



WEST SUSSEX SOFT SAND REVIEW: PARISH COUNCIL RESPONSE

1. PART A: Personal information

A.1. Personal details

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A2. Client details

- d. Not applicable

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I DO NOT wish to be notified of the following.

Any further updates about Strategic Waste or Minerals Planning in West Sussex

2. Introductory Remarks

This response was unanimously approved by the council members at a meeting of the Trotton with Chithurst parish council on the 13th March 2019. At that meeting it was also agreed it should be forwarded by email to mwdf@wstsussex.gov.uk as the parish council's response to the Soft Sand Review Consultation.

"The Community Planning Toolkit" issued by the South Downs National Park states "*National Parks are considered to be the nations finest landscapes. They are extensive tracts of countryside that have been given strong protection – under legislation and the planning system – for the conservation and enhancement of their special qualities.*" The Parish Council is therefore at a loss to understand how the extraction of up to 4 million tonnes of soft sand from quarries at Severals East and or West and Minsted and its permanent adverse impact on the Wildlife and Amenity value of the Heathland and Woodland together with the associated noise and damage to air quality and the approach roads by the lorries transporting the sand is in anyway compatible with the conservation and enhancement of the special qualities of the South Downs National Park. This is more so because it is at least arguable there is with existing sources sufficient soft sand available for the next 10 years and other sources outside the National Park, such as sand from quarries in Surrey or Marine dredged sand from the West Sussex coast are not given proper consideration. Thus, there are no exceptional circumstances which would justify the quarrying of soft sand in the South Downs National Park.

Further the Parish Council are also very concerned regarding the damage which would be caused to Trotton Bridge which is a Grade 1 Listed excellent example of a medieval Sandstone 5 Arch bridge. Possibly built as early as the 14th century and no later than the 16th century. Whilst many such bridges were built there are now fewer than 200 left in the country. Whilst bridges and roads can survive being driven over by cars and other light vehicles, heavy vehicles such as laden tipper trucks will cause significant damage in a short time. The bridge is of course not designed to take heavy lorry traffic. A few years ago as lorry traffic on the A272 increased in part due to the failure to improve the A27, the surfacing of the bridge started breaking up, eventually resulting in extensive repairs. It is now once again showing signs of distress and needs further repair. This appears to be happening more frequently as the lorry traffic increases. The extra lorry movements both in and out of the Severals (estimates vary between 100 and 200 a day) will inevitably result in further damage to the bridge surface and ultimately the structure and require more frequent and extensive repair. Also the approach to the bridge particularly from Midhurst is less than ideal, being both narrow and with sharp bends and this can result in lorries straying into the oncoming traffic. It is an accident waiting to happen. Further the vibration from heavy lorries particularly when bouncing over dips, manhole covers or potholes can cause the adjacent houses to shake and vibrate, with the potential for causing structural damage.

The above are the main reasons why the Parish Council is opposed to soft sand quarrying at Severals East or West and Minsted. Further particulars, where necessary, are provided in the answers given below to the questions posed in the West Sussex Soft Sand Review: Issues and Options.

3. PART B: ISSUE 1

Question 1A: Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

1. 1A-1 House Building Forecast Overestimated

The demand scenarios are completely unrealistic and not based on facts. The scenarios predict a 26% increase in new house building which is based on potential sites identified from local plans. Other statistics or forecasts for actual or predicted new house building starts do not come anywhere near this growth rate.

Long term local forecasts are difficult to find but the Office for Budget Responsibility forecasts predict no increase in new house building nationally until 2023. In 2014 the Department for Communities and Local Government forecast house building in England would remain steady at 210,000 per year until 2039. A recent report showed growth from 2016-17 to 2017-18 to be only 2%. Thus it is likely the growth in housing, if any, is more likely to be minimal. Thus, together with the change in housing construction methods referred to below, the evidence suggests no increase in demand for soft sand

2. 1A-2 Resource Availability

How up to date and accurate are the resource assessments? The reserve estimates are not publicly available and thus the estimated period over which soft sand may be available from existing sources is unsupported by evidence and is thus not valid for use here.

