

West Sussex Joint Minerals Local Plan

**Have your say on the Draft Joint Minerals
Local Plan Consultation 2016**

Outcomes Report

December 2016



Working in Partnership



West Sussex Joint Mineral Local Plan - Have your say on the Draft Joint Minerals Local Plan Consultation Report (April – June 2016)

SUMMARY - KEY RESPONSE THEMES

This report summarises responses to the 2016 consultation on the Draft (Regulation 18) West Sussex Joint Mineral Local Plan (JMLP) held between Thursday 14th April and Friday 17th June 2016. 744 responses were received to the consultation covering the following themes:

- General support for the vision though some requested greater emphasis towards protecting the two Areas of Outstanding Natural Beauty alongside the South Downs National Park (SDNP);
- support for the strategic objectives with some comments noting apparent conflicts between them. For example, an apparent contradiction between the strategic objectives to minimise traffic movements and seek a managed retreat from quarrying in the SDNP due to possible increases in traffic resulting from the importation of soft sand;
- concerns with the approach to soft sand and likelihood of securing sufficient supplies from other areas;
- contrasting comments about the approach to mineral working in the SDNP and the lack of site allocations within the SDNP for both soft and silica sand;
- a large number of objections to the Plan's approach to hydrocarbon development, particularly the potential for hydraulic fracturing (or 'fracking') to be used and requests for policies to enhance the level of protection against potentially adverse impacts;
- contrasting comments from minerals industry and local authorities about the strength of policies safeguarding mineral resources and infrastructure, including railheads and wharves in Shoreham and Littlehampton Ports;
- a large number of comments were received from members of the public opposed to the allocation of the Ham Farm site and a related petition with 4,000 signatures was also received. Key concerns related to the following:
 - transport issues, including congestion, traffic and pedestrian safety, concerns about increases in heavy goods vehicles and traffic noise and pollution;
 - landscape, water environment, natural habitat and heritage impacts;
 - impacts on the quality of life for local residents and businesses, for example, from vehicle emissions and dust from quarrying. Also, a restrictive covenant exists on part of the proposed site

- allocation which prohibits activity liable to be a nuisance to, or lessen the value of, the adjacent Wappingthorn Manor;
 - cumulative impacts resulting from nearby existing quarries;
 - that there are other locations, including within the SDNP, better suited to the extraction of soft sand;
 - the impacts of restoration using inert material;
- the proposer of the Ham Farm site suggested that the boundary be changed, especially as this would help address local concerns;
 - some concerns about the allocation of the extension to West Hoathly brickworks largely related to impacts on the High Weald AONB and HGV movements;
 - minerals operators requested the allocation of other sites, while also supporting the proposed site allocations; and
 - the conclusion of the technical assessment of the Hambrook grouping of sites as 'acceptable in principle' was disputed.

All the responses to the public consultation have been taken into account, where appropriate, in the Proposed Submission Draft JMLP¹.

¹ Published for representations in January 2017

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Contact Details

For further information on the West Sussex Joint Minerals Local Plan and to view supporting documents please visit www.westsussex.gov.uk/mlp

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Consultation Document References

Draft West Sussex Joint Minerals Local Plan Consultation ‘Have your say on the Minerals Local Plan’ documents – The Draft Joint Minerals Local Plan, consultation summary ‘Have Your Say on the Draft Joint Minerals Local Plan’ are available at:
www.westsussex.gov.uk/mwdf/consultation

West Sussex Statement of Community Involvement – The West Sussex Statement of Community Involvement (SCI), Second Review, June 2012 is available at:
www.westsussex.gov.uk/mwdf/sci

South Downs National Park Statement of Community Involvement – First revision, available online at: <http://www.southdowns.gov.uk/wp-content/uploads/2015/02/NPLP-Statement-of-Community-Involvement.pdf>

Background Papers Engagement (Summer 2014) – Engagement on a series of five Background Papers took place between Monday 30 June and Monday 28 July 2014. This included a number of events targeted towards town and parish councils and key stakeholders, as well as with the minerals industry, which are summarised in separate reports, available at www.westsussex.gov.uk/mlp.

Mineral Site Study Engagement (2014) – Engagement on the “long list” of potential mineral sites that were promoted to the Authorities took place between Monday 11 August and Monday 22 September 2014. The summary report of this engagement period is available at the following link - www.westsussex.gov.uk/mlp

Proposed Submission Draft West Sussex Joint Minerals Local Plan (Regulation 19) – information is available at: www.westsussex.gov.uk/mlp

Background supporting evidence – Supporting evidence and technical reports including the Background Document, sustainability appraisal, Local Aggregates Assessment, Minerals Sites Selection Report, Silica Sand Study and transport, landscape, habitat and flooding assessments are available at: www.westsussex.gov.uk/mwdf/evidence

1. DRAFT (REGULATION 18) WEST SUSSEX JOINT MINERALS LOCAL PLAN CONSULTATION 2016 – BACKGROUND

1.1. Introduction

- 1.1.1. This report summarises responses to the draft Joint Minerals Local Plan, which was subject of informal public consultation from 14 April to 17 June 2016, under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.1.2. The Plan was prepared in accordance with national planning practice guidance which expects local planning authorities to consider all representations made on draft plans, and set out how the main issues raised have been taken into account.
- 1.1.3. There were 744 responses to the consultation from a variety of groups. The consultation included discussion about the two proposed site allocations for mineral development (clay and soft sand) at the relevant County Local Committees (CLCs) as well as discussions with District and Borough Councils, Parish Councils, landowners, developers, residents, and community groups.
- 1.1.4. West Sussex County Council (WSSCC) and South Downs National Park Authority (SDNPA) ('the Authorities') are grateful to all those who took the time to respond and for the detailed and considered comments received.

1.2. Background

- 1.2.1. On 13 May 2011, WSSCC agreed to prepare separate Minerals and Waste Local Plans jointly with the SDNPA for the area of National Park within West Sussex. Priority was given to the preparation of a 'Waste Local Plan' with a separate 'Minerals Local Plan' to be prepared at a later date. The Waste Local Plan was adopted in 2014.
- 1.2.2. For the Joint Minerals Local Plan (JMLP), informal public consultation on the content of a Minerals Local Plan and relevant background (Five Background Papers), and on potential minerals sites (Mineral Sites Study (Version 1), was undertaken in Summer 2014. Following consideration of the responses received, a report on the outcomes of the Background Paper engagement, as well as new versions (Version 2) of the Background Papers, were published in October and November 2014. In March 2015, an outcomes report on the Mineral Sites Study engagement, together with an updated version of the Mineral Sites Study (MSSv2), for further targeted consultation were published. Following this consultation, and further technical work and dialogue with other Minerals Planning Authorities and stakeholders on specific matters, a draft Joint Minerals Local Plan (JMLP) was prepared. The draft JMLP was the subject of informal public consultation between April and June 2016, in accordance with Regulation 18 of the Town and

Country Planning (Local Planning) (England) Regulations 2012 (as amended).

- 1.2.3. Comments received during the consultation have subsequently informed the preparation of the Proposed Submission Draft West Sussex JMLP that is published for representations on soundness and legality in accordance with Regulation 19 of the above regulations in early 2017.

1.3. Consultation approach and feedback

- 1.3.1. The consultation on the draft JMLP followed the principles set out in both Authorities' Statements of Community Involvement (SCI). This consultation involved discussion about the proposed site allocations at the relevant County Local Committees (CLCs) as well as discussions with district and borough councils, parish councils, developers, and resident and community groups. Related consultation material is signposted under the 'references' section above. The consultation specifically included the following:

- Approximately 3,000 individuals and organisations were notified about the consultation either by email or letter;
- hard copy documentation and notices were made available for inspection at council offices and libraries;
- publication of the consultation on the County Council Minerals and Waste Planning and Have Your Say Consultation webpages;
- Media press releases and subsequent press, TV and radio coverage;
- presentation to the SDNPA West Sussex Parish Meeting on 11 May 2016. The presentation outlined the contents of the Plan and aims of the consultation as well as encouraging the Parishes present at the meeting to submit responses to the Plan;
- presentations to meetings of the Chanctonbury County Local Committee and North Mid Sussex County Local Committee;
- in response to many queries about the allocation of Ham Farm an 'FAQs' note was prepared and published on the County Council website and a well-attended exhibition was held at the Steyning Centre on 23 May 2016;
- attendance at a meeting of the West Sussex Planning Policy Officers Group; and
- workshop for stakeholders on minerals safeguarding on 29 June

1.3.2. During the consultation, the County Council processed seven requests for information made under the Environmental Information Regulations 2004. All the requests related to the proposed site allocation at Ham Farm, near Steyning. Subsequent meetings were held with two mineral operators.

1.4. Responses to the consultation

1.4.1. A total of 744 responses were received during the consultation with the following breakdown:

- 671 responses submitted by individuals (including parish councillors and from local businesses; 630 were received from residents/members of the public)
- 73 by organisations (including minerals industry, county, district & borough and parish councils, government bodies, community and environmental organisations - see Appendix A).

1.4.2. The table below shows a more detailed breakdown of the categories of respondent:

Category	Number	% of respondents
Resident/Member of the public	630	84.7%
Local business	28	3.8%
County/District/Parish councillor	13	1.7%
District/Borough Council	7	0.9%
Town/Parish Council	19	2.6%
Neighbouring authority/other minerals planning authority	8	1.1%
Minerals and waste industry	9	1.2%
Landowner	3	0.4%
Statutory stakeholders, utilities and advisory bodies	6	0.8%
Other community groups, societies and forums	16	2.2%
Other environmental organisation	5	0.7%
Total number of responses:	744	100%

1.4.3. Over a third of the responses were received via one of the survey formats, whilst nearly two-thirds were other 'open' responses received via email or letter. The table below shows a breakdown of the format of the responses.

Form Type	Number	% of total
Online form	217	29%
Emailed form	9	1%
Hard copy form by post	45	6%
Other response email/electronic letter	467	63%

Other response hard-copy letter	6	1%
Survey form responses	271	36%
Other (non-survey response form) comments	473	64%
Totals:	744	100%

1.5. Approach to analysis

1.5.1. The consultation generated a large amount of comments on a range of issues. The analysis of responses below is structured around the questions in the main survey as follows:

- the Vision and Strategic Objectives of the Plan;
- the 'mineral specific' and 'development management' policies of the Plan; and
- the mineral site allocations.

1.5.2. The content of each response was analysed and placed into themes covering the following key areas:

- planning;
- highway/transport impacts;
- environmental considerations (including impacts on landscape, nature and habitat conservation, water and soil, air quality and the historic environment);
- impacts on residential amenity and neighbouring land uses (including cumulative impact, health impacts, noise and light pollution, and impacts on recreation); and
- other technical feasibility and general comments.

1.5.3. Comments were placed into various sub-categories within the themes above depending on the specific nature of the comment. The analysis focussed on identifying the range of issues raised through the consultation, as opposed to the frequency of occurrence of individual comments. The categorisation process was complex and subjective, but efforts were made to ensure that the influence of subjectivity was minimised. Regardless of whether comments were submitted using the survey form, comments were analysed using the same process with the analysis of comments structured around the themes presented above. Due to the breadth and large number of issues raised, it has not been possible to mention every specific issue raised, but the following sections highlight the common themes that emerged.

1.6. Changes to the Proposed Submission Draft Joint Minerals Local Plan

1.6.1. Comments received as a result of the consultation have helped to inform the preparation of the Proposed Submission Draft Joint Minerals Local Plan (Regulation 19). A summary of the main issues raised have been set out with details of how the Authorities have responded to these matters, including the main changes made to the Plan, shown in the grey boxes.

1.6.2. The most significant changes proposed to the Plan in light of comments received are as follows:

- Change to the boundary of the Ham Farm site allocation to reduce the overall size of the allocation
- Safeguarding of the two temporary minerals wharves on the Western Harbour Arm of Shoreham Harbour

1.6.3. Other changes to the Plan in response to the main issues raised are considered below although none of these involved changes to the strategy and overarching approaches set out in the draft JMLP. Further changes were made for the following reasons:

- Factual updates
- Improvements to the clarity of the Plan to ensure its correct interpretation

1.7. Equalities questions summary

1.7.1. Part C of the consultation response form asked a series of equalities questions to help understand the effectiveness of the consultation. Specific equalities questions were selected for inclusion in the main consultation survey where it was believed these had most relevance to mineral planning issues. Information was collected on gender, age, ethnicity, faith and disability and this information is summarised in Appendix B.

1.7.2. The most notable issue was under-representation of respondents in age categories under 25, although a number of responses to the consultation were known to have been received on behalf of households including younger members of family. The consultation responses raised questions about the potential impacts on the health of children in locations near to the proposed Ham Farm site allocation (for example, the Elan Nursery on the Chanctonfold Estate near the village of Steyning). However the consultation did not identify substantial issues and related mitigation unique to groups with protected characteristics under the Equalities Act.

