

West Sussex County Council and South Downs National Park Authority

Joint Minerals Local Plan Single Issue Review

Regulation 19

Sustainability Appraisal Main Report

Prepared by South Downs National Park Authority

Draft

September 2019

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1. Introduction

- 1.1 This Sustainability Appraisal Report has been prepared by the South Downs National Park Authority (SDNPA) as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Soft Sand Single Issue Review (SSR) which will form part of the West Sussex and South Downs National Park Joint Minerals Local Plan (hereafter referred to as the JMLP) which was adopted in 2018.
- 1.2 This report supports the Single Issue Review Proposed Submission draft Regulation 19 document and it should be read in conjunction with that document.
- 1.3 The National Planning Policy Framework (NPPF) advises that planning authorities should produce Local Plans and that a series of separate Development Plan Documents should only be produced where justified. The Planning Inspector for the JMLP required the SSR to be carried out on adoption of the JMLP and the SSSR Reg19 will be the second stage in that process.
- 1.4 The preparation of the JMLP (2018) was subject to a full Sustainability Appraisal (SA), in line with the Planning and Compulsory Purchase Act 2004 and current Government planning policy (the NPPF). The preparation of the JMLP was also be in accordance with the requirements of European Directive 2001/42/EC (known as the Strategic Environment Assessment, or SEA Directive). The SSR will follow the same processes and procedures although ultimately the SSR will form a new chapter of the JMLP and will not exist as a standalone document.
- 1.5 In relation to soft sand strategy, the Inspector of the JMLP was “unable to conclude that the approach to soft sand is justified and offers the most appropriate strategy, as I consider all the reasonable alternatives have not been considered or appraised in the SA”. The Authorities have now assessed all reasonable alternative options for soft sand as part of the SSR and this SA have formed part of that process.

About Sustainability Appraisal and Strategic Environmental Assessment

- 1.6 The purpose of SA is to promote sustainable development by integrating sustainability considerations in to the preparation and adoption of plans. This SA Report has been prepared to provide key stakeholders and members of the public with information on the process and the findings of the SA undertaken in preparing the SSR Reg19 document.
- 1.7 The SA is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the Development Plan Document (DPD) preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process appraises the likely social, environmental and economic effects of the strategies and policies within a DPD (in this case the SSR for the JMLP) from the outset of its development.
- 1.8 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment, and set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA, as defined in Article 1 of the SEA Directive is ‘to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development’.

- I.9 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses only on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. The Government's Sustainability Appraisal guidance outlines how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations.

Scope of the JMLP and SSR

- I.10 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 2018 (NPPF).
- I.11 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 to ensure that a steady and adequate supply can be maintained.

Soft Sand Review

- I.12 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, requiring the Authorities to undertake a review to address the shortfall in soft sand to the end of the JMLP plan period (2033); and to remove the proposed Ham Farm allocation from Policy M11.
- I.13 This Single Issue Review (SSR) must consider the strategy for how the shortfall will be met and, as required, the potential need for allocating sites for soft sand extraction
- I.14 Preparation of the Single Issue Review (SSR) 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 (2018).
- I.15 The SSR must 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. The timetable for the SSR is set out in the statutory management plan, the West Sussex Minerals and Waste Development Scheme.
- I.16 Once adopted, the SSR will integrate into the JMLP to provide an up-to-date and robust policy for Soft Sand. The SSR covers the following three key matters:
- The identified need for soft sand during the period to 2033;
 - The supply strategy, that is, the options that can, either singularly or in combination, be used to meet any identified shortfall; and
 - The identification of potential sites and, if required, the selection of one or more of those sites to meet identified need

Aims and structure of the report

I.17 This report is the SA/SEA report for SSR Reg 19 November 2019. It has been prepared in the spirit of the integrated approach to SEA and SA, and throughout the report, the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

I.18 The remainder of this report is structured into the following chapters:

- Chapter 2 – Methodology, describes the stages of the SA process and the approach used for the specific SA tasks, including how reasonable alternatives have been identified and appraised.
- Chapter 3 – Sustainability Context for Minerals Development in West Sussex, summarise the SSR of the JMLP's relationship with other relevant plans, policy and strategies, summarise the social, economic and environmental characteristics of West Sussex, and identify the key sustainability issues relating to mineral development within West Sussex.
- Chapter 4 – Sustainability Appraisal Framework and Assumptions, describes the SA Framework and the assumptions used for assessing the potential sustainability effects of the SSR of the JMLP.
- Chapter 5 – Assessment of Issues and Options, provides commentary and summarises the assessment tables that form Appendix 3 of this report. The assessment of Issues has been updated and the assessment of Options considers each potential combination of options in turn.
- Chapter 6 – Assessment of Sites, provides commentary and summarises the Site Assessment tables set out in Appendix 4 of this report. Site assessments have been updated to reflect updated technical evidence.
- Chapter 7 – Initial findings, brings the Options and Site Assessments together to inform the proposed strategy for the SSR.
- Chapter 8 – SA of proposed policy wording considers draft policies M2 and M1 I and sets out how the SA process has influenced development of the policies
- Chapter 9 – Monitoring, sets out how the monitoring of the SSR will be taken forward and Next Steps, sets out how the SSR and SA will progress.

I.19 As referred to above, there are also a number of supporting appendices:

Appendix 1 Plans, Policies and Programmes

Appendix 2 SA Assumptions and decision making criteria

Appendix 3 SA Tables: Options A, B, C, D, E

Appendix 4 SA Tables: Issues and Revised Options (E1, E2, E3, E4, E5, E6)

Appendix 5 SA Tables: Site Assessments

Appendix 6 Assessment of draft policies M2 and M1 I

2. Methodology

Key stages in the SA/SEA process

- 2.1 In addition to complying with legal requirements, the approach being taken to the SA of the SSR for the JMLP is based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process. Figure 1 below sets out the main stages of the plan-making process and shows how these correspond to the SA process.
- 2.2 Figure 2 signposts how the legal requirements of the SEA Directive have been met as set out in this SA Report.

Figure 1: Corresponding stages in plan making and SA

Local Plan Step	SA Stages and Tasks
Step 1: Evidence gathering and engagement	Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope <i>1: Identifying other relevant policies, plans and programmes, and sustainability objectives</i> <i>2: Collecting baseline information</i> <i>3: Identifying sustainability issues and problems</i> <i>4: Developing the SA framework</i> <i>5: Consulting on the scope of the SA</i>
Step 2: Production of the Local Plan	Stage B: Developing and refining options and assessing effects <i>1: Testing the Plan objectives against the SA Framework</i> <i>2: Developing the Plan options</i> <i>3: Evaluating the effects of the Plan</i> <i>4: Considering ways of mitigating adverse effects and maximising beneficial effects</i> <i>5: Proposing measures to monitor the significant effects of implementing the Plans</i> Stage C: Preparing the Sustainability Appraisal Report <i>1: Preparing the SA Report</i> Stage D: Seek representations on the Plan and the Sustainability Appraisal Report <i>1: Public participation on Plan and the SA Report</i> <i>2(i): Appraising significant changes</i>
Step 3: Examination	<i>2(ii): Appraising significant changes resulting from representations</i>
Step 4 & 5: Adoption and Monitoring	<i>3: Making decisions and providing information</i> Stage E: Monitoring the significant effects of implementing the Plan <i>1: Finalising aims and methods for monitoring</i> <i>2: Responding to adverse effects</i>

Figure 2: SEA Directive Requirements

SEA Directive Requirements	Where covered in this SA Report
<ul style="list-style-type: none"> Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I): 	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 3, Appendix I
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3
c) The environmental characteristics of areas likely to be significantly affected.	Chapter 3
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3, Appendix I
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Chapter 3, Appendix I
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long- term permanent and temporary, positive and negative effects)	Chapters 5, 6, 7, 8 Appendices of Assessments 2-6.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapters 5, 6, 7, 8 Appendices of Assessments 2-6.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2, Chapter 4, Assessment Tables
i) A description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 9 (related to full SA of JMLP)
j) A non-technical summary of the information provided under the above headings	A separate non-technical summary document will be published to accompany this SA report.
<ul style="list-style-type: none"> The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately 	

assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	
<ul style="list-style-type: none"> • Consultation: Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4) 	Chapter 2. Consultation on revised scoping report carried out in late 2018.
<ul style="list-style-type: none"> • Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2) 	Consultation will take place in late 2019.
<ul style="list-style-type: none"> • Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	Not applicable.
<ul style="list-style-type: none"> • Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed: <ul style="list-style-type: none"> ○ the plan or programme as adopted ○ a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and ○ • the measures decided concerning monitoring (Art. 9) 	Will be carried out at the plan making stage indicated in Figure I.
<ul style="list-style-type: none"> • Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10) 	Will be carried out at the plan making stage indicated in Figure I.
<ul style="list-style-type: none"> • Quality assurance; environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12). 	The Authorities have undertaken all work in accordance with the relevant parts of the SEA Directive.

