



Norfolk Minerals and Waste Plan Examination 2024

Main Matter 6: [Protecting Mineral Resources, Infrastructure and Facilities](#)

Document Control Sheet

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1 Introduction

1.1.1 The following document responds to Main Matter 6 identified by the Planning Inspector in relation to the examination of the Norfolk Minerals and Waste Local Plan Publication Version.

1.1.2 Issue: Whether the Plan adequately balances the needs of competing development.

1.2 Is the appropriate balance struck between the needs of competing development with the need to protect the mineral resource, in particular, is the justification for a 250m buffer clear

1.2.1 We support the inclusion of a mineral safeguarding and mineral consultation policy but believe the policy wording should be amended as set out below. The changes set out below are suggested to ensure adequate protection of mineral resources in accordance with paragraph 210 of the NPPF. In particular, the additional text reflects the national and strategic importance of Norfolk's silica sand resource with particular reference to colourless glass production. This would allow the Council to consult with mineral operators to seek their technical industrial knowledge of minerals to best ensure effective safeguarding. This is an approach taken by Devon County Council in response to the existence of nationally important ball clay resources.

1.2.2 Proposed Changes (deletions in strikethrough; new text in bold)

"The County Council will safeguard existing, permitted and allocated mineral extraction sites from inappropriate development proposals. Mineral Consultation Areas are delineated on the Policies Map and extend to 250 metres from each safeguarded site. Development proposals within 250 metres of a safeguarded site should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction and the 'agent of change' principle will be applied in all such cases. **In consultation with mineral operators**, ~~the~~ County Council will object to development proposals which would prevent or prejudice the use of safeguarded sites for mineral extraction.

The County Council will safeguard Norfolk's silica sand, carstone, and sand and gravel mineral resources, within the Mineral Safeguarding Areas identified on the Policies Map, from inappropriate development proposals. For mineral resources the Mineral Consultation Area is the same defined area as the Mineral Safeguarding Area.

The Mineral Planning Authority should be consulted on all development proposals within Mineral Consultation Areas, except for the excluded development types set out in Appendix 4.

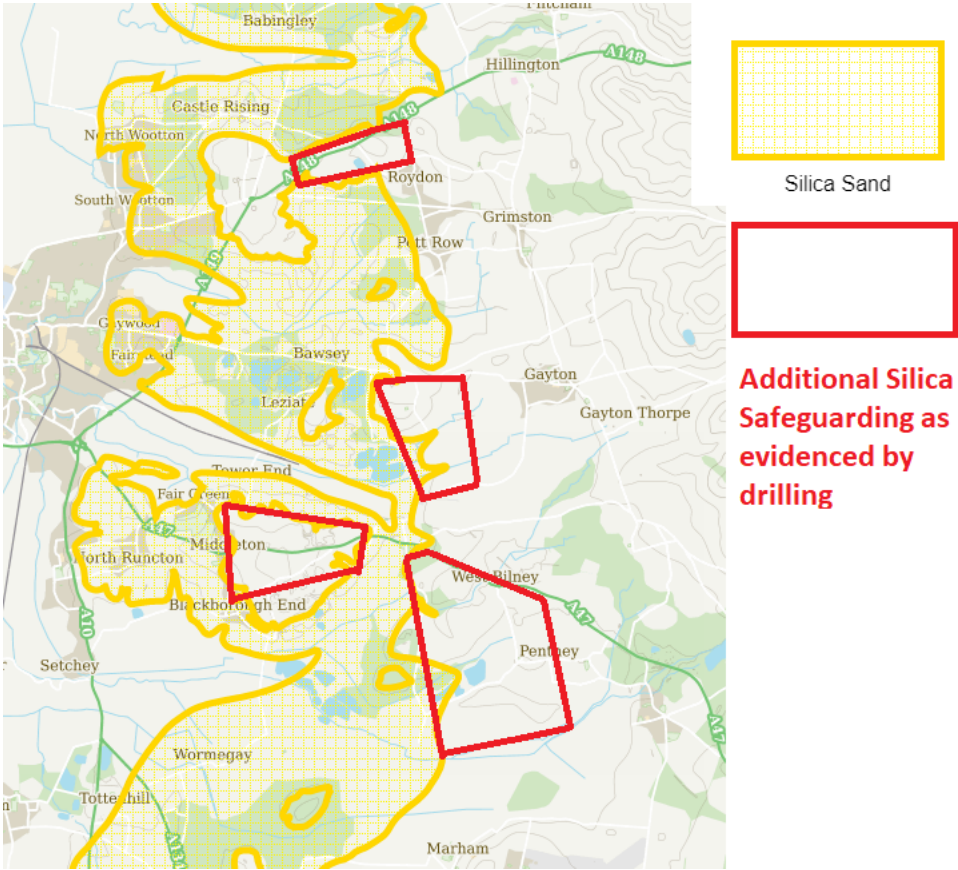
For relevant development proposals located within a Mineral Safeguarding Area the Mineral Planning Authority will expect to see appropriate investigations carried out to assess whether any mineral resource there is of economic value, and if so, whether the mineral could be economically extracted prior to the development taking place. This information should be provided through the submission of a Mineral Resource Assessment, as set out in Appendix 10.

The conservation benefits of carstone will be a consideration in safeguarding resources.

1.3 Should the area defined as a mineral resource safeguarding area for silica sand be increased to include the Carstone formation as well as the Leziate Member and Mintyn Member resources?

1.3.1 Yes. NPPF at para 210 c) requires all known locations of mineral resources of local and national importance (as defined in the NPPF Glossary) to be safeguarded. NPPF is unequivocal.

- 1.3.2 It is considered that the delineation of the Mineral Safeguarding Area and subsequently the Minerals Consultation Area should be amended on the Policies Map as silica sand resources known to Sibelco occur outside of the area proposed to be safeguarded for silica sand. In particular the Carstone Formation, Leziate member and Mintlyn Member. Sibelco submitted geological evidence to the pre-submission consultation which advocated the need to safeguard this resource. This has been ignored and we are dismayed by this approach.
- 1.3.3 The Sibelco document 'Proposed Silica Sand Allocations Norfolk County Council Minerals and Waste Local Plan Publication Document Consultation Supplementary Information Report' contains supporting geological information supporting this conclusion.
- 1.3.4 We below identify those areas where silica sand is present, is viable for extraction and should be safeguarding from alternative forms of development and included on the Safeguarded Mineral Resources Plan.



Inset 1: Copy of Safeguarded Mineral Resources in Norfolk with additional evidenced area of silica.

