

WEST SUSSEX JOINT MINERALS LOCAL PLAN

This Plan covers the whole of West Sussex so it is drawn up by the County Council and the National Park Authority together. The Plan determines how many aggregates – mainly sand and gravel – will be extracted in the period to 2033 and where they will come from. Sand and gravel are divided into sharp sand and gravel, and soft sand, which includes the specialised mineral silica sand.

The main area where soft sand is found is the National Park and its borders.

Sites were considered by the Authority and these included the Wickford Bridge site and the Horncroft site, both said to contain silica sand and both in the National Park. The Government assumption is that minerals extraction won't take place in National Parks unless there are exceptional circumstances or it is in the public interest. But we live in changing times. At the time of the last Minerals Plan, there was no inkling that silica sand existed in West Sussex.

Silica sand contains a very high proportion of quartz. It is too rarefied for building. The highest grades of silica (99%+) are used for manufacturing glass and specialised uses like television screens. Some lower grades (95%+) are used for golf courses, agriculture and horticulture, children's playgrounds etc. This is a growing market. Need is assessed nationally, not on a local basis. Longer planning permissions are given for silica (10/15 years) than for soft sand sites (7 years).

The Joint Minerals Authority commissioned a report last year on silica and soft sand in the National Park. It was reluctant to release this until the Plan had been published for consultation. The effect was that a lot of background papers would have to be considered very quickly, so the Wiggonholt Association obtained a copy of the sand report under the Environmental Information Regulations. The report revealed that there was probably a great deal of silica sand in the National Park, and that some of this could be used to meet a future national shortage of high-grade silica, for which distant markets are no object.

We saw the first version of the Plan when it went to committee last month. The Authority has taken the position that there will be no new sites for sand extraction within the National Park. It has adopted a stance of "managed retreat". It has allocated only one new soft sand site in West Sussex (outside the Park at Ham Farm near Steyning). Shortages will be made up from neighbouring counties but there are no details yet. This is an admirable stance. However the Sand Report has found that the main national sites for highest-grade silica in the rest of the country are on the wane. This means that if there is a shortage the Park could be called upon to fill it. So the report is a bit of a bombshell. It provides quite a lot of ammunition for anyone who wants to extract silica sand. Horncroft seems particularly vulnerable as it appears to have a number of high-quality deposits. Some tests were carried out by the owner's expert, and others by an independent operator. There was also a control test on a dormant site nearby. The Wickford Bridge site is less likely to have high-quality silica, but since the tests were carried out on molehills they may not be very accurate.

I should add that there will be no new sites allocated for sharp sand and gravel: it will all be marine-dredged and landed on the south coast. This type of aggregate is not much found within the Park. At the same time there is great pressure from the district councils to turn the ports into marinas and housing. The long-term effect of port closure would be more land-won aggregate.

National minerals policy is agreed by working parties composed of operators, local authorities and central government, so West Sussex is to be congratulated on a complete change of attitude to minerals extraction. But this doesn't mean that its Plan won't be challenged. Owners of sites and the operators are bound to seize on the anomalies between the sand report and the published Plan. These will be

thrashed out at Public Examination and then the Inspector will decide. So it is at the very least up to us to suggest improvements to the Plan which will make it sounder. It's also a matter of self-interest as we don't want the misery that extraction brings with it.

The next two years are going to be interesting. We've worked for 20 years to get to this point. First we kept our own site secure, then we promoted the birth of the National Park. We supported alternative materials, and always kept a watching brief on the minerals scene. Now is our chance to help the Minerals Planning Authority make the Plan truly watertight while paying attention to the vulnerable sites near Pulborough.

So, the key points are:

- Refusal by the Minerals Authority to allocate further sand sites in the National Park unless they can be justified by exceptional circumstances or the public interest (*a second runway at Gatwick?*).
- The Plan contains very few statistics about the figures on which it is based (*e.g. expected outputs and reserves in different sites, annual rates of supply over the last 10 years, rates of marine landings etc*). These will have to come out before the draft Plan can go much further.
- The Sand Report proposes that there will soon be national need for highest-grade silica sand, regardless of the distance it has to travel.
- Horncroft appears to contain large deposits of this.
- Other samples suggest extensive quantities of lower grade silica sand, but there is less need for this nationally.
- There appears to be little frac sand in the Park.
- The Wickford Bridge site has not been properly tested. It is a very small site and that produces its own constraints. But there is always a danger of small operators seeking planning permission to meet local need for a particular market.
- There is a commitment to sea-dredged aggregate but this requires safeguarding of the traditional ports, and dredging has its own environmental problems.

The stages are now as follows:

Public consultation 14 April 2016 for eight weeks
Approval of Proposed Submission Plan October 2016
Soundness consultation Nov 2016 – Jan 2017
Submission to Government March 2017
PUBLIC EXAMINATION June 2017
Approval of any changes September 2017
Soundness consultation Oct-Nov 2017
INSPECTOR'S REPORT February 2018
Adoption March 2018

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