What has been involved in the SA process so far

Stage A: Scoping

- 2.3 The SA process for the JMLP began in 2014 with the production of a Scoping Report for which was prepared by LUC on behalf of WSCC and SDNPA.
- 2.4 The Scoping stage of SA involves collating information about the social, economic and environmental baseline for the plan area and the key sustainability issues facing it, as well as information about the policy context for the preparation of the plan. The SA Scoping Report presented the outputs of the following tasks.
- 2.5 Policies, plans and programmes of relevance to the JMLP were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.

- 2.6 In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and the landscape. Data on social and economic issues were also taken in to consideration. This baseline information provides the basis for predicting and monitoring the likely effects of the JMLP and helps to identify alternative ways of dealing with any adverse effects identified. As with the review of plans, policies and programmes, baseline information that was collated in relation to the SA of the West Sussex Waste Local Plan was drawn upon. The baseline information for the SA of the Waste Local Plan was last updated in March 2013, therefore, where relevant, it was updated and revised further to provide an appropriate focus in relation to the JMLP.
- 2.7 Drawing on the review of relevant plans, policies and programmes and the baseline information, key sustainability issues for West Sussex were identified (including environmental problems, as required by the SEA Regulations). Consideration was given to the likely evolution of each issue, if the Local Plan were not to be implemented.
- 2.8 A Sustainability Appraisal 'framework' was then presented, setting out the SA objectives against which options and subsequently policies, and sites in the JMLP would be appraised. The SA framework provides a way in which the sustainability impacts of implementing a plan can be described, analysed and compared. The SA framework comprises a series of sustainability objectives and subsidiary questions that can be used to 'interrogate' options and draft policies, and sites during the plan-making process. These SA objectives define the long- term aspirations of WSCC and SDNPA with regard to social, economic and environmental issues in relation to minerals development in the plan area. During the SA, the performance of the policy and site options (and subsequently draft policies and site allocations) is assessed against these SA objectives and sub-questions.
- 2.9 The review of relevant plans, policies and programmes and the baseline information will be updated as necessary during each stage of the SA process to ensure that they reflect the current situation in West Sussex and continue to provide an accurate basis for assessing the likely effects of the JMLP. As such, Chapter 3 and Appendices 2 and 3 of the SA of the JMLP include updated versions of the review of relevant plans, policies and programmes and baseline information.
- 2.10 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The SA Scoping Report for the JMLP was published in June 2014 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England). The comments received during the consultation were then reviewed and addressed as appropriate and a final version of the Scoping Report was published in January 2015. A further consultation with the statutory consultees on the SA Scoping Report was undertaken in September 2018 in preparation for the SSR I&O Consultation in January 2019. The statutory consultees confirmed the SA Scoping Report was fit for purpose subject to the updating of references to certain Plans, Policies and Projects. These were incorporated into the following stages of the SA Report.

Stage B: Development and Refining Options Assessing Effects

- 2.11 Developing options for a plan is an iterative process undertaken by the local planning authority usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan, for example, additional sites that may be suitable for development.

The SA can also help decision makers by identifying the potential positive and negative sustainability effects of each option.

2.12 Regulation 12 (2) of the SEA Regulations requires that:

“The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of —

implementing the plan or programme; and

reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme”

2.13 It should be noted that any alternatives considered to the plan need to be “reasonable”. This implies that alternatives that are “not reasonable” do not need to be subject to appraisal. Examples include alternatives that do not meet the objectives of the plan or national policy, for example the NPPF, or are not within the geographical scope of the plan.

2.14 It also needs to be recognised that the SEA and SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. There will often be an equal number of positive or negative effects identified for each option, such that it is not possible to ‘rank’ them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability, conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

Proposed Submission Draft JMLP (April 2016)

2.15 The options or reasonable alternatives that have been considered during development of the Draft JMLP April 2016 comprised the following:

- Proposed Vision and Strategic Objectives.
- Policy Options (covering Minerals Supply, Minerals Resource Safeguarding and Minerals Infrastructure Safeguarding).
- Potential Minerals Site Options.

2.16 WSCC and SDNPA prepared a Background Document which describes in detail how the options were identified and their evolution into policies within the JMLP. Table A4.1 in Appendix 4 of the SA for the JMLP summarises the audit trail of the reasonable alternatives considered by WSCC and the SDNPA for each policy area in the MLP at each stage in its development, and explains which alternatives were taken forward into the final JMLP or discounted. The reasonable site options were presented in Appendix 7 (which also includes the appraisal findings for all of the site options).

Proposed Submission Draft JMLP (January 2017)

2.17 As a result of consultation responses received, the Authorities made a number of amendments to the Vision, Strategic Objectives and Policies following the consultation on the Regulation 18 Draft JMLP in April-June 2016. The changes to the Vision, Strategic Objectives and Policies that have been made in the Proposed Submission Draft JMLP and the reasons for the changes are shown in Table A4.2 in Appendix 4 of that SA report,

SSR Issues and Options

- 2.18 The SA for the SSR prepared a high level assessment of the proposed Issues, Options and Sites as guided by the original SA for the JMLP and the Inspector's report for JMLP.

Stage C: Preparing the SA Report

- 2.19 The JMLP SA Report describes the process undertaken to date in carrying out the SA of the JMLP. It sets out the findings of the appraisal, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the plan, and outlining proposed monitoring measures.
- 2.20 Each policy option and site was assessed against each SA objective, and a judgement was made with regards to the likely effect that they would have on that objective. These judgements were recorded as a colour coded symbol, as shown below in Figure 3. (This is the same colour coding and symbol table carried forward to the SSR SA).
- 2.21 The scoring was reviewed prior to the SA of the SSR Issues and Options (2019). No changes were made to the scoring system at that stage and the same scoring table has been used to assess all stages of the SA of the draft Pre-Submission Soft Sand Single Issue Review.

Figure 3: Key to symbols and colour coding used in the SA of the JMLP (and SSR)

++	The policy is likely to have a significant positive impact on the SA objective(s).
+	The policy is likely to have a minor positive impact on the SA objective(s).
0	The policy is likely to have a negligible or no impact on the SA objective(s).
+/-	The policy is likely to have a mixture of positive and negative impacts on the SA objective(s).
-	The policy is likely to have a minor negative impact on the SA objective(s).
--	The policy is likely to have a significant negative impact on the SA objective(s).
?	It is uncertain what effect the policy will have on the SA objective(s).

Stage D: Consultation

- 2.22 WSCC and SDNPA consulted on the SA, and options for soft sand, for the Regulation 19 Pre-Submission JMLP between January and March 2017. The SA for the SSR I&O was published for consultation between January and March 2019. This SA report is for the Pre Submission SSR Reg19 consulted upon between November 2019 and February 2020.

Stage E: Monitoring

- 2.23 Stage E will follow adoption of the SSR. The SEA Regulations and the Government's SA Guidance require that the Sustainability Report includes a description of measures envisaged concerning monitoring. Monitoring related to the matter of soft sand is considered in Chapter 9 of this SA Report. The wider monitoring approach is discussed in Chapter 7 of the JMLP SA.

3. Summary of review of Plans, Policies and Programmes

Review of Plans, Policies and Programmes

- 3.1 This section addresses the SEA Directive requirements in Annex I:
an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes; and
(e) the environmental protection objectives, established at international, Community or Member State level which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.
- 3.2 Relationship between JMLP and other relevant plans and programmes, including their environmental protection objectives
- 3.3 The JMLP and SSR are not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and plans, such as the National Park Management Plan and emerging Local Plan and those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level.
- 3.4 A review has been undertaken of the other plans, policies and programmes that are relevant to the JMLP. The purpose of the review of other plans and strategies is to understand how they will influence the preparation of the JMLP and the SA. Appendix I lists relevant plans, programmes and strategies. The list is not and cannot be exhaustive. The review has only sought to identify key documents which reflect local, national and international social, economic and environmental issues. In line with the SEA Directive requirements, Appendix I of this report identifies the relationship that the plans and policies have with the development of the JMLP (and SSR) and also shows how the environmental, social and economic objectives contained within those plans and policies have been taken into account during preparation of the JMLP, SSR and also the SA.
- 3.5 The most significant developments in terms of the policy context for the SSR are the adoption of the JMLP in 2018 which will provide a set of up to date development management policies for minerals development, the adoption of the South Downs Local Plan (2019) and the 2019 update to the NPPF.
- 3.6 The JMLP and SSR must be consistent with the requirements of the NPPF, which sets out information about the purposes of local plan-making. It states that:

“11. Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.

