

Norfolk County Council, Mineral Planning Authority

Respondent: Mr Richard Drake (ID: 617458)

Submission no: 210

Hearing Issue 5: West Winch (E.2)

**5.3 What is the Council's attitude towards the potential silica sand deposits on the site? Have the implications of the Minerals Safeguarding Area been addressed by the Council?**

The Mineral Planning Authority considers that the BCKLWN has not been consistent in its attitude to Mineral Resource Safeguarding. Paragraph E.2.73 as submitted is unjustified, and inconsistent with national policy. Our representation (ref 210) on this matter in Section 5 sets out our reasoning for concluding that the policy as drafted is unsound, and the Inspector's attention is drawn to this section in considering the first part of question 5.3. Briefly, paragraph E.2.73 contains statements which are not based on evidence in relation to mineral safeguarding and prior extraction, and differs from both national policy contained in the NPPF in relation to mineral resource safeguarding and the adopted Norfolk Mineral and Waste Core Strategy Policy CS16-safeguarding.

The Norfolk Minerals and Waste Core Strategy Policy CS16 and national policy indicate that where non-mineral development is proposed on a MSA, site investigation, assessment and potentially prior extraction are required to ensure that needless sterilisation does not occur.

Norfolk County Council consider that the implications of the Mineral Safeguarding Area have not been fully addressed in Paragraph E.2.73 and therefore in the policy for the West Winch Growth Area. Section 6 of our representation (ref 210) highlights the modifications which the Mineral Planning Authority considers necessary in order to rectify the soundness issues raised. These modifications to the Plan will mean that the implications of the Mineral Safeguarding Area will be addressed in the policy.