The Authorities' response:

Strategic Objective 7 of the Plan is: "To protect, and where possible, enhance the health and amenity of residents, businesses and visitors". The need to avoid unacceptable impacts on health and amenity due to mineral related development is specifically addressed in Policy M18 of the Plan. Relevant development principles are also included for the proposed site allocations and this matter will need to be looked at in greater detail at the planning application stage for any proposal.

2. VISION, STRATEGIC OBJECTIVES AND POLICIES COMMENTS

The following sections identify key themes raised in consultation responses, during meetings and at the exhibition.

2.1. Vision

2.1.1. The table below shows that responses did not demonstrate overwhelming support for the vision, however of the organisations that responded there was general support.

Q1.1: Do you support the Vision?		
Response	Number	% of question responses
Yes	105	42%
No	124	50%
Don't know	21	8%
No response	21	
Total question responses	250	
Total form responses	271	
Total responses	744	

2.1.2. Organisations making specific comments on the Vision included:

- Adur District Council
- Balcombe Parish Council
- British Horse Society
- Bury Parish Council
- Cemex
- Chichester Harbour Conservancy Council
- CPRE Sussex
- Frack Free Balcombe Residents Association
- Friends of the Earth
- High Weald Joint Advisory Committee
- Historic England
- I-Gas Energy
- Ibstock Brick Ltd
- Minerals Products Association
- Portsmouth Water
- Sussex Wildlife Trust
- The Dudman Group of Companies
- The Visitor and Tourism Group of the Steyning and District Community Partnership
- The Wiggonholt Association
- West Sussex Local Access Forum

2.1.3. The main concerns regarding the Vision related to the following:

- The apparent imbalance shown towards protection of Areas of Outstanding Natural Beauty compared to the South Downs National Park (SDNP).
- An apparent contradiction between the possibility of increasing imports of soft sand and an expectation that there would be a reduced impact of transport.
- The suggestion, in the Vision, that supply of oil and gas will support growth whereas energy security is better delivered a programme of energy efficiency.
- The Plan does not recognise the precautionary approach, in particular to the development of unconventional hydrocarbons.

The Authorities' response:

The Vision has been updated to included references to protection of AONBs which are equivalent to those for the SDNP. An additional paragraph has been included concerning transport impacts of HGVs. The Vision and Plan as a whole seek to provide for the exploration and development of hydrocarbons in a manner that is both consistent with Government policy support and will minimise or avoid adverse impacts. The detailed assessment of impacts associated with any proposal for hydrocarbon development will be considered through the planning application and licensing processes.

2.2. Strategic Objectives

2.2.1. Again there was general support for the strategic objectives amongst organisations, though overall, just over half of responses did not support the objectives.

Q1.2: Do you support the Strategic Objectives? (SO1-SO14)		
Response	Number	% of question responses
Yes	100	40%
No	138	55%
Don't know	14	6%
No response	19	
Total question responses	251	
Total form responses	271	
Total responses	744	

2.2.2. Organisations making specific comments on the Strategic Objectives include:

- Adur District Council
- Aggregate Industries

- British Horse Society
- Cemex
- CPRE Sussex
- Days Aggregates
- Frack Free Balcombe Residents Association
- Friends of the Earth
- Historic England
- I-Gas Energy
- Kirdford Parish Council
- Ibstock Brick Ltd
- Midhurst Town Council
- Minerals Products Association
- Portsmouth Water
- Steyning Quarry Action Group
- Steyning & District Business Chamber
- Sussex Wildlife Trust
- The Dudman Group of Companies
- The Wiggonholt Association
- UK Oil & Gas Investments
- West Sussex Local Access Forum

2.2.3. The main issues raised concerning the draft strategic objectives are set out and considered below.

2.2.4. Comments were received on the appropriateness of the objectives which reflected responses to specific issues outlined in sections 2.3, 3.0 and 4.0 below. Comments were also received requesting greater detail within the objectives. In particular comments were received on several objectives which were seeking greater protection from development associated with the production of hydrocarbons.

2.2.5. Comments were made that strategic objectives concerned with ensuring provision for minerals resources are in general conflict with those objectives concerned with protecting and enhancing the local environment, public health and amenity.

The Authorities' response:

Some modifications have been made to the objectives to improve their clarity. Changes have not been made in response to requests for greater specificity as the objectives are intended to be general overarching statements and such detail is included within linked policies of the Plan which implement the objectives (e.g. specific policy is included concerning hydrocarbons).

Strategic Objective 1: To promote the prudent and efficient production and use of minerals, having regard to the market demand and constraints on supply in the Plan area.

2.2.6. Conflicting comments over the appropriateness use of the word 'prudent'. Considered the term supply rather than 'production' is

more in keeping with term used in the NPPF. Mention should be made on the SDNP.

The Authorities' response:

The term 'production' has been replaced with 'supply'. The term 'prudent' is appropriate as it relays the intention of the NPPF (paragraph 142) to conserve primary land-won minerals. The SDNP is specifically covered by Strategic Objective 8.

Strategic Objective 2: To maximise and prioritise the supply and use of secondary and recycled aggregates before supply and use of primary sources; in particular to reduce reliance on land-won aggregates.

2.2.7. There was wide support for this objective though concern was raised regarding impacts on the marine environment.

The Authorities' response:

Impacts on the marine environment from dredging for aggregate are addressed by the Marine Management Organisation as mentioned in Chapter 5 of the Plan.

Strategic Objective 3: To make provision for soft sand to meet the needs of West Sussex from outside the South Downs National Park, where possible; and only make provision for a declining amount of extraction within the SDNP over the Plan period.

2.2.8. Industry objection to this objective on the basis that it is not justified and pre-empts possibility that exceptional circumstances and public interest could be demonstrated (in accordance with paragraph 116 of the NPPF) which would allow development within the SDNP. Suggested rewording to say soft sand provision will be made in the SDNP where exceptional circumstances test can be met and it is in the public interest e.g. by adding 'soft sand' to Strategic Objective 4.

The Authorities' response:

The objective is consistent with Plan approach of protecting the SDNP and the fact that 'exceptional circumstances' must exist before development can come forward. The NPPF states at paragraph 115 that great weight should be given to conserving the landscape and scenic beauty of national parks. Extraction of sand from the SDNP is not consistent with this expectation so it is desirable and justifiable to reduce the level and impact of extraction if possible. This approach leaves it open for exceptional circumstances to be argued, consistent with paragraph 116 of the NPPF.

Strategic Objective 4: To protect the South Downs National Park by only providing for silica sand from within it in exceptional circumstances and when in the public interest.

2.2.9. Concern with how the public interest test will be applied.

The Authorities' response:

The Planning Authority is responsible for deciding mineral planning applications and will be responsible for assessing the public interest in such cases. The 'public interest' test is taken from national policy for the Plan to be 'sound' it must be consistent with national policy.

Strategic Objective 7: To protect, and where possible enhance, the health and amenity of residents, businesses and visitors

2.2.10. Comment received concerning need to avoid impacts on health and amenity rather than only minimise them.

The Authorities' response:

The text associated with this objective has been amended to clarify that the intention of the objective is not only to minimise impacts on health and amenity but also to avoid them.

Strategic Objective 9: To protect and, where possible, enhance the natural and historic environment and resources of West Sussex.

2.2.11. Comments were received about the appropriateness of the terms 'where possible and 'enhance' and the need to mention all forms of biodiversity in the supporting text.

The Authorities' response:

The Objectives are intended to be realistic and are phrased with this in mind. All forms of biodiversity are mentioned and when referring to specific areas the term 'in particular' has been used so as to avoid the suggestion that other sites are excluded.

Strategic Objective 10: To minimise the risk to people and property from flooding, safeguard water resources, including aquifers, from contamination, and ensure the quality and quantity of the water environment is conserved and enhanced

2.2.12. Considered that the objective should be split so that flood risk is separated from water resources.

The Authorities' response:

The Objective is intended to cover all aspects of the water resource. It is unnecessary to have two separate objectives for the water topic, but the different components are now emphasised through amended wording.

Strategic Objective 12: To protect the environment and local communities in West Sussex from unacceptable impacts of any proposal for oil and gas development, whilst recognising the national commitment to maintain and enhance energy security in the UK

2.2.13. Concern that the objective inappropriately reflects a political view. Separate industry concern that the objective should be more positively worded.

The Authorities' response:

To be sound the Plan must be consistent with national policy which needs to be recognised as the key driver for hydrocarbon exploration and development (DCLG/DECC² policy paper on Shale gas and oil published August 2015). The objective as worded seek to strike a balance between acknowledging and planning to meet the Government's commitment to hydrocarbon exploration and development, and the need to protect public amenity and the environment. The Plan's approach to climate change is set out under Objective 14.

Strategic Objective 13: To ensure high quality mitigation and restoration to appropriate after uses

2.2.14. Suggested that the term 'mitigation' is incorrect and that the objective should be strengthened.

The Authorities' response:

The intention behind the Objective includes a desire to reduce the impacts of mineral working (mitigate against the impacts) and the wording reflects this. The wording of the objective is 'high level' and detail of its implementation is included in Policy M24 which reflects the 'strength' called for.

Strategic Objective 14: To minimise carbon emissions and to adapt to, and to mitigate the potential adverse impacts of, climate change.

2.2.15. Considered the objective should be amended to reflect the need to reduce emissions and require renewable energy developments. Also that there is a need to address methane emissions as well as carbon dioxide and consider overall emissions associated with minerals supply.

²Department of Energy & Climate Change (DECC) became part of Department for Business, Energy & Industrial Strategy in July 2016

The Authorities' response:

It is considered that the word 'minimise' is stronger than 'reduce'. The objective is not concerned with renewable energy since that does not fall within the remit of a minerals plan which is related to Mineral Development and its associated impacts. Reduction in dependence on fossil fuels relates to technologies such as wind, and solar. Development of this type are dealt with by District Councils. The term 'carbon emissions' is widely understood to include both carbon dioxide and methane and any other gases resulting in the build-up of carbon in the atmosphere which causes climate change.

2.3. Mineral specific policies

2.3.1. A breakdown of the comments on the minerals specific policies in Chapter 6 is included below:

Q3.1 Do you support the mineral specific policies set out in Section 6 of the Plan?		
Response	Number	% of question responses
Yes	52	24%
No	119	54%
Don't know	49	22%
No response	51	
Total question responses	220	
Total form responses	271	
Total responses	744	

2.3.2. The main issues raised concerning minerals specific approaches in the Plan related to the following areas:

- Sharp Sand and Gravel Supply (Policy M1)
- Soft Sand Supply (Policy M2)
- Silica Sand Supply (Policy M3)
- Oil and Gas Supply (M7a and M7b)
- Plant, Processing and Secondary Activities (M8)
- Safeguarding Mineral Resources (Policy M9)
- Safeguarding Mineral Infrastructure Safeguarding (Policy M10)

2.3.3. These are considered in turn below.

Approach to Sharp Sand and Gravel Supply (Policy M1)

2.3.4. Very few comments were received on this policy, although a concern was raised that the wording of the policy did not properly

reflect the fact that there are in fact sufficient supplies to meet requirements during the plan period.

The Authorities' response:

In accordance with national policy the Plan has been positively prepared and sets out the circumstances in which minerals development within West Sussex would be considered acceptable. However the text of clause (a) in Policy M1 has been amended to make it clearer that proposals would have to demonstrate that they are needed to ensure a steady and adequate supply of mineral. This is intended to clarify that if a steady and adequate supply already exists then permission should not be granted.

Approach to Soft Sand Supply (Policy M2)

2.3.5. Specific comments on the approach to supplying soft sand were received from the following organisations and the minerals operators:

- Cemex
- Central Bedfordshire Council
- CPRE Sussex
- The Cuckfield Society
- East Sussex County Council
- Hampshire County Council
- Kent County Council
- Mineral Products Association
- Stedham with Iping Parish Council
- Surrey County Council
- The Wiggonholt Association

2.3.6. A summary of the main issues raised is as follows:

- The Plan ignores national policies regarding the supply of minerals, economic and sustainable development;
- The approach for soft sand is to rely on existing permitted reserves, the allocation of only one site and increasing imports from other areas. This is not sustainable and is a risky approach to take as it has not been demonstrated that an increase in imports is likely to occur;
- More soft sand sites should be allocated to meet the needs for West Sussex;
- As the majority of the soft sand deposit in West Sussex is within the SDNP, it would be difficult not to identify sites in the SDNP;
- Maintenance of the landbank from sites solely outside the National Park is not practical;
- There is no evidence to support the claim that soft sand can be supplied by other quarries in the south east;
- A number of MPAs have suggested that they may not be able to contribute to meeting the need for soft sand in West Sussex;

- Soft sand does not tend to travel over distances greater than 30 miles and there is too much reliance on soft sand travelling 45 miles. Such movements are questionable economically and environmentally;
- The Plan should emphasise that rare soft sand minerals should be for local (West Sussex) use only and to help address problems like lack of affordable housing for local residents.
- Alternative approaches to building (e.g. modular/prefabricated) would reduce the need for soft sand;
- The Plan prioritises protection of the SDNP above protection of AONBs;
- The word "and" should be added to each criterion in policy M2; and
- In light of the shortfall in soft sand provision, the Authorities should delete criterion a) of policy M2 (concerning the maintenance of a seven year landbank).