- 3.7 However, with respect to the SDNP, the NPPF acknowledges that specific policies in the Framework, including National Park designation, may indicate development should be restricted. 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 states 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.
- 3.8 While the NPPF 2012 replaced a number of former Minerals Policy Statements, the principles for minerals planning were retained and included in the NPPF 2018, most notably:
- The maintenance of landbanks for crushed rock and sand and gravel.
 - Designation of Mineral Safeguarding Areas.
 - Safeguarding existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways or minerals.
 - Providing for restoration and aftercare at the earliest opportunity and to high environmental standards.
 - Setting out environmental criteria against which planning applications will be assessed.
- 3.9 A full list of the Plans, Policies and Programmes is contained in Appendix I.

Baseline Information

- 3.10 This section addresses the SEA Directive requirements in Annex I:
- the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme; and the environmental characteristics of areas likely to be significantly affected.*
- 3.11 Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the ‘Birds Directive’] and 92/43/EEC [the ‘Habitats Directive’].
- 3.12 Baseline information provides the context for assessing the sustainability of proposals in the JMLP and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.
- 3.13 The baseline data focuses on key indicators which are readily available and can be updated to illustrate the environmental, social and economic issues. The choice of baseline data has been informed by the previous stages in the SA process. Potentially a key limitation of the SA process is gaps in baseline data. Appendix 3 of the overarching report SA report for the JMLP provides an extensive discussion on the relevant baseline information for West Sussex and in particular the role of minerals development.

- 3.14 Annex I(f) of the SEA Directive requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors (these are often referred to as 'SEA Topics'). As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included; for example information about housing, social inclusiveness, transport, energy, minerals and economic growth.

Key Sustainability Issues

- 3.15 Identification of the key sustainability issues, and consideration of how these issues might develop over time if the JMLP is not prepared, help to meet the requirements of Annex I of the SEA Directive to provide information on:

(b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan; and

Any existing environmental problems which are relevant to the plan.

- 3.16 An up-to-date set of key sustainability issues facing West Sussex was identified during the Scoping stage of the SA and was presented in the Scoping Report. Figure 4 describes the likely evolution of each key sustainability issue if the SSR of the JMLP were not to be adopted.

Figure 4 Key sustainability issues for West Sussex and the likely evolution of the environment in the absence of the JMLP and the SSR

No.	Key Sustainability Issues	The likely evolution of the environment in the absence of the JMLP and SRR
1	<p>Poor health in some areas</p> <p>There are some communities in West Sussex that are relatively deprived, mainly in the towns along the coastal strip and in Crawley. Deprivation has a strong direct association with poorer health as well as other aspects of life that influence wellbeing, such as employment.</p>	<p>In the absence of the JMLP, there may be negative impacts on human health in some areas of West Sussex as a result of less stringent mitigation or poorly planned minerals development. However, there are fewer minerals sites in and around the towns along the coastal strip, and the minerals sector also contributes to employment levels, particularly in Adur District. Therefore, in the absence of the JMLP, employment in the minerals sector may decrease and have indirect effects on health and well-being due to unemployment.</p>
2	<p>Lower employment levels</p> <p>In 2015, 82.6% of residents that were of working age were employed, with 4.3% of residents unemployed. Unemployment rates were lower in 2015 than the average for the South East and Great Britain.</p> <p>Also, a 2011 study to inform the West Sussex Local Economic Assessment showed that employment in the mining and quarrying</p>	<p>In the absence of the JMLP, employment in the minerals sector within West Sussex may further decrease.</p>

No.	Key Sustainability Issues	The likely evolution of the environment in the absence of the JMLP and SRR
	<p>sector grew from 2001 to 2008 by 0.2%, but employment in the sector is projected to decrease from 2008 to 2026 by 0.1%.</p>	
3	<p>Difficulties in terms of protecting West Sussex's environment whilst providing minerals needed by society</p> <p>Minerals can only be worked where they are found, and due to the close correlation between the location of mineral resources and areas of high quality and designated landscapes, which are considered to be sensitive environments, the need for mineral working should be balanced against the impact on protected landscapes.</p>	<p>In the absence of the JMLP, and appropriate policies, there may be damage to valued landscapes and sensitive environments within West Sussex as a result of less stringent mitigation or poorly planned minerals development. However, there is a high level of protection afforded to internationally and nationally designated landscapes, nature conservation sites and cultural heritage sites within the NPPF.</p>
4	<p>Declines in condition status of West Sussex's biodiversity</p> <p>Overall the county has lost 28% of the semi-natural habitat that existed in 1971.</p> <p>77% of SSSI were in favourable condition in 2012 compared to 85% in 2008. Only 46.31% were in 'favourable' condition in 2014, and 51.78% were in an 'unfavourable recovering' condition.</p>	<p>The provision of minerals for society's needs may cause adverse effects to the natural environment. However, JMLPs contain policies which aim to protect and enhance the environment. Despite the high level of protection afforded to internationally and nationally designated nature conservation sites within the NPPF, without the JMLP it is more likely that environmental designations in the County could be adversely affected by poorly planned minerals development or with less stringent mitigation measures applied. In addition to designated nature conservation sites, wider habitat networks (including BAP habitats) and land used by protected species could be adversely affected. The opportunity to protect and enhance the environment and achieve net biodiversity gains (e.g. through restoration) could be limited.</p>
5	<p>Changes in landscape character and tranquillity</p> <p>There are two Areas of Outstanding Natural Beauty (AONB) in the County, South Downs National Park (SDNP) and other important Landscape Character Areas. There is the potential for minerals development to contribute to detrimental</p>	<p>Despite the high level of protection afforded to nationally designated landscapes, within the NPPF, in the absence of the JMLP and appropriate policies there may be inappropriate mineral development within valued landscapes within West Sussex or adverse effects to them as a result of less stringent mitigation or poorly planned minerals development.</p>

No.	Key Sustainability Issues	The likely evolution of the environment in the absence of the JMLP and SRR
	<p>changes in landscape character in the County and plans should endeavour to avoid or minimise impacts as much as possible.</p> <p>The percentage of landscape classified as tranquil has reduced since 1960 when it was 69%, to 35% in 2007.</p>	
6	<p>Potential for damage to the historic environment</p> <p>In West Sussex there are 235 Conservation Areas, 7,532 Listed Buildings (including 176 Grade I, and 300 Grade II* listed buildings), 34 Registered Park and Gardens, and 346 Scheduled Monuments.</p>	<p>Despite the high level of protection afforded to nationally designated cultural heritage sites within the NPPF, in the absence of the JMLP and appropriate policies there may be adverse effects to West Sussex's cultural heritage (including architecture and archaeology) as a result of less stringent mitigation or poorly planned minerals development.</p>
7	<p>Climate change: warmer, wetter winters; drier summers, increase in flash flooding.</p> <p>134 extreme weather events between 1998 and 2008 in West Sussex.</p> <p>In the south east, it is estimated that in 2050/18, the winter mean temperature will rise by 2.5°C and the summer mean temperature will rise by 3.1 °C¹⁹</p>	<p>Despite policies in the NPPF, in the absence of the JMLP and specific policies aimed at combating climate change and reducing the impacts, it is likely that contributions to climate change from minerals development in West Sussex will not be appropriately controlled and mitigated.</p>
8	<p>Increases in greenhouse gas emissions</p> <p>UK Greenhouse gas emissions: 22.9 million tonnes (mt) from HGVs (2012 data).</p>	<p>Despite policies in the NPPF, in the absence of the JMLP and specific policies aimed at combating greenhouse gas emissions and therefore climate change and reducing the impacts, it is likely that greenhouse gas emissions from minerals development in West Sussex will not be appropriately controlled and mitigated.</p>
9	<p>Potential for flooding</p> <p>Certain areas in West Sussex are becoming more vulnerable and prone to coastal, fluvial, groundwater and surface water flooding.</p> <p>Currently 12.6% of West Sussex is within a flood plain.</p>	<p>In the absence of the JMLP the potential for flooding is unlikely to be affected due to national policy included in the NPPF.</p> <p>Although, in the absence of the JMLP there is unlikely to be the opportunity to increase flood storage capacity, as some mineral developments (e.g. sand and gravel sites) are compatible with all flood risk zones and therefore once restored can be used as a means of flood storage.</p>

