

Appendix B: Summary of comments on the Issues and Options Consultation of the Soft Sand Review (Regulation 18)

Summary of comments received on Issue 1 – the amount of soft sand needed to 2033

Comments were received on the approach to calculating demand for soft sand from organisations, including neighbouring Mineral Planning Authorities, the minerals industry, and general stakeholders.

A summary of comments received is as follows;

- The house building forecasts are overestimated;
- Modern building practices use less soft sand, therefore less sand is needed;
- The Committee for Climate Change published a report setting out that housing should be built in low carbon methods (such as wood);
- The lowest levels of demand (Scenario 1) should be applied, to reduce impact on residents, the environment and traffic;
- The highest levels of demand (Scenario 3) should be applied, ensuring 'other relevant local information' is considered;
- Demand from West Sussex only should be applied / West Sussex should not export soft sand;
- Demand projections are too low to meet demands in line with Governments aim to build 300,000 homes per annum.
- The projections are based on 'loose' assumptions
- The method of predict and provide is unsustainable considering the finite nature of the resource;
- Agreement that there is a link between housing completion and aggregate sales, but disagreement on the correlation that is applied.
- Concerns over the use of 10-year averages;
- Information on movements is flawed, and hidden behind commercial confidentiality, therefore artificially inflating demand;
- Existing reserve data (in LAA Table 6) is not verified;
- Marine sands have been discounted too quickly;
- The Plan should seek to make provision for soft sand to 2040, ensuring that at the end of the Plan period, there is a 7-year landbank;
- Brexit uncertainty likely to reduce demand;
- Consideration of the environmental impact of exporting sand should be applied, not just importing sand;
- Reduce demand by recycling more;
- There are no exceptional circumstances to warrant further extraction in the SDNP;
- Local, regional and national economic forecasts should be considered when forecasting for soft sand;
- Population projections should be applied for forecasts for soft sand;
- The landbank is 10.7 years, therefore no more sand is needed.

Summary of comments received on Issue 2 – the strategy for soft sand supply

Comments were received on the options for a soft sand supply strategy from organisations, including neighbouring Mineral Planning Authorities, the minerals industry, and general stakeholders.

A summary of comments received is as follows;

- Not enough investigation into the use of marine material;
- Marine material is not a viable option;
- Development within the SDNP should not be considered and therefore the strategy and all options are unacceptable;
- Considering sources of material from outside West Sussex is not appropriate;
- Soft sand resources outside of the Plan Area cannot be relied upon;
- More should be done to consider sources outside of the Plan Area;
- It has not been demonstrated that WSCC/SDNP need to plan for further extraction with the Plan Area;
- West Sussex is a net exporter of sand and not enough has been done to consider soft sand only for the needs of West Sussex;
- Support for all options (individually);
- All options considered inappropriate (individually and as a whole);
- No options is appropriate except Option B or Option E;
- Technical assessments have not underpinned the strategy;
- The strategy is inconsistent with national policy and guidance;
- Strategy is too vague.
- Sites should not have been excluded from consideration at this stage
- Long term benefits should be given more weight

Summary of comments received on Issue 3 – The identification of potential sites, and approach to site selection

Comments were received on the site options, and the approach to site selection from organisations, including local groups and organisations, the minerals industry, and general stakeholders.

A summary of comments received is as follows;

The site selection methodology

- Concern that national parks should not be identifying areas where planning permission might reasonably be expected (Areas of Search or Preferred Areas) fits into the methodology;
- The methodology has already been endorsed by the previous Minerals Plan Inspector, therefore has been subject to a high level of scrutiny through the previous Examination process
- The 4SR report should set out how each site fits with the guiding principles;
- Some of the sites fall foul of the guiding principles;
- Concern that assessments don't include consideration of impact on water tables;
- Concern that sites will be worked and restored to create habitat, rather than returned to agricultural uses;
- Priority Habitats should be included in the assessment framework;
- Support for the protection of ancient woodland and locally designated sites;
- There should be a presumption against the loss of heathland habitat;
- Not clear how the balance between harm caused to features and opportunities to enhance features has been struck;
- There is a lack of consideration of ecosystem services within the 4SR;