The Authorities' response:

In accordance with national policy the Plan has been positively prepared and sets out the circumstances in which minerals development within West Sussex would be considered acceptable. There is a tension between national policies concerning minerals supply and those relating to the environmental protection, particularly regarding National Parks, on which the Plan seeks to identify an appropriate balance. The way in which demand for soft sand has been calculated is detailed in the Local Aggregates Assessment and is in accordance with national policy which includes taking account of relevant local information.

The Plan allocates a site for soft sand extraction (Policy M11) and allows proposals in other locations to come forward for consideration on their merits taking account of the circumstances which exist at that time.

Data from a government sponsored British Geological Survey (BGS) report³ confirms the extent to which sand was transported across the south east region in the four year period up to and including 2014. This suggests that soft sand moves across the region and occasionally between regions.

An exhaustive assessment of the availability of potential sites for soft sand has been undertaken (as set out in the Minerals Site Selection Report). Other than Ham Farm, no sites were assessed as suitable. This is in part due to the fact that allocation of a minerals extraction site within the SDNP would be contrary to NPPF paragraph 116 that sets out tests for major development taking place within National Parks (and AONBs), except in exceptional circumstances, which do not exist in the case of new minerals extraction within the National Park. Furthermore paragraph 144 states that, as far as practicable, landbanks for non-

³ Collation of the results of the 2014 Aggregate Minerals survey for England and Wales, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/563423/Aggregate_Minerals_Survey_England_Wales_2014.pdf

energy minerals should be maintained outside of National Parks. It also important to refer to paragraph 115 which states: *“Great weight should be given to conserving 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 landscape and scenic beauty.”*

The Plan recognises that the difficulties associated with identifying suitable sites for soft sand supply means that it will not be possible to maintain soft sand supplies at historic levels from sources within West Sussex. However evidence shows that the demand for soft sand within West Sussex will be met in future by alternative sources of supply including imports and from marine won sources⁴.

The calculations for future demand for land-won soft sand, as set out in the Local Aggregates Assessment, are based on historical supply levels and these have been in decline for recent years. The 10 year average of past annual sales is 329,394tpa, whereas the 3 year average is 253,288tpa. This decline has occurred during a period of increased construction activity in West Sussex which suggests that demand is already increasingly being met by alternatives to soft sand extracted from quarries in West Sussex.

A Statement of Common Ground (SCG) between Mineral Planning Authorities in the South East of England is being prepared specifically to set out how the supply of soft sand should be planned for. This will confirm the need for the transport of soft sand to ensure adequate supplies are maintained across and into the region.

The Soft Sand Study (2015) (published alongside the draft Plan as part of the evidence base) concluded that whilst the radius of economic transportation of sand is often quoted as being less than 30 miles, there is robust evidence that it actually travels a greater distance, up to 45 miles. Since the publication of that study, further evidence, included in the BGS/DCLG Collation of the results of the 2014 Aggregate Minerals survey for England and Wales indicates that soft sand travels even greater distances. The BGS/DCLG report states that soft sand has been transported from West Sussex to the South West of England. This is supported by evidence from operators.

Policy M2 on soft sand makes specific reference to the SDNP because the majority of the soft sand resource in West Sussex exists within the SDNP. There are no soft sand resources with the AONBs in West Sussex. The Plan does not prioritise protection of the SDNP above protection of AONBs, however it should be noted that the status of National Parks is given additional weight by legislation. In the Plan, AONBs are given equal protection which is necessary to ensure consistency with national policy. In particular this is demonstrated by Policy M12.

A change to clause (a) has been made that recognises that, in light of

⁴ See, Minerals Sites Selection Report appendices

the demand for soft sand, it would be disproportionate to demonstrate that the Ham Farm allocation cannot be developed before permission for a suitable site elsewhere was granted.

The word "and" has been added to each criterion in policy M2 to clarify that each criteria applies. Criterion c) states: "the proposal is needed to ensure a steady and adequate supply is maintained" to clarify the position with regard to need for development".

Approach to Silica Sand Supply (Policy M3)

2.3.7. As well as from a local resident, comments on the approach to supplying silica sand were received from the following organisations which included Minerals Planning Authorities with silica sand reserves in their areas, a landowner with an interest in working silica sand resources, the minerals industry and a community association:

- Barlavington Estate
- Central Bedfordshire Council
- Cuckfield Society
- Hampshire County Council
- Mineral Products Association
- Norfolk County Council
- The Wiggonholt Association

2.3.8. The Authorities approach to silica sand supply was supported by evidence contained in a report prepared by Cuesta Consulting (Soft and Silica Sand Study, 2015) that was published with the draft JMLP and comments were also received on this report.

2.3.9. The comments are summarised as follows:

- The Plan may fail the test of soundness as it fails to realistically assess the current reserves of silica sand within the UK and therefore dismisses potential sites put forward without proper consideration;
- A number of sites in Central Bedfordshire have ceased production of silica sand and the industry is undertaking a re-evaluation of reserves;
- There is less certainty that Norfolk would be able to meet any shortfall in the national demand for silica sand, especially glass sand, than would be the case if specific site allocations were available to meet the requirements. The Authorities should reconsider the need for silica sand extraction within West Sussex (i.e. the SDNP); and
- It is noted that silica sand is a nationally important mineral and as such, the national importance of silica sand and the scarcity of resources should form part of the criteria-based policy which should be more proactive.

- There are alternative supplies of Silica Sand outside National Parks (inc. in Scotland) that are closer to the specialist glass manufacturers.
- Conclusions reached in the study, concerning the presence of silica sand, are incorrect.

2.3.10. It should be noted that the comments received from Barlavington Estate also suggested that a site, known as Horncoft, should be allocated in the Plan for purpose of supplying high quality silica sand. This matter is deal with separately below in section 4.1.

The Authorities' response:

In response to the comments received on the Soft Sand and Silica Sand Study (2015), the Authorities appointed Cuesta Consulting to review the evidence and update the Study as necessary. The updated Study, known as the Silica Sand Study (2016) incorporates additional evidence obtained through consultation, and through subsequent further enquiries. The updated study confirms the findings of the original study which indicate that most, if not all, of the Folkestone Formation sands within West Sussex are likely to be capable of being defined as 'silica sands' in the broadest sense. However, in West Sussex the majority of the Folkestone Formation is found within the SDNP and major development within the Park should only be permitted in exceptional circumstances and when it is in the public interest. The updated Study confirms that there are alternative sources to the Folkestone Formation resource elsewhere in the country, particularly with regard to the relatively low purity specialist applications relating to agricultural, horticultural, sports and leisure end-uses. These alternative resources are still quite limited in extent (compared with resources of more general construction aggregate) but many of them fall outside nationally designated landscapes and (subject to planning consent) are capable of supplying the geographical areas which could potentially be served from the SDNP. In some (but not all) of these applications, the alternatives also include the option of utilising recycled glass. In light of this, the exceptional circumstances needed to allocate a site for silica sand extraction within the SDNP do not exist, therefore no allocation has been made in the Proposed Submission JMLP.

Given that most, if not all, of the Folkestone Formation sands within West Sussex may be capable of being classified as silica sands, they are considered as strategic resources and so safeguarded from needless sterilisation by other forms of development – the approach to safeguarding is set out in section 6.9 of the Proposed Submission Plan.

During discussions with the Authorities, Norfolk County Council (NCC) suggested that:

"there are significant resources of silica sand within Norfolk and it should be possible for suitable sites to come forward, although some parts of the resource are heavily constrained. Whether a sufficient landbank can be maintained depends in large parts on the operator's willingness to submit

planning applications.”

Based on these comments and the comments received from other authorities, the Authorities are confident that the approach taken in the Plan is sound. In addition, it is noted that the Norfolk Coast AONB has been removed from the Area of Search as part of NCC’s review of its plan for silica sand supply. The response from NCC therefore appears to be at odds with the approach it is taking in its own Plan, i.e. while NCC has discounted sites within its AONB at the same time it asks the SDNPA to re-consider whether there is a need for silica sand extraction from within protected landscapes, such as the SDNP, in West Sussex.

In conclusion, following a thorough review of the comments received, and in light of a review of the relevant evidence, it is not considered that any changes are needed to the approach to the supply of silica sand as set out in the draft JMLP.

Approach to Oil and Gas Supply (M7a and M7b)

2.3.11. Approximately 67% (499) of the responses received were concerned with the Plan’s proposed approach to the supply of oil and gas (497 in opposition of which 420 were of a standard template response, with 2 additional oil and gas industry responses received).

2.3.12. Organisations which commented on these policies included the following:

- Chidham and Hambrook Parish Council
- CPRE Sussex
- Cuckfield Society
- Frack Free Balcombe Residents Association
- Friends of the Earth
- Graffham Parish Council
- Historic England
- High Weald Joint Advisory Committee
- Kirdford Parish Council
- Portsmouth Water
- Cllr Sarah Sharp
- Sussex Wildlife Trust
- The Movement for Universal Democracy and Justice
- UK Oil and Gas Investments

2.3.13. Comments covered the following main areas:

- Hydraulic fracturing should not be allowed;
- Oil and gas supply is incompatible with European and national government’s climate change obligations, and policies (including the NPPF) and onshore supplies contribute minimally to our energy security;

- Energy should be provided from alternative renewable sources;
- The Plan and its policies should take a precautionary approach and be generally less permissive and more robust with respect to:
 - protection of: communities; groundwater; designated landscape and protected features;
 - differentiating between different designations
 - potential indirect impacts on protected areas
 - transportation of oil/gas and wastewater to and from the site
 - production of waste
 - storage and transportation of hazardous chemicals and contaminated fluids
 - light/air/water pollution
- Health impact assessments should be sought;
- Protected areas should be protected from developments directly adjacent to, or under them at any depth;
- Stringent monitoring should be required and there should be no assumption that other regulatory bodies will “operate as intended”;
- Time frame for completion of restoration should be specified and requirement be included to guarantee funds, to ensure restoration takes place; and
- Development may contaminate the land.
- Concern about extent of development creating an unreasonable level of disturbance and so multiple wells should not be allowed.

The Authorities’ response:

The wording of the NPPF, and, in particular, its expectation that Plans be ‘positively prepared’, suggests that, to be found sound, the Plan should include policies that positively encourage development meeting certain criteria, rather than negatively discourage development that does not meet the criteria.

The Plan is concerned with the supply of minerals and so the provision of renewable energy developments is not within its scope. To be found ‘sound’ the Plan must be consistent with national policy which, among other things, does not allow the authorities to prohibit the supply of oil and gas. Furthermore, the Government believes that UK shale development is compatible with its goal to cut greenhouse gas emissions and does not detract from its support for renewables. In terms of UK energy policy, it is considered that shale gas can create a bridge to a low carbon future while renewable energy is developed, energy efficiency improvements are made and power from new nuclear facilities is developed. Separately, Development Management Policy M23 requires all mineral operations to include measures which seek to avoid or minimise Greenhouse Gas emissions and maximise use of low carbon energy.

The Plan is sufficiently comprehensive to ensure that all potential

impacts, insofar as they are controlled by the planning regime, will need to be adequately addressed in planning applications. The policies have been amended to clarify protection provided in the following areas:

- the built environment
- onsite storage of substances
- associated transport of consumables, products and waste
- groundwater

Changes have also been made to certain Development Management policies to ensure that their meaning is further clarified. Supporting text which sets out the other regulatory regimes concerned with ensuring that hydrocarbon development does not cause unacceptable harm has been clarified and moved from after the policy to before it for clarity and emphasis. This supporting text confirms that national guidance is very clear that issues covered by other regulators including emissions, well and surface equipment integrity, processes controlling drilling and extraction, and health and safety should not be addressed by the planning process.

There is no international evidence that hydraulic fracturing (when properly regulated) should cause contamination of water supplies or other environmental damage. The UK has one of the most stringent regulatory systems in the world and in the unlikely event that operations posed a risk of pollution or risk to communities, the Government has the powers to close them down.

Regarding concerns about impacts on health, Policy M18 is included in the Plan specifically to ensure that there will not be an unacceptable impact on public health and amenity. To comply with this policy, and Environmental Impact regulations, assessments of potential health impacts from development will often need to accompany planning applications. Furthermore, the National Planning Policy Framework makes clear that wherever a planning permission is granted for mineral development, which includes hydrocarbon development, there should be no unacceptable adverse impacts on the natural and historic environment, or on human health.

Areas of residential development are also protected from unacceptable impacts by the development management policies including Policy M18. The inclusion of a specific minimum distance away from residential development cannot be justified as such a distance will vary depending on the exact circumstances of what is proposed and any mitigation which might already exist.

