West Sussex Joint Minerals Local Plan

Single Issue Soft Sand Review – Proposed Submission Draft (Reg.19)

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November 2019

west sussex county council

Working in Partnership

South Downs National Park Authority

Contents

Executive Summary 3
1. Introduction.....4
2. The Soft Sand Review – Proposed Strategy and Allocations.....7
3. Key Evidence.....16
4. Proposed modifications to the JMLP – The Soft Sand Review.....20
5. Next Steps 44

DRAFT

Executive Summary

This document is the proposed submission soft sand review of the West Sussex Joint Minerals Local Plan. It sets out how the Authorities have addressed the issue of soft sand supply, namely;

- the need for soft sand;
- the strategy for soft sand supply; and
- potential sites and site selection.

About this consultation

This consultation is under Regulation 19 of the Town and Country Planning (Local Planning) Regulations (2012). Representations will be accepted for a period of ten weeks from 25 November 2019 to 6 February 2020.

We are seeking views on the proposed strategy and allocations for soft sand. Once adopted, the new strategy for soft sand will form part of the Joint Minerals Local Plan. The key documents and response forms will be available for inspection during office hours at:

- County Hall, Chichester
- South Downs Centre, Midhurst
- All district and borough offices in West Sussex
- County libraries in West Sussex
- Online at www.westsussex.gov.uk/mwdf

We are only seeking representations on the proposed soft sand strategy. The other parts of the JMLP are adopted and not part of this review.

Details on how to make your representation can be found in the Statement of Representations procedure and the guidance note provided.

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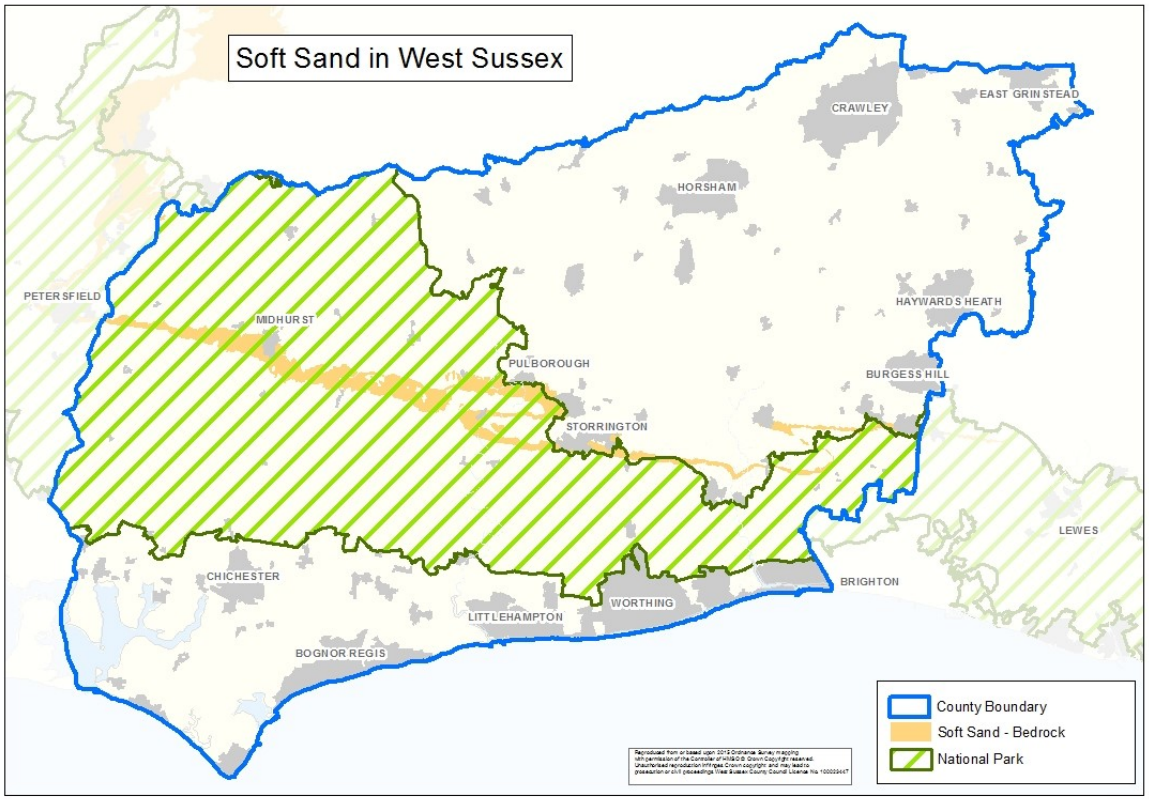
1. Introduction

Soft Sand

1.1 Minerals are essential to the nation's prosperity, as they are required to support growth and development. It is important that there is an adequate and steady supply of minerals to provide the infrastructure, buildings and goods that society, industry and the economy needs. It is also important that this provision is made in accordance with the principles of sustainable development.

1.2 'Soft sand' is generally fine-grained, where individual grains are smooth and well-rounded imparting a relatively soft texture and free-flowing nature. These properties are different to those associated with sharp sand which is rough, angular, and used predominantly in concrete. The fine, smooth, characteristics of soft sand lend it for use as building sand in products that need to be easily workable by hand, for example, mortar and plaster.

1.3 In West Sussex, soft sand is won from the Folkestone Formation, which runs east-west through the County and is mainly located within the South Downs National Park. There are a small number of active extraction sites in the west and central parts of the Formation. The variable grain size and low clay content mean that little or no processing is required to produce high quality building sands for mortar.



West Sussex Joint Minerals Local Plan

1.4 As mineral planning authorities, West Sussex County Council (WSCC) and the South Downs National Park Authority (SDNPA) (the Authorities) are required to plan for a steady and adequate supply of minerals in accordance with paragraph 207 of the National Planning Policy Framework (NPPF).

1.5 The West Sussex Joint Minerals Local Plan (JMLP) was jointly prepared and adopted by the Authorities in July 2018. The Plan sets out strategic policies for a number of different types of mineral for the period to 2033.

Soft Sand Review

1.6 During the examination hearings of the JMLP in September 2017, the Planning Inspector raised concerns about the soft sand strategy. The Inspector suggested modifications prior to adoption of the JMLP: to delete references to planning for a declining amount of sand extraction from within the National Park; to replace Policy M2 with new wording; and to remove the proposed Ham Farm allocation from Policy M11.

1.7 Accordingly, Policy M2 of the JMLP requires the Authorities to undertake a single issue Soft Sand Review (herein SSR). This was required to commence within six months of adoption of the JMLP and be submitted to the Secretary of State within two years from the commencement of the review.

1.8 Preparation of the Review must be undertaken in accordance with the relevant legislation (including the Planning and Compulsory Purchase Act 2004 and Regulations) to ensure procedural and legal compliance. The Review must also be consistent with the National Planning Policy Framework (2019).

1.9 The National Parks and Access to the Countryside Act 1949, as amended by the Environment Act 1995, sets out the statutory purposes and duty for national parks. National Policy states that great weight should be given to conserving and enhancing landscape and scenic beauty in national parks, which have the highest level of protection through policy.

1.10 The timetable for the Review is set out in the statutory management plans, the West Sussex Minerals and Waste Development Scheme, and the South Downs National Park Local Development Scheme (Oct 2018).

Scope of the Review

1.11 The Review considers the following three key issues

- **Issue 1:** the identified need for soft sand during the period to 2033;
- **Issue 2:** the supply strategy, that is, the options that can, either singularly or in combination, be used to meet any identified shortfall; and

DRAFT

- **Issue 3:** the identification of potential sites and, if required, the selection of one or more of those sites to meet identified need.

1.12 The Review does not consider any other mineral planning issues or seek to make changes to any other parts of the JMLP.

Previous Consultation (Jan – March 2019)

1.13 This consultation set out the Issues and Options that relate to the demand for, and supply of, soft sand in line with Regulation 18 of the Town and Country Planning (Local Planning) Regulations (2012).

1.14 A number of supporting documents were prepared, including Sustainability Appraisal (SA), a Local Aggregate Assessment (LAA) and the Soft Sand Site Selection Report (4SR), all of which were made available on our website, at deposit points, and all county libraries. Other relevant evidence base documents, which underpinned the Joint Minerals Local Plan through to adoption in July 2018, were also available on our website.

1.15 Comments were invited to help the Authorities determine the changes that will be required to the JMLP in order to prepare a new strategy for soft sand.

1.16 A total of 804 responses were received during the consultation with the following breakdown:

- 716 responses submitted by individuals (including parish councillors, local businesses, and from residents/members of the public)
- 88 by organisations (minerals industry, county, district & borough and parish councils, government bodies, community and environmental organisations).

1.17 A full summary of the consultation, including setting out responses from the Authorities' has been prepared, and is available on our website or deposit points.

Sustainability Appraisal

1.18 The Authorities have undertaken a Sustainability Appraisal (SA), which incorporates Strategic Environmental Assessment (SEA), as required by the European Union (EU) Strategic Environmental Assessment directive, to inform the preparation of this Review. The Authorities undertook consultation with the statutory consultees[1] in September 2018, about the content of the SA Scoping Report, followed by inviting the statutory consultees to comment on the Issues and Options Consultation documents.

1.19 All of the statutory consultees confirmed that the scoping report was still fit for purpose for the SSR.

[1] Environment Agency, Historic England and Natural England.

DRAFT

1.20 A standalone SA document was prepared to support the draft Pre-Submission SSR.

1.21 The SA has been updated to inform and reflect the proposed new strategy for soft sand. The *Plans, Policies and Programmes* section was updated to take account of the adopted South Downs Local Plan (July 2019) and other new or updated documents, including as a result of comments received during the Issues and Options (2019) consultation.