Question 1B: Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

3. 1B-1 Future Soft Sand Requirements

A recent report by the UK Independent Committee on Climate Change (UK Housing: Fit for the Future? Feb 2019) concluded that government targets for greenhouse gas emissions would not be met without widespread changes in housing construction practices. One of the specific findings was the need to improve the focus on reducing the whole life carbon impact of new homes by increasing the use of wood in construction and reduce high carbon materials such as cement, concrete and mortar - and thus soft sand. The new policies to change the way houses are built are already being implemented and their use is increasing. These changes will significantly impact the requirements for soft sand. Thus even if the value of house building increases over the next 10 years it will not result in a pro-rata increase in demand for soft sand

4. 1C: Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/ evidence to support your view.

Yes. As set out above the demand curves are too high. Further and in addition the shortfall is not verifiable from published evidence.

The West Sussex LAA Dashboard 2018 table at the end of the Executive Summary shows that West Sussex has a landbank for soft sand of 7.4 years and may be as much as 9.4 years (Para 2.1.20). As the requirement is for a landbank of at least 7 years this would seem to be adequate (although the MLP inspectors report seems to be suggesting that "at least" means "more than"). However, Table 21 suggests that there is a demand of approx. 5.6 mT and reserves of 2.75mT. So where did the 7.4 years landbank come from and why is it different from the demand/reserves estimates provided later in the report? It is noted that these numbers are different from those shown in MM21 of the MLP Inspector's report which suggests a landbank of 10.7 years which is well over the 7 year landbank required.

The summary table on soft sand (page 22) concludes that an additional 1.66 – 2.83mT is needed over the period of the plan to 2033. The next section highlights that West Sussex is a net exporter of 1.82mT. Elsewhere in the report it states that most of these exports are to the London area. The MLP Inspectors report criticises the previous assessment for assuming imports from Kent and Oxfordshire including potential impacts from lorry traffic. And yet this report appears to consider that continued exports to London from inside a National Park with

its associated traffic along much busier routes are acceptable. In addition, the impacts of lorry traffic to London would probably be higher given traffic issues and potential Air Quality Management Areas along the route.

In addition, the large range of numbers used for planning is derisory, e.g. exports range from 42,400 – 275,600mT (14% to 94%) of the quoted demand forecast of 293,737mT. As such, proper conclusions cannot be drawn and does not justify the environmental harm to the landscape. The industry cannot hide behind ‘confidentiality reasons’ for not producing more accurate data. If the Industry were made to pay the true cost of damage to the environment, this ‘justification’ would never be accepted – the SDNPA should lobby accordingly.

- With up to 94% of sand & gravel being exported out of West Sussex there is no correlation with house building in West Sussex as a driver for growth in demand.
- The data does not support the inspector’s statement (para 30) about the ‘strategy to rely on imports from surrounding authorities’, indeed the opposite is true.
- Para 31 of the inspector’s report recognises the ‘significant adverse effects in terms of transport’ yet up to 27% of the sand gravel is being exported as far as Buckinghamshire that borders Oxfordshire.

4. **PART C: ISSUE 2**

5. Question 2A: Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

The existing sand quarry at Minsted may be a source of further reserves. Further work needs to be done on a more accurate assessment of current reserves and potential

6. Question 2B: Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

References made throughout comments.

7. Question 2C: Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

The only reasonable option is E – a combination of alternatives (marine dredged), supplies within West Sussex and supply from outside West Sussex. The preferred strategy needs to reflect this.

8. Option D - Marine provides the least environmental impact and the most reasonable sustainable solution. The understanding of the use of marine dredged sands appears very weak with statements in the consultation document such as:

- 2.2.1 states that marine won sand and gravel is not considered a viable substitute and yet Para 2.2.9 of the LAA states that mortar manufacturers in the south east may be using marine won sand in the products in place of soft sand. The use of marine won sand is more common in other parts of England,
- para 3.20 ‘it is not known if this material is being blended with other, land-won sand, or is a direct substitute’. This needs to be known!
- Para 3.23 states that ‘the industry may be turning towards utilising more of this resource’. Why is this not known?