- Lack of information on potential impacts on air quality around heathland sites;
- Full information on minerals type/quantity, total reserves, marketable reserves, estimated annual yield, suggested working arrangements, suggested after use, and land ownership/developer/operator is made available;
- The RAG system is subjective;
- Wastewater should be added to list of considerations for services and utilities;
- The methodology is too simplistic;
- A rigorous assessment of deliverability to ensure appropriate landowner consents are in place to support any proposal and that there are no fundamental legal or title issues exist that would delay or prevent development (eg restrictive covenants) is required;
- The planning judgements made at this stage are based on assumptions. Therefore, the RAG assessments can only flag up key issues;
- Disagreement on some of the scores given in the Stage 3 proformas;
- Question why previously ruled out sites have been reconsidered via a Call for Sites;
- Exceptional circumstances have not been applied to the RAG assessment testing;
- No consideration of noise pollution;
- The methodology is flawed as the economic benefits of extraction are more of a priority than the residents surrounding the sites;
- Borehole data should be made available.

Ham Farm

- Highways impact should be scored red or red/amber for this site;
- Access will be problematic, and require tree clearance;
- Concerns about air pollution impacts, residential amenity, local economy, impact on listed buildings;
- Lack of borehole evidence for the site available / No viability evidence;
- Concern over impact on watercourses, particularly during quarrying and landfill;
- Inaccurate highways reports (2015), which is different to the 2011 report
- Site goes against the guiding principles seeking extensions over new sites.

Bunton Manor Farm

- The site is not suitable for allocation;
- The transport and access impacts have been underestimated;
- Concern about Air quality, proximity to housing, impact on the SDNP/views from Chanctonbury Ring, water table concerns and land stability were raised.

Chantry Lane Extension

- Development of site is inappropriate in the SDNP due to the landscape impact and that the SDNP should be afforded the highest level of protection;
- Presumption should be against major development in the SDNP;
- All sites should consider the impact on protected sites, protected species, water environment, wildlife corridors (e.g. for bats) and cumulative impacts;
- Contrary to the aims and protection for Dark Night Skies;
- Loss of tranquillity;

- Concern about impact of HGV lorries on surrounding roads and safety of access on to major (an minor) routes;
- Negative impact on heritage assets and archaeology;
- Detrimental impact on ancient woodland;
- Impact on local footpaths and rights of way;
- Loss of agricultural land;

Minsted West

- Development of site is inappropriate in the SDNP due to the landscape impact and that the SDNP should be afforded the highest level of protection;
- Development of site is inappropriate due to ongoing issues at the existing Minsted Quarry;
- Unacceptable impact on amenity of neighbouring residents;
- All sites should consider the impact on protected sites, protected species, water environment, wildlife corridors (e.g. for bats) and cumulative impacts;
- Harm to heritage interests and archaeological features;
- Loss of farmland;
- impact and effect on the Iping and Stedham Commons Local Nature Reserve;
- Noise and pollution;
- Contrary to the aims and protection for Dark Night Skies;
- Loss of tranquillity;
- Unacceptable loss of trees;
- Impact on local footpaths and rights of way;
- Loss of agricultural land.

Severals East

- Site should be considered with Severals West as a joint proposal;
- Development of site is inappropriate in the SDNP due to the landscape impact and that the SDNP should be afforded the highest level of protection;
- Presumption should be against major development in the SDNP;
- Unacceptable impact on amenity of neighbouring residents;
- Impact on Severals Bog SSSI;
- Restoration would be sympathetic to Severals Bog and increase heathland
- Development of site would be detrimental to existing habits, including heathland;
- Loss of tourism;
- New access would be achievable;
- Access to site would be difficult and cause irreparable damage;
- Traffic from development would increase air quality issues in Midhurst (potential AQMA);
- Early investigations (by the operator) suggest the resource is viable ;
- All sites should consider the impact on protected sites, protected species, water environment, corridors (e.g. for bats) and cumulative impacts;
- Detrimental impact on sensitive water environment;
- Contrary to the aims and protection for Dark Night Skies;
- Loss of tranquillity;
- Unacceptable loss of trees;
- Impact on local footpaths and rights of way;