1.22 The Site Assessments and Option Assessments have been updated to take account of the consultation responses and the updated technical studies. Additional appraisals were made of the alternatives for the preferred combination Option E. The Authorities considered that a combined Option including all aspects of Option B, C and D is the most sustainable.

1.23 Further SA work has been undertaken on the proposed wording for draft revised policies M2 and M11.

2. The Soft Sand Review – Proposed Strategy and Allocations

2.1 The draft Pre-Submission SSR follows on from the Issues and Options documents that were published for public consultation in early 2019. The Issues and Options document was accompanied by a Sustainability Appraisal and set out three key issues and a series of high level options (see para 1.11).

Issue 1: the identified need for soft sand during the period to 2033

2.2 Mineral planning authorities (MPAs) are required to prepare a Local Aggregates Assessment (LAA) that identifies future demand for aggregates, including soft sand, based on historic sales and other relevant local information. Therefore, the LAA provides the basis for making provision for land-won aggregates through Local Plans.

2.3 The LAA is prepared by the Authorities annually, in late autumn, and sets out amounts of aggregate (including soft sand) that may be needed during the period to 2033. This is based on assumptions around historical sales, planned housing development, and the amounts of sand that are used in construction projects. The calculations are made for a number of scenarios including an assessment of local information. The identified shortfall in the current LAA is between **1.66 and 2.83** million tonnes to 2033 (the period of the Joint Minerals Local Plan).

2.4 The LAA sets out the demand for soft sand to 2033, taking account of the previous 10 years sales (2008–2017), and the following assumptions;

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- Assumption 1: the construction of new residential dwellings in West Sussex is projected to grow by 26.8%
- Assumption 2: Up to 91% of sand and gravel may be used in the construction of residential dwellings

2.5 Combinations of the assumptions, and taking account of the 10 year average of sales, gives three scenarios, set out below.

	Demand Forecast Scenario 1 (tonnes)	**Demand Forecast Scenario 2 (tonnes)**	**Demand Forecast Scenario 3 (tonnes)**
Assumptions applied	None (10 yr. avg. only)	1 and 2	1
10 year average	293,737		
Additional demand for housing (26.8%)	n/a	71,637	78,722
Total Annual requirement	293,737	365,374	372,459
Total requirement over Plan period (2018 – 2033)	4,406,062	5,480,613	5,586,887
Current reserves	2,745,000		
Shortfall	1,652,062	2,726,613	2,832,887

2.6 The LAA has been subject to Aggregate Working Party (AWP) scrutiny, as required by NPPF (para 207b), and provided the baseline for making provision for aggregates in the JMLP.

2.7 There were no soundness or legal compliance issues raised through the examination of the JMLP with regards to the forecast for aggregates. As the approach taken was considered to be sound, the Authorities have prepared an updated version of the Local Aggregates Assessment (LAA) to continue to monitor the situation with regards to aggregate supply and the performance of the JMLP, and to provide information about the amount of soft sand that is required to 2033.

Issue 2: the supply strategy, namely, the options that can, either singularly or in combination, be used to meet any identified shortfall

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2.8 The only source of land-won soft sand within West Sussex is within the Folkstone Formation, which is largely contained within the South Downs National Park.

2.9 Paragraph 172 of the NPPF states "that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks … which have the highest status of protection in relation to these issues".

2.10 The statutory purposes and duty for national parks are set out in the National Park and Access to the Countryside Act 1949 as amended by the Environment Act 1995. The National Park purposes are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area
- To promote the opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

2.11 The National Park Authority also has a duty when carrying out the purposes, to seek to foster the economic and social well-being of the local communities within the National Park.

2.12 In addition, Section 62 of the Environment Act 1995 also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes; this includes West Sussex County Council. For the SSR, this means that assessment of the potential sites outside of the SDNP boundary will also be considered for their potential impact on the National Park.

2.13 Mineral extraction is considered to be 'major development' as defined in the Glossary of the NPPF and the Town and County Planning (Development Management Procedure) (England) Order 2015. Paragraph 172 of the NPPF states that planning permission should be refused for major development in national parks other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Footnote 55 of the NPPF says that the question of whether a development proposal is 'major' in a national park is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

2.14 Paragraph 172 of the NPPF relates primarily to the determination of planning applications. However, to ensure that all local plan allocations are deliverable, it is also necessary to consider the issue of major development at the plan making stage. All potential allocations for soft sand in the National Park will need to address paragraph 172 of the NPPF and draft policy SD3 of the South Downs Local Plan.

2.15 With regard to plan-making, paragraph 207c of the NPPF requires that MPAs make provision for land-won aggregates in "the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate".

DRAFT

2.16 Against the national legislative and policy context, the Authorities have identified the following five 'reasonable alternatives' to meet the demand for soft sand:

- Option A: Supply from sites within West Sussex but outside of the National Park;
- Option B: Supply from sites within West Sussex, including within the National Park;
- Option C: Supply from areas outside West Sussex;
- Option D: Supply from alternative sources including marine-dredged material; and
- Option E: A combination of the above options.

Option A: Supply from sites within West Sussex, but outside of the National Park

2.17 There are a number of active soft sand sites within West Sussex that fall outside the boundary of the SDNP. The Authorities have undertaken a full desk based assessment to assess whether there were any other potential sites that had not been promoted by landowners or operators when work on the JMLP was underway.

2.18 Only two sites outside the SDNP were shortlisted (Ham Farm and Buncton Manor Farm), with a total combined potential yield of 1.725mt.

2.19 The Authorities have considered the potential to identify sites outside the SDNP boundary within West Sussex, and the cumulative impact of any potential allocations with active sites in close proximity, and whether this option could meet the full supply requirement.

2.20 It is important to note that sites outside, but in close proximity to the National Park have the potential to adversely impact on the landscape of the National Park.

Option B: Supply from sites within West Sussex, including within the National Park

2.21 Consideration has been given to the potential of each site on the 'shortlist' within the SDNP, on their merits. Landscape assessments have been undertaken to consider the potential impact on the special qualities of the South Downs National Park (regardless of whether the site is within or outside the National Park).

2.22 All potential sites have been considered on an equal basis, and then sequentially, as detailed within the 4SR report.

Option C: Supply from areas outside West Sussex

2.23 Option C considers the potential of other Plan Areas to supply the wider market in the South East to compensate for any shortfall in supply from West Sussex, due to the constrained nature of the resource. Outside of this Plan Area, there are a number of counties that already supply soft sand to

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the wider market from the Folkestone Formation, as well as the Corallian Group (in Oxfordshire), and the 'Reading Beds'.

2.24 The transportation of minerals over long distances is a key consideration. The M25, M23, M26, M20, A3, M3, M2, M4, and M40 provide routes between the counties of the South East and, therefore, cross-boundary transportation can be readily facilitated to major population centres. Long distance movements of soft sand are already taking place, facilitated by rail, sea and road transportation, and there is no reason why soft sand could not continue to travel further distances in future.

2.25 The South East MPAs have worked jointly on a Position Statement, setting out a joint understanding of the soft sand issue within the South East. The Authorities are pursuing Statements of Common Ground with other MPAs, as required by national policy (NPPF Para 27) and guidance, to demonstrate effective cooperation to address the issues around soft sand and explore the potential for supply to the wider market from areas less constrained by designated landscapes, as is the case in West Sussex.

2.26 Work has been undertaken with Kent County Council, Brighton & Hove City Council and East Sussex County Council, resulting in a Statement of Common Ground (SoCG). The SoCG states that the Authorities will work together and that if any surplus of material (max. 1m tonnes) is available in Kent, then it could travel within the wider region to make up a shortfall of material elsewhere.

Option D: Supply from alternative sources including marine-dredged material

2.27 There are currently no known viable equivalents to land-won building sand in the South East. Marine dredged material is increasingly supplied to the market but is not known to be directly substitutable for land won resource at this time. There is evidence that some marine dredged material is being landed at wharves in West Sussex and sold as soft sand, but it is not known if this material is being blended with other, land-won sand, or is a direct substitute. The SSR will consider this Option in the context that this type of material may become more accessible and available over time, and an economically viable alternative to land-won soft sand extraction. However, this would be entirely dependent on the industry and market.

2.28 Results from Annual Aggregate Monitoring Surveys have revealed that marine-dredged aggregate being landed in West Sussex is being sold for soft sand uses. During the three-year period 2015 -2017, an average of 21,846 tonnes of marine dredged material was sold from West Sussex wharves as soft sand per annum.

2.29 At this time, there is no suitable or reliable alternative supply of material in the South East; this situation will continue to be monitored.

Option E: A combination of the above options

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2.30 The Authorities have considered whether a combination of the options would provide the most robust and deliverable strategy for supply. It has been concluded that a combination of the options (Option E) provides the most reasonable strategy to take forward. Option A would not provide enough resource. Option B does not take account of the material that may be available in other areas or alternative materials. Options C and D would not provide enough certainty of supply.

2.31 Option E therefore provides the preferred option for the Soft Sand Review. It has been assessed through the Sustainability Appraisal and informed the identification of potential site allocations.

Issue 3: the identification of potential sites and, if required, the selection of one or more of those sites to meet the supply options

2.32 Mineral Planning Authorities should plan for a steady and adequate supply of minerals by, amongst other things, identifying specific sites. Therefore, consideration has been given to allocating sites for soft sand extraction to meet identified shortfalls over the plan period.

2.33 The approach to site identification was subject to discussion at the examination hearings of the JMLP. The Planning Inspector concluded that the site selection methodology and its application, including the RAG (Red, Amber, Green) traffic light system of assessment, were robust and sound. Accordingly, the Authorities have applied the same site assessment methodology, having first reviewed it with technical specialists to ensure it is up-to-date.

