



# **Norfolk Minerals and Waste Plan Examination 2024**

**Proposed Main Modifications to the Norfolk Minerals and Waste Local Plan**

## Document Control Sheet

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	Name	Position	Date
Prepared by:	David Walton	Head of Planning and Estates	29.11.2024

## Contents

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
1.2	MM03 - Minerals Strategic Objectives, Page 21 .....	1
1.3	MM41 Proposed Modification to Paragraph MP1.18, Page 70 .....	1
1.4	MM42 Paragraph MP1.20, Page 71 .....	1
1.5	MM47 - Paragraph MP2.4, Page 74.4, Page 74 .....	1
1.6	MM50 - Policy MPSS1. Silica Sand Extraction Sites, Page 77 .....	2

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# 1 Introduction

1.1.1 The following document responds to the Schedule of Proposed Main Modification to the publication version of the Norfolk Minerals and Waste Plan as proposed by Norfolk County Council (NCC).

## 1.2 MM03 - Minerals Strategic Objectives, Page 21

1.2.1 Proposed Modification to Mineral Strategic Objective MS02

1.2.2 The proposed wording put forward by NCC isn't consistent with national policy and is not positively prepared.

1.2.3 As per our previous representations we suggest the wording should be amended to read as:

*“MS02. To provide a steady and adequate supply of industrial minerals by identifying adequate mineral extraction sites/areas within Norfolk sufficient to meet the forecast need and stocks of permitted reserves of silica sand of at least 10 years production for individual silica sites or at least 15 years where significant new capital is required and safeguarding existing infrastructure.”*

## 1.3 MM41 Proposed Modification to Paragraph MP1.18, Page 70

1.3.1 Sibelco notes the amendments and considers it provides some flexibility. However, it was clearly identified in the hearings that the Plan cannot limit this nationally important resource to one processing plant and to provide flexibility and consistency with the NPPF we consider that the wording needs to be amended to reflect this.

## 1.4 MM42 Paragraph MP1.20, Page 71

1.4.1 Sibelco welcome the amendment to the figures.

## 1.5 MM47 - Paragraph MP2.4, Page 74.4, Page 74

1.5.1 The proposed additional wording is ill placed and appears designed to cause confusion rather than address the Inspectors comments and those of Sibelco at the Hearings. In particularly the placement in brackets of “(or another silica sand processing plant in Norfolk if one was to be built)” is nonsensical and doesn't link to the remainder of the sentence or point that is attempting to be made. This goes against the discussions and representations at the Hearings. It still tries to impose a restrictive hierarchy in terms of extraction of silica sand at new sites. At the Hearings it was clear that a new processing plant may be required to come forward due to the mineral only being able to be worked where it is found and that an amended Policy MPSS1 would have the hierarchy of controls to ensure only applications that do not have demonstrable significant impacts on the environment will achieve planning consents.

1.5.2 There is no basis or justification for imposing this restriction as a new mineral site could be a significant distance from the Leziat Plant Site which might mean that the only viable or the most sustainable option to provide a steady and adequate supply of silica sand is to build a new processing plant or warehousing facility.

1.5.3 We suggest the Planning Inspector amends the wording of this paragraph to something which better represents the positive approach required by the NPPF and will make the plan sound.

## **1.6 MM50 - Policy MPSS1. Silica Sand Extraction Sites, Page 77**

- 1.6.1 The amended wording is not justified, inconsistent with national planning policy and not positively prepared. It doesn't reflect the evidence presented at the hearings and the issues identified by the Planning Inspector. We suggest that sub clause A is amended to read:

“(a) To address the shortfall in silica sand supply to meet the requirements of the NPPF”

We suggest Sub Clause (M) is deleted as this is an attempt to limit silica sand production to one processing site and this is not in accordance with the NPPF. Transport impacts of any potential future site should be subject to sub clause (N) which required the submission of an acceptable Transport Statement or Assessment.