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- Contrary to the aims and protection for Dark Night Skies;
- Loss of tranquillity;
- Unacceptable loss of trees;
- Impact on local footpaths and rights of way;

Coopers Moor

- Development of site is inappropriate in the SDNP due to the landscape impact and that the SDNP should be afforded the highest level of protection;
- All sites should consider the impact on protected sites, protected species, water environment, wildlife corridors (e.g. for bats) and cumulative impacts;
- Cumulative impact with ongoing issues at Heath End sandpit;
- Graffham Road onto the A285 is not suitable for increased lorry movements;
- Impact on SSSIs and protected species;
- Potential impact on the Serpent Trail, bridleways and footpaths
- Current use of site for educational purposes;
- The development of the site has the potential to affect the amenity and recreational value of the adjacent areas;
- A reduction in the number of visitors to the area would have a severe adverse economic impact on local businesses;
- Contrary to the aims and protection for Dark Night Skies;
- Loss of tranquillity.

Duncton Common

- Development of site is inappropriate in the SDNP due to the landscape impact and that the SDNP should be afforded the highest level of protection;
- All sites should consider the impact on protected sites, protected species, water environment, wildlife corridors (e.g. for bats) and cumulative impacts;
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- Current use of site for educational purposes;

- The development of the site has the potential to affect the amenity and recreational value of the adjacent areas;
- A reduction in the number of visitors to the area would have a severe adverse economic impact on local businesses;
- Contrary to the aims and protection for Dark Night Skies;
- Loss of tranquillity;

Other Sites

- One site was submitted without any detail about the potential for resource or how the site would come forward;
- Cumulative impact of existing sites is not acceptable;
- Permitted reserve has not been adequately accounted for;
- Permitted sites have not been restored properly or in a timely manner;
- Proposals for new sites have not been considered in combination with existing permitted sites;

The Guiding Principles

- None of the guiding principles should over-rule the fact that sites within the SDNP should demonstrate exceptional circumstances before development takes place
- Support for existing guiding principles
- Query as to whether extensions to existing sites are appropriate
- Support for 'extensions to existing sites' as new guiding principle
- Guiding principles have not been applied in the consideration of sites shortlisted for allocation
- Guiding principles are not consistent with national policy or guidance, particularly in relation to protected sites
- Presumption should be against major development in the SDNP regardless of the guiding principles
- Insertion of a new guiding principle in the JMLP could be confusing
- There is no clear definition of an 'extension site'
- It is not certain that extension sites would have less impact than completely new sites and the new principle is not necessary
- Unclear how the potential timescales of each development is taken account of in the guiding principles
- Long term benefits should be given more weight
- Additional weight should be given to biodiversity within the guiding principles

Summary of comments received on the Sustainability Appraisal

A summary of the comments received on the draft Sustainability Appraisal are as follows;

- Not clear how the SA fits with the SA of the JMLP;
- Indicators in the SA should be updated;
- Plans, Policies and Programmes section should be updated to include; detail of the 25 Year Environment Plan;
- Commentary and tables in the SA reflect 'opinion';
- Commentary is not consistent within the SA or with the 4SR;
- The SA is fit for purpose;
- SA commentary is repetitive;

- SA does not consider the overall principle of mineral extraction on a global basis;
- SA does not consider sustainability appropriately and should make the case for alternatives to land or marine won building materials;
- Extraction of minerals is never sustainable and this should be reflected in the sustainability appraisal;
- SA of sites is incorrect and inconsistent ;
- Restoration of mineral sites could positively contribute to SA Objectives 1, 5 and 6;
- Air quality and transport impacts, as well as impacts on human health have been inconsistently assessed;
- The SA scoring suggests that no site should be considered acceptable for allocation.