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Main Modification 24 comments	<p>Detailed below are our comments on the mineral element of the plan because these are the issues that specifically affect Kingsley. There are two extractive sites of significance in Kingsley. These are Kingsley Quarry (not currently producing – although it is subject to an extractive permission until 2028 (after an extension granted in 2020 per 6.95) and Frith End Quarry. It is noted that the silica sand currently available for extraction in Kingsley could be provided by other existing quarries. Other quarries producing other sands, which currently do not produce silica sand, but do contain commercial quantities of silica sand are not highlighted. This seems at odds with the Vision statement at para 2.26 which states the ambition to reduce the minerals and waste -related emissions to support transition to net-zero. Operating extraction from a smaller number of sites is almost certainly more aligned with this ambition than spreading extraction activities across multiplicity of sites. The continued operation of the Kingsley Quarry in particular will require the expansion of the extraction footprint through the Rookery Farm site. This includes the destruction of the former Bordon to Bentley railway line. Given the significant increase in housing development in the Bordon area, this will preclude the option to create transport infrastructure to re-connect the area with the mainline railway to London and will diminish the employment opportunities for new residents, especially acute with the withdrawal of the army from Bordon Camp. It is noted at 6.21 that alternative resources have been identified in Whitehill and Bordon which are subject to significant development works. These may be developed as a by product of property development and being so proximate to ongoing development would reduce the Emissions impact of their extraction and utilisation. 6.76 – it is our understanding that the</p>

statement that silica sand is extracted at Kingsley Quarry, is no longer accurate and extraction has ceased (indeed the dredging equipment which is necessary has been removed). This quarry has been dormant for a number of years. A short summary of our comments can be found on pages 2 and 3.

1. Silica sand sites in Hampshire

1.1 There are two sites in Hampshire, other than Kingsley Quarry and Frith End Quarry, producing silica sand. They are: Forest Lodge Farm (Hythe) Quarry – Hythe Quarry, located just outside the New Forest National Park, produces 0/1mm sand with virtually no silt and 99% silica content making it ideal for cattle bedding. Hythe Quarry's sand is also used widely for sports surfacing, equestrian racing tracks and menages and golf bunkers. This is not mentioned in the reviewed report.

Badminton Farm (Fawley) Quarry – Fawley Quarry, located in the New Forest National Park on the Barton Beds, produces silica sand used for cattle bedding in the agricultural sector.

2. Silica sand resources in Hampshire

2.1 The Plan acknowledges that the distinction between sand used for industrial purposes (silica sand) and sand used for construction aggregate is based principally on application and market specifications. It further acknowledges that the silica sand resources in Hampshire are currently only being worked for use in the agriculture, horticulture and leisure (AH&L) sectors.

2.2 There is evidence, herein above and elsewhere*, that bedrock deposits of soft sand in south and south west Hampshire, both within and outside of the New Forest National Park, have properties which make them suitable for use in the AH&L sectors, i.e. silica sand. The fact that not all quarries in these areas are catering to the AH&L markets does not mean the sands are unsuitable for these applications.

3. Soft sand and silica sand processing in Hampshire

3.1 Sand produced for AH&L applications in Hampshire is processed in the same way as washed and graded building sand. Therefore, the level of investment in plant for producing both construction and non-construction sands in Hampshire is the same. The sands are not being produced for high value industrial uses. The latter application requires a far higher level of investment in plant. Words to this effect were included in paragraphs 316 - 320 of Vs.7 of the Minerals in Hampshire: Background Study, February 2013 but have been omitted from the latest submission version. Kingsley Parish Council feels strongly that this information should be included in

the revised final submission version of the Minerals Background Study.

4. Silica sand reserves at Kingsley Quarry and Frith End Quarry

4.1 Paragraphs 6.95 of the Plan states that Kingsley Quarry and Frith End Quarry would struggle to achieve the 10-year minimum permitted reserve requirement of at least 10 years based on 3-year collective sales. Firstly, Kingsley Quarry has not been operating in the last 3 years. Secondly, Kingsley Quarry has an as yet unworked permitted reserve of 1 million tonnes of soft/silica sand. It is anticipated this will be worked at a rate of 100,000 tonnes per annum. The operator claims to sell 75% (or 75,000tpa) of sand from the site as silica sand. Kingsley Quarry therefore currently has a silica sand reserve of 750,000 tonnes or the required minimum silica sand reserve of 10 years.

5. Alternative sources of soft sand and silica sand

5.1 The Plan states in paragraph 6.47 that recycled and secondary aggregates cannot be used as a substitute for soft sand (also known as building sand). However, this is incorrect. There are several suppliers of recycled soft/building sand including Brewster Bros , Avon Material Supplies and Foley Aggregates to name a few.

5.2 Foley Aggregates sells 0.1-0.5mm recycled silica sand. Recycled glass is being used in golf bunkers and rootzones for sports pitches as an alternative to sand. Paragraph 317 of Vs.7 of the Background Study February 2013 previously confirmed this.

6. Mineral Safeguarding – Whitehill & Bordon

6.1 Inset Map 6 shows an area by Bordon Trading Estate, formerly known as the Oakhanger Road site (ref. EHS013), marked as being part of the Whitehill & Bordon Green Town development. However, this area, which is estimated to have a soft/silica sand reserve of 1.8 million tonnes, has not been allocated for development in the draft East Hampshire District Council Local Plan covering 2021-2040. In fact, the boundaries of the Whitehill & Bordon Green town in Inset Map 6 do not match those in the EHDC Local Plan.

Summary of comments:

1. Hythe Quarry should be included in the silica sand sites listed in Policy 21 and its supporting text .

2. All references to silica sand resources in Hampshire should include the resources and potential resources in the south/south west of Hampshire within, near to and beyond the New Forest National Park. Furthermore, the words “within the Folkestone bed formation and ...” should be deleted from paragraph 2 of Policy 21.

3. Supporting

text regarding investment in plant for processing silica sand in Hampshire which was included in paragraphs 316 to 320 of Vs.7 of the Minerals in Hampshire: Background Study, February 2013 should be included in the Plan or, at the very least, in the new final submission version of the Background Study.

4. The Plan should state that soft building sand and silica sand can be obtained from recycled aggregates and recycled glass, and that these can provide a suitable alternative for some sports and leisure applications.

5. Inset Map 6 in the Plan should be amended to mirror the boundary of the Whitehill & Bordon Green Town, as shown in the East Hampshire District Council Local Plan, which excludes the Oakhanger Road potential soft/silica sand site ref. EHS013.

6. The net-zero impact of extracting the Kingsley and Frith end sites versus other larger sites is ignored. The benefits of extracting minerals at the Oakhanger site which is more proximate (albeit Kingsley is not distant) to large scale construction has been ignored. I imagine that there is a development related reason for this ie the site may lie within the development plan boundary for B&W whereas Kingsley quarry does not and is too close to SDNP to expect development at this site.