9. Option C

As stated earlier, the demand data is so poor with potentially 94% being exported out of West Sussex, including 27% to Buckinghamshire, that if the harm from transport is being properly considered then these practices should be discouraged by reducing the amount produced in West Sussex.

The sands are what define the habitat that resulted in the inclusion of this area north of the Downs in the SDNP. To remove the sands would destroy the habitat around Midhurst that defines the SDNP (“Heart of the South Downs National Park”).

10. Question 3: Do you have any comments on the draft Sustainability Appraisal of the Options
There is nothing sustainable about minerals extraction. Once it is removed, it is gone and cannot be reinstated, but instead leaving a lake or pond and a wasteland behind and so it is in no way sustainable. What this report and many other reports on sustainability refer to is ensuring efficient operations with impacts as low as practicable. The report itself is confusing and littered with errors and in any event will not result in the areas being reinstated as they once were but at best aims to minimise the environmental damage.

An SEA must identify the key environmental hazards that may result from mineral extraction. I do not see this anywhere in the report and thus is not fit for purpose.

5. PART D: ISSUE 3

11. Question 4: Do you have any comments on the methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Most National Park Authorities (NPAs) are Mineral Planning Authorities (MPAs) and are expected to identify areas where mineral resources are known to exist. However, unlike other MPAs, they are not expected to identify areas where planning permission might reasonably be expected (known as Areas of Search or Preferred Areas). Thus the whole site selection process does not fit within this framework.

The Issues and Options Consultation sets out 5 site selection principles:

- Places where there are opportunities to restore land beneficially
- Places without a sensitive natural or built environment and away from communities
- Sites that have a good access to the Lorry Route Network
- The need to conserve and where possible enhance protected landscapes in the area
- A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments.

It would have been very useful if the reports assessed how each of the sites met these strategic principles. The sites adjacent to Trotton do not satisfy these principles, as:

- They have undergone extensive habitat improvement over the past years with significant sums of money invested
- They occupy sensitive heathland sites which are one of the key habitat types identified in establishing the boundaries of the SDNP and are adjacent to existing housing
- A local lorry route is relatively close but access is dangerous, it would be unable to handle what is estimated to be up to 200 lorry movements per day and there are significant restrictions due to road size to the west, such as Trotton Bridge as referred to earlier and AQMA's to the east and south.
- Removing the sand would completely destroy the heathland habitat with no possibility of conserving or enhancing (the assessment suggests a completely unnatural restoration of broad-leaved woodland and interlinked ponds which is definitely not in keeping with the area).
- The sites have a high potential for significant cumulative impacts.

As the sites do not fit the 5 basic principles then there is little point in going through all of the extended detail outlined in the other reports.

12. Question 5: Do you have any comments on the 9 shortlisted sites identified in the Consultation Document? Comments provided on Severals East and Severals West attached at the end of this document.

13. Question 6: Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

None at this time

14. Question 7: Are there any sites we should be considering that are not included in the Site Selection Report (4SR)?

Yes marine sources and sources outside of West Sussex. See previous comments above.

15. Question 8: Do you have any comments on the sustainability appraisal of the potential sites?

Dealt with under Q3?

16. Question 9: Do you have any comments on the proposed site selection strategy and guiding principles? Are there any other factors that should guide the selection of allocated sites?

There is nowhere with the various reports which contain demonstration and definition of the exceptional circumstances that would make minerals development within the South Downs National Park acceptable. The site selection process cannot continue until the question of exceptional circumstances has been resolved. The MLP Inspector raised the issue of "exceptional circumstances" but in reopening this review his report stated that "there is the potential, in the future, for exceptional circumstances" (Para 15). That means that no exceptional circumstances exist at present and therefore mineral development in the SDNP is not acceptable. The inspector seems to be going against policy by ignoring the exceptional circumstances criteria for selection of sites within the SDNP. This should be the key requirement before considering mineral extraction within the SDNP.

17. NB: Site Specific Comments on Severals East and West are available on request