

HORNCROFT REVISED COMMENTS (POST-COMMITTEE)

1. The Joint Committee is aware of the current sub-regional apportionment in the South East Plan for West Sussex and the Secretary of State's Proposed Changes to Policy M3 of the Plan that would increase that apportionment, both of which demonstrate the importance of aggregates to the economy of the region. The Joint Committee is also aware that virtually all of the County's soft sand reserves lie within the South Downs National Park.
2. However, the Joint Committee does not consider that this means that every potential site should be developed, particularly when they come forward outside of the development plan process.
3. The Joint Committee notes that this particular site is not an allocated site in either the adopted Minerals Local Plan or the emerging Minerals Development Document. It has been identified as a potential site, but no more than that, and only one of a number of potential sites. There is still uncertainty over the final sub-regional apportionment for West Sussex, and it may be that not all the identified sites will be needed for the current period (until 2026).
4. The Joint Committee is aware from the Background Papers that West Sussex has a shortfall in its minerals landbank, but the Joint Committee believes that if the current application for the allocated extension to the existing West Heath Quarry is approved, the County Council's landbank would be at the requisite level. The Joint Committee therefore considers that at this time there does not appear to be a need to develop this site.
5. The Joint Committee considers that the proposals have been well thought out, and the proposed mitigation measures and phased restoration to enhance biodiversity are welcome. However, it is clear that even with the mitigation measures, the extraction of sand from this site would have some adverse impacts, both during excavation (visual, landscape character and biodiversity) and permanently (cultural heritage). The indication that following the cessation of extraction and restoration in 25 years' time landscape character and biodiversity will benefit significantly is attractive, but the Joint Committee does not consider this sufficient to warrant acceptance of this proposal without caution. In particular, the Joint Committee would wish to see independent corroboration of the applicant's hydrological study and its conclusions to ensure that there would be no long-term harm to either the stream through the site or the pond to the north-east of the site before a permission is contemplated.
6. The Joint Committee considers that more work needs to be undertaken in assessing all the potential sites and a decision made on which sites to take forward in the light of that assessment, submitted comments and the final sub-regional apportionment for the County. The Joint Committee believes that the best way of developing a strategy to meet the future soft sand needs of West

Sussex is through the progression of the Minerals Development Document rather than through the approval of ad hoc individual applications for unallocated sites.

7. The Joint Committee therefore considers this application to be premature pending the County Council's planned consultation on preferred sites later this year and the publication of the Proposed Submission Core Strategy, and therefore **objects** to this application. (It should be noted that an objection on this basis at this time is without prejudice to any future comments that might be submitted).
8. If, notwithstanding the Joint Committee's objection, the County Council is minded to approve this application, the Joint Committee would wish to see the following the subject of conditions and/or a legal agreement attached to the permission:
 - a time limit on the permission requiring extraction to cease after twenty years or earlier from the date of commencement of extraction (unless permission is given for an extension of time);
 - working to be in accordance with an approved Landscape Management Plan and Ecological Mitigation Plan;
 - the provision of advance landscaping and other mitigation works as proposed;
 - a restriction on the hours of working;
 - a restriction on lighting;
 - working to be subject to the proposed noise and dust attenuation measures and ongoing monitoring of the hydro-geology (particularly in relation to the stream through the site and the pond to the north-east of the site) and ecological and archaeological interest;
 - any requirements of Natural England, the Environment Agency, or the County Council's Landscape Architect, Archaeologist and/or Ecologist;
 - restoration of the site to be undertaken progressively during working and to be completed within three years of the cessation of extraction (unless permission is given for an extension of time) in accordance with an agreed Site Restoration and Management Plan, which should include the establishment of heathland habitats as proposed;
 - a bond to ensure that sufficient funds will be available to complete the restoration; and
 - the provision of public access to the land when restoration is complete.

In addition, the Joint Committee would welcome the provision of funding for an officer to oversee the heathland restoration of the site and for compensation measures for any users of the rights of way and open access land close to the site for any detriment they may suffer as a consequence of this development.