2.34 A 'Call for Sites' was undertaken during August–September 2018. The sites submitted, along with all previously-considered sites, made up a 'long list' of 21 sites. All of these sites were reviewed and 12 were ruled out as they were considered to be unsuitable for further consideration (due to either availability or viability). Therefore, nine were shortlisted (two outside the SDNP, and seven within), which are set out in the Table below.

2.35 The nine shortlisted sites were included in the Issues and Options Consultation, with the aim of seeking views from stakeholders on the accuracy of the information held on each site and providing the opportunity to submit further evidence on the sites.

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Site Name	Parish	Site (Ha)	Yield (tonnes)	In SDNP?	Extension to existing site?
Buncton Manor Farm (new site)	Washington	23	1,000,000	No	No
Chantry Lane (Extension)	Storrington and Sullington	2.5	1,000,000	Yes	Yes
Coopers Moor (Extension)	Duncton	6	500,000	Yes	Yes
Duncton Common (Extension)	Duncton and Petworth	28	1,800,000	Yes	Yes
East of West Heath Common (Extension)	Harting and Rogate	16	1,000,000	Yes	Yes
Ham Farm (new site)	Steyning and Wiston	8.2	725,000	No	No
Minsted West (Extension)[2]	Stedham with Iping	10	2,000,000	Yes	Yes
Severals East (new site)	Woolbeding with Redford	20	1,700,000	Yes	No
Severals West (new site)	Woolbeding with Redford	50		Yes	No

2.36 Due to the requirement in NPPF on consideration of major development in national parks (see para 2.12) An initial scoping assessment of the potential development of each of the shortlisted sites within the SDNP has been undertaken, to assess whether they would to constitute major development;

[2] The existing Minsted site is currently subject to an application and it is unclear at this time whether or not the new site should be considered as an extension

Site Name	Potential impact on landscape and natural beauty	Potential impact on conservation and enhancement of wildlife	Potential impact on recreational opportunities	Potential impact on cultural heritage	Likely to be major development?
Chantry Lane (Extension)	Yes	Depends on scheme details	Unlikely	Depends on scheme details	Yes
Coopers Moor (Extension)	Yes	Depends on scheme details	Yes	Yes	Yes
Duncton Common (Extension)	Yes	Yes	Yes	Yes	Yes
East of West Heath Common (Extension)	Depends on scheme details	Yes	Depends on scheme details	Depends on scheme details	Yes
Minsted West (Extension)	Yes	Yes	Yes	Depends on scheme details	Yes
Severals East (new site)	Yes	Yes	Yes	Depends on scheme details	Yes
Severals West (new site)	Yes	Yes	Yes	Depends on scheme details	Yes

2.37 Through the 'Call for Sites', further technical work and taking account the responses to the Issues and Options consultation, the Authorities have prepared an updated Soft Sand Site Selection Report (4SR), which sets out how the shortlisted sites have been assessed for their suitability and to further assess their capacity and potential to help meet the demand for soft sand.

2.38 A detailed explanation of the methodology, as well as the results of the site assessments are captured in the 4SR. The potential impacts of mineral development cover the extraction phase and the potential for restoration.

2.39 The outcomes of the site assessments (as set out within the 4SR) have indicated that the following sites are acceptable in principle for their proposed uses;

- Ham Farm
- Chantry Lane Extension
- East of West Heath Common
- Minsted West
- The Severals (East and West)

Proposed Site Allocations

2.40 The adopted JMLP (at paragraph 7.1.6) includes guiding principles. These were reviewed, and a suggested amendment was put forward through the issues and options consultation, to include an additional guiding principle.

2.41 The guiding principles, that have helped guide the selection of soft sand sites are as follows;

- ***First principle:*** *Places where there are opportunities to restore land beneficially, for example a net-gain in biodiversity.*

- ***Second principle:*** *Places without a sensitive natural or built environment and away from communities, in order to protect the amenity of businesses, residents and visitors to West Sussex*

- ***Third principle:*** *the new sites should have good access to the Lorry Route Network (LRN). Access from the site to the LRN should be acceptable 'in principle', that is, there should not be any technical issues, with regard to highway capacity and road safety, that cannot be overcome.*

- ***Fourth principle:*** *The need to protect and enhance, where possible, protected landscapes in the plan area, particularly ensuring that any major minerals development will only be considered within designated landscapes in exceptional circumstances and in the public interest.*

- ***Fifth principle:*** *A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments.*

- ***Sixth principle:*** *The need to avoid the needless sterilisation of minerals by other forms of development*

2.42 Taking account of the information in the updated technical evidence and the guiding principles, including consideration of the sites having least impact on the SDNP, the following sites have been proposed for allocation;

	Proposed Allocation	Ruled out
Inside West Sussex, Outside of the SDNP	Ham Farm	

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Inside West Sussex, Inside of the SDNP	East of West Heath (Extension) Chantry Lane (Extension)	Minsted West (Extension) Severals East and West

2.43 The proposed allocations are set out in proposed modifications to Policy M11 (see Chapter 4). Each allocation is supported by a suite of development principles, that is, specific issues that will need to be addressed at the planning application stage, as and when proposals come forward. The development principles must be satisfactorily addressed in addition to any requirements within the use-specific and general development management policies in the Plan.

2.44 Proposals to develop allocated sites in the SDNP, where they are determined to be major development, will need to demonstrate exceptional circumstances exist and that development of those sites is in the public interest. The Authorities have determined that these circumstances may exist due to constrained supply in the wider south east region. However, a decision can only be made when it is clear what the development proposals are for and against the circumstances when the proposals come forward.

3. Key Evidence

Soft Sand Site Selection Report (4SR)

3.1 As part of the work on the JMLP, the Authorities prepared a Mineral Site Selection Report (MSSR - January 2017) that was submitted alongside the Plan for the examination. The MSSR set out in detail the methodology for assessing possible sites and it identified the sites that were considered suitable for allocation and those that were not. In his report, the Planning Inspector that examined the JMLP concluded that "the site selection methodology and its application, including the traffic light system, is robust and sound" (paragraph 64) and that "the methodology and criteria is justified, effective and consistent with national policy" (paragraph 76). Accordingly, the Authorities have applied the same site assessment methodology, having first reviewed it with technical specialists to ensure it is up-to-date.

3.2 The methodology applied is to consider whether or not proposed sites are 'acceptable in principle' against a number of key criteria, which provide a framework for assessing sites at a high level. Acceptability of a site is achieved where a site is considered to be suitable for development, available, and considered to be viable against the key criteria. In order to assess each criterion, a traffic light system has been applied based on the professional judgement of specialist officers of the Authorities. The key criteria considered are:

- Landscape designations/visual impact
- Nature conservation and geodiversity
- Historic environment

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- Water environment (including flooding)
- Air quality
- Soil quality
- Public Rights of Way
- Transport (including access)
- Services and utilities
- Amenity
- Cumulative impact
- Airport Safeguarding Zones
- Site specific information
- Mineral type/quality
- Potential yield
- Ownership
- After use and restoration.

Transport Assessment

3.3 The NPPF states that Plans should take account of whether:

- opportunities for sustainable modes of transport have been considered
- safe and suitable access to the site can be achieved
- significant impacts from the development on the transport network, or highway safety, can be cost effectively mitigated to an acceptable degree (NPPF, Para 108).

3.4 A detailed Transport Assessment has been carried out on sites and as part of the previous work for the JMLP. This assessment included:

- A comprehensive review of the associated traffic impacts that would occur if a site were worked;
- access safety implications; and
- routing strategies.

Landscape Assessment

3.5 All potential sites have been reassessed as part of the updated Landscape Assessment. The assessment criteria were updated to reflect changes in policy since 2015. Each site was also assessed for its potential to contribute to ecosystem services and, where relevant, long term objectives of the South Downs National Park.

Strategic Flood Risk Assessment (SFRA)

3.6 The NPPF states that Local Plans should take account of climate change over the longer term, including associated factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. The NPPF also states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, and where development is necessary, making it safe without increasing

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flood risk elsewhere. The NPPF expects that consideration of this matter will be via the preparation of a Strategic Flood Risk Assessment.

3.7 In allocating land for development, the NPPF expects local planning authorities to apply a 'Sequential Test' to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed. The SFRA provides the evidence to inform the Sequential Test.

3.8 The Strategic Flood Risk Assessment (SFRA) that accompanies the SSR therefore provides information about flood risk to inform decisions about site selection.

Major Development Paper

3.9 As many of the potential site allocations are within the boundary of the SDNP, the Authorities scoped the potential for each of these sites to fall under the scope of major development and have set out their views within the Major Development Paper. A detailed assessment will be made at planning application stage as to whether the proposal is major development and would then need to consider exceptional circumstances and the public interest tests.

Sustainability Appraisal (SA)

3.10 The policies and site allocations within the SSR have been appraised against sustainability objectives on an iterative basis through the SA. The SA also considers reasonable alternatives and the Authorities consider that the SSR sets out the most reasonable strategy for soft sand extraction in West Sussex.

3.11 The SA was undertaken by officers of the South Downs National Park Authority. The SA is currently in a draft stage and will be published alongside the SSR for NPA. The SA for the Pre-Submission SSR builds on the SA for the Issues and Options consultation and the SA for the Joint Minerals Local Plan but has been prepared as a standalone document.

3.12 The SA has considered the Options, combination of Options and potential Site Allocations as well as the potential for in combination effects. The SA has guided the strategy set out in draft Policy M2 and the site allocations and the development principles set out in draft Policy M11. The SA also made recommendations for the proposed policy wording for policies M2 and M11.

Habitat Regulations Assessment

3.13 The purpose of the HRA is to report on the 'likely significant effects' of the plan on internationally designated nature conservation sites.

3.14 The HRA has been produced by officers of the South Downs National Park Authority and West Sussex County Council. The HRA is currently in a draft stage and will be published alongside the Pre-Submission SSR for NPA.

