

27th June 2016

Norfolk County Council
Planning Service (Minerals and Waste Policy)
Community and Environmental Services
County Hall
Martineau Lane
Norwich
NR1 2BR

Mineral Products Association Ltd

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Dear Sir/Madam

MINERALS SITE SPECIFIC ALLOCATIONS DPD - SINGLE ISSUE SILICA SAND REVIEW

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries, together with recently expanded interests in ball clay and china clay. With the recent addition of The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

Further to your recent consultation on the above document, we have the following comments to make on the document. Unfortunately, it was not possible to complete the online form and as such this response has presented the issues for consideration in tabular form.

Please do not hesitate to contact me if you have any questions or wish to discuss any of the points raised within the consultation response

Yours faithfully



Nick Horsley
Director of Planning, Industrial Minerals and MPA Wales

**Please use a separate form for each part of the Minerals Site Specific Allocations
DPD – Single Issue Silica Sand Review that you wish to comment on.**

Return to: Norfolk County Council, Planning Services (Minerals and Waste Policy), Community and Environmental Services, County Hall, Martineau Lane, Norwich, NR1 2BR

PART A

1. Personal Details

Name: **Nick Horsley**
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38-44 Gillingham Street
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Organisation (if applicable):
Telephone: **07568 427720**
Email: **nick.horsley@mineralproducts.org**

Please tick your preferred method of contact: Email letter

Which category do you fall into (please choose one only)?

District or County council

Parish council in Norfolk

Statutory Consultee

Neighbouring Parish council outside Norfolk

Mineral Industry

Waste Industry

Individual

Agent/Consultant

Other organisation (please specify): **TRADE ASSOCIATION**

PART B

Paragraph/ Policy/ Figure/Table	Relevant Text	Issue	Suggested amendment
Para 2.24	(Spring 2015)	I think this should read Spring 2016	Correct typo
Page15/16 – Amended para 3.5	From Point a. The starting point..... to point m.	Whilst the distances indicated within the text are a starting point to identify the Areas of Search, care must be taken not to regard these distances as “buffer zones”. The distances indicated may involve the unnecessary sterilisation of a nationally important mineral and stand-off distance will be appropriately determined by a detailed Environmental Impact Assessment (EIA)	The text needs to be clarified that these distances for AOS purposes, are indicative and are not stand-off distances for the purposes of development control. Any application partly or wholly within these areas would be considered on its own merits, subject to the findings of any EIA.
Areas of Search Policy	The introduction to this policy states: <i>“Development will be subject to compliance with the adopted Core Strategy and Development Management policies, national legislation, policy and guidance, and will require any planning application within the Area of Search to address, <u>in particular</u>, the requirements below “</i>	The underlined text pre-empted the findings of any scoping exercise and should be replaced with “as appropriate”	Development will be subject to compliance with the adopted Core Strategy and Development Management policies, national legislation, policy and guidance, and will require any planning application within the Area of Search to address, in particular as appropriate , the requirements below
Areas of Search Policy – bullet point 1	The first bullet point states: : <i>“To address the shortfall in silica sand supply to meet the requirements of the existing processing plant (as set out in the NPPF)”</i>	This does not take into consideration any new plant or new capital consideration as referenced in para 146 of NPPF. Suggest rewording of the text	<i>“To address the shortfall in silica sand supply to meet the requirements of the “new or” existing processing plant “and equipment or any new capital expenditure” (as set out in the NPPF)”</i>

Yes, I wish to participate at the oral examination

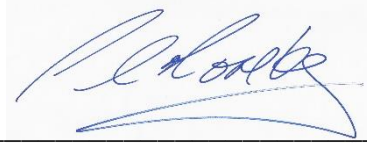
No, I do not wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We would wish to participate in any oral examination if the above suggested amendments are not deemed appropriate by the Mineral Planning Authority or should

any third party representation seek to secure changes to this document which are contrary to national policy

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.



9. Signature: _____ **Date:** 27th June 2016