

Draft Soft Sand Review Policy M2 - SDNPA Planning Committee

Soft Sand

- 1.1.1. Land won soft sand is of a particular quality that cannot be substituted by other minerals. The soft sand resource is heavily constrained due its location within or adjacent to the South Downs National Park.
- 1.1.2. The current 10 year average sales value is much higher than for sharp sand and gravel, at 293,737 tonnes per annum (2008-2017), and other relevant local information suggests average demand may be as high as 372,459 tonnes per annum. The total permitted reserve of land-won soft sand in West Sussex is 2,754,000 tonnes which currently provides a landbank of 7.4 years, based on the 10 year average sales, taking account of other relevant local information. Current reserves are not sufficient to meet demand over the Plan period (up to 2033). Planning Guidance (NPPG, para 064) states that MPA's should also consider average sales over the previous three years, to identify the general trend of demand. The 3-year average of soft sand sales is 295,115 tonnes (2015-2017). Based on this 3-year average and current reserves, the landbank (taking account of other relevant local information) is currently 9.3 years.
- 1.1.3. The relevant **strategic objectives** are;
- *1: To promote the prudent and efficient production and use of minerals, having regard to the market demand and constraints on supply in the Plan area.*
 - *3: To make provision for soft sand, silica sand and sharp sand and gravel, to meet the need, from outside the South Downs National Park, where possible; and only allow development within the national park in exceptional circumstances and where it is in the public interest.*
- 1.2. In order to inform the **strategy** for the provision of land won soft sand, the Authorities considered the opportunities for extraction:
- within West Sussex but outside of the SDNP
 - outside of West Sussex
 - from other sources
 - from within the SDNP, within West Sussex
 - a combination of the options
- 1.2.1. The Authorities have engaged in discussions under Duty to Cooperate with all Mineral Planning Authorities across the South East culminating in the agreement of a joint Position Statement for Soft Sand. Further Statements of Common Ground have been prepared on the issue of soft sand

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provision, as necessary, and the Authorities will continue to engage with other MPAs on the issue given to constrained nature of soft sand in West Sussex.

- 1.2.2. In light of this work, site allocations through Policy M11 make provision for soft sand to meet the shortfalls set out in the latest LAA.
- 1.2.3. The **strategy** for the provision of land won soft sand is:
 - to allocate a new site inside of West Sussex and outside of the South Downs National Park (see Policy M11)
 - to allocate two extensions to existing soft sand sites within the South Downs National Park (see Policy M11)
 - to continue to work with Mineral Planning Authorities across the South East to identify potential alternative sources of soft sand (land won, marine won or substitute materials) to ensure that sites provision is made for soft sand outside of protected landscapes in the first instance.
- 1.2.4. This strategy accords with national policy as it seeks to make provision for non-energy minerals from outside of protected areas in the first instance NPPF para 205 (a). In future, provision for soft sand may be available from beyond West Sussex and from alternative sources. This information will form part of the assessment of any planning application that comes forward on allocated or unallocated sites.
- 1.2.5. Any application for soft sand extraction within the SDNP, that is determined to be major development, will be assessed to determine whether or not exceptional circumstances exist and whether a proposal would be in the public interest.
- 1.2.6. Policy M2 will be used to determine all planning applications for soft sand extraction in West Sussex, including extensions of time and physical extensions on allocated and unallocated sites.

Policy M2: Soft Sand
<p>(a) Proposals for land won soft sand extraction, including extensions of time and physical extensions to existing sites, will be permitted provided that:</p> <ol style="list-style-type: none"> i. The proposal is needed to ensure a steady and adequate supply of soft sand and to maintain at least a seven year land bank, as set out in the most recent Local Aggregates Assessment; and ii. The site is allocated within Policy M11 of this Plan, or if the proposal is on an unallocated site, it can be demonstrated

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<p>that the need cannot be met through the site/s allocated for that purpose; and</p> <p>iii. Where transportation by rail or water is not practicable or viable, the proposal is well-related to the Lorry Route Network.</p> <p>(b) Proposals located outside the South Downs National Park that accord with part (a) must not adversely impact on its setting.</p> <p>(c) Proposals located within the South Downs National Park that accord with part (a) and constitute major development will be refused other than in exceptional circumstances and where it can be demonstrated to be in the public interest.</p>

- 1.2.7. The Authorities' Monitoring Report will be updated annually to contain the latest information about the status of the allocated sites. The landbank calculation for the purposes of Policy M2(a(i)) will be made by using the reserve and annual demand information set out in the most recent published Local Aggregate Assessment.
- 1.2.8. Site allocations are set out in policy M11. The Soft Sand Site Selection Report, Sustainability Appraisal and Major Development Background Paper [LINKS] set out how the Authorities undertook the site selection process. For development proposals on unallocated sites a clear preference will be given to sites with the least impact on the SDNP in line with national policy.
- 1.2.9. Sites outside of the boundary of the SDNP will be assessed for their impact on the setting of the SDNP in line with Section 62 of the Environment Act 1995 which requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to the purposes of a National Park.
- 1.2.10. Sites within the South Downs National Park that are assessed as constituting major development will need to demonstrate exceptional circumstances exist and the development would be in the public interest before planning permission is granted.¹
- 1.2.11. Physical extensions to existing sites generally benefit from established infrastructure (e.g. access roads, processing plant and offices) which means that it may be more appropriate to continue activities, rather than develop new sites. The acceptability of extending existing sites will also depend on the cumulative impacts of continued working, considered in more detail by Policy M22.

1.1.1. _____

¹ West Sussex and South Downs Major Development Paper

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1.2.12. Proposals to extend existing sites will only be supported where the existing site does not have any outstanding or unresolved issues in relation to planning controls aimed at ensuring that the site operates without harm. For example, if a site that should have been partly restored in accordance with a phased restoration scheme were to be extended, this would exacerbate the ongoing impact on the landscape.

Implementation and Monitoring	
<i>Actions</i>	<i>Key Organisation(s)</i>
Annual monitoring of sand and gravel sales data from operators. Annual production of Assessment of Need for Aggregates (Local Aggregate Assessment)	WSCC, SDNPA, minerals operators, South East England Aggregates Working Party.
<i>Measure/Indicator</i>	<i>Trend/Target</i>
<ul style="list-style-type: none"> - Soft sand sales - Permitted soft sand reserves 	Trends: <ul style="list-style-type: none"> - Declining landbank within the South Downs National Park - Soft sand continues to be adequately supplied to the construction industry in West Sussex.
<i>Intervention Levels</i>	<i>Actions</i>
Lack of sites coming forward that are able to demonstrate exceptional	<ul style="list-style-type: none"> - Work with the Aggregates Working Party to monitor supplies of soft sand in the south east - Review policy