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3.15 No significant issues have arisen. However, the assessment suggests that a project level Appropriate Assessment is necessary for each of the proposed soft sand sites. Minor wording amendments or additions are recommended to polices and site allocations and in relation to the later and these draft recommendations have already been incorporated into the Plan.

Duty to Cooperate

3.16 The duty to co-operate applies to all local planning authorities, national park authorities and county councils in England as well as a number of other public bodies including the Environment Agency, Highways England and Natural England. It places a requirement on all such bodies to engage constructively and actively on cross boundary matters.

3.17 A draft Duty to Cooperate statement setting out the strategic issues where cooperation has been undertaken and that highlights areas of agreement and unresolved issues. There are no significant unresolved issues at this time.

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4. Proposed modifications to the JMLP – The Soft Sand Review

4.1 The modification table below sets out the proposed changes to be made to the adopted Joint Minerals Local Plan as a result of this Single Issue Soft Sand Review. Text to be deleted is shown as ~~struck through~~ and additional text to be added is shown in red and underlined.

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
SSR1	Executive Summary	TBC	To add reference to new allocations
SSR2	6.2.13	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.	Additional text added and split into two paragraphs
SSR3	6.2.13	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. ~~soft sand is 313,210 tonnes (2007 – 2016) (based on January 2017 data), which is higher than for sharp sand and gravel. In 2017,~~ T~~t~~he total permitted reserve of land-won soft sand in West Sussex is 2,754,000 ~~was 3,354,800 tonnes~~ which currently provides a landbank of 7.4 ~~10.7~~ years[3]~~.~~, based on the 10 year average sales, taking account of other relevant local information. ~~The supply and demand picture shows that additional supplies of 2.36mt of soft sand are likely to be needed towards the latter half of the Plan period.~~ Current reserves are not sufficient to meet	Additional paragraph to be added of amended text from para 6.2.13 Footnote wording removed

[3] ~~This does not take account of other relevant local information concerning future levels of house building and road construction as set out in the Local Aggregates Assessment.~~

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		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.	
SSR4	6.2.14	The relevant **strategic objectives** are; *1: To promote the prudent and efficient production and use of minerals ~~and to ensure a steady and adequate supply,~~ 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.*	Removal of wording in section 1
SSR5	6.2.15	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	Additional text – new paragraph
SSR6	6.2.16	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 provision, as	Additional text – new paragraph

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		necessary, and the Authorities will continue to engage with other MPAs on the issue given to constrained nature of soft sand in West Sussex.	
SSR7	6.2.17	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.	Additional text – new paragraph
SSR8	6.2.18	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.	Additional text – new paragraph
SSR9	6.2.19	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.	Additional text – new paragraph
SSR10	6.2.20	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.	Additional text – new paragraph
SSR11	6.2.21	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.	Additional text – new paragraph
SSR12	6.2.15	~~Any proposals for land-won soft sand extraction submitted before the adoption of the single issue soft sand review of the Plan, will be considered on their merits and against Policy M2 and other policies in this Plan.~~	Removal of paragraph

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
SSR13	Policy M2	~~Proposals for land-won soft sand extraction, including extensions of time and physical extensions to existing sites, will be permitted providing that the proposal is needed to meet the shortfall of soft sand of 2.36 million tonnes (or as calculated in the most recent Local Aggregates Assessment) over the Plan period and maintain at least a seven year landbank.~~ ~~The Authorities will commence a single issue soft sand review of this Plan within 6 months of the adoption of this Plan. The Plan Review will be submitted for examination within two years from the commencement of the review and address the shortfall of soft sand at that time (as calculated in the most recent Local Aggregates Assessment). In the event that the reviewed Plan is not submitted within two years then the Plan, in terms of soft sand, will be deemed to be out-of-date.~~ (a) Proposals for land won soft sand extraction, including extensions of time and physical extensions to existing sites, will be permitted provided that: 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 that the need cannot be met through the site/s allocated for that purpose; and iii. Where transportation by rail or water is not practicable or viable, the proposal is well-related to the Lorry Route Network.	Revised policy wording to reflect new strategy for soft sand. The revised policy now features three clauses, with the first clause (a) containing two sub-clauses

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		(b) Proposals located outside the South Downs National Park that accord with part (a) must not adversely impact on its setting. (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.	
SSR14	6.2.16	~~The shortfall of supply, as calculated at the time when the planning application is determined, will be a material consideration. The landbank calculation for the purposes of Policy M2 will be made by using the reserve and annual demand information set out in the latest Local Aggregate Assessment.~~ 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.	Removal of paragraph, new text provided.
SSR15	6.2.17	~~The single issue review of the Plan required under Policy M2 will address the strategy to maintain a steady and adequate supply of soft sand, the supply and demand for soft sand, and the approach to meet any shortfall, including the potential need to allocate sites. Although the Plan Review will address these matters, it will not change the end date of this Plan.~~ 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	Removal of paragraph, new text provided.

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		proposals on unallocated sites a clear preference will be given to sites with the least impact on the SDNP in line with national policy.	
SSR16	6.2.18	~~Policy M2 sets out the timeframe for the commencement and submission of the Plan Review. 'Commencement' is defined as being publication of an invitation to make representations in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. If the Plan Review is not submitted within two years from commencement, the soft sand parts of this Plan will be deemed to be out-of-date.~~ 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.	Removal of paragraph, new text provided.
SSR17	6.2.19	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]	Additional text – new paragraph to continue from 6.2.18
SSR18		[1] West Sussex and South Downs Major Development Paper	New footnote to relate to new paragraph 6.2.19
SSR18	6.2.20	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.	Additional text – new paragraph to continue from 6.2.19
SSR19	6.2.21	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	Additional text – new paragraph to continue from 6.2.20

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		restoration scheme were to be extended, this would exacerbate the ongoing impact on the landscape.	
SSR20	Policy M2 - Implementation and Monitoring	Implementation and Monitoring *Actions* / *Key Organisation(s)* 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. *Measure/Indicator* / *Trend/Target* - Soft sand sales - Permitted soft sand reserves / Trends: ~~- Soft sand continues to be adequately supplied to the construction industry in West Sussex.~~ ~~- 100% of decisions made on planning applications for soft sand extraction are consistent with Policy M2.~~ - Declining landbank within the South Downs National Park	Additional text – new wording is provided in place of existing text under the Trend/Target and Intervention Levels columns

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		- Soft sand continues to be adequately supplied to the construction industry in West Sussex. *Intervention Levels* — *Actions* ~~New soft sand reserve permitted within the South Downs National Park (contrary to approach of managed retreat)~~ Lack of sites coming forward that are able to demonstrate exceptional — - Work with the Aggregates Working Party to monitor supplies of soft sand in the south east - Review policy	
SSR21	7.1.1	This chapter identifies the mineral sites that has~~ve~~ been allocated in the Plan in pursuit of the following **strategic objective**; *1: To promote the prudent and efficient production and use of minerals and to ensure a steady and adequate supply, 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.*	Additional text – new wording provided at the end of the paragraph. Minor changes to tenses made.
SSR22	7.1.2	Paragraph ~~143~~204 of the NPPF requires that Local Plans should allocate sites to promote development and flexible use of land. Specifically in relation to planning for aggregate minerals, paragraph 207 of the NPPF states that Mineral Planning Authorities should plan for a steady and adequate supply by,	Paragraph number modified to reflect the revised NPPF (2019)

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		amongst other things, identifying specific sites, preferred areas and/or areas of search and locational criteria as appropriate.	
SSR23	7.1.4	Development within the SDNP will need to consider its impact on the purposes of the SDNP[2] at each stage of development. Restoration of sites within or nearby to the SDNP should consider their ability to contribute to ecosystem services and biodiversity net-gain. The SDNPA will prepare a guide to restoration of mineral sites within the SDNP and proposals should take account of this in the preparation of any planning application.	New paragraph inserted after 7.1.3
SSR24		[2] As set out in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995	Footnote added for new paragraph 7.1.4
SSR25	7.1.~~4~~5	Although the allocated sites are currently available for mineral uses during the Plan period, circumstances may change and they may not come forward as expected. Private sector businesses (and, therefore, commercial considerations) will determine whether extraction will actually take place. Therefore, the Plan potentially allows, under the use-specific policies in the preceding chapter, for other sites to come forward for mineral extraction. Such provision will provide additional flexibility and compensate for any allocated sites that do not come forward for minerals extraction. Accordingly, the fact that a site is not allocated in the Plan does not mean that a proposal for mineral extraction at that site will not receive planning permission at some future date.	Owing to the insertion of paragraph 7.1.4, the consequent paragraph 7.1.4 is amended to 7.1.5
SSR26	7.1.~~5~~6	Following technical work and discussions with the mineral industry, statutory and other consultees, and resident and community groups, a number of guiding principals have been identified for the location of new mineral extraction sites. These sites are needed to address likely demand shortfalls for meeting needs for soft sand in West Sussex as identified in Chapter 6.	Owing to the insertion of paragraph 7.1.4, the consequent paragraph 7.1.5 is amended to 7.1.6

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
SSR27	7.1.~~6~~7	There are ~~five~~ six key guiding principles that have been used to guide the identification of the allocated sites: • **First principle:** Places where there are opportunities to restore land beneficially, for example a net-gain in biodiversity. • **Second principle:** Places without a sensitive natural or built environment and away from communities, in order to protect the amenity of businesses, residents and visitors to West Sussex • **Third principle:** the new sites should have good access to the Lorry Route Network (LRN). Access from the site to the LRN should be acceptable 'in principle', that is, there should not be any technical issues, with regard to highway capacity and road safety, that cannot be overcome. • **Fourth principle:** The need to protect and enhance, where possible, protected landscapes in the plan area, particularly ensuring that any major minerals development will only be considered within designated landscapes in exceptional circumstances and in the public interest. • **Fifth principle:** The need to avoid the needless sterilisation of minerals by other forms of development • Sixth **principle**: The need to avoid the needless sterilisation of minerals by other forms of development	Additional text - Guiding principles amended to include all six guiding principles
SSR28	7.2.1	A detailed technical assessment of the site has been undertaken that has not identified any overriding or fundamental constraints to the proposed forms of development on the allocated sites. This includes, for example, the potential impact of the development on amenity and character, and risk to the natural	Additional text added