No.	Key Sustainability Issues	The likely evolution of the environment in the absence of the JMLP and SRR
10	<p>Water Quality</p> <p>The water quality within the County is not yet meeting 'good' ecological status in regards to the EU Water Framework Directive. Only 19% of water bodies within the County have good ecological status.</p> <p>In West Sussex there are 30 groundwater bodies and 33% are classified as good overall. The chalk resource in particular acts as an important aquifer in the South East and provides the principle source of water supply in West Sussex.</p>	<p>In the absence of the JMLP and policies aimed at the protection of the water environment, water bodies and hydrological regimes in West Sussex are more likely to be adversely affected as a result of less stringent mitigation or poorly planned minerals development.</p>
11	<p>Air Quality</p> <p>The number of Air Quality Management Areas has increased from 5 in 2008 to 10 in July 2015.</p>	<p>In the absence of the JMLP and policies aimed at reducing emissions from transport of minerals, air quality in West Sussex is more likely to be adversely affected as a result of less stringent mitigation or poorly planned minerals development.</p>
12	<p>Traffic Growth</p> <p>Current forecasts estimate that the amount of traffic on the roads within West Sussex will increase during 2011-2026.</p> <p>Traffic growth will continue to affect the transport network and has exceeded planned capacity in some places²⁰.</p> <p>Increased traffic could have a detrimental effect on quality of life within the County.</p>	<p>In the absence of the JMLP and policies aimed at reducing emissions from transport of minerals, traffic growth in West Sussex may continue in certain areas and along particular routes. However, other non-minerals related road traffic is likely to contribute more to overall traffic growth in the County.</p>

4. SA Framework

The SA Framework

4.1 This section helps to address the SEA Directive requirements in Annex I:

(e) The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

4.2 Development of an SA Framework is not a requirement of the SEA Directive. However, it provides a recognised way in which the likely sustainability effects of a plan can be predicted, described, analysed and compared in a consistent way. Once SA Objectives are developed they provide the basis for testing options and policy formulation of relevant aspects of the JMLP. The objectives derived from this process are the basis for identifying appropriate indicators and targets against which the success of adopted strategies and policies may be judged.

4.3 The SA Framework contains a number of objectives and was developed by LUC, SDNPA and WSCC's Minerals and Waste Planning Policy officers for the SA of the JMLP. The objectives have been informed by the objectives previously identified in the March 2013 SA Report for the West Sussex Waste Local Plan, reviewed to be relevant to the Minerals Local Plan, reflect the review of relevant plans and programmes (as set out in Appendix 1) and baseline situation/key issues described in Chapter 3 of this report and Appendix 3 of the SA Report of the JMLP. The SA objectives developed for the SDNP Local Plan have also been taken into consideration.

4.4 The policies and sites allocations included in the Issues and Options document for the SSR (2019) have been appraised against the SA Objectives, which are included in Figure 5 below. Each SA Objective has a number of subsidiary questions, which help to provide decision-making criteria to use during the identification of potential effects from the JMLP and SSR.

Figure 5 Subsidiary questions for each SA Objective

Sustainability Appraisal Objectives and Subsidiary questions
SOCIAL
1. To protect and, where possible, enhance health, well-being and amenity of residents,
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Have harmful effects on human health and be sited close to sensitive receptor(s)? • Affect amenity through dust and noise (e.g. through blasting/traffic) or vibration? • Affect road safety? • Have the potential to create land use conflict issues? • Provide opportunities for improvements to health, well-being and amenity through enhancements? • Create cumulative effects in terms of adverse impacts on environmental quality, social cohesion and inclusion or economic potential?
2. To protect and, where possible, enhance recreation opportunities for all, including access to and enjoyment of the countryside, open spaces and Public Rights of Way (PROW)
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Be likely to affect the amenity of users on PROW, recreation areas/open spaces or other users of the countryside in the area, or affect views and/or tranquillity of these areas? • Provide restoration opportunities for recreation?

ECONOMIC
3. To protect, sustain, and where possible, enhance the vitality and viability of the local
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Help the local economy, for example by generating new jobs, and how might implementing the policy impact on local businesses? • Encourage the provision of more locally based skills and facilities? • Affect tourists' decisions to visit an area? • Compromise safe operating of commercial aerodromes (i.e. be near to an airfield and through restoration likely to attract large numbers of birds and increase the chance of bird strike)?
4. To conserve minerals resources from inappropriate development whilst providing for the
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Reduce the extraction of virgin materials? • Avoid sterilising mineral resources by preventing unnecessary development on or near to mineral resources? • Require prior extraction if development that would sterilise mineral resources were to go ahead?
ENVIRONMENTAL
5. To protect, and where possible, enhance the landscape, local distinctiveness and landscape
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Help enable the protection of landscape (particularly AONBs and SDNP) and townscape character? • Contribute to the restoration of minerals sites, maximising after-use potential for beneficial use (e.g. agriculture, nature conservation, recreation, amenity, water storage, flood management) as appropriate? • Facilitate the supply and use of local building materials to protect local character? • Affect dark skies from light pollution? • Protect and enhance the tranquillity of West Sussex including the SDNP and AONBs (e.g. by minimising noise arising from minerals facilities and transport)? • Encourage landscape improvement?
6. To protect, conserve and enhance biodiversity including natural habitats and protected species.
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Have an adverse effect on biodiversity, including the protection of designated sites (e.g. Special Protection Areas, Special Areas of Conservation, Ramsars, Sites of Special Scientific Interest, National Nature Reserves and Ancient Woodland)? • Have an adverse effect on locally designated sites which form part of a network of ecosystems? • Have an adverse effect on wider habitat networks (including BAP habitats) and land used by protected species? • Provide opportunities for enhancing biodiversity and achieving net gains as part of the development or restoration?
7. To protect and conserve geodiversity.
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Have an adverse effect on geodiversity, including the protection of geological features or sites (e.g. Sites of Special Scientific Interest, and Local Geological Sites, formally RIGS)? • Create new geological exposures of education interest? • Provide opportunities for geodiversity as part of the development or restoration?
8. To conserve, and where possible, enhance the historic environment.

<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Help enable the conservation of features of archaeological and other historic interest in the county, such as conservation areas, listed buildings, scheduled ancient monuments and areas of archaeological potential?
9. To protect and, where possible, enhance soil quality, and minimise the loss of best and most
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Minimise the loss of the best and most versatile agricultural land? • Improve the soil quality?
10. To reduce air pollution and to protect and, where possible, enhance air quality.
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Lead to a change in local air quality? • Cause further deterioration of air quality in Air Quality Management Areas? • Cause an increase in deposition of pollutants on sensitive designated nature conservation sites?
11. To protect and, where possible, enhance water resources, water quality and the function of
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Affect the quality of surface and/or groundwater bodies? • Interfere with the flows of water bodies?
12. To reduce vulnerability to flooding, in particular preventing inappropriate development in the floodplain.
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Affect the likelihood of flooding or lead to inappropriate development in a flood risk zone (e.g. Flood Zones 2 or 3) contrary to national policy on flooding? • Impact on flood defences? • Provide opportunities for flood alleviation/mitigation?
13. To minimise transport of minerals by roads. Where road use is necessary, to reduce the
<p>Would the option/policy/site:</p> <ul style="list-style-type: none"> • Have the potential for rail or water-based access to and from mineral sites? • Lead to the production of traffic-derived pollutants, including CO₂, NO₂ and PM₁₀ due to road transport to and from minerals sites? • Optimise the use of the Lorry Route Network and reduce the use of rural roads thus reducing the disruption and pollutants caused by HGVs?
14. To reduce the emissions of greenhouse gases.
<p>Would the policy/option/site:</p> <ul style="list-style-type: none"> • Lead to the production of carbon dioxide or other greenhouse gases from on-site vehicles and machinery? • Reductions in transport distances by supporting the location of mineral extraction sites in proximity to surrounding markets for minerals and to serve local needs? • Encourage the use of renewable or lower carbon energy sources on-site (e.g. through the use of small on-site renewable energy sources, i.e. wind turbines, solar panels)?

