepared to support an application should take into account all relevant factors relating to the non-mineral development, the mineral resource, and the surrounding environment in arriving at a conclusion regarding the potential for prior extraction and its timing if suitable.

While the bullet points in paragraph E.2.73 highlight some potential issues for an assessment to consider, they do not include all those which might be relevant. This may lead to an incomplete assessment of mineral resources, for example it does not include mention that silica sand is a scarce and nationally important industrial mineral.

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It should be noted that silica sand has significant downstream economic effects, including to the construction industry, as around half the window glass manufactured in England uses silica sand from Norfolk.

NMWCS Policy CS16 is adopted and its appropriateness has therefore already been tested at examination. The Mineral Products Association which represents the industry has highlighted Norfolk as one of 17 Mineral Planning Authorities which are judged to be examples of Best Practice by having in place appropriate safeguarding policies (out of 171 Mineral Planning Authorities).

It is the view of the Mineral Planning Authority that a further modification is required to paragraph E.2.73 to ensure a full assessment of mineral resources is undertaken which is fully compliant with NMWCS Policy CS16, to ensure that paragraph E.2.73 and paragraph E.2.75 are not contradictory, and to meet the core planning principles in the NPPF that planning should be positive and proactive.

This modification (including the Borough Council's new wording in the follow up work) is shown below, with new text underlined and deleted text ~~struck through~~

Suggested modification to paragraph E.2.73

The County Council advise that the Growth Area could be underlain by silica sand deposits, and in line with the adopted Minerals Plan these deposits should be investigated for viability and seek to avoid sterilising them if they prove viable. The 'Norfolk Minerals and Waste Development Framework Core Strategy Policy CS16 - Safeguarding mineral and waste sites and mineral resources' is the relevant mechanism for considering how potential mineral resources are treated. The Borough Council is mindful of the policy approach but would wish to ~~take into account the fact~~ ensure that any mineral safeguarding assessment includes consideration that:

- the Growth Area is a long standing proposal contributing to housing provision in the area*
- the significant constraints to alternative locations in the area*
- the potential for adverse effects ~~likely~~ on the existing built up area*
- the need to ensure that a suitable likelihood of a resulting unsuitable landform for the non-mineral development exists post any suggested extraction*
- the likely ~~lengthy~~ period of any suggested extraction, and the potential for any delay to housing delivery*

Norfolk County Council as the statutory authority for Mineral Planning in Norfolk wishes to be kept informed of the progress of any further consultation.

If there are any queries with this response please contact me.

Yours Sincerely

Caroline Jeffery
Principal Planner (Minerals and Waste Policy)