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		and historic environment. It is considered, therefore, that any potential unacceptable impacts can be prevented, minimised, mitigated, or compensated for to an acceptable standard. Restoration forms a key part of any application for mineral extraction and proposals should ensure appropriate mitigation through the extraction period as well as the proposals for the final land use. Pre-application advice should be sought to ensure each site is brought forward in the most appropriate way, as set out in Policy M24 Restoration and Aftercare. Accordingly, the site allocated in Policy M11 is acceptable 'in principle' for the allocated use/s.	
SSR29	7.2.2	Proposals for development on the allocations within the SDNP that are considered to be major development will need to demonstrate exceptional circumstances exist and the development would be in the public interest before planning permission is granted in line with policy M2.	New paragraph inserted after 7.2.1
SSR30	Policy M11	(a) The following site is allocated for the extraction of clay for brick making and is acceptable, in principle, for that purpose: • Extension to West Hoathly Brickworks (Policies Map 1) (b) The following sites are allocated for soft sand extraction and are acceptable, in principle, for that purpose: • Ham Farm, Steyning (Policies Map 8) • East of West Heath Common (Extension) (Policies Map 9) • Chantry Lane Extension (Policies Map 10)	To add the new allocations/provision to address shortfall of soft sand to 2033 under the new clause (b) the following clauses are amended accordingly.

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		(~~b~~c) The development of the allocated sites must take place in accordance with the policies of this Plan and satisfactorily address the 'development principles' for that site identified in the supporting text to this policy. (~~c~~d) The allocated site will be safeguarded from any development either on or adjoining the sites that would prevent or prejudice the development of its allocated minerals use or uses.	
SSR31	7.2.~~2~~3	The broad location of the site allocated in Policy M11 is shown on the Policies Map. The boundary of the allocated site is identified on Policies Map 1. The following paragraphs identify 'development principles' for the site, that is, specific issues that will need to be addressed at the planning application stage, as and when proposals come forward for the allocated site. Policy M11 requires these principles to be satisfactorily addressed in addition to any requirements within the use-specific and general development management policies of this Plan. Application of the Development Principles should take place alongside full consideration of the Development Management policies set out in Chapter 8.	Paragraph number updated due to the insertion of paragraph
SSR32	7.2.~~3~~4	***Extension to West Hoathly Brickworks, West Hoathly (Policies map 1)***: Located in West Hoathly, Mid Sussex, the site is used for agricultural purposes and is approximately 9 hectares in size. The site would provide a 2-3 year supply of Wadhurst clay to the existing brick factory. The after use for this site would be a return to agricultural uses, or restoring part, or all, of the land to woodland. Restoration should seek to reinstate the original profile of the site.	Paragraph number updated due to the insertion of paragraph
SSR33	7.2.~~4~~5	The development principles for the Extension to West Hoathly Brickworks are as follows:	Paragraph number updated due to the insertion of paragraph

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		(i) Phasing of clay extraction and restoration so that a series of small areas are developed in sequence, to reduce visual intrusion; (ii) Careful siting of extraction and infrastructure on the lower areas to the northwest of the site to reduce visual intrusion on the village and Historic Park and Garden to the south; (iii) Perimeter mounding (using topsoil and overburden) and then planting of native trees and shrubs along the southern and eastern boundary, including some evergreen species, to screen/filter views of the village to the southeast, and Top Road to the south; (iv) Perimeter mounding should be carried out and then planting of native trees and shrubs along the north western boundary, to reduce visibility from views along the valley and the hills to the northwest within the wider AONB; (v) In order to minimise negative impacts on mature trees and watercourses, appropriate buffers, where no development shall take place, should be created and retained along the watercourse, and around the mature trees and ancient woodland within and adjacent to the site around these features; (vi) In areas where no excavation is to occur, existing hedgerows, mature trees and vegetation should be protected and linked by new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas and reducing overall visibility across the site from surrounding areas; (vii) An assessment of the impact on the Ancient Woodland (Blackland Wood, Front Wood and Cookhams Shaw); should be carried out , appropriate buffers incorporated, and mitigation provided, if required in accordance with Natural England and the Forestry Commission's standing advice;	

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		(viii) An assessment of the impact on the Ashdown Forest SPA/SAC, and Wakehurst & Chiddingly Woods SSSI and Weir Wood Reservoir SSSI should be carried out and mitigation provided, if required; (ix) An assessment of the impact on nearby listed buildings (including Aldern House, Old Coombe House and Blackland Farmhouse) and the Historic Parkscapes (Courtlands and Northwood House) should be carried out and mitigation provided, if required; (x) At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required; (xi) A flood risk assessment should be carried out, and mitigation provided, if required; (xii) Potential impacts on the Crawley AQMA resulting from site operations and HGV traffic should be identified and mitigation set out if required; (xiii) Opportunities should be sought to enhance future public access.; (xiv) Access to the site should be through the existing brickworks; (xv) As the site contains Grade 3 Agricultural Land Quality, an assessment should be undertaken of the of potential for high quality agricultural land should be undertaken, and mitigated provided, if required; (xvi) The power line and BT line should be diverted or protected, as necessary; (xvii) The site shall be restored either to agricultural or woodland use in accordance with the following principles, either: a. Reinstate the original profile of the site and returning it to agricultural use. Long term restoration should aim to restore	

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		and reinforce existing landscape elements in keeping with the surrounding pattern, including the structure of hedgerows and hedgerow trees. It should aim to maximise the farmland habitat value and connectivity with the surrounding structure of hedgerows and woodland. It should also include the creation of ponds, a notable feature of the local landscape and important component of the habitat diversity of the area, or, b. Restoring all or part of the site to woodland following extraction. Long term restoration should aim to maximise the habitat value by taking opportunities to link it into the surrounding structure of hedgerows and woodland. It should also include the creation of ponds, a notable feature of the local landscape and important component of the habitat diversity of the area. (xviii) A site liaison group involving the local community should be established if necessary, by the operator to address issues arising from the operation of the site.	
SSR34	New Para – 7.2.6	***Ham Farm, Steyning (Policies Map 8)***: Located in Steyning, Horsham, the site is used for agricultural purposes, and is approximately 7.9 hectares in size. It would provide 725,000 tonnes of soft sand. Materials would be exported from the site by road. The after use for this site would be a return to agricultural use, and restoration would consider enhancement of the existing woodland within the site.	New Allocation – name, basic info
SSR35	New Para – 7.2.7	The development principles for Ham Farm are as follows:	The development principles for the site

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		(i) A project level Appropriate Assessment is required to assess potential impacts and demonstrate how this site will be delivered without any adverse effect on the integrity of any Natura 2000 sites (ii) A landscape and visual impact assessment should inform the development of proposals for the extraction of minerals from the site, taking into account and seeking to minimise impacts on the South Downs National Park and its setting, and Wiston Park; (iii) The Landscape and Visual Impact Assessment should cross reference all other relevant studies within the Environmental Statement in order to ensure that it is fully integrated and considers both direct and indirect impacts from any proposals; (iv) The access should be carefully sited to ensure lines of mature broadleaf trees remain intact. A tree survey and arboricultual impact assessment in accordance with "BS5837 Trees in Relation to Design, Demolition and Construction 2012" should be provided to ensure that retained trees are adequately protected from site operations and that any to be removed are clearly identified and appropriate mitigation proposed; (v) The entrance to the site should be carefully designed to minimise adverse impacts upon the South Downs National Park and its setting; (vi) During excavation there should be screening, such as perimeter mounding and planting of native trees and shrubs (including native evergreen specifies) along the eastern and southern boundaries to strengthen and reinforce existing screening of views into the site from the A283, Cherrytree Rough to the north and surrounding open farmland should be considered as part of the Landscape and Visual Impact Assessment process. Any screening landform and/or planting should be designed to be consistent with local landscape	

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		character in order to minimise unintended additional impacts on landscape character from incongruous screening features; (vii) Existing hedgerows, mature trees and vegetation along perimeters and within the site, should, where possible, be retained and linked to new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas; (viii) There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas; (ix) A historic building setting impact assessment of nearby listed buildings (including but not limited to Horsebrook Cottage and Wappingthorn Manor) should be carried out and mitigation provided, if required; (x) At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required; (xi) A hydrological assessment should be completed, evaluating and seeking to minimise the impact from the proposals on ground water and watercourses, including but not limited to, Alderwood Pond and Wiston Pond; (xii) A flood risk assessment should be carried out and mitigation provided, if required; (xiii) The transport assessment should consider the net impact of changing the land use from agricultural (maize production) to mineral and include allowances for the importation of materials for restoration and importation of feedstock for anaerobic digestion at Wappingthorn Farm;	