Assumptions used in applying the SA Framework

- 4.5 SA inevitably relies on an element of subjective judgement. In predicting and assessing the likely sustainability effects of the JMLP and SSR, the SA team's analysis of the characteristics of West Sussex and the sustainability issues it faces has been drawn upon as well as the professional experience of the SA team of having undertaken numerous SAs of minerals local plans and site allocations.
- 4.6 In making SA judgements for the appraisal of each issue, option and site the SA builds on the the extensive data collated and the assessments produced by WSCC and SDNPA for each site and the JMLP.
- 4.7 To support the appraisal of potential mineral site options a series of decision-making criteria for each SA headline objective was developed (this can be seen in Appendix 2) with the purpose of providing a consistent approach to the prediction and assessment of effects. The decision-making criteria relates specifically to the assessment of the potential sites being considered at this stage for allocation in the SSR , and set out assumptions and justifications for the level of significance of the potential effects that mineral sites developed at those sites may have. These assumptions were developed so that, where possible, quantitative data could be used to appraise the sites, and in particular, will provide a framework to draw on the updated technical assessments that will be carried out for the sites including the WSCC and SDNPA assessments, Habitats Regulations Assessment, Transport Assessment, Flood Risk Assessment and Landscape Assessment. For some of the assumptions in Appendix 2, evidence included in former planning policy statements and planning practice guidance has been referred to in support of some of the assumptions made, in addition to relevant sections of the Planning Policy Guidance.
- 4.8 It should be noted that distances from specific assets (e.g. biodiversity, heritage, recreational) used within relevant SA Objectives to predict the magnitude of potential effects of allocating the sites are for a guide only and do not mean that mineral sites within a certain distance would definitely have an effect in every instance. The potential effect depends significantly on the type and design of mineral sites eventually developed on the site, which will need to be assessed if prescribed within policies of the Minerals Local Plan and the relevant Local Plans at the planning application stage

5. Assessment of Issues and Options

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

- 5.1 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.
- 5.2 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 within the LAA was considered to be sound, the Authorities have prepared an updated version of the 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.
- 5.3 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;
 - I. Assumption 1: the construction of new residential dwellings in West Sussex is projected to grow by 26.8%
 - II. Assumption 2: Up to 91% of sand and gravel may be used in the construction of residential dwellings
- 5.4 Policy M2 of the submission JMLP identified a shortfall of soft sand of 2.36 million tonnes (mt) at the time of the examination hearings. The level of need has been reassessed by the Authorities on an annual basis as part of the Local Aggregates Assessment [LINK] as the first part of this Review and, as set out in page 10 of the Issues and Options consultation document
- 5.5 Using the 10 year sales average and a combination of the assumptions above, it is calculated that there is a shortfall of between 1.66 and 2.83 million tonnes (mt) to 2033. When preparing the JMLP, the Authorities approach was to plan for the highest demand scenario, to ensure that sufficient provision is made for a steady and adequate supply of soft sand over the Plan period. Any fluctuations in the 10 year or 3 year averages, or the demand scenarios, will be picked up on an annual basis and could trigger a Plan Review.

Summary

- 5.6 The issue of supply has not changed substantially from that set out in the JMLP (2018) and therefore the SA has been carried forward from the JMLP. The assessment of Issue 1 is set out in Appendix 3 of this report.

Issue 2: Supply strategy

- 5.7 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. 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”.
- 5.8 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.
- 5.9 The National Park purposes are:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage and special qualities of the National Park
 2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public
- 5.10 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.
- 5.11 In addition, Section 62 of the Environment Act 1995 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.
- 5.12 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.
- 5.13 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 emerging South Downs Local Plan.
- 5.14 With regard to plan-making, paragraph 207 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”.
- 5.15 Against this national legislative and policy context, the Authorities have to consider all ‘reasonable alternatives’ for soft sand supply to meet the identified shortfall. ‘Reasonable alternatives’ are the available options to promote sustainable development, the likely significant effects of which are assessed through SA. The ‘reasonable alternatives’ should be identified at an early stage, in order to help develop the preferred strategy. The options below are considered to be the reasonable alternatives.

Summary of options

- 5.16 At the Issues and Options consultation this stage, the Authorities have identified the following options that could be used to meet the identified shortfall 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.
- 5.17 The options and summary of the SA assessment are set out in Figure 6 below. The full assessment of Options A-D are set out in Appendix 3. Issue 3 ‘The identification of potential

sites and, if required, the selection of one or more of those sites to meet identified need' is considered in Chapter 7 Site Selection Process.

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Figure 6 Summary assessments of SSR Options A to E

Option	Summary of Option	Summary of SA Assessment
Option A: Supply from sites within West Sussex but outside of the National Park	There are a number of currently active soft sand sites within West Sussex that fall outside the boundary of the SDNP. The Authorities also undertook 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. In assessing Option A, the Authorities will consider the potential to identify sites outside the SDNP boundary within West Sussex the cumulative impact of any potential allocations with active sites in close proximity, and whether this option is able to meet the full supply requirement.	This option is unlikely to meet the supply requirements. There will be a number of negative impacts including landscape and the location of potential sites outside of the SDNP are adjacent to the boundary as well as existing and historic mineral workings. Further assessment on the impact of this option on the SDNP is required. The cumulative impacts due to the location of current mineral workings (for example, via views) from, the National Park have the potential to impact on the landscape, including the setting and experiential qualities.
Option B: Supply from sites within West Sussex, including within the National Park	This option will consider the potential of each site on the 'shortlist' (see Issue 3, below) on its merits. Landscape assessments will 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	This option may meet the supply requirements set out in the Plan. There will be a number of negative impacts including landscape and the location of potential within and adjacent to the SDNP boundary. Further assessment on the impact of this option on the SDNP should be noted that sites outside but in close proximity to, or adjacent to (for example, via views) from, the National Park have the potential to impact on the landscape, including the setting and experiential qualities of the National Park
Option C: Supply from areas outside West Sussex	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 the wider market from the Folkestone Formation, as well as the Corallian Group (in Oxfordshire), and the 'Reading Beds'.	Seeking supply solely from areas outside of West Sussex will increase the potential impacts and reduces control on impacts such as the nature of the minerals market means that soft sand will be sourced through the Plan Area so some impacts may be neutral, or less than if sourced from elsewhere.
Option D: Supply from alternative sources including marine dredged material	This option seeks to meet supply from alternative materials to land-won resources within the Plan Area. 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	The SA considers that Option D is the most uncertain, and at the early stages of the Plan. It is unclear at present what amount of material could be provided and where it would be sourced from. With the potential for less direct impacts on the landscape and biodiversity within the Plan Area, including the South Downs National Park, it is difficult to assess the transport impacts and also therefore impacts on climate change. This option on its own could meet the supply required for the Plan.

Option	Summary of Option	Summary of SA Assessment
	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.	
Option E: Combination of options A-D	Option E was identified in the previous stage of SA as likely to be the most sustainable option. It will be difficult for any single option to meet the out in the most recently adopted LAA. Unless the Authorities decide not to meet the supply requirements, a combination of the options may be to meet the requirements of national policy. All the potential combinations of Option E is considered below.	

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Summary of assessment of options E1, E2, E3, E4, E5 and E6

5.18 Through the Issues and Options assessments, Option E was considered to be the most sustainable overall. Option E is made up of each of the Options A to D. As such there are a number of potential combinations to assess.

5.19 Firstly the options have been grouped spatially

- Combinations with Option A (Sites in West Sussex but outside of the SDNP)
- Combinations with Option B (Sites in West Sussex, including the SDNP)

5.20 Option A was then assessed in combination with

- Option C (Supply from areas outside West Sussex)
- Option D (Supply from marine or other sources)
- Option C and Option D

5.21 Separately, Option B was assessed in combination with

- Option C (Supply from areas outside West Sussex)
- Option D (Supply from marine or other sources)
- Option C and Option D

5.21 The combination of options to be considered is set out as follows.

Figure 7 Variations of Option E

A: Inside West Sussex excluding the SDNP		B: Inside West Sussex including the SDNP	
E1	A plus C- Supply from areas outside West Sussex	E4	B plus C- Supply from areas outside West Sussex
E2	A plus D – Supply from alternative sources including marine dredged material	E5	B plus D – Supply from alternative sources including marine dredged material
E3	A plus C and D (all combinations outside of the SDNP)	E6	B plus C and D (all combinations including inside the SDNP)

Option A (Supply from within West Sussex but outside of the SDNP)

- 5.22 Option A has not changed since the initial assessment in the table above. There are two potential sites to deliver this option: Ham Farm and Buncton Manor Farm. An assessment of the potential sites to deliver the preferred option is set out in Chapter 6.

E1 (E-A plus C- Supply from areas outside West Sussex)

- 5.23 In assessing E1, the SA has taken account of the work prepared of the South East Mineral Planning Authorities in relation to the Position Statement on Soft Sand, as well as the Statement of Common Ground the Authorities have prepared with Kent County Council and East Sussex County Council. There is still a high degree of uncertainty about how much material is available in the wider south east region and where such material might travel. It is entirely conceivable that some material will travel from Kent to West Sussex (and vice versa) as indicated by research that ESCC has prepared jointly with the SDNPA and BHCC in preparation of the Review of the East Sussex, South Downs and Brighton and Hove Waste and Minerals Plan.

- 5.24 This combination of options slightly increases the deliverability of the strategy however the uncertainty in relation to how much material may be available is high Policies M2, M11 and future reviews of the JMLP should take account of the changing position of the availability and constraint on material in the wider South East.