The policies provide protection of designated landscapes, habitats and other special features and Policy M7a has been drafted to ensure consistency with other legislation and national policy concerning hydraulic fracturing development within these areas. The scope of policy protection to areas beneath and proximate to designated areas has been clarified. As stated in the JMLP, applicants will be required to provide information about how the site has been selected including the extent of

the geographical area from which the target reservoir could be reached and how alternative sites within this area have been considered. This is important to demonstrate that the site selected is the least sensitive location from which the target reservoir can be accessed and needs to take into account on-site and off-site activities, including HGV movements and routing.

Policy M22 specifically addresses cumulative impacts which might arise if more than one mineral development takes place within a particular area. This policy is intended to ensure that an “unreasonable level of disturbance to the environment and/or to residents, businesses and visitors will not result”.

The plan does address indirect impacts such as those caused by movement of vehicles however it cannot control impacts resulting from the way in which minerals produced from developments are used.

Restoration of all oil and gas sites is a key site consideration and should take place at the earliest opportunity in accordance with Policy M24. Decommissioning, restoration and aftercare takes place either after appraisal, if the site is not suitable for production, or after production has ceased. Restoration and aftercare requirements will be set out in planning conditions and where necessary, through section 106 Agreements.

Text has been inserted within the supporting text and within the policies to clarify their scope including, for example, confirmation that the policies would apply to applications made to extend the time period of operations.

Policy M25 ('Community Engagement') requires liaison with communities as necessary. This is intended to help ensure that local concerns and opportunities are adequately taken into account in the design of the scheme, including any mitigation measures proposed. There is also a 'Community Charter' which the oil and gas industry has committed to for communities that host unconventional oil and gas development.

Approach to Plant, Processing and Secondary Activities (Policy M8)

2.3.14. Very few comments were received on this policy, although the Minerals Products association raised a concern that as written, the policy appeared to be aimed at processing and ancillary activities associated only with mineral working i.e. at quarries whereas certain types of mineral processing activity, such as concrete batching, takes place away from quarries at other types of minerals sites such as railheads.

The Authorities' response:

The need to expand the scope of the policy to make it clear that it covers processing activity at sites other than quarries is accepted and appropriate amendments to the title and content of the policy have been made.

Approach to Safeguarding Mineral Resources (Policy M9)

2.3.15. The Draft Plan's approach to safeguarding mineral resources was set out in policy M9. In addition a standalone guidance document intended to provide more details about the approach was prepared and published for consultation alongside the Plan

2.3.16. Organisations which commented on the Plan's approach to safeguarding mineral resources included the following:

- CEMEX
- Chichester District Council
- Crawley Borough Council
- Day Group
- Ibstock
- Michelmersh Brick Holding
- Mineral Products Association
- Norfolk County Council
- The Wiggonholt Association

2.3.17. Comments received mainly concerned the following matters:

- Concern about the requirement to show Minerals Safeguarding Areas (MSAs) on Policies Maps (prepared by District & Borough Councils as part of Local Plans) as they cover a broad area. A similar approach to EA flood maps is suggested instead. The industry should be consulted on more detailed safeguarding maps;
- Strengthen policy to positively protect mineral resources and specifically clause b (iii)⁵ to ensure that minerals safeguarding is given due consideration against the need for non-mineral development;
- Consultation within urban areas is not considered appropriate as mineral development is already sterilised and it would be unfeasible to extract in these areas.
- A minimum threshold for the size of a development below which mineral safeguarding would not apply should be considered;

⁵ This allows non-mineral development to take place in a Minerals Safeguarding Area where the overriding need for the development outweighs the need to safeguard the mineral.

- An additional clause is suggested to ensure development permitted close to mineral safeguarding areas does not prejudice the ability of the mineral to be worked; and
- Support for the approach to safeguarding silica sand as it is a nationally important mineral.

Comments on Draft Minerals Safeguarding Guidance

- Clarify who would be responsible for validating Mineral Resources Assessments and what assistance the Mineral Planning Authority would provide to the applicant and Local Planning Authorities during the planning process;
- Clarify how the process of prior extraction would be enforced (condition, legal agreement?);
- Consider the inclusion of a threshold in the list of 'exceptions';
- Safeguarding maps are not easy to read and clarification required about how built up areas have been defined. Consider making them contiguous with Local Plan built up area boundaries;
- Consultation buffer zone for minerals infrastructure should extend to 250 metres;
- Suggestions made to the list of information that applicants should consider when making an assessment of proposals that could compromise minerals infrastructure;
- Include potential users of the mineral as part of the consultation process.

2.3.18. Comments were also raised by organisations that attended a Minerals Safeguarding workshop in June 2016. These organisations are indicated by an asterisk in Appendix A. The main comments raised during the workshop were as follows:

- Regular training to reinforce the importance of mineral safeguarding;
- Suggested changes to the 'exceptions' list to clarify whether it should include 'reserved matters' applications, thresholds and householder applications. 'Exceptions' list is detailed but may make it unworkable;
- Query about Permission in Principle and Article 4 directions;
- Query about whether built up areas should be included in mineral safeguarding areas and that they should be consistent with District and Borough Local Plans;
- The need to consider mineral safeguarding should be included in validation checklists and local lists;
- Suggested changes to the mineral consultation flow chart;
- Clarification about the consideration of minerals safeguarding as part of the pre-application process and allocation of sites in Local Plans and Neighbourhood Plans. Need to include discussions with operators as part of the pre-application process.

The Authorities' response:

Mineral resources are finite and national policy requires local authorities to safeguard known locations of specific mineral resources of local and national importance so that they are not needlessly sterilised by non-mineral development. Policy M9 (Safeguarding Minerals) and the Mineral Safeguarding Area maps in the Plan provides the tools to ensure that the presence of minerals is considered during the planning process. A separate guidance document has also been prepared giving details of how effective consultation should take place between the District/Borough Councils and the Mineral Planning Authority.

In response to the consultation, some minor text changes have been made to policy M9 to ensure that minerals are given due consideration when proposals for non-mineral development are being considered. The Mineral Safeguarding Areas have also been amended to ensure the boundaries of key settlements (which, in some cases, are excluded from safeguarding) are consistent with the built up area boundaries in district and borough local plans.

Many of the other comments raised relate to how the mineral safeguarding policy would be implemented in practice. Amendments have been made to the Minerals Safeguarding Guidance to ensure that these points have been addressed. The Guidance now includes specific reference to the pre-application process and how the presence of minerals should be considered in Local and Neighbourhood Plan allocations. The list of planning applications that are exempt from the consultation process (the exceptions list) has also been amended to include a threshold and further clarification about when the Minerals Planning Authority would want to be consulted on applications for reserved matters.

Amendments have been made to the Minerals Safeguarding Guidance to address the general view that the approach to safeguarding specific minerals should vary according to the scarcity and demand for that mineral.

Further detail has been added to clarify the approach to safeguarding building stone. The approach is pragmatic and reflects the large extent of the resource and the low level of demand. This means that the MPA would only be consulted on proposals that are important for the repair of historic buildings.

The revised Minerals Safeguarding Guidance is published alongside the Proposed Submission Draft JMLP.

Mineral infrastructure safeguarding (Policy M10)

2.3.19. The Authorities also consulted on draft guidance that further explains the approach to Minerals Resource and Infrastructure Safeguarding; a related workshop was held on 29 June 2016 where the approach was discussed.

2.3.20. A number of responses were received from the following organisations regarding the approach to infrastructure safeguarding:

- Adur District Council
- Aggregate Industries
- Ardingly Parish Council
- Arun District Council
- Bluebell Railway Plc
- Brighton & Hove City Council
- CEMEX
- The Chichester Society
- Crawley Borough Council
- Day Group
- East Sussex County Council
- Mineral Products Association
- UK Oil and Gas Investments
- The Wiggonholt Association

2.3.21. There was general mineral industry support for the policy. The main matters raised were:

- The policy does not go as far as it could in comprehensively safeguarding sites from potential noise sensitive development coming forward;
- Wharves in the Western Harbour Arm of Shoreham Harbour should be safeguarded temporarily, until regeneration proposals come forward;
- Railway Wharf, Littlehampton, forms part of a proposed Economic Growth Area within the Submission Draft Arun Local Plan (currently in examination) and the supporting text should acknowledge this as it could impact the wharf;
- Concerns about the safeguarding of Ardingly Rail Depot and Chichester Rail Sidings; and
- Support shown by LPAs that have signed the Statement of Common Ground on safeguarding wharves at Shoreham Harbour (Brighton & Hove City Council, East Sussex County Council and Adur District Council).

The Authorities' response:
The concerns raised with regards to the policies not going as far as they could to safeguard sites from potential noise sensitive development coming forward have not resulted in any changes within the Plan. The Authorities feel that any noise sensitive development would be viewed as being able to "prevent or prejudice the use of existing minerals

infrastructure”, therefore would be resisted. The Authorities have added text to the Mineral Safeguarding Guidance to make clear that the impacts from noise (and dust) from aggregate activities would need to be considered for non-minerals development, to ensure that the minerals infrastructure is not prevented or prejudiced.

The buffer zone around safeguarded sites has been increased to 250 metres in response to one particular operator who has experienced problems arising from non-mineral development being located nearby. Further points have also been added to the list of information, included in the Minerals Safeguarding Guidance, that an applicant should provide as part of a ‘Minerals Infrastructure Assessment’ to ensure that policy M10 is properly addressed.

The Authorities recognise that the Railway Wharf (Littlehampton) forms part of a proposed Economic Growth Area within the Submission Draft Arun Local Plan. A reference to this has been made with the Plan.

The concerns raised regarding Ardingly Rail Depot and Chichester Rail Sidings have been considered. As both sites are existing, operational and permitted, they will continue to be safeguarded in line with requirements on national policy.

The two active temporary wharves (Kingston Railway Wharf and New Wharf) at Shoreham Ports’ Western Harbour Arm have been included in two new clauses within Policy M10. Discussions were undertaken with Adur District Council (the lead authority for the Shoreham Joint Area Action Plan) to ensure that the decision to safeguard these wharves would not result in becoming a barrier to the long term regeneration aspirations. The wharves will be safeguarded whilst they have planning permission, to ensure that non-minerals development in the area does not prevent or prejudice the operation of the wharves, as required by national policy.

Further clauses to the policy have been added to address the safeguarding of temporary minerals infrastructure more generally.

2.4. Development Management Policies

2.4.1. A breakdown of the comments on the development management policies in Chapter 8 is included below:

Q3.2 Do you support the development management policies set out in Section 8 the Plan?		
Response	Number	% of responses
Yes	62	29%
No	109	51%

Don't know	43	20%
No response	57	
<hr/>		
Total question responses	214	
Total form responses	271	
Total responses	744	

2.4.2. Organisations with specific concerns relating to the Plan's development management policies included the following:

- Balcombe Parish Council
- British Horse Society
- CEGA Group Services Limited (represented by Vail Williams)
- CPRE Sussex
- Cuckfield Society
- Frack Free Balcombe Residents Association
- Friends of the Earth
- Graffham Parish Council
- High Weald Joint Advisory Committee
- Historic England
- Midhurst Town Council
- Portsmouth Water
- Sussex Wildlife Trust
- West Sussex Local Access Forum
- The Wiggonholt Association

2.4.3. The majority of comments on the JMLP Development Management policies related to their effectiveness and whether, as drafted, they could be implemented in a way that would result in the outcome intended.

2.4.4. Comments were received on the need for the Plan to make it clear when certain development management matters, in particular those requiring restoration and aftercare of sites, could be covered in legal agreements (planning obligations).

2.4.5. Concern was raised that the Development Management policies are overly permissive with inclusion of the text "Proposals for development will be permitted provided that....".

The Authorities' response:

Many of the potential impacts that are addressed by the JMLP Development Management policies are similar in type to those that would result from waste management facilities and for this reason the text of many of the policies is based on the text of the Development Management policies in the adopted West Sussex Waste Local Plan. To some extent it may therefore be said that the wording of the Development Management policies is 'tried and tested'. However, it is recognised that, in some cases (but not all), amendments are needed to ensure the policies are effective and, in light of this, minor changes have been made to the following policies:

- M16 Water Resources

- M17 Biodiversity and Geodiversity
- M19 Flood Risk Management
- M23 Design and Operation of Minerals Developments
- M24 Restoration and Aftercare

In some cases, but not all, it was considered that the purpose of a policy could be made clearer with changes to the supporting text. This has occurred in the case of the following policies:

- M13 Protected Landscape
- M14 Historic Environment
- M15 Air and Soil
- M16 Water Resources
- M17 Biodiversity and Geodiversity
- M18 Public Health and Amenity
- M19 Flood Risk Management
- M21 Aerodrome Safeguarding
- M22 Cumulative Impact
- M20 Transport
- M23 Design and Operation of Minerals Developments
- M24 Restoration and Aftercare

Separate text has been added to the introduction of Chapter 8 setting out the types of matters that may be covered by planning obligations.