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		(xiv) A HGV routing agreement is required , including a robust approach to monitoring adherence, to ensure that HGVs travelling to/from the site avoid the village s of Steyning and Storrington; (xv) If the traffic from the site could have a negative impact on the Air Quality Management Area in Storrington High Street, then an Air Quality Assessment is required; (xvi) Vehicular access to the site to be created at the existing gated access and shall be designed to accord with the standards and guidance within the Design Manual for Roads and Bridges and Roads in the South Downs; (xvii) There should be an assessment of the cumulative impact associated with other development (e.g. other minerals development) including landscape and transport considerations, such as the A24/A283 Washington roundabout and mitigation, if required; (xviii) Any loss of potentially high quality agricultural land should be considered and mitigation provided, if required; (xix) There are known power cables, power lines and water mains within and adjacent to the site which should be diverted or protected, as necessary; (xx) A lighting, noise, dust, odour and vibration management plan should be completed, setting out how unacceptable impacts will be avoided; (xxi) Options for restoration could include reinstating the original profile of the site and returning it to agricultural use and restoring the structure of hedgerows and hedgerow trees, with the aim of maximising farmland habitat value, and connectivity with the surrounding structure of hedgerows and lines of trees. Long term restoration should aim to maximise the habitat value by taking	

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		opportunities to link the surrounding hedgerow and woodland structure; and (xxii) A site liaison group involving the local community should be established by the operator to address issues arising from the operation of the site.	
SSR36	New Para – 7.2.8	7.2.8. East of West Heath Common (Extension), Rogate (Policies Map 9): Located near to Rogate, Chichester, the extension to West Heath Quarry is located within the South Downs National Park, and used for agricultural purposes. The site is approximately 14 hectares in size and would provide 950,000 tonnes of soft sand. Materials would be exported from the extension site to the existing quarry by conveyor or pipeline, for processing, before transport by road using the existing quarry access and routing provision. Development of this site should contribute to the Petersfield to Pulborough via Midhurst non-motorised route. The after use for this site would be to create a low level water environment that should maximise nature conservation and informal recreation. Any restoration schemed should be fully integrated with the restoration scheme on the existing site. The restoration proposals should also take account of the opportunities to improve long distance trails and key public Rights of Way. Restoration proposals should clearly relate to landscape projects in the wider South Downs National Park[3].	New Allocation – name, basic info
SSR37		[3] SSR Landscape Assessment (2019)	Corresponding footnote for new paragraph 7.2.8 and 7.2.10
SSR38	New Para – 7.2.9	The development principles for the East of West Heath Common site are as follows: (i) A project level Appropriate Assessment is required to assess potential impacts and demonstrate how this site will be delivered	The development principles for the site

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		without any adverse effect on the integrity of any Natura 2000 sites; (ii) A landscape and visual impact assessment should inform the development of proposals for the extraction of minerals from the site (including the use of conveyors or pipeline), taking into account and seeking to minimise adverse impacts on the South Downs National Park; (iii) The Landscape and Visual Impact Assessment should cross reference all other relevant studies within the Environmental Statement in order to ensure that it is fully integrated and considers both direct and indirect impacts from any proposals; (iv) Existing hedgerows, mature trees and vegetation along perimeters and within the site, should, where possible, be retained and linked to new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas; (v) There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas; (vi) Proposals should ensure that there are no significant adverse impacts on the nearby Scheduled Monuments including bridges on the A272; (vii) At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required; (viii) A hydrological assessment should be completed, evaluating and seeking to minimise the impact from the proposals on ground water and watercourses, including the River Rother SNCI;	

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		(ix) The potential for impact on the Wealden Heaths Phase II SPA and East Hampshire Hangers SAC should be considered, and mitigation applied to ensure no harm occurs; (x) Any loss of potentially high quality agricultural land should be minimised and mitigation provided, if required; (xi) A lighting, noise, dust, odour and vibration management plan should be completed, setting out how unacceptable impacts will be avoided; (xii) Consideration should be given to ensuring mitigation measures are applied to Public Footpath 861, which is 500m west of the site, and may be impacted by the use of conveyors; Proposals for restoration should be informed by a landscape and ecosystem services led strategy agreed with the SDNPA. The strategy should be informed by relevant technical assessments, contribute to the purposes of the SDNP and form a cohesive scheme with the existing quarry site. A site liaison group involving the local community should be established by the operator to address issues arising from the operation of the site	
SSR39	New Para – 7.2.10	Chantry Lane Extension, Storrington (Policies Map 10): Located near to Storrington, Horsham, the extension to Chantey Lane is located within the South Downs National Park, and used for agricultural purposes. The site is approximately 2.5 hectares in size and would provide 1,000,000 tonnes of soft sand. Extraction of material at this location would be linked to an holistic revised restoration scheme and lower levels of extraction at the existing site. The after use for this site could be a return to agricultural use, and restoration would consider enhancement of the existing woodland within the site. The restoration proposals should also take account of the opportunities to improve long distance trails and key public Rights of Way. Restoration proposals should clearly relate to landscape projects in the wider South Downs National Park .	New Allocation – name, basic info

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
SSR40	New Para – 7.2.11	The development principles for the Chantry Lane Extension are as follows: (i) A project level Appropriate Assessment is required to assess potential impacts and demonstrate how this site will be delivered without any adverse effect on the integrity of any Natura 2000 sites; (ii) A landscape and visual impact assessment should inform the development of proposals for the extraction of minerals from the site, taking into account and seeking to minimise impacts on the South Downs National Park; (iii) The Landscape and Visual Impact Assessment should cross reference all other relevant studies within the Environmental Statement in order to ensure that it is fully integrated and considers both direct and indirect impacts from any proposals; (iv) The entrance to the site should be carefully designed to minimise adverse impacts upon the South Downs National Park and its setting, and designed to accord with the standards and guidance within the Design Manual for Roads and Bridges and Roads in the South Downs; (v) During excavation there should be screening, such as perimeter mounding and planting of native trees and shrubs (including native evergreen specifies) along the boundaries to strengthen and reinforce existing screening of views into the site from the A283, and surrounding open farmland should be considered as part of the Landscape and Visual Impact Assessment process. Any screening landform and/or planting should be designed to be consistent with local landscape character in order to minimise unintended additional impacts on landscape character from incongruous screening features;	The development principles for the site

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		(vi) Existing hedgerows, mature trees and vegetation along perimeters and within the site, should, where possible, be retained and linked to new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas; (vii) There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas; (viii) At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required; (ix) A hydrological assessment should be completed, evaluating and seeking to minimise the impact from the proposals on ground water and watercourses, given its location close to the Arun Valley SPA; (x) An HGV routing agreement is required , including a robust approach to monitoring adherence, to ensure that HGVs travelling to/from the site avoid the village of Storrington; (xi) If the traffic from the site could have a negative impact on the Air Quality Management Area in Storrington High Street, then an Air Quality Assessment is required; (xii) There should be an assessment of the cumulative impact associated with other development (e.g. other minerals development) including landscape and transport considerations, such as the A24/A283 Washington roundabout and mitigation, if required; (xiii) Any loss of potentially high quality agricultural land should be minimised and mitigation provided, if required; (xiv) There are known power cables, power lines and water mains within and adjacent to the site which should be diverted or protected, as necessary;	

DRAFT

Reference	JMLP Paragraph/Policy	Proposed Modifications	Reason for proposed modification
		(xv) A lighting, noise, dust, odour and vibration management plan should be completed, setting out how unacceptable impacts will be avoided; (xvi) Proposals for restoration should be informed by a landscape and ecosystem services led strategy agreed with the SDNPA. The strategy should be informed by relevant technical assessments, contribute to the purposes of the SDNP and form a cohesive scheme with the existing quarry site. (xvii) A site liaison group involving the local community should be established by the operator to address issues arising from the operation of the site.	

DRAFT

5. Next Steps

5.1 Following this formal period of consultation to allow representations to be made on the soundness and about legal and procedural compliance in accordance with Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012, the review will be submitted for independent examination. Some changes may be suggested before they are submitted to the Secretary of State for examination.

5.2 Following examination by an independent Planning Inspector, the SSR, amended as necessary (and main modifications subject to consultation), will be taken forward and adopted as formal changes to the JMLP.

DRAFT

Appendix 1: Revised policy M2 and supporting text

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

DRAFT

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 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
(a) Proposals for land won soft sand extraction, including extensions of time and physical extensions to existing sites, will be permitted provided that: **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**

DRAFT

ii. The site is allocated within Policy M11 of this Plan, or if the proposal is on an unallocated site, it can be demonstrated that the need cannot be met through the site/s allocated for that purpose; and

iii. Where transportation by rail or water is not practicable or viable, the proposal is well-related to the Lorry Route Network.

(b) Proposals located outside the South Downs National Park that accord with part (a) must not adversely impact on its setting.

(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.

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.[4]

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

[4] West Sussex and South Downs Major Development Paper

depend on the cumulative impacts of continued working, considered in more detail by Policy M22.

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	
Actions	*Key Organisation(s)*
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.
Measure/Indicator	*Trend/Target*
- Soft sand sales - Permitted soft sand reserves	Trends: - Declining landbank within the South Downs National Park - Soft sand continues to be adequately supplied to the construction industry in West Sussex.
Intervention Levels	*Actions*
Lack of sites coming forward that are able to demonstrate exceptional	- Work with the Aggregates Working Party to monitor supplies of soft sand in the south east - Review policy

DRAFT

Appendix 2: Revised policy M11 and supporting text

2. Strategic Minerals Site Allocations

2.1. Introduction

2.1.1. This chapter identifies the mineral sites that have been allocated in the Plan in pursuit of the following **strategic objectives**; *1: To promote the prudent and efficient production and use of minerals and to ensure a steady and adequate supply, having regard to the market demand and constraints on supply in the Plan area and 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.*

2.1.2. Paragraph 204 of the NPPF requires that Local Plans should allocate sites to promote development and flexible use of land. Specifically in relation to planning for aggregate minerals, paragraph 207 of the NPPF states that Mineral Planning Authorities should plan for a steady and adequate supply by, amongst other things, identifying specific sites, preferred areas and/or areas of search and locational criteria as appropriate.