E2 (E-A plus D – Supply from alternative sources including marine dredged material)

- 5.25 In assessing E2, the SA has taken account of the information provided by the Crown Estate and others who made representations to the Issues and Options consultation. There is evidence that some marine material may be blended to provide a substitute for soft sand in very limited cases. The material involved is likely to be dredged from the Bristol Channel and would need to travel a long distance to reach West Sussex. At this time it is not considered that the seabed off the South Coast offers the same potential. Although there may be potential in the future there is unlikely to be infrastructure in place to support the exploration of this potential until much later in the Plan period. Dredging of any viable material from the sea would also be subject to sustainability and environmental assessments.

- 5.26 This combination of options slightly increases the deliverability of the strategy however uncertainty in relation to how much material may be available to meet the need as set out in Issue 1 is high. Policies M2, M11 and future reviews of the JMLP should take account of the potential of material to be dredged from the south coast.

E3 (E-A plus C and D (all combinations outside of the SDNP))

- 5.27 This combination of options slightly increases the deliverability of the strategy and reduces some of the uncertainty in relation to how much material may be available to meet the need as set out in Issue 1. All options that rely on material solely from outside of the SDNP increase uncertainty of supply and potential environmental impacts. Policies M2, M11 and future reviews of the JMLP should take account of the potential of material to be dredged from the south coast.

Option B (Inside West Sussex including the SDNP)

- 5.28 B has not changed since the initial assessment in Appendix 3. The potential sites to deliver this option are set out in the site assessment section below Chapter 6.

E4 (E-B plus C- Supply from areas outside West Sussex)

- 5.29 In assessing Option E4, the SA takes account of the limited availability of sites solely within West Sussex and outside of the SDNP. There are a number of sites within the SSR I&O shortlist within the SDNP so it is reasonable to assume that there is flexibility in identifying the sites that are the most sustainable.

- 5.30 There is still a high degree of uncertainty about how much material is available in the wider south east region and where such material might travel. It is entirely conceivable that some material will travel from Kent to West Sussex (and vice versa) as indicated by research that ESCC has prepared jointly with the SDNPA and BHCC in preparation of the Review of the East Sussex, South Downs and Brighton and Hove Waste and Minerals Plan which is currently being prepared.
- 5.31 This combination of options slightly increases the deliverability of the strategy and reduces some uncertainty in relation to how much material may be available. Policies M2, M11 and future reviews of the JMLP should take account of the changing position of the availability and constraint on material in the wider South East.

E5 (E-B plus D – Supply from alternative sources including marine dredged material)

- 5.32 In assessing Option E5, the SA takes account of the limited availability of sites solely within West Sussex and outside of the SDNP. There are a number of sites within the SSR I&O shortlist within the SDNP so it is reasonable to assume that there is flexibility in identifying the sites that are the most sustainable.
- 5.33 The SA has taken account of the information provided by the Crown Estate and others who made representations to the Issues and Options consultation. There is evidence that some marine material may be blended to provide a substitute for soft sand in very limited cases. The material involved is likely to be dredged from the Bristol Channel and would need to travel a long distance to reach West Sussex. At this time it is not considered that the seabed off the South Coast offers the same potential. Although there may be potential in the future there is unlikely to be infrastructure in place to support the exploration of this potential until much later in the Plan period. Dredging of any viable material from the sea would also be subject to sustainability and environmental assessments.
- 5.34 This combination of options slightly increases the deliverability of the strategy and reduces some uncertainty in relation to how much material may be available. Policies M2, M11 and future reviews of the JMLP should take account of the changing position of the viability of marine material.

Preferred Option

E6 (E-B plus C and D (all combinations including inside the SDNP))

- 5.35 This combination of options increases the deliverability of the strategy and reduces the uncertainty in relation to whether sites are deliverable and how much material may be available. Policies M2 and M11 and future reviews of the JMLP should take account of the availability of material in the wider south east and the potential of material to be dredged from the south coast.

6. Assessment of Sites

- 6.1 Issue 3 concerns concerned the identification of sites to meet the supply identified in Issue 1 and the strategy identified in Issue 2. As two of the supply options relate to the allocation of sites within the Plan Area, the Authorities have undertaken work to identify potential sites to meet identified supply requirements to 2033. Following the Issues and Options (2019) consultation the Authorities revised all the pertinent technical assessments, including:
- HRA
 - Transport Assessment
 - Landscape Assessment
 - Site Selection Report (4SR)
- 6.2 In total, 21 possible sites for extraction were identified at 'Stage 1' of the Site Selection Report. The sites on this 'long list' have all been considered in the past. The sites on the long list were reviewed and 12 of them were considered to be unsuitable for further consideration (see Appendix 3 of the 4SR [link]).
- 6.3 The remaining nine sites have been shortlisted and have been subject of a 'Stage 2' assessment, taking account of all previous evidence and any new evidence that has been submitted as part of the 'Call for Sites' and in response to the Issues and Options consultation (2019). Figure 7 identifies the nine potential sites, including specific information about their location, size, yield and nature and whether they are new sites or extensions to existing sites.

Figure 7 Summary of Sites

Site Name	Parish	Site (Ha)	Yield (tonnes)	In SDNP?	Extension to existing site?
Bunton 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) ¹	Stedham with iping	10	2,000,000	Yes	Yes
Severals East ² (new site)	Wiston	20	1.7 million	Yes	No
Severals West (new site)	Wiston	50		Yes	No

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¹ Minsted West is no longer considered a functional extension due to the uncertainty around the existing site
² Severals East and West are now being promoted together by the potential site operator

SA Objective	Bunton Manor Farm	Chantry Lane	Coopers Moor	Duncton Common	East of West Heath	Ham Farm	Minsted West	Severals East	Severals West
1. To protect and, where possible, enhance health, well-being and amenity of residents, neighbouring land uses and visitors to West Sussex.	0/-?	0/-?	0/-?	0/-?	0/-?	0/-?	0/-?	0/-?	0/-?
2. To protect and, where possible, enhance recreation opportunities for all, including access to the countryside, open spaces and Public Rights of Way (PROW).	-	0	0	-	+?	-?	-	--?	--?
3. To protect, sustain, and where possible, enhance the vitality and viability of the local economy.	+	+	+	+	+	+	+	+	+
4. To conserve minerals resources from inappropriate development whilst providing for the supply of aggregates and other minerals sufficient for the needs of society.	+	+	+	+	+	+	+	+	+
5. To protect, and where possible, enhance the landscape, local distinctiveness and landscape character in West Sussex.	--	-	--	--	-	-	--	--	--
6. To protect, conserve and enhance biodiversity including natural habitats and protected species.	-?	0	-?	--?	-?	-?	--?	--?	--?

SA Objective	Bunton Manor Farm	Chantry Lane	Coopers Moor	Dunton Common	East of West Heath	Ham Farm	Minsted West	Severals East	Severals West
7. To protect and conserve geodiversity.	0	-?	0	0	0	0	-?	0	0
8. To conserve, and where possible, enhance the historic environment.	--?	-?	--?	--?	-?	-?	--?	-?	-?
9. To protect and, where possible, enhance soil quality, and minimise the loss of best and most versatile land.	-	0	0	0	0	--	-	0	0
10. To reduce air pollution and to protect and, where possible, enhance air quality.	-?	-?	-?	-?	-?	-?	-?	-?	-?
11. To protect and, where possible, enhance water resources, water quality and the function of the water environment.	?	?	-	--?	?	?	-	--?	--?
12. To reduce vulnerability to flooding, in particular preventing inappropriate development in the floodplain.	-?	0?	-?	-?	-?	0?	-?	-?	-?
13. To minimise transport of minerals by roads. Where road use is necessary, to reduce the impact by promoting use of the Lorry Route Network.	-	--	-	-	0	-	-	--	--
14. To reduce the emissions of greenhouse gases.	-?	-?	-?	-?	-?	-?	-?	-?	-?