The wording of the NPPF, and, in particular, its expectation that Plans be 'Positively prepared', suggests that, to be found sound, the Plan should include policies that positively encourage development meeting certain criteria, rather than negatively discourage development that does not meet the criteria. Essentially, the Authorities are expected to prepare a balanced plan that is in line with Government policy and accepts that there are compromises. That is the reason for the inclusion of a range of policies that a) seek to enable mineral product and energy supply, and b) seek to limit harm to the environment and amenity to 'acceptable' levels, and where possible offer some environmental benefits.

2.4.6. Other specific concerns relating to certain Development Management policies included the following:

Policy M13 Protected Landscape

2.4.7. The policy should require development within a designated landscape to positively enhance the landscape.

2.4.8. Concern that impacts on areas outside of 'protected landscapes', believed to be as equally sensitive and of value to local residents, are not given equal protection.

The Authorities' response:

Policy M13 is a restricting policy rather than an enabling policy. Policies and text at M12 (Character), M24 (restoration & aftercare) and paragraph 8.33 (text to M13) explain and require that developments should achieve overall landscape benefit. It should be noted that this

policy received support from Historic England.

The Government has decided that certain landscapes have such unique qualities that they merit particular protection from development, however this does not mean that other areas are not protected. It is considered that, when taken as a whole, the policies of the Plan provide adequate protection and will ensure that development can only take place which is sympathetic to its *locality*. This is reflected by Strategic Objective 8 that states the Plan's intention "**To conserve and enhance the landscape and townscape character of West Sussex...**".

Policy M14 Historic Environment

2.4.9. Specific concern raised by Historic England concerning the need to tighten up the wording of the policy and make it more explicit in its intention.

The Authorities' response:

Paragraph 143 of the NPPF advises that Plans should set out environmental criteria to ensure that permitted operations do not have unacceptable adverse impacts on the historic environment. The policy as drafted protects a) known features of importance, and seeks enhancement where possible; b) features of importance that may be revealed through archaeological survey arising as part of a planning application; and c) requires further investigation and recording where an asset will be lost. This set of criteria is considered appropriate to meet with the aims of the NPPF. The policy should be read in conjunction with the accompanying text that explains the detailed means by which the policy will be applied.

Policy M15 Air and Soil

2.4.10. Concerns about whether the policy would adequately protect health and amenity.

The Authorities' response:

Policy M18: public health and amenity deals with the impacts of dust and air quality. Text accompanying that policy explains that the Environment Protection Act covers this matter. It should be noted that this policy received support from the Environment Agency.

Policy M17 Biodiversity and Geodiversity

2.4.11. Detail changes to the wording were suggested including inserting reference to specific sections of the NPPF.

The Authorities' response:

Policies should not repeat national policy as all proposals will, in any

case, be assessed against their consistency with national policy. Changes to the supporting text, to reference protection provided by specific legislation have been inserted.

Policy M18 Public Health & Amenity

2.4.12. There is a need to consider the impacts on health of anxiety and stress caused by applications for unconventional oil and gas.

The Authorities' response:

Planning applications for most types of mineral development can cause stress to individuals, in part because of the uncertainty that surrounds change. In part because of this, the Council places considerable weight on the importance of communication and engagement; hence the inclusion of Policy M25 on Community Engagement.

Policy M19 Flood Risk Management

2.4.13. Concern raised that policy should recognise that Sustainable Urban Drainage Systems can have adverse impacts on groundwater and should be worded accordingly.

The Authorities' response:

Sub paragraph (iii) indicates that SUDS should only be used 'where appropriate'. Paragraph 8.8.5 of the Plan explains that the broad approach of assessing, avoiding, managing and mitigating flood risk should be followed. This approach would determine the suitability of SUDS for any particular proposal.

Policy M20: Transport

2.4.14. There are concerns about what is meant by severe impact, as for vulnerable road users (walkers, cyclists, equestrians) this would mean not being able to safely use a local road as a link to access off-road routes e.g. public rights of way.

The Authorities' response:

Change 'severe' to 'unacceptable' to allow more reasonable judgements to be made about the acceptability of traffic impact

Policy M22 Cumulative Impact

2.4.15. The policy should include the need to take into account cumulative and indirect impacts of hydrocarbon extraction.

The Authorities' response:

The Plan does address indirect impacts such as those caused by movement of vehicles however it cannot control impacts resulting from the way in which minerals produced from developments are used

Policy M23 - Design & Operation of Minerals Developments

2.4.16. Concern that inclusion of the term 'where appropriate' means that small scale sites will not to comply with the policy.

The Authorities' response:

There is nothing in the wording of the policy that reduces protection of small sites, or of environmental and public amenity around small sites.

2.5. Other general comments

2.5.1. The precautionary principle should be applied in the Plan so that it is considered when development proposals are assessed.

The Authorities' response:

The NPPF includes a presumption in favour of sustainable development and does not promote a precautionary approach – inclusion of such an approach would therefore be inconsistent with national policy.

2.5.2. A further general concern was raised about the how certain terms within policies would be interpreted (e.g. 'unacceptable impact', 'adequate', 'small scale').

The Authorities' response:

It is the role of the Authorities' Planning Committees to make these judgements taking into account Government and other policy, the views of consultees and the public, and the recommendations of the Council's planning officers which, as appropriate is informed by specialist advice from statutory consultees including the Environment Agency, Natural England, Highways England, the Highways Authority and the Environmental Health Authority.

3. Comments on shortlisted MINERAL sites

The table below shows the breakdown for the formal consultation survey responses. Many more respondents responded on individual sites through other non-response form means.

Survey responses - Support inclusion of site?

Minerals sites	Survey responses received	Yes	No	Don't Know	No Response
Ham Farm	161	19	137	3	2
%		12%	85%	2%	1%
Extension to West Hoathly Brickworks	22	11	9	2	0
%		50%	41%	9%	0%
Chantry Lane Extension (non-allocated)	4	1	3	0	0
Horncroft (non-allocated)	3	1	2	0	0
Buncton Manor Farm (non-allocated)	1	1	0	0	0
Minsted West (non-allocated)	1	1	0	0	0
Madam Green Farm (non-allocated)	1	1	0	0	0
Coopers Moor (non-allocated)	1	1	0	0	0
Duncton Common (non-allocated)	1	1	0	0	0
Hambrook Grouping sites (non-allocated)	1	0	1	0	0
Lower Stumble, Balcombe (oil & gas exploration)	4	0	2	0	2
Markwells Wood (oil & gas exploration)	1	0	1	0	0
Broadford Bridge, Billingshurst (oil & gas exploration)	1	0	1	0	0
Philpots Stone Quarry (active site)	1	1	0	0	0

3.1. Allocation of Ham Farm

3.1.1. Approximately 23% (179) of the responses received were concerned with the proposed Ham Farm allocation (158 comments opposed, 16 in support and others neutral). Organisations making comments on the allocation included the following:

- Ashurst Parish Council
- Bramber Parish Council
- CPRE Sussex
- Elan Nursery
- Environment Agency
- Historic England
- Horsham District Council
- Natural England
- The Dudman Group of Companies
- Southern Water

- South Downs Society
- Steyning Parish Council
- Steyning Quarry Action Group (SQAG)
- Sussex Wildlife Trust
- The Visitor and Tourism Group of the Steyning and District Community Partnership
- Washington Parish Council
- The Wiggonholt Association

3.1.2. The main comments concerning this matter were as follows:

- Soft sand should be sourced from other areas;
- There are exceptional circumstances which mean Ham Farm should not be allocated;
- There will be an unacceptable impact on unspoilt countryside in particular the South Downs National Park, views from Chanctonbury Ring and the site will be an eyesore for the village of Steyning until 2033;
- There will be impacts on historic buildings including the Grade 1 listed Wiston House and the 'numerous listed buildings' within the house's grounds including Wappingthorn Manor;
- The economic impact will be large due to detrimental impact on tourism;
- The site will have an adverse impact on roads causing congestion and road safety issues;
- The number of vehicular movements, and the impact on traffic and residents in the area will be greater than assumed in the Transport Assessment;
- Large amounts of water will need to be removed from the site by road, and this has not been considered;
- The site access will require removal of a section of established trees/vegetation;
- The site will impact on the hydrology and hydrogeology including the adjacent Alderwood Ponds;
- The site will cause air, light and noise pollution and impact adversely on health and amenity;
- House prices/property values will suffer;
- Concern about the impact on the visitor economy;
- Concern about impact on ecology;
- The land should be used to grow maize for the Anaerobic Digestion Plant at Wappingthorn Farm;
- There is insufficient inert material in West Sussex to restore the site;
- There may be issues of cumulative effect if the site is developed alongside the Rock Common and Sandgate Park sites; and
- Requests for other sites to be considered, irrespective of whether they were within the SDNPA.
- The proposer of the Ham Farm site suggested that the boundary be changed, especially as this would help address local concerns;

- 3.1.3. A key matter raised was the existence of a restrictive covenant on part of the Ham Farm site that might prevent quarrying in this location.

The Authorities' response:

The responses received have resulted in a change to the boundary of the Ham Farm allocation such that the allocation is now overall a smaller area than originally proposed. This change was in response to the existence of a restrictive covenant, which the proposer of the Ham Farm site considers does not make the site 'undeliverable'. Although any decision to enforce the restrictive covenant is a private matter, the site allocation has been reduced in size to exclude the area of land covered by the covenant to ensure it is deliverable. This has also resulted in a new area being included to the South West corner of the site. The site is now approximately 8.2 hectares and the potential yield from the site has been reduced from 850,000mt to 725,000mt (based on borehole data), which would still make a significant contribution to the supply of soft sand in West Sussex. The development principles have been further strengthened to ensure the future mineral extraction at the site would not cause unacceptable impacts.

Use of the term 'exceptional circumstances' in the Plan has been misunderstood as this relates specifically to paragraph 116 in the NPPF which states that major development should only be allowed in National Parks (and AONBs) in 'exceptional circumstances'. As Ham Farm is not within the SDNP this paragraph does not apply.

The Landscape Assessment was updated, taking account of the amended boundary of Ham Farm (this is published with the evidence base). This has shown that the revised site boundary is more acceptable than the previous site boundary set out in the Regulation 18 Draft JMLP. The impact of any proposal on the landscape will also be considered against policy M13 of the Plan that is intended to help ensure that the quality of the landscape is enhanced and conserved.

NPPF Paragraph 145 states that, Mineral Planning Authorities (in this case West Sussex County Council and the South Downs National Park Authority) must plan for a steady and adequate supply of aggregates. Estimates of the annual demand set out in the most recent Local Aggregate Assessment for West Sussex suggest that there is a currently a shortfall of up to 3.3 million tonnes of soft sand to 2033 and excavation at Ham Farm (which is assessed as acceptable in principle) would therefore meet some of that need. Other areas within West Sussex underlain by soft sand have been assessed as unsuitable for extraction due to largely being constrained by national landscape designations i.e. the SDNP (See the Minerals Site Selection Report). In the absence of other, more suitable sites in West Sussex outside national landscape designations, and without any substantive evidence which shows the site would not be suitable for future extraction, non-allocation of Ham Farm would be contrary to national policy.

The Authorities are aware that there are a number of historic and listed buildings within the area. There is no evidence that impacts on historic buildings cannot be overcome. The scope of the development principle related to historic buildings has been expanded, and the impact on listed buildings would be considered at planning application stage. Policy M14 of the Plan also ensures that impact on the historic environment is considered, and only those proposals that are acceptable would be permitted.

To take account of the latest data available, staff vehicle movements, and also the impact of materials being imported for restoration of the site, an updated Transport Assessment has been undertaken for the Ham Farm site and this has been published as part of the evidence base. This updated transport assessment shows that the site would not cause severe harm. The site is also located adjacent to the A283 that forms part of the Advisory Lorry Route and is suitable for HGV use. To ensure that vehicles would use the A283 and not less suitable routes, a lorry routing agreement would be required with the site operator.

The transport assessment considered that the removal of trees will be required to allow for safe access to/from the site. The impact of this vegetation clearance was considered as part of the updated landscape assessment which concluded that this tree loss will have only a very localised landscape and visual impact, due to the extent of tree cover on the south side of the road. The trees do not have any great landscape value in their own right, and any ecological impacts would be considered in detail at the planning applications stage. The development principles require that the access should be carefully sited to ensure lines of mature broadleaf trees remain intact. A tree survey and arboricultural impact assessment in accordance with "BS5837 Trees in Relation to Design, Demolition and Construction 2012" should be provided to ensure that retained trees are adequately protected from site operations and that any to be removed are clearly identified and appropriate mitigation proposed. There is no evidence to suggest that water would need to be removed from the site by road. A specific policy (M20) is intended to ensure that all minerals proposals address transport issues as they come forward. A planning application for the site would need to be accompanied by a separate detailed transport assessment setting how transport issues are to be addressed through development of the site.