2.1.3. Allocation of a site gives certainty to the mineral industry and local communities about the acceptability 'in principle' of the use of an identified site for mineral extraction. However, all planning applications must be judged on their merits and the allocation of a site in the Plan does not mean that a proposal for the allocated use will automatically be granted planning permission; the proposal must be acceptable in its own right taking into account all the material considerations. This includes the application to the proposed development of the relevant use-specific and general development management and policies of this Plan. It should also be noted that wider (non-land use planning) controls may apply to development proposals, for example, the environmental permitting regime.

2.1.4. Development within the SDNP will need to consider its impact on the purposes of the SDNP[5] at each stage of development. Restoration of sites within or nearby to the SDNP should consider their ability to contribute to ecosystem services and biodiversity net-gain. The SDNPA will prepare a

[5] As set out in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995

DRAFT

guide to restoration of mineral sites within the SDNP and proposals should take account of this in the preparation of any planning application.

2.1.5. Although the allocated sites are currently available for mineral uses during the Plan period, circumstances may change and they may not come forward as expected. Private sector businesses (and, therefore, commercial considerations) will determine whether extraction will actually take place. Therefore, the Plan potentially allows, under the use-specific policies in the preceding chapter, for other sites to come forward for mineral extraction. Such provision will provide additional flexibility and compensate for any allocated sites that do not come forward for minerals extraction. Accordingly, the fact that a site is not allocated in the Plan does not mean that a proposal for mineral extraction at that site will not receive planning permission at some future date.

2.1.6. Following technical work and discussions with the mineral industry, statutory and other consultees, and resident and community groups, a number of guiding principals have been identified for the location of new mineral extraction sites. These sites are needed to address likely demand shortfalls for meeting needs for soft sand in West Sussex as identified in Chapter 6.

2.1.7. There are six key guiding principles that have been used to guide the identification of the allocated sites:

- ***First principle:*** *Places where there are opportunities to restore land beneficially, for example a net-gain in biodiversity.*

- ***Second principle:*** *Places without a sensitive natural or built environment and away from communities, in order to protect the amenity of businesses, residents and visitors to West Sussex*

- ***Third principle:*** *the new sites should have good access to the Lorry Route Network (LRN). Access from the site to the LRN should be acceptable 'in principle', that is, there should not be any technical issues, with regard to highway capacity and road safety, that cannot be overcome.*

- ***Fourth principle:*** *The need to protect and enhance, where possible, protected landscapes in the plan area, particularly ensuring that any major minerals development will only be considered within designated landscapes in exceptional circumstances and in the public interest.*

DRAFT

- ***Fifth principle:*** *A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments.*

- ***Sixth principle:*** *The need to avoid the needless sterilisation of minerals by other forms of development*

2.2. Strategic Mineral Site Allocation

2.2.1. A detailed technical assessment of each site has been undertaken that has not identified any overriding or fundamental constraints to the proposed forms of development on the allocated sites. This includes, for example, the potential impact of the development on amenity and character, and risk to the natural and historic environment. It is considered, therefore, that any potential unacceptable impacts can be prevented, minimised, mitigated, or compensated for to an acceptable standard. Restoration forms a key part of any application for mineral extraction and proposals should ensure appropriate mitigation through the extraction period as well as the proposals for the final land use. Pre-application advice should be sought to ensure each site is brought forward in the most appropriate way, as set out in Policy M24 Restoration and Aftercare. Accordingly, the sites allocated in Policy M11 are acceptable 'in principle' for the allocated uses.

2.2.2. Proposals for development on the allocations within the SDNP that are considered to be major development will need to demonstrate exceptional circumstances exist and the development would be in the public interest before planning permission is granted in line with policy M2.

Policy M11: Strategic Minerals Site Allocations
(a) The following site is allocated for the extraction of clay for brick making and is acceptable, in principle, for that purpose: • **Extension to West Hoathly Brickworks (Policies Map 1)** **(b) The following sites are allocated for soft sand extraction and are acceptable, in principle, for that purpose:** • **Ham Farm, Steyning (Policies Map 8)** • **East of West Heath Common (Extension) (Policies Map 9)** • **Chantry Lane Extension (Policies Map 10)** **(c) The development of the allocated sites must take place in accordance with the policies of this Plan and satisfactorily address the 'development principles' for that site identified in the supporting text to this policy.** **(d) The allocated sites will be safeguarded from any development either on or adjoining the sites that would prevent or prejudice the development of its allocated minerals use or uses.**

DRAFT

Implementation and Monitoring	
Actions/Activities	*Key Organisation(s)*
Development management process	WSCC, minerals industry
Monitoring the 'take-up' of allocated sites through the AMR	n/a
Measure/Indicator	*Trend/Target*
Number of applications for minerals working on allocated sites permitted per annum.	n/a
Type of facilities permitted on allocated sites per annum	In line with the requirements of the Plan area as set out in Policy M11
Intervention Levels	A downward trend in applications on allocated sites (compared with applications on unallocated sites). Loss of allocations to non-minerals uses or use for minerals determined as being undeliverable.

2.2.3. The broad locations of the sites allocated in Policy M11 are shown on the Key Diagram. The boundary of each allocated site is identified on the Policies Maps. The following paragraphs identify 'development principles' for the sites, that is, specific issues that will need to be addressed at the planning application stage, as and when proposals come forward for the allocated sites. Policy M11 requires these principles to be satisfactorily addressed in addition to any requirements within the use-specific and general development management policies of this Plan. Application of the Development Principles should take place alongside full consideration of the Development Management policies set out in Chapter 8.

2.2.4. ***Extension to West Hoathly Brickworks, West Hoathly (Policies map 1)***: Located in West Hoathly, Mid Sussex, the site is used for agricultural purposes and is approximately 9 hectares in size. The site would provide a 2-3 year supply of Wadhurst clay to the existing brick factory. The after use for this site would be a return to agricultural uses, or restoring part, or all, of the land to woodland. Restoration should seek to reinstate the original profile of the site.

2.2.5. The development principles for the Extension to West Hoathly Brickworks are as follows:

(xix) Phasing of clay extraction and restoration so that a series of small areas are developed in sequence, to reduce visual intrusion;

(xx) Careful siting of extraction and infrastructure on the lower areas to the northwest of the site to reduce visual intrusion on the village and Historic Park and Garden to the south;

(xxi) Perimeter mounding (using topsoil and overburden) and then planting of native trees and shrubs along the southern and eastern boundary, including some evergreen species, to screen/filter views of the village to the southeast, and Top Road to the south;

(xxii) Perimeter mounding should be carried out and then planting of native trees and shrubs along the north western boundary, to reduce visibility from views along the valley and the hills to the northwest within the wider AONB;

(xxiii) In order to minimise negative impacts on mature trees and watercourses, appropriate buffers, where no development shall take place, should be created and retained along the watercourse, and around the mature trees and ancient woodland within and adjacent to the site around these features;

(xxiv) In areas where no excavation is to occur, existing hedgerows, mature trees and vegetation should be protected and linked by new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas and reducing overall visibility across the site from surrounding areas;

(xxv) An assessment of the impact on the Ancient Woodland (Blackland Wood, Front Wood and Cookhams Shaw); should be carried out , appropriate buffers incorporated, and mitigation provided, if required in accordance with Natural England and the Forestry Commission's standing advice;

(xxvi) An assessment of the impact on the Ashdown Forest SPA/SAC, and Wakehurst & Chiddingly Woods SSSI and Weir Wood Reservoir SSSI should be carried out and mitigation provided, if required;

(xxvii) An assessment of the impact on nearby listed buildings (including Aldern House, Old Coombe House and Blackland Farmhouse) and the Historic Parkscapes (Courtlands and Northwood House) should be carried out and mitigation provided, if required;

(xxviii) At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required;

(xxix) A flood risk assessment should be carried out, and mitigation provided, if required;

(xxx) Potential impacts on the Crawley AQMA resulting from site operations and HGV traffic should be identified and mitigation set out if required;

(xxxi) Opportunities should be sought to enhance future public access.;

(xxxii) Access to the site should be through the existing brickworks;

(xxxiii) As the site contains Grade 3 Agricultural Land Quality, an assessment should be undertaken of the of potential for high quality agricultural land should be undertaken, and mitigated provided, if required;

DRAFT

(xxxiv) The power line and BT line should be diverted or protected, as necessary;

(xxxv) The site shall be restored either to agricultural or woodland use in accordance with the following principles, either:

a. Reinstate the original profile of the site and returning it to agricultural use. Long term restoration should aim to restore and reinforce existing landscape elements in keeping with the surrounding pattern, including the structure of hedgerows and hedgerow trees. It should aim to maximise the farmland habitat value and connectivity with the surrounding structure of hedgerows and woodland. It should also include the creation of ponds, a notable feature of the local landscape and important component of the habitat diversity of the area, or,
b. Restoring all or part of the site to woodland following extraction. Long term restoration should aim to maximise the habitat value by taking opportunities to link it into the surrounding structure of hedgerows and woodland. It should also include the creation of ponds, a notable feature of the local landscape and important component of the habitat diversity of the area.

(xxxvi) A site liaison group involving the local community should be established if necessary, by the operator to address issues arising from the operation of the site.

2.2.6. ***Ham Farm, Steyning (Policies Map 8)***: Located in Steyning, Horsham, the site is used for agricultural purposes, and is approximately 7.9 hectares in size. It would provide 725,000 tonnes of soft sand. Materials would be exported from the site by road. The after use for this site would be a return to agricultural use, and restoration would consider enhancement of the existing woodland within the site.