Figure 8 Summary of site assessment scoring

Site Name	New (N)/ Extension (E)	Site Summary	Key constraints	SA Summary
Bunton Manor Farm	N	The site is currently in agricultural use and would yield approximately 1m tonnes of soft sand. It would be worked over a period of 10-15 years. There are a number of restoration options available.	High landscape sensitivity Impact on ancient woodland and listed buildings Impact on aquifer but SFRA carried out Impact on AQMA Loss of agriculture Access Adjacent to landfill and nearby residential Cumulative impact	Bunton Manor is one of the sites likely to have the most severe cumulative impact, including transportation <u>transportation</u> . It is highly visible within the landscape, particularly from Chanctonbury Ring, although the site itself is outside of the SDNP. There is potential for negative impact on PROW and soils.
Chantry Lane	E	The site would be an extension to existing workings and could yield approximately 1m tonnes of soft sand. There are a number of restoration options available that were considered in the West Sussex Landscape Capacity Study 2011.	Medium/high landscape sensitivity Adjacent to SSSI and RIGS Uncertain archaeological impacts Minimal impact on water environment AQMA Agricultural land Moderate transport impact	Chantry Lane may be slightly less sensitive in terms of landscape but there are a number of designations and known heritage assets that may be impacted on without sensitive working of the site. As an extension to an existing quarry some of the impacts may be easier to minimise.
Coopers Moor	E	Extension to Heath End sandpit which could yield 500,000 tonnes of soft sand. The site is currently woodland (birch regeneration and chestnut coppice). Restoration to wetland or woodland/agriculture.	Unacceptable landscape impact Adjacent to SNCIs and within 2km of SAC/SSS Major harm to listed buildings Potential impact on groundwater AQMA Low impact on soil and transport Residential Amenity	Although development of this site may have minimal impact on soils and transport, there would be unacceptable harm to the landscape, designated areas and heritage assets.

Site Name	New (N)/ Extension (E)	Site Summary	Key constraints	SA Summary
Duncton Common	E	The site would be an extension to Heath End quarry and is currently formed of forestry and heathland. Restoration options include a mix of dry heath and wetland habitats.	Unacceptable landscape impact Severe harm to wet heathland, SNCI, BAP and SPA/Ramsar Potential major harm to SAM Potential impact on the water environment protection zone 2/3 AQMA Residential amenity Cumulative impact	Development of this site could not avoid an unacceptable landscape impact or severe harm to designated areas, heritage assets or the water environment.
East of West Heath Common	E	Extension to existing quarry (would be worked after existing extraction site is worked out). This site could yield 950,000 tonnes of soft sand. It is currently in agricultural use and could be restored for informal recreation uses, including links to the wider footpath network .	Medium landscape sensitivity Nearby to a number of local and national designations Visual impact on SAM Major aquifer No AQMA impact No highway concerns Amenity impacts Cumulative impact	This site has a lower landscape sensitivity than some of the other sites. It would require careful consideration of the designated areas, heritage assets, water environment and cumulative impact. As an extension to an existing quarry the impacts may be easier to minimise.
Ham Far-m	N	The site is currently in arable use with a number of isolated residential properties in the surrounding area. The site could yield approximately 725,000 tonnes of soft sand and could be restored to agricultural use.	Medium high landscape sensitivity Minor harm to ancient semi-natural woodland Moderate harm to listed buildings Compatible with the water environment Medium AQMA impact Grade 3 soils Minimal transport impact Residential amenity	This site has a lower landscape sensitivity than some of the other sites. It would require careful consideration of the designated areas, heritage assets, amenity and cumulative impacts. This site was considered acceptable for allocation in the Submission JMLP.

Site Name	New (N)/ Extension (E)	Site Summary	Key constraints	SA Summary
Minsted West	E ³	The site is currently in agricultural use and could yield 2 million tonnes of soft sand. Potential restoration to nature conservation and heathland.	Medium/High landscape sensitivity National designations and potential hydrogeological impacts Within 200m of SAM Proximity to listed buildings and registered parks Impact on Iping Common SSSI Chichester AQMA Impact on residential amenity Cumulative impact (Severals E&W)	This site has a slightly lower landscape sensitivity than some of the other sites. It would require careful consideration of the designated areas, heritage assets, water environment and cumulative impact. As an extension to an existing quarry the impacts may be easier to minimise.
Severals East	N	The site is currently used for commercial forestry and could yield 1m tonnes of soft sand. Potential for restoration includes linking with Midhurst Common/the Serpent Trail.	Medium-High landscape sensitivity Priority habitat and ancient woodland Potential minor harm to listed buildings Lidar/Moderate mitigation levels Vulnerable water impacts AQMA Moderate transport impact Sensitive amenity receptors High cumulative impact	Although development of this site may have a lower impact on soils and transport, there would potentially be unacceptable harm to the landscape, designated areas and heritage assets. <u>The site has been promoted jointly with Severals West.</u>
Severals West	N	The site is currently used for commercial forestry and could yield 1m tonnes of soft sand. Potential for restoration includes linking with Midhurst Common/the Serpent Trail.	Medium-High landscape sensitivity Severals Bog SINC Potential minor harm to listed buildings Vulnerable water impacts AQMA Moderate transport impact Sensitive amenity receptors High cumulative impact	Although development of this site may have a lower impact on soils and transport, there would potentially be unacceptable harm to the landscape, designated areas and heritage asset. <u>The site has been promoted jointly with Severals West.</u>

³ Minsted West is no longer considered a functional extension due to the uncertainty around the existing site

Figure 9 Summary of site assessments

7. Site Selection Process

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

- 7.1. Following the SA of Need, Strategy and Sites as set out in the previous chapters, the SA considered the approach to choose the most sustainable sites. As the options include sites within the SDNP, the SA considers whether those sites can be considered ‘a reasonable alternative’ [REF] due to the potential additional constraints on developing those sites. The Authorities have prepared a Major Development Background Paper which assess each site in the SDNP and sets out a framework for the assessment of major development in the context of the SDNP.
- 7.2. This is necessary in the context of the NPPF, which states in paragraph 172:
- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁴. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development⁵ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*
- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
 - *the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
 - *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated*
- 7.3. Additional advice is given in Planning Practice Guidance, paragraph 005 Reference ID: 8-005-20140306. This states:
- “Planning permission should be refused for major development in a National Park, the Broads or an Area of Outstanding Natural Beauty except in exceptional circumstances and where it can be demonstrated to be in the public interest. Whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 172 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context. The Framework is clear that great weight should be given to conserving landscape and scenic beauty in these designated areas irrespective of whether the policy in paragraph 172 is applicable.”*

⁴ English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matters.

⁵ For the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ 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.

- 7.4. The South Downs Local Plan (adopted July 2019) (SDLP) is also considered material. The SDLP explains that the NPPF does not define major development. The National Park Authority has sought legal opinions on what constitutes major development. These opinions are that the definition of “major development” is based on whether, prima facie, the development might potentially have adverse impacts on a national park, rather than whether, after a careful and close assessment, it will have such adverse impacts.
- 7.5. As such, it is necessary at the plan-making stage to consider whether sites shortlisted for possible selection have the potential for adverse impacts on the South Downs National Park due to their scale, character or nature and are therefore considered to be major development for the purposes of plan-making. The consequence of failing to do so would be to risk allocating land for major development that was undeliverable in a National Park because it was contrary to both paragraph 172 of it was incapable of meeting the major development test in the NPPF, and Policy SD2 of the South Downs Local Plan. The major development test will also apply at the planning application stage, as set out in paragraph 172 of the NPPF and in Planning Practice Guidance, as set out in paragraphs XX and XX above.
- 7.6. The SA therefore considers the outcomes of the assessments of Issues, Options and Sites in the context above and the outcome of that assessment is set out below.

Looking for sites outside the SDNP in the first instance

- 7.7. National policy [REF] directs planning authorities to look for sites for non-energy minerals outside of designated landscapes in the first instance. The two sites put forward through the I&O 2019 are Ham Farm and Buncton Manor Farm. The Guiding Principle of the JMLP (REF) guide development towards site extensions before new 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: 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
- 7.8. Both Ham Farm and Buncton Manor Farm would form new sites. No extension sites were put forward outside of the SDNP for consideration through the Call for Sites.

Ham Farm

- 7.9. The 4SR considers that Ham Farm is still acceptable in principle following updates to all the relevant technical assessments. The HRA proposes that any development criteria for this site should include a requirement for a project level appropriate assessment.

Buncton Manor Farm

- 7.10. Although this site is outside of the SDNP, the 4SR and Landscape Assessment (2019) consider that the potential impact on the SDNP, particularly from the South Downs Way and Chanctonbury Ring would make this site unsuitable for allocation.

Material from other sources outside of the SDNP and marine won sand

- 7.11. As set out in Section X, it is considered that at this time the availability of soft sand in the wider area and the embryonic state of the marine sand extraction industry mean that these materials may make a contribution to the soft sand market through the Plan Period but cannot be relied on at this time. In the absence of certainty at this time, the SA supports the view that considering allocation within the SDNP in the context of the Major Development Paper, is a reasonable alternative.

Sites within the SDNP

- 7.12. All the other sites considered in Section XX are within the SDNP. Coopers Moor and Duncton Common have been ruled out due to the potential negative impacts set out in the SA assessments and the technical documents summarised in the updated 4SR.
- 7.13. The Guiding Principles direct the Authorities to extension sites before the consideration of new sites. Extension sites considered initially acceptable for consideration are: Chantry Lane Extension, East of West Heath, and Minsted West. Several East and West have been put forward together by the operator as one new site. It is now unclear if Minsted West can be considered an extension site due to ongoing negotiations at the existing Minsted Quarry.