The Landscape Sensitivity and Capacity study states that there are suitable mitigation measures which will ensure any impacts on tourism and the economy are not unacceptable. Furthermore proposals for the site would only be acceptable if it was demonstrated that they did not result in any unacceptable impact on public amenity, such as on public footpaths including the South Downs Way. In addition, as the site is located on a road suitable for HGVs, there will be no impact on tourism around the SDNP, or Steyning area. As set out above, an updated transport assessment has also shown that the impact from the site would not be severe. Development principles have been included in the Plan to ensure landscape assessments are carried out, taking account of the SDNP and Wiston Park. Therefore it is not considered that the site would

result in an adverse impact on tourism.

An assessment (known as 'Habitats Regulation Assessment') of this site has been undertaken that shows the site would not have any impact on habitats which are protected by specific legislation. The Plan includes a specific policy (M17) intended to ensure that minerals proposals address biodiversity and geodiversity issues.

The development principles for the Ham Farm site include the need for a Flood Risk Assessment (FRA) and mitigation to be provided at planning application stage to avoid unacceptable impacts on hydrology and hydrogeology. The Authorities have consulted the Environment Agency who consider that the site is acceptable in principle. Southern Water have been consulted, and state that there are no fundamental reasons why the site could not be allocated for minerals development. The new site area further reduces any risk by excluding the watercourses to the north of the site and this is reflected in an improved score in the Sustainability Appraisal. Any proposal for extraction would be considered against Policies M16 and M19 are included to help ensure that risks to people and property from flooding are minimised, water resources including aquifers are safeguarded from contamination, and the quality and quantity of the water environment is conserved and enhanced.

The Authorities are aware that, if not managed properly, mineral activity can have an impact on health and amenity from air, light and noise pollution. At all quarries, steps are taken to minimise noise by ensuring vehicles are fitted with silencers and acoustic barriers are constructed as required. Dust suppression measures are also employed to prevent dust dispersion. Due to the distance of the site from the main built up area of Steyning (including the school and leisure centre), noise and dust is not expected to have a noticeable impact on the village, however these issues would be considered in detail at the planning application stage, when detailed proposals are put forward. Any proposals would be tested against all relevant policies in the Plan. Policy M18 of the Plan ensures that public health and amenity are considered and protected. Relevant development principles are also included specifically xix and xxi.

The Authorities accept that the impact that extraction could have on property values is a concern, however it must be noted, that this is not a planning consideration.

Concerns were raised that the land should be used to grow maize for the Anaerobic Digestion (AD) Plant at Wappingthorn Farm. Original plans for this AD plant anticipated that maize would be grown at the site to supply the plant, however the need to feed the plant by importation is something that the applicant (Wappingthorn Farm) has made provision for. West Sussex County Council, as Local Highway Authority, was consulted on the application for the AD plant at Wappingthorn Farm to assess the potential for impact on the highway as a result of the development. The application was assessed in detail in order to establish vehicle movements. This assessment considered several potential sources of movement, including for the importation of crops from

locations other than Wappingthorn Farm. The conclusion was that, due to its size, the amount of feedstock required by the plant is limited; therefore any importation of material will also be limited. Overall, the Local Highway Authority was satisfied that such a scenario would not cause severe highway safety or capacity issues and should not prevent the development. Any such traffic or movement would not be considered out of the ordinary for a farm.

Concerns have been raised that there is insufficient inert material in West Sussex to restore the site. There is no evidence that this is the case, particularly as existing sites are being progressively restored with inert materials. The Annual Monitoring Report shows the amount of inert waste that is produced annually.

The cumulative effect of Ham Farm has been considered alongside the existing quarries to the west (Rock Common and Sandgate Park), from both a landscape and transport impact point of view. The transport and landscape assessments have both shown that there would not be an unacceptable impact as a result of Ham Farm becoming operational. Furthermore, the operator's intention is that extraction would not be begun at Ham Farm until extraction at Rock Common had ceased. A specific development principle has been included for Ham Farm, seeking to ensure that the cumulative impact on the highways network is considered at planning application stage, whilst Policy M22 is on Cumulative Impacts.

It should be noted that a site allocation is not a grant of planning permission. Before planning permission is granted, a planning application will need to be submitted and determined by the Mineral Planning Authority. The planning application will be assessed against all the policies in the JMLP (as well as other material considerations) and development could only take place once the planning issues have been satisfactorily addressed.

3.2. Allocation of West Hoathly Brickworks Extension

3.2.1. Approximately 2% of the responses were concerned with the proposed allocation of an extension to the claypit at West Hoathly Brickworks (4 in opposition, 6 in support and 3 others). The following organisations made comments:

- CPRE Sussex
- High Weald Joint Advisory Committee
- Ibstock Brick Ltd.
- Mid Sussex District Council
- Natural England
- Sussex Wildlife Trust
- West Hoathly Parish Council

3.2.2. A summary of the main comments received is as follows:

- Operator's support for the allocation;
- Contrasting comments concerning the development principles on the one hand questioning the appropriateness of setting out detailed requirements and on the other suggesting they be strengthened;
- Information concerning the content of archaeological assessments should be set out in the policy;
- Concerns with the impact on the High Weald AONB;
- Concerns about increased HGV traffic and impact on the road network;
- The potential for cumulative impacts must be recognised in particular relating to the Ashdown Forest SPA/SAC;
- Concerns about pollution;
- Concern about how the site will be restored and request that the High Weald Joint Advisory Committee, Mid Sussex District Council and West Hoathly Parish Council be involved in discussions about restoration of the site;
- Should be made clear that the allocation would provide circa 3 years additional life, and, as this is less than the 25 year reserve sought by national policy, additional reserves elsewhere may be required to support the brickworks;
- Annual monitoring should consider whether circumstances have changed such that the site isn't required.

The Authorities' response:

Development principles have been added as a result of recommendations set out within evidence gathered through the Plan making process. They are intended to guide the developer, as well as provide local communities, that the issues of concern are addressed at planning application stage. The development principles are intended as 'prompts' to developers to consider certain matters relevant to a particular site and the level of detail included reflects this, nevertheless they have been amended to ensure specific mention of the Ashdown Forest SPA/SAC, and Wakehurst & Chiddingly Woods SSSI and Weir Wood Reservoir SSSI.

The Policy is focussed on the allocations, and includes development principles which set out specific matters that would attract attention in any planning application. Expanding the policy to explain what each individual development principle entails would make the policy unnecessarily long and unduly prescriptive. The supporting text of Policy M14, and Policy M14 itself, provide further detail on how matters concerning protection of the historic environment should be addressed. An application would need to satisfy all policies in the Plan and therefore there is no need to include further explanation as suggested.

The Authorities commissioned a landscape assessment, which concludes that the site is suitable for extraction subject to mitigation. Several development principles have been specifically included to ensure that there is mitigation to minimise any impact on the AONB landscape. The site is to be restored to existing levels. In addition any application would be considered against Policy M12 which is specifically concerned with

ensuring that proposals for mineral development will not have an unacceptable impact on the character, distinctiveness, sense of place of the different areas of the County and the special qualities of the National Park and Areas of Outstanding Natural Beauty and their settings.

The Plan includes a specific strategic objective (9) that states: *"To protect and, where possible, enhance the natural and historic environment and resources of West Sussex."* The Plan also includes a specific policy (M17) which is intended to provide appropriate protection and enhancement of features of biodiversity and geodiversity

The brick factory is subject to planning permission from Mid Sussex District Council, and extraction is dealt with by the County Council. In any event, the operator does not intend to increase production of bricks at the site, therefore there would be no increase in the number of HGVs leaving or entering the site. Any planning application submitted to the County Council would concern extraction of raw material to supply the factory.

The Transport Assessment concluded that there are no issues with allocation of the extension to this site. The Transport Assessment is available to view with other evidence base documents and the outcomes are summarised in the Mineral Site Selection Report.

The Authorities are aware that, if not managed properly, mineral activity can have an impact on health and amenity from air, light and noise pollution. At all quarries, steps are taken to minimise noise by ensuring vehicles are fitted with silencers and acoustic barriers are constructed as required. Dust suppression measures are also employed to prevent dust dispersion. Such issues would be considered at the planning application stage, when detailed proposals are put forward. Any proposals would be assessed against all relevant policies in the Plan. Policy M18 of the Plan ensures that public health and amenity are considered and protected. Policies M16 and M19 are included to help ensure that risks to people and property from flooding are minimised, water resources including aquifers are safeguarded from contamination, and the quality and quantity of the water environment is conserved and enhanced.

The Plan includes a specific policy (M22) intended to ensure avoid cumulative impacts and states that the proposals will be approved if an *"unreasonable level of disturbance to the environment and/or to residents, businesses and visitors will not result from minerals development either individually or as a cumulative effect alongside other sites operating simultaneously and/or successively"*.

Policy M25 of the Plan expects appropriate community engagement, including liaison panels. The Plan includes a specific objective 13: *To ensure high quality mitigation and restoration to appropriate after uses.* The Plan also includes a specific policy (M24) intended to ensure appropriate restoration and aftercare. In order to comply with Policy M24, any planning application would include restoration conditions and plans, which would be subject to consultation with the District Council

and Parish Council. Paragraph 7.2.5 of the JMLP states: *"The after use for this site would be a return to agricultural uses, or restoring part, or all, of the land to woodland. Restoration should seek to reinstate the original profile of the site."* The development principles expand on the type of restoration that would be considered appropriate and expect the existing site liaison group to be continued.

Any permission to allow imports to the brickworks would be considered separately to the allocation and on its merits against other policies of the Plan including M5. Such an application would most likely be dealt with by the District Council. Any application for additional reserves in West Sussex to serve the brickworks would be considered against policy W5 though no specific sites have been promoted. The potential need for additional reserves is acknowledged in the Mineral Site Selection Report.

Information will be gathered on an annual basis concerning the need for clay from this particular site which will inform any decision to develop it. This information is set out in the monitoring arrangements for the clay supply policy, M5.

Detailed information concerning the assessment of the site's suitability for allocation in the JMLP is included in the Mineral Site Selection Report.

4. SPECIFIC COMMENTS ON NON-ALLOCATED OR ALTERNATIVE SITES

4.1.1. Areas of comment relating to non-allocated or alternative sites covered the following broad areas:

- minerals operators requested the allocation of other sites in the JMLP, while also supporting the proposed site allocations;
- support for non-allocation of certain sites, in particular Horncroft; and
- the conclusion of the technical assessment of the Hambrook grouping of sites as 'acceptable in principle' was disputed.

4.1.2. Comments received on each site are considered in turn below.

4.2. Horncroft

4.2.1. Five comments were received concerning the Horncroft site as a potential site for silica sand extraction. Detailed comments, prepared by mineral planning consultants, were received both promoting the site (from the landowner) and arguing against its inclusion as a site allocation (from a local resident). Comments were received from the following organisations:

- Barlavington Estate (represented by Mineral Planning Group)
- Bury Parish Council
- Fittleworth & District Association
- Horncroft Residents Association
- The Wiggonholt Association

4.2.2. The main comments can be summarised as follows:

- The site is now being promoted as a far larger site that would require a large on-site processing plant, which has not been considered in the Minerals Site Selection Report.
- The site is the source of high quality silica sand that can only be obtained from limited areas in England and, as such, is of strategic national importance and should be allocated in the Plan.
- Conflicting comments concerning impacts on the landscape of the site with the majority suggesting there would be an unacceptable impact and one suggesting that, as the site is well screened, there would not be an adverse impact.
- There are significant deposits of silica sand in Scotland that are outside any National Parks and closer in distance and journey time to the specialist glass manufacturers based in Cheshire, Yorkshire and Merseyside
- There is no evidence that the site is a source of high grade silica sand.
- Development of the site would result in unacceptable impacts to the landscape, tourism, public health and amenity and on local roads.

- If developed it is important to ensure that the silica sand is only used in high grade applications such as glass making

The Authorities' response:

The impacts of any processing equipment at the site has not been separately assessed, however the promoter of the site considers that sand will not be processed at this site but will be transported to a processing facility in Surrey.

A review of silica sand supply and demand evidence has been undertaken⁶ and this concludes that high quality silica sand is present within the Horncroft site. However this review also concludes that, although this is a nationally important mineral, alternative sources are available to satisfy demand elsewhere in the UK and so, the exceptional circumstances (as set out in paragraph 116 of the NPPF) needed for this site to be allocated (within the National Park) do not exist.

With regard to the impacts of the site, the Authorities' assessment of the site's suitability concluded the following:

- There would be an unacceptable impact on the landscape;
- there is a minor risk of adverse impact due to vehicles accessing the site but this could be reduced by mitigation measures, such as a detailed routing agreement;
- mitigation measures could be adopted to ensure local residents do not suffer any harm;
- public rights of way would not be affected.

The JMLP Sustainability Appraisal concluded that the site would have a 'minor positive' impact on the local economy as its development of the site may lead to new employment opportunities;

Detailed information concerning the assessment of the site's suitability for allocation in the JMLP is included in the Mineral Site Selection Report.

