

Response ID ANON-2TKJ-414D-R

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**

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Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

Mr

First name:

David

Last name:

Payne

Job title (where relevant):

Senior Planning Advisor

Organisation or affiliation (where relevant):

Mineral Products Association

A2 Client Details if applicable

Title:

First name:

Last name:

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A3 Contact Address Details

Same as details provided in A1

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Minerals or Waste Industry

Other:

Part B - Issue 1

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

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

We recommend using and planning for highest demand scenario (Scenario 3) to ensure that sufficient provision is made to meet potential needs, as proposed in para 2.10 This is sensible to take account of planned growth in housing and reflecting use of soft sand in mortar, with strong relationship with housing development to be expected given the use of mortar in housebuilding. (Table 4 of the LAA).

The LAA (Table 1) indicates that sales of land-won sand and gravel have increased in recent years, with the 3 year average exceeding the 10 year average by almost 30,000t (10%), the 3 year average (assuming 95% of sales) is 320,717t with 2017 sales at 359,000t, all indicating that basing provision on the 10 year average alone would not be appropriate or adequate.

In calculating the 'shortfall' to be provided for over the Plan period, it should be recognised that in order to maintain a landbank of at least 7 years' supply throughout the Plan period, and to accord with the NPPF and PPG, at 2033 there will need to have permitted reserves of at least 2.6mt (Scenario 2 = 2.557mt and Scenario 3 = 2.607mt). This total needs to be added to those in the table on page 10 and para 2.10.

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

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

Commercial development will also influence demand, but the focus on housing is sensible given the quantum can be determined from planned provision in Local Plans and housing is likely to be the major market for soft sand (used in mortar).

PPG recommends that in looking ahead at possible future demand LAAs should consider 'levels of planned construction and housebuilding in their area and throughout the country' (Paragraph: 064 Reference ID: 27-064-20140306). West Sussex is a net exporter of sand and gravel. Therefore, potential demand from neighbouring areas, particularly where there are limited or no soft sand resources, should also be a factor that is considered. This includes Brighton and Hove, which has no resources or reserves, but planned growth in housing of over 60% over the Plan period (Table B1 of the LAA). Overall, there is planned growth in housing of almost 30% across West Sussex and neighbouring areas, indicating that this should be factored in to forecasting demand and making provision.

The potential availability of supplies from elsewhere, taking into account resources and reserves, and distance of these from markets in West Sussex are also relevant factors – considered in the Options C and D in the document These have been considered in detail by the planning authority over the last few years including in preparation of the Joint Minerals Local Plan, and by the inspector at the plan examination in 2017. As noted in the inspector's report (paras 23-33), the soft sand resource in West Sussex and SDNP area is of local and regional importance, and that there cannot be reliance on imports from Kent, Oxfordshire, Hampshire or Surrey to meet any shortfall that may arise in West Sussex over the Plan period. Nor can there be reliance on marine sources at the current time (ie the Plan period).

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.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Reflecting our comments above, it would be prudent to apply an assumption that planned housing in West Sussex and neighbouring areas increases by 30%, which would more accurately reflect the demand that may arise and need to be met including in areas with no soft sand resource eg Brighton & Hove. In addition, the total that should be planned for needs to include the maintenance of a landbank of reserves of at least 7 years' supply at the end of the Plan period at 2033.

Part C - Issue 2

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?

Please provide reasons for your views.:

Yes

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?

Options comments:

Option A

Reliance on this option alone is unlikely to provide sufficient reserves to meet the required provision over the Plan period, as identified in the SA (with only 2 of the proposed shortlisted sites being outside the SDNP with a total estimated yield of 1.725mt).

Option B

This option would be more likely to meet the required provision, as identified in the SA.

Option C

Reliance on this option alone is risky and it has not been demonstrated that it would meet the required provision, as evidenced by statements by other potential supplying authorities and the conclusions of the Joint MLP examination inspector. This option could also result in potential significant negative impacts on transport and air quality as identified in the SA.

Option D

The MPA and BMAPA has recently questioned its members about dredging and landings of marine soft sand in Sussex. The only soft sand landed in Sussex that they report relates to re-location of vessels from the Bristol Channel to the South Coast bringing loads, with no 'commercial' operations regularly landing marine dredged soft sand at Sussex wharves, although there have been some trial dredges recently. Landing of soft sand, should it be licensed and dredged, in commercial quantities would require dedicated dredger capacity as well as wharf space, to avoid contamination of material with coarse sand and gravel. This wharf space and dredger capacity does not exist at present. The tonnages of soft sand reported in the document as being sold from wharves is very small at c.22,000t. The statement in the document (para 3.23) that industry is 'turning towards utilising this [marine soft sand] resource' does not appear to hold true.

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.

Please give your reasons.:

Option B should be taken forward, given the lack of evidence that the alternatives are viable, and indeed the conclusions of the inspector's report of the Examination of the Joint Minerals Local Plan that demonstrated these could not be relied on.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

Do you have any comments on the draft SA of the options?:

No

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

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

No

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Tick all the site boxes that apply (above) and provide comments below.:

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)?

non-shortlisted sites:

No

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

no

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 site(s)?

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 site(s)?:

No

Part E - About You (The Equality Act 2010)

More questions About You

Age

45-54

About You (part 2)

Sex

Male

What is your ethnicity?

White British

Do you consider yourself to have a disability*?

No

Religion

No religion