Chantry Lane Extension

- 7.14. Chantry Lane may be slightly less sensitive in terms of landscape but there are a number of designations and known heritage assets that may be impacted on without sensitive working of the site. As an extension to an existing quarry some of the impacts may be easier to minimise. An allocation on this site should carefully consider the landscape impact, including the proposed access.

East of West Heath

- 7.15. This site has a lower landscape sensitivity than some of the other sites. It would require careful consideration of the designated areas, heritage assets, water environment and cumulative impact. As an extension to an existing quarry the impacts may be easier to minimise. A pipeline instead of a conveyor could be a more sensitive solution to convey material to the existing plant.

Minsted West

- 7.16. This site has a slightly lower landscape sensitivity than some of the other sites. It would require careful consideration of the designated areas, heritage assets, water environment and cumulative impact. It is unclear at this time how the proposed extension could function as an extension to the existing site. This increases the uncertainty of any potential impacts.

Several East and West

- 7.17. Bringing the two sites forward together could ensure an holistic approach to development. Although development of this site may have a lower impact on soils and transport, there would potentially be unacceptable harm to the landscape, designated areas and heritage asset.

Proposed Allocations

- 7.18. Taking account of the information in the updated technical evidence, sites were chosen where they are believed to have the least impact on the South Downs National Park:

Figure 10 Proposed Allocations

Location	Proposed Allocation	Not allocated
Inside West Sussex, Outside of the SDNP	Ham Farm	
Inside West Sussex, Inside of the SDNP	East of West Heath (Extension) Chantry Lane (Extension)	Minsted West Severals East and West (New site)

- 7.19 Proposals to develop allocated sites in the SDNP, where they are determined to be major development, will need to demonstrate exceptional circumstances 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 and against the circumstances when the proposals come forward. The SA considers that the potential impacts of each site could be mitigated at the application stage and the development principles for each site should follow the recommendations of the technical assessments, including the requirement for project level appropriate assessment for each of the proposed allocations.

Cumulative impact of sites

- 7.20 The sites put forward for allocation are

- Ham Farm
- East of West Heath
- Chantry Lane Extension

- 7.21 Two sites are in reasonable proximity (Ham Farm, Chantry Lane Extension) and one site is some distance away. The potential for cumulative impacts needs to consider existing minerals development as well as the impact of the combination of sites proposed.

- 7.22 There are existing quarry sites to the north of the A272 between Chantry Lane and Ham Farm. The SSR should consider how to minimise impacts on all SA objectives but particularly those relating to landscape, transport, air quality and amenity. The two extension sites will need to be carefully controlled through the planning application process to ensure that the impact of extended working in these areas is minimised. The extended working area does allow for greater potential in restoration schemes and greater impact on landscape projects in the wider area.

- 7.23 Traffic and air quality impacts of all development will need to be considered at the application stage. Although the SA and the technical assessments in support of the SSR consider the potential impacts at a plan making stage, some of the potential impacts can only be fully understood at the time a planning application is submitted. The SA recommends that any allocation policy considers the requirement for further information at the appropriate stage.

8. SA of Proposed Policy Wording

Background to policies and summary of appraisal

- 8.1 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.
- 8.2 Policy M2 required the Authorities to prepare a new strategy for soft sand in West Sussex which robustly considered reasonable options and potential site allocations. The Authorities are proposing to replace both Policy M2 and Policy M11 in the JMLP through the SSR as the strategy proposed new site allocations. Full appraisals, including supporting text of each policy are set out in Appendix 6.

Policy M2 recommendations

- 8.3 The SA assessments indicate that the most sustainable strategy is likely to be a combination of the options that allows for all potential sites and sources to come forward, where they are available, over the plan period. The SA recommends that Policy M2 clearly sets out a hierarchy of decision making, ensuring that sites only come forward in relation to the need at the time of the application and applicants are signposted to the NPPF requirement to seek sites outside of designated landscapes in the first instance. Policy M2 should be clear that sites allocated in Policy M11 have precedence over windfall sites and that sites should be well located to the Lorry Route Network if other modes of transport is not viable. The JMLP contains a number of DM policies which can control and ensure mitigation of any impacts from development and the policy should clearly reference this, or provide further information in the supporting text. As the strategy allows for allocations in the SDNP, M2 should be clear that any application will be considered in the context of major development and applications outside of the SDNP also must assess the potential impact they would have [REF].
- 8.4 The final proposed text for JMLP Policy M2: Soft Sand is set out below.

Figure 11 Draft Policy M2: Soft Sand

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

Policy M11 recommendations

- 8.5 As stated above, the SA assessments indicate that the most sustainable strategy is likely to be a combination of the options that allows for all potential sites and sources to come forward, where they are available, over the plan period. Policy M2 incorporates a hierarchy of decision making and the SA recommendations set out above.
- 8.6 The requirements for M11 are assessed in this context. Policy M11 should be clear that sites will be assessed in the context of the all policies within the JMLP, and other relevant policies in the development plan. The adopted policy includes a series of 'Development Principles' for the allocation at West Hoathly Brickworks. It is recommended that these are included of all soft sand allocations and that these follow the outcomes of the technical assessments and the HRA.
- 8.7 The final proposed text for JMLP Policy M11: Strategic Minerals Site Allocations is set out below. The supporting text is included in Appendix 6.

Figure 11 Draft Policy M11: Strategic Minerals Site Allocations

Policy M11: Strategic Minerals Site Allocations	
(a)	<p>The following site is allocated for the extraction of clay for brick making and is acceptable, in principle, for that purpose:</p> <ul style="list-style-type: none"> Extension to West Hoathly Brickworks (Policies Map 1)
(b)	<p>The following sites are allocated for soft sand extraction and are acceptable, in principle, for that purpose:</p> <ul style="list-style-type: none"> Ham Farm, Steyning (Policies Map 8) East of West Heath Common (Extension) (Policies Map 9) Chantry Lane Extension (Policies Map 10)
(c)	<p>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.</p>
(d)	<p>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.</p>

9. Monitoring

Background

- 9.1. The SEA Directive requires that “member states shall monitor the significant environmental effects of the implementation of plans or programmes... in order, inter alia, to identify at an early stage, unforeseen adverse effects, and be able to undertake appropriate remedial action” (Article 10.1) and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring” (Annex I (i)). Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 9.2. The NPPG relating to SA states that it is not necessary to monitor everything. Instead, monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Because of the early stage of the SIR and the uncertainty attached to many of the potential effects identified, the SA continues to use the previous monitoring framework prepared for the JMLP. Policies M2 and M11 include proposed monitoring frameworks for each policy and how any further policy reviews would be triggered.
- 9.3. The main SA report for the JMLP and the adopted JMLP set out a number of suggested indicators for monitoring the potential effects of implementing the JMLP. At this stage it is not proposed to update the indicators put forward as part of the adopted JMLP, except where required by the proposed indicators for policies M2 and M11. Indicators included in the supporting text for each policy are set out below for reference.

Figure 12 M2 Monitoring and Implementation

M2: Implementation and Monitoring	
<i>Actions</i>	<i>Key Organisation(s)</i>
Annual monitoring of sand and gravel sales data from operators. Annual production of Assessment of Need for Aggregates (Local Aggregate Assessment)	WSCC, SDNPA, minerals operators, South East England Aggregates Working Party.
<i>Measure/Indicator</i>	<i>Trend/Target</i>
- 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.
<i>Intervention Levels</i>	<i>Actions</i>
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

Figure 13 MII Monitoring and Implementation

MI I: Implementation and Monitoring	
<i>Actions/Activities</i>	<i>Key Organisation(s)</i>
Development management process	WSSC, minerals industry
Monitoring the 'take-up' of allocated sites through the AMR	n/a
<i>Measure/Indicator</i>	<i>Trend/Target</i>
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 MI I
<i>Intervention Levels</i>	<p>A downward trend in applications on allocated sites (compared with applications on unallocated sites).</p> <p>Loss of allocations to non-minerals uses or use for minerals determined as being undeliverable.</p>

10. Next steps

- 10.1 This SA Report will be available for consultation alongside the Pre-Submission Draft SIR JMLP between January and March 2019.
- 10.2 Following this stage any comments on the SA will be submitted to the Secretary of State along with the Proposed Submission JMLP. The SA and any comments will then be considered by an independent planning inspector who will examine the SIR and check that the SA has been undertaken in accordance with the regulations and that the SIR has taken account of the SA as appropriate. The SA Report will be updated to reflect any changes the Authorities make to the SIR or changes that are made through the examination process.

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