4.3. Hambrook Group of Sites

4.3.1. 10 responses were received in relation to the Hambrook Grouping of sites, which had been assessed for the extraction of land-won sharp sand and gravel. The Hambrook Grouping of sites are considered acceptable in-principle, but were not allocated in the draft Plan as the need for sharp sand and gravel is already being met from existing sites and marine won sources.

4.3.2. The comments received are concerned with the view that the grouping is assessed as 'acceptable in-principle' in the Mineral Site

⁶ Silica Sand Study 2016 <https://www.westsussex.gov.uk/about-the-council/strategies-plans-and-policies/environment-planning-and-waste-plans-and-policies/minerals-and-waste-policy/new-minerals-local-plan/evidence-base/>

Selection Report and should be re-classified as not acceptable in principle.

4.3.3. Comments were received from the following organisations:

- CEGA Group Services Limited
- Chidham & Hambrook Parish Council's
- Hambrook District Residents' Association

4.3.4. Detailed responses were also received from local residents.

4.3.5. The main areas of comment are as follows:

- Not consistent with the vision and strategic objectives of the draft Plan;
- The sites should be considered not acceptable in principle, and the assessment scores do not support the conclusions made;
- The sites are not consistent with Government Guidance – no evidence of viability of resource, landowner support, and acceptability in planning terms not properly considered
- Not well related to the Advisory Lorry Route (ALR), and the local roads are not suitable for HGVs, therefore would fail against Policy M20 in the draft Plan;
- The proposals would have an unacceptable impact on the character of the area, and would therefore fail against Policy M12 in the draft Plan;
- The proposals would result in noise, vibration and air pollution caused by HGVs;
- Concerns over the impact on neighbouring land uses, including the CEGA site;
- No consideration of impacts on groundwater levels;
- Potential impacts of the conveyors have not been included;
- There is no analysis of Chichester District landscape policies;
- Concerns with impacts on views;
- Cumulative impacts are likely as the processing area would be operational at the same time as extraction at one of the sites;
- The key issues and constraints section is unbalanced;
- No evidence of the viability of resources or landowner support; and
- Inconsistencies in the Mineral Site Selection Report.

The Authorities' response:

It is considered that, in principle, these sites could be developed in a manner that did not have an unacceptable impact on the environment, local amenity and businesses. For it to be acceptable, any proposal would have to show, in detail, how the criteria set out in the policies of the Plan would be met. Any proposal that was assessed as not achieving this, would not be granted permission.

The RAG assessments used in the Mineral Site Selection Report are designed to bring to the Authorities' attention key issues on sites. Only in

cases where sites have a red score against criteria, are they they considered to present insuperable obstacles to development. The sites were not scored as 'red' against any criteria and therefore, are considered acceptable 'in principle'.

The conclusion box is always marked as green or red. Green being those sites that are considered suitable for consideration at the next stage of site assessment and red being those considered "not acceptable". They are not intended to be in line with the 5 colour RAG scoring system.

It is considered that these sites would not be promoted for inclusion in the Plan by a minerals operator (as they have been) if viable resources were not present. Furthermore, details, such as resource depth, would be considered at the planning application stage. There is no evidence to suggest it is not practicable or viable to extract minerals here.

Discussions with landowners have not revealed any outright objection to development of these sites for minerals extraction but in any event , as the sites are not being allocated, there is no requirement to provide further evidence.

The Transport Assessment concludes that the sites would not have an unacceptable impact on local highways. Only those proposals considered 'severe' would be ruled out at this stage of transport assessment. The Transport Assessment recommends improvements at the Common Road/Cheesemans Lane junction, which would be dealt with at the planning application stage. Should a planning application be submitted, this matter would be considered in much greater detail, and permission would only be granted if the proposals are considered acceptable against the policies in the Plan

There is no evidence to suggest that, with appropriate mitigation, these sites would cause an unacceptable impact on public health and amenity. Should a planning application be submitted, such impacts, including those caused by ransport, would be considered in much greater detail, and permission would only be granted if the proposals are considered acceptable against Policies M18 and M20 concerning Public Health and Amenity and Transport.

There is no evidence to suggest that impacts on neighbouring uses would be severe in nature, or that other users would be required to relocate. The Authorities are aware of the nearby CEGA site and the company have been consulted on the Plan. For permission to be granted for mineral activity, any proposal would need to demonstrate that any unacceptable impacts could be satisfactorily mitigated.

The impact on the water environment has been considered through SFRA and set out in the MSSR. Minerals development is water compatible, and the Environment Agency has not identified any concerns. The impact on the water environment would be dealt with in detail at the planning application stage, including against consistency with Policy M16 that concerns protection of the water environment.

The use of conveyors, and their impacts, has been taken into account. These are issues that would be dealt with at planning application stage where potential impacts would be considered in detail against the policies in the Plan.

Cumulative impacts resulting from simultaneous processing and excavation operations have been assessed as part of the landscape and transport assessments and found not be unacceptable in principle. Policy M22 is specifically concerned with controlling cumulative impacts.

The landscape assessment of the Hambrook Grouping concludes that the site will not have unacceptable impacts that cannot be mitigated. In any event, if an application were to come forward the proposal would need to demonstrate this and would also be considered against relevant adopted policies in the Chichester District Local Plan.

Policy M12 in the Proposed Submission Joint Minerals Local Plan states that developments would be permitted provided that they would:

- not have an unacceptable impact on the character, distinctiveness, sense of place of the different areas of the County, the special qualities of the South Downs National Park, and the setting and character of the Chichester Harbour and High Weald Areas of Outstanding Natural Beauty and the setting of protected landscapes;
- not have an unacceptable impact on the separate identity of settlements and distinctive character of towns and villages (including specific areas or neighbourhoods) and development would not lead to their actual or perceived coalescence;

There is no evidence to suggest that the sites could not be effectively screened. Details of screening would be provided at the planning application stage. At this high level, plan-making stage, the Landscape Assessments have concluded that any potential unacceptable impacts could be mitigated, as necessary, and therefore overcome.

Some minor amendments have been made to the Mineral Site Selection Report, correcting minor inconsistencies and errors.

It should be noted that, even if a site is not assessed as “acceptable in principle”, it would not necessarily stop a site gaining planning permission if proposals put forward in a planning application were deemed to address concerns, and be consistent with policies in the Plan. The assessment of a site as ‘acceptable in principle’ at the plan-making stage, makes no difference to the Authorities’ assessment of a planning application (which must be treated on its merits).

The intention is only to provide a short summary of the key issues that would need further consideration. This list is not intended to be definitive or assign weighting to the key issues.

For those sites proposed for allocation within the Plan, these lists

provided a starting point for the Development Principles.

4.4. Buncton Manor Farm

4.4.1. This is a soft sand site that was ruled out due to concerns related to impacts on views from Chanctonbury Ring and the South Downs Way. A summary of comments from the potential operator (The Dudman Group of Companies) are as follows:

- The site lies outside the SDNP, therefore satisfies elements of the vision and strategic objectives;
- Overemphasis of the landscape impact and insufficient examination of potential mitigation measures has been included in landscape assessments. Detailed landscape matters would be considered at planning application stage and visual impact issues would be overcome; and
- Reference made to cumulative impacts due to Rock Common sandpit, however development of this site could be delayed until Rock Common is completed.

The Authorities' response:

The Authorities agree that site lies outside the SDNP and therefore satisfies elements of the vision and strategic objectives. However it is considered that the site would have an unacceptable impact on views from the Chanctonbury Hill Fort (a scheduled ancient monument), and the South Downs Way, therefore it would not be in keeping with Strategic Objectives 3, 8, and 9 which seek to *make provision from outside the SDNPA, where possible; to conserve and enhance the landscape and townscape of the SDNPA; and to protect the natural and historic environment* respectively.

Further details are included in the Landscape Capacity and Sensitivity Study (2016), which concludes that a minerals site at Buncton Manor Farm would have a significant impact on the South Downs National Park. The site has therefore been excluded from allocation in the Plan.

4.5. Madam Green Farm

4.5.1. Comments were received by the potential operator (The Dudman Group of Companies) who requested that the site be allocated for the following reasons:

- The site lies outside of the National Park
- There would be no harm to amenity
- The site could be restored to a beneficial use e.g. agriculture, flood alleviation
- The Environment Agency do not rule the site out on flood risk grounds
- The site would provide a much-needed supply of sharp sand

The Authorities' response:

The site has not been allocated as there is no requirement to plan for additional sharp sand supplies in the JMLP.

Non-allocated soft sand sites within the SDNP

4.5.2. As part of the site selection process, soft sand sites within the SDNP, which were assessed as 'acceptable in principle', were ruled out as they were considered not to have passed the 'exceptional circumstances' and 'public interest' tests (as required by NPPF Paragraph 116). Responses were received which questioned this approach and these are summarised below:

4.6. Land to the East of West Heath Common

4.6.1. The only comments relating to this site were received from the promoter of the site (Cemex) which included the following:

- Site should be included due to the clear need for the plan to allocate additional soft sand supplies;
- The site can be worked and restored without significant harm to the character or purpose of the SDNP;
- The site would contribute to the local economy in terms of jobs and local building materials;
- The site would enhance the SDNP in terms of landscape, biodiversity and recreation opportunities;
- The existing quarry has been operational for many years without detrimental effect on the former AONB, and now the SDNP; and
- The proposed site should be included as it will be able to meet the exceptional circumstances and public interest tests for major development in a protected landscape, as set out in the NPPF.

The Authorities' response:

When assessing potential impacts, the Minerals Sites Selection Report (MSSR) concluded that Land to the East of West Heath Common would be acceptable in principle. However, the site has not been allocated as to do so would be contrary to NPPF (Paragraph 116) that is against major development taking place within National Parks (and AONBs), except in exceptional circumstances, and where it can be demonstrated that they are in the public interest. These NPPF tests have not been satisfied in this instance and as such the site is not allocated for mineral development in the JMLP.

This is explained in detail in the Minerals Sites Selection Report.

Furthermore paragraph 144 of the NPPF states that, as far as practicable, landbanks for non-energy minerals should be maintained outside of National Parks.

It also important to note paragraph 115 of the NPPF which states: "Great weight should be given to conserving 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 landscape and scenic beauty."

The Plan recognises that the difficulties associated with identifying suitable sites for soft sand supply means that it will not be possible to maintain soft sand supplies at historic levels from sources within West Sussex. However the Plan expects that the demand for soft sand within West Sussex will be met in future by existing sites, a new allocation at Ham Farm, and alternative sources of supply including imports and from marine won sources⁷.

The calculations for future demand for land-won soft sand, as set out in the Local Aggregates Assessment, are based on historical supply levels and these have been in decline over recent years. The 10 year average of past annual sales is 329,394tpa, whereas the 3 year average is 253,288tpa. This decline has occurred during a period of increased construction activity in West Sussex which suggests that demand is already increasingly being met by alternatives to soft sand extracted from quarries in West Sussex.

4.7. Minsted West

4.7.1. The only comments relating to this site were received from the promoter of the site (The Dudman Group of Companies) which included the following:

- Landscape concerns have been over-emphasised and insufficient examination of potential mitigation measures has been included in the assessment. The existing site and the proposed extension are well screened by mature woodland. The current site is being restored;
- The Minerals Site Selection Report (MSSR) makes reference to HRA in 2010/11, which concludes differently regarding sediment impact in 2015 assessment;
- The site is deliverable, and the landowner supports extraction from this area; and
- The site contains silica sand which is of national importance and so the test of exceptional circumstances is met through the need for development in terms of national considerations.

The Authorities' response:

Detailed information concerning the assessment of the site's suitability for allocation in the JMLP is included in the MSSR. It is not considered that any changes to the assessment of the site as set out in this report are necessary.

⁷ See Minerals Sites Selection Report, Appendix 7

When assessing potential impacts, the MSSR concluded that Minsted West would be acceptable in principle though only if landscape and hydrological issues can be overcome. In any event allocation of the site would be contrary to NPPF (Paragraph 116) that is against major development taking place within National Parks (and AONBs), except in exceptional circumstances and where it can be demonstrated that they are in the public interest. These NPPF tests have not been satisfied in this instance and as such the site is not allocated for mineral development in the JMLP.

A review of silica sand supply and demand evidence has been undertaken⁸ and this concludes that, although this is a nationally important mineral, alternative sources are available to satisfy demand elsewhere in the UK and so, the exceptional circumstances (as set out in paragraph 116 of the NPPF) needed for this site to be allocated (within the National Park) do not exist.

4.8. Chantry Lane Extension

4.8.1. Comments were received supporting the non-allocation of the site (including from the Sandgate Conservation Society) which are in contrast to those received by the potential operator (The Dudman Group of Companies) who requested that the site be allocated for the following reasons:

- Although the site is within the national park there is a potential access outside the SDNP, directly on to the A283 that would mean the Chantry Lane access would no longer be required. The landscape assessment considers significant impact, however in the absence of detail this is premature and misleading and mitigation would be proposed with any planning application.
- Allocation would allow preservation of a mature woodland.