2.2.7. The development principles for Ham Farm are as follows:

(xxiii) A project level Appropriate Assessment is required to assess potential impacts and demonstrate how this site will be delivered without any adverse effect on the integrity of any Natura 2000 sites

(xxiv) A landscape and visual impact assessment should inform the development of proposals for the extraction of minerals from the site, taking into account and seeking to minimise impacts on the South Downs National Park and its setting, and Wiston Park;

(xxv) The Landscape and Visual Impact Assessment should cross reference all other relevant studies within the Environmental Statement in order to ensure that it is fully integrated and considers both direct and indirect impacts from any proposals;

DRAFT

(xxvi) The access should be carefully sited to ensure lines of mature broadleaf trees remain intact. A tree survey and arboricultual impact assessment in accordance with "BS5837 Trees in Relation to Design, Demolition and Construction 2012" should be provided to ensure that retained trees are adequately protected from site operations and that any to be removed are clearly identified and appropriate mitigation proposed;

(xxvii) The entrance to the site should be carefully designed to minimise adverse impacts upon the South Downs National Park and its setting;

(xxviii) During excavation there should be screening, such as perimeter mounding and planting of native trees and shrubs (including native evergreen specifies) along the eastern and southern boundaries to strengthen and reinforce existing screening of views into the site from the A283, Cherrytree Rough to the north and surrounding open farmland should be considered as part of the Landscape and Visual Impact Assessment process. Any screening landform and/or planting should be designed to be consistent with local landscape character in order to minimise unintended additional impacts on landscape character from incongruous screening features;

(xxix) Existing hedgerows, mature trees and vegetation along perimeters and within the site, should, where possible, be retained and linked to new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas;

(xxx) There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas;

(xxxi) A historic building setting impact assessment of nearby listed buildings (including but not limited to Horsebrook Cottage and Wappingthorn Manor) should be carried out and mitigation provided, if required;

(xxxii) At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required;

(xxxiii) A hydrological assessment should be completed, evaluating and seeking to minimise the impact from the proposals on ground water and watercourses, including but not limited to, Alderwood Pond and Wiston Pond;

(xxxiv) A flood risk assessment should be carried out and mitigation provided, if required;

(xxxv) The transport assessment should consider the net impact of changing the land use from agricultural (maize production) to mineral and include allowances for the importation of materials for restoration and importation of feedstock for anaerobic digestion at Wappingthorn Farm;

DRAFT

(xxxvi) A HGV routing agreement is required , including a robust approach to monitoring adherence, to ensure that HGVs travelling to/from the site avoid the village s of Steyning and Storrington;

(xxxvii) If the traffic from the site could have a negative impact on the Air Quality Management Area in Storrington High Street, then an Air Quality Assessment is required;

(xxxviii) Vehicular access to the site to be created at the existing gated access and shall be designed to accord with the standards and guidance within the Design Manual for Roads and Bridges and Roads in the South Downs;

(xxxix) There should be an assessment of the cumulative impact associated with other development (e.g. other minerals development) including landscape and transport considerations, such as the A24/A283 Washington roundabout and mitigation, if required;

(xl) Any loss of potentially high quality agricultural land should be considered and mitigation provided, if required;

(xli) There are known power cables, power lines and water mains within and adjacent to the site which should be diverted or protected, as necessary;

(xlii) A lighting, noise, dust, odour and vibration management plan should be completed, setting out how unacceptable impacts will be avoided;

(xliii) Options for restoration could include reinstating the original profile of the site and returning it to agricultural use and restoring the structure of hedgerows and hedgerow trees, with the aim of maximising farmland habitat value, and connectivity with the surrounding structure of hedgerows and lines of trees. Long term restoration should aim to maximise the habitat value by taking opportunities to link the surrounding hedgerow and woodland structure; and

(xliv) A site liaison group involving the local community should be established by the operator to address issues arising from the operation of the site.

2.2.8. ***East of West Heath Common (Extension), Rogate (Policies Map 9)***: Located near to Rogate, Chichester, the extension to West Heath Quarry is located within the South Downs National Park, and used for agricultural purposes. The site is approximately 14 hectares in size and would provide 950,000 tonnes of soft sand. Materials would be exported from the extension site to the existing quarry by conveyor or pipeline, for processing, before transport by road using the existing quarry access and routing provision. Development of this site should contribute to the Petersfield to Pulborough via Midhurst non-motorised route. The after use for this site would be to create a low level water environment that should maximise nature conservation and informal recreation. Any restoration schemed should be fully integrated with the restoration scheme on the existing site. The restoration proposals should also take account of the

DRAFT

opportunities to improve long distance trails and key public Rights of Way. Restoration proposals should clearly relate to landscape projects in the wider South Downs National Park[6].

2.2.9. The development principles for the East of West Heath Common site are as follows:

(xiii) A project level Appropriate Assessment is required to assess potential impacts and demonstrate how this site will be delivered without any adverse effect on the integrity of any Natura 2000 sites;

(xiv) A landscape and visual impact assessment should inform the development of proposals for the extraction of minerals from the site (including the use of conveyors or pipeline), taking into account and seeking to minimise adverse impacts on the South Downs National Park;

(xv) The Landscape and Visual Impact Assessment should cross reference all other relevant studies within the Environmental Statement in order to ensure that it is fully integrated and considers both direct and indirect impacts from any proposals;

(xvi) Existing hedgerows, mature trees and vegetation along perimeters and within the site, should, where possible, be retained and linked to new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas;

(xvii) There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas;

(xviii) Proposals should ensure that there are no significant adverse impacts on the nearby Scheduled Monuments including bridges on the A272;

(xix) At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required;

(xx) A hydrological assessment should be completed, evaluating and seeking to minimise the impact from the proposals on ground water and watercourses, including the River Rother SNCI;

(xxi) The potential for impact on the Wealden Heaths Phase II SPA and East Hampshire Hangers SAC should be considered, and mitigation applied to ensure no harm occurs;

(xxii) Any loss of potentially high quality agricultural land should be minimised and mitigation provided, if required;

(xxiii) A lighting, noise, dust, odour and vibration management plan should be completed, setting out how unacceptable impacts will be avoided;

1.1.1. [6] SSR Landscape Assessment (2019)

DRAFT

(xxiv) Consideration should be given to ensuring mitigation measures are applied to Public Footpath 861, which is 500m west of the site, and may be impacted by the use of conveyors;

(xxv) Proposals for restoration should be informed by a landscape and ecosystem services led strategy agreed with the SDNPA. The strategy should be informed by relevant technical assessments, contribute to the purposes of the SDNP and form a cohesive scheme with the existing quarry site. A site liaison group involving the local community should be established by the operator to address issues arising from the operation of the site.

2.2.10. ***Chantry Lane Extension, Storrington (Policies Map 10)***: Located near to Storrington, Horsham, the extension to Chantey Lane is located within the South Downs National Park, and used for agricultural purposes. The site is approximately 2.5 hectares in size and would provide 1,000,000 tonnes of soft sand. Extraction of material at this location would be linked to an holistic revised restoration scheme and lower levels of extraction at the existing site. The after use for this site could be a return to agricultural use, and restoration would consider enhancement of the existing woodland within the site. The restoration proposals should also take account of the opportunities to improve long distance trails and key public Rights of Way. Restoration proposals should clearly relate to landscape projects in the wider South Downs National Park[7].

2.2.11. The development principles for the Chantry Lane Extension are as follows:

(xviii) A project level Appropriate Assessment is required to assess potential impacts and demonstrate how this site will be delivered without any adverse effect on the integrity of any Natura 2000 sites;

(xix) A landscape and visual impact assessment should inform the development of proposals for the extraction of minerals from the site, taking into account and seeking to minimise impacts on the South Downs National Park;

(xx) The Landscape and Visual Impact Assessment should cross reference all other relevant studies within the Environmental Statement in order to ensure that it is fully integrated and considers both direct and indirect impacts from any proposals;

(xxi) The entrance to the site should be carefully designed to minimise adverse impacts upon the South Downs National Park and its setting, and designed to accord with the standards and guidance within the Design Manual for Roads and Bridges and Roads in the South Downs;

1.1.2. [7] SSR Landscape Assessment (2019)

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(xxii) During excavation there should be screening, such as perimeter mounding and planting of native trees and shrubs (including native evergreen specifies) along the boundaries to strengthen and reinforce existing screening of views into the site from the A283, and surrounding open farmland should be considered as part of the Landscape and Visual Impact Assessment process. Any screening landform and/or planting should be designed to be consistent with local landscape character in order to minimise unintended additional impacts on landscape character from incongruous screening features;

(xxiii) Existing hedgerows, mature trees and vegetation along perimeters and within the site, should, where possible, be retained and linked to new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas;

(xxiv) There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas;

(xxv) At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required;

(xxvi) A hydrological assessment should be completed, evaluating and seeking to minimise the impact from the proposals on ground water and watercourses, given its location close to the Arun Valley SPA;

(xxvii) An HGV routing agreement is required , including a robust approach to monitoring adherence, to ensure that HGVs travelling to/from the site avoid the village of Storrington;

(xxviii) If the traffic from the site could have a negative impact on the Air Quality Management Area in Storrington High Street, then an Air Quality Assessment is required;

(xxix) There should be an assessment of the cumulative impact associated with other development (e.g. other minerals development) including landscape and transport considerations, such as the A24/A283 Washington roundabout and mitigation, if required;

(xxx) Any loss of potentially high quality agricultural land should be minimised and mitigation provided, if required;

(xxxi) There are known power cables, power lines and water mains within and adjacent to the site which should be diverted or protected, as necessary;

(xxxii) A lighting, noise, dust, odour and vibration management plan should be completed, setting out how unacceptable impacts will be avoided;

(xxxiii) Proposals for restoration should be informed by a landscape and ecosystem services led strategy agreed with the SDNPA. The strategy should be informed by relevant technical assessments, contribute to the purposes of the SDNP and form a cohesive scheme with the existing quarry site.

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(xxxiv) A site liaison group involving the local community should be established by the operator to address issues arising from the operation of the site.

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