The Authorities' response:

The site satisfies elements of the vision and objectives and would provide a significant proven reserve of soft sand. Detailed information concerning the assessment of the site's suitability for allocation in the JMLP is included in the Mineral Site Selection Report. It is not considered that any changes to the assessment of the site as set out in this report are necessary.

When assessing potential impacts of the Chantry Lane extension site, the Minerals Sites Selection Report concluded that the site contains reserves of soft sand which could be worked as an extension to the existing site.

⁸ Silica Sand Study 2016, <https://www.westsussex.gov.uk/about-the-council/strategies-plans-and-policies/environment-planning-and-waste-plans-and-policies/minerals-and-waste-policy/new-minerals-local-plan/evidence-base/>

There are no significant deliverability issues associated with this site, subject to the acceptability of any new access in relation to highway safety and any associated impact on the landscape. The cumulative impact of this site with any other existing or proposed sites in area would need to be considered. Mitigation for the loss of best and most versatile agricultural land would also need to be considered.

However it is considered that the allocation of the site would be inconsistent with NPPF paragraph 116 that is against major development taking place within National Parks (and AONBs), except in exceptional circumstances, which do not exist in the case of new sites for the extraction of soft sand minerals extraction within the South Downs National Park – this is explained in detail in the Minerals Sites Selection Report.

4.9. Coopers Moor

4.9.1. Comments were received by the potential operator (The Dudman Group of Companies) who requested that the site be allocated for the following reasons:

- Although the site is within the national park the site had previously been considered acceptable
- Impacts on landscape could be mitigated as mineral extraction would be contained within the mature woodland, retaining existing mature trees as a perimeter screen
- The site would be worked following completion of sand extraction at Heath End Quarry and its restoration (apart from the planting) and so there would be no issue of cumulative impact.
- The site would provide a significant proven reserve of soft sand.

The Authorities' response:

Detailed information concerning the assessment of the site's suitability for allocation in the JMLP is included in the Mineral Site Selection Report. It is not considered that any changes to the assessment of the site as set out in this report are necessary which concludes that the impact on the landscape is unacceptable.

Furthermore it is considered that the allocation of the site would be inconsistent with NPPF paragraph 116 that is against major development taking place within National Parks (and AONBs), except in exceptional circumstances, which do not exist in the case of new sites for the extraction of soft sand minerals extraction within the South Downs National Park – this is explained in detail in the Minerals Sites Selection Report.

4.10. Duncton Common

4.10.1. Comments were received by the potential operator (The Dudman Group of Companies) who requested that the site be allocated for the following reasons:

- The site can be worked as an extension to Heath End Quarry making use of existing infrastructure.
- The site would be worked following completion of sand extraction at Heath End Quarry and its restoration (apart from the planting) and so there would be no issue of cumulative impact.
- Impacts on landscape would occur in any event due to the cropping of the trees associated with the commercial forestry at the site.
- The site is large enough to be able to be designed so as to exclude and/or protect ecologically sensitive areas
- The site would provide a significant proven reserve of soft sand.

The Authorities' response:

Detailed information concerning the assessment of the site's suitability for allocation in the JMLP is included in the Mineral Site Selection Report. It is not considered that any changes to the assessment of the site as set out in this report are necessary which concludes that the impact on the landscape and habitat is unacceptable.

Furthermore, it is considered that the allocation of the site would be inconsistent with NPPF paragraph 116 that is against major development taking place within National Parks (and AONBs), except in exceptional circumstances, which do not exist in the case of new sites for the extraction of soft sand minerals extraction within the South Downs National Park – this is explained in detail in the Minerals Sites Selection Report.

4.10.2. It should be noted that owners of a soft sand site within the SDNP (known as Severals West), that was considered in the MSSR and ruled out on grounds of failing the exceptional circumstances test, did not submit any comments. In addition, Woolbeding with Redford Parish Council supported the non-allocation of Severals East and Severals West as this will ensure that important greensand heathland habitats are conserved and protected.

5. Summary

- 5.1.1. A West Sussex Joint Minerals Local Plan is being prepared by the County Council, in partnership with the South Downs National Park Authority, to cover the period to 2033. Once adopted, the West Sussex Joint Minerals Local Plan will replace the saved policies in the adopted West Sussex Minerals Local Plan (2003). A draft Joint Minerals Local Plan was the subject of informal public consultation from 14 April to 17 June 2016 under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 5.1.2. The consultation generated 744 responses some which were very detailed. The results of the consultation are summarised in this report which also sets out how the Authorities have responded, including making changes to the Plan.
- 5.1.3. The largest numbers of responses were from members of the public opposed to the Plan's approach to the supply of hydrocarbons.
- 5.1.4. The proposed soft sand allocation at Ham Farm near Steyning received the second most number comments. The most common concerns were in relation to transport issues, and impacts on the local community, including health and amenity impacts from noise and dust.
- 5.1.5. In light of the comments received and updated evidence base work, the only substantive changes that have been made to the Proposed Submission Draft Plan are an amendment to the boundary of the proposed site allocation at Ham Farm near Steyning, which reduces the overall site area, and safeguarding of additional wharves at Shoreham Harbour.

APPENDIX A – List of organisations commenting on the Draft JMLP

Comments were also raised by organisations that attended a Minerals Safeguarding workshop in June 2016. These organisations are indicated below by an asterisk.

Community Groups:

- Chichester Society
- CPRE Sussex
- Cuckfield Society
- Fittleworth and District Association
- Frack Free Balcombe Residents Association
- Hambrook and District Residents Association
- Horncroft Residents Association
- Keep Kirdford and Wisborough Green
- Sandgate Conservation Society
- South Downs Society
- Steyning Climate Action Group
- Steyning and District Business Chamber
- Steyning Quarry Action Group (aka 'Save Steyning')
- Sussex Wildlife Trust
- The Visitor and Tourism Group of the Steyning and District Community Partnership
- The Wiggonholt Association
- West Sussex Local Access Forum

Other Interest Groups:

- British Horse Society
- Friends of the Earth
- Movement for Universal Democracy & Justice

Large Local Businesses:

- Bluebell Railway plc (represented by Rail Estate)
- Gatwick Airport
- CEGA Group Services Limited (represented by Vail Williams)

Town/Parish Councils:

- Ardingly Parish Council
- Ashurst Parish Council
- Balcombe Parish Council
- Bramber Parish Council
- Bury Parish Council
- Chidham and Hambrook Parish Council
- Duncton Parish Council
- Graffham Parish Council
- Kirdford Parish Council
- Midhurst Town Council
- Pulborough Parish Council
- Stedham with Iping Parish Council
- Steyning Parish Council
- Storrington & Sullington Parish Council
- Woolbeding with Redford Parish Council
- West Hoathly Parish Council
- Wisborough Green Parish Council

District and Borough Councils:

- Adur District Council
- Arun District Council*
- Chichester District Council
- Crawley Borough Council*
- Horsham District Council*
- Mid Sussex District Council
- Waverley Borough Council

Individual Councillors:

- David Barling, WSCC
- Julie Tassell, Chichester District
- 11 other parish/town/city councillors from Ashurst, Bramber, Chichester, Duncton, Littlehampton, Midhurst, Steyning, Storrington & Sullington and Wiston.

Mineral Planning Authorities:

- Brighton & Hove City Council*
- Central Beds Council
- East Sussex County Council*
- Hampshire County Council
- Kent County Council
- Norfolk County Council
- Northants County Council
- Surrey County Council*

Minerals Industry:

- Cemex
- IGas Energy
- Day Group (represented by Firstplan)*
- Aggregate Industries (represented by Firstplan)
- Cemex (represented by Firstplan)*
- Michelmersh Brick Holdings Plc (represented by Stephen Bowley/Martin Warner)
- Minerals Products Association*
- The Dudman Group of Companies
- UK Oil and Gas Investments (represented by Barton Wilmore)

Landowners:

- Barlavington Estate (represented by MPG)

Statutory bodies:

- Environment Agency
- High Weald Joint Advisory Committee
- Highways England
- Historic England
- Natural England
- Portsmouth Water
- Southern Water

APPENDIX B – Equalities questions responses

This appendix provides an overview of equalities data collated through responses to the consultation. The information presented in this appendix is for resident/members of the public responses to the consultation only.

Consultation responses received

	No of responses
Total resident/member of the public consultation survey form responses:	174
Total resident/member of the public consultation responses (survey form and non-form):	631
Total consultation responses (all respondent groups):	744

Equalities questions complete responses

	Complete responses	Complete responses proportion of survey form responses	Complete responses proportion of all responses
Gender	138	79.3%	21.9%
Age	137	78.7%	21.7%
Ethnicity	138	79.3%	21.9%
Faith	120	69.0%	19.0%
Disability	137	78.7%	21.7%

A high proportion of resident/member of the public consultation survey respondents completed ethnicity questions, although this varied by question. The comparisons below against proportions for the population of West Sussex as a whole use data from National Statistics mid-year population estimates and Census 2011 statistics (<http://www.neighbourhood.statistics.gov.uk/>).

Equalities data comparisons

Gender - West Sussex Resident Population Estimate, Mid 2015		Gender - Draft West Sussex Minerals Local Plan Consultation	
	%		%
Male	48.5%	Male	52.9%
Female	51.5%	Female	47.1%
Age - West Sussex Resident Population Estimate, Mid 2015		Age - Draft West Sussex Minerals Local Plan Consultation	
0-15	18.2%	0-15	0.0%
16-24	9.2%	16-24	1.5%
25-49	30.8%	25-44	19.0%
50-64 males/50-59 females	19.6%	45-64	45.3%
65+ males/60+ females	22.3%	65+	34.3%
Ethnicity - West Sussex Census 2011		Ethnicity - Draft West Sussex Minerals Local Plan Consultation	
White: English/Welsh/Scottish/Northern Irish/British	88.9%	White: English/Welsh/Scottish/Northern Irish/British	92.8%

White: Irish	0.7%	White: Irish	0.0%
White: Gypsy or Irish Traveller	0.1%	White: Gypsy or Irish Traveller	0.0%
White: Other White	4.0%	Any other White background	5.8%
Mixed/multiple ethnic groups: White and Black Caribbean	0.4%	Mixed/multiple ethnic groups: White & Black Caribbean	0.0%
Mixed/multiple ethnic groups: White and Black African	0.3%	Mixed/multiple ethnic groups: White & Black African	0.0%
Mixed/multiple ethnic groups: White and Asian	0.5%	Mixed/multiple ethnic groups: White & Asian	1.4%
Mixed/multiple ethnic groups: Other Mixed	0.4%	Any other Mixed/multiple ethnic background	0.0%
Asian/Asian British: Indian	1.2%	Asian/Asian British: Indian	0.0%
Asian/Asian British: Pakistani	0.6%	Asian/Asian British: Pakistani	0.0%
Asian/Asian British: Bangladeshi	0.3%	Asian/Asian British: Bangladeshi	0.0%
Asian/Asian British: Chinese	0.4%	Asian/Asian British: Chinese	0.0%
Asian/Asian British: Other Asian	1.0%	Any other Asian background	0.0%
Black/African/Caribbean/Black British: African	0.6%	Black/African/Caribbean/Black British: African	0.0%
Black/African/Caribbean/Black British: Caribbean	0.2%	Black/African/Caribbean/Black British: Caribbean	0.0%
Black/African/Caribbean/Black British: Other Black	0.2%	Any other Black/African/Caribbean/background	0.6%
Other ethnic group: Arab	0.1%	Other Ethnic Group: Arab	0.0%
Other ethnic group: Any other ethnic group	0.2%	Any other ethnic group	0.0%
Faith - West Sussex Census 2011		Faith - Draft West Sussex Minerals Local Plan Consultation	
Christian	61.8%	Christian (including Church of England, Catholic, Protestant and all other Christian denominations)	53.3%
Buddhist	0.4%	Buddhist	0.0%
Hindu	0.9%	Hindu	0.0%
Jewish	0.2%	Jewish	0.8%
Muslim	1.6%	Muslim	0.0%
Sikh	0.1%	Sikh	0.0%
Other religion	0.5%	Any other religion	1.7%
No religion	26.9%	No religion	41.7%
		Unknown	2.5%
Disability - West Sussex Census 2011		Disability - Draft West Sussex Minerals Local Plan Consultation	
Day-to-day activities limited a lot	7.5%	Yes	5.8%
Day-to-day activities limited a little	9.8%	No	94.2%
Day-to-day activities not limited	82.8%		

There was a much higher representation of respondents in older age categories than for the population as a whole, reflecting experience with other consultations. A number of respondents from family groups were presented on behalf of households containing younger family members.

There were very small proportions of respondents from minority ethnic groups as well as minority faith groups, consistent with Census statistics.

There was a smaller proportion of representations by respondents with disabilities, as opposed to the population as a whole.