West Sussex
Joint Minerals Local Plan

Have your say on the Joint Minerals Local Plan Consultation 2016

Responses

January 2017

west sussex county council

Working in Partnership

South Downs National Park Authority

Joint West Sussex Minerals Local Plan - Have your say on the Joint Minerals Local Plan Consultation 2016 Responses

Consultation responses background

This document contains the responses to the public consultation carried out in spring 2016 on the Draft West Sussex Joint Minerals Local Plan (JMLP) under regulation 18 of the Town and Country Planning (Local Planning) (England) regulations 2012.

Further information about the consultation is available in the accompanying document "Have your say on the Joint Minerals Local Plan Consultation 2016 Report". This includes a summary of the main issues raised and the Authorities' response.

In total there were 744 responses made to the consultation, 271 (36%) of these via consultation response forms, whilst 473 responses (64%) were other (non-survey response form) comments received by email or post.

The responses are structured in this document as following:

- responses by organisations including from local authorities and other public bodies, land agents, land owners, town and parish councils, named local businesses, and local community organisations listed in alphabetical order. These are listed below as 01: Organisation: *Organisation name*. Responses from County, District and City/Town/Parish councillors are also included with organisation responses. Individual councillor names are not given, however responses are listed by council affiliation i.e. 01: Organisation: *Council name Councillor*
- responses to questions by individuals including from residents/members of the public and unnamed local businesses. These responses are listed by theme.

The responses from individuals are listed in the theme order listed on the contents information below.

Some responses from individuals referred to more than one potential site allocation. These responses are included under what has judged to be the dominant theme of the response.

Please note that there were a large number of repeat template responses concerning the draft Plan's approach to the supply of hydrocarbons (oil and gas) submitted through a website coordinated by Friends of the Earth. These are listed in a single batch for response ID numbers 366-744 in the '09: oil and gas opposition/concern' section. Some additional template responses were individually edited before submission on the Friends of the Earth website and these are shown as additional individual responses in this same section.

Please note responses are identified by a response ID and a respondent ID. Personal details such as names and contact details have been removed from the responses for data protection purposes.

Please note this is a very large document and not suitable for printing.

Please use the index below and search functions within your document viewing software to view comments on specific sites and by specific organisation/affiliation names. If you are having difficulties viewing any of the information in this document please use the contact details below.

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

Questions about this document or the Joint Minerals Local Plan can also be directed to:

Email: mwdf@westsussex.gov.uk

Telephone: 01243 642118

Address: Strategic Planning (Ref: Joint Minerals Local Plan), West Sussex County Council, County Hall, Chichester, West Sussex, PO19 1RH

Have your say on the Joint Minerals Local Plan Consultation 2016

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O1 – ORGANISATION RESPONSES

01 - Organisation: Adur District Council (Response ID: 212 Respondent ID: 3089)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Covering email information)

Attached are my comments on behalf of Adur District Council on the West Sussex Joint Minerals Plan. Please note these are officer level comments only. These mostly relate to the safeguarding of wharves at Shoreham Harbour.

(Response main comments)

Draft West Sussex Joint Minerals Plan April 2016

Adur District Council officer comments

Adur District Council and West Sussex County Council are working in partnership with Brighton & Hove City Council and Shoreham Port Authority to prepare a Joint Area Action Plan (JAAP) for the Shoreham Harbour Regeneration Area. This sets out a strategy to regenerate the area over the next 15 to 20 years.

The regeneration area includes the entirety of Shoreham Port. The port plays an important role in the supply of minerals to West Sussex and the wider sub-region. These could deliver a significant number of new homes and employment floorspace as well as an improved and consolidated port.

Vision

Adur District Council supports the vision for minerals in West Sussex; in particular, ensuring the supply of minerals via Shoreham Port. This is consistent with vision for the regeneration area for “sustainable mixed use developments alongside a consolidated and enhanced Shoreham Port” (Shoreham Harbour Draft Joint Area Action Plan, February 2014).

Objectives

Adur District Council supports the strategic objectives; in particular, strategic objective 5 which seeks to safeguard wharf capacity for minerals. All parties in the regeneration project, and neighbouring minerals authorities (East Sussex County Council and South Downs National Park Authority) have been working together to ensure that the sufficient capacity is safeguarded at ports, including Shoreham Harbour. The parties have agreed a Statement of Common Ground (2016) setting out this position.

Policy M10

Adur District Council supports Policy M10: Safeguarding Minerals Infrastructure. This policy does not safeguard Free Wharf and Kingston Wharf, which will be allocated for mixed use redevelopment in the emerging Joint Area Action Plan. The council considers that the redevelopment of these sites has wider economic and social benefits that outweigh the retention of safeguarding on these sites.

The policy safeguards ARC Wharf, Turberville and Penneys Wharf, Halls Wharf and Rombus Wharf. These wharves are all within the port operational area identified in the emerging JAAP. No new residential development is proposed at these wharves through the JAAP.

* * *

01 - Organisation: Aggregate Industries, Cemex and Day Group (represented by Firstplan) (Response ID: 145 Respondent ID: 3756)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Yes see attached sheet FP1/A1/Cemex/Days/14.06.16

Firstplan are instructed by Aggregate Industries UK Ltd (AI), Cemex UK Operations Ltd (Cemex), and Day Group Ltd (Days) to provide the following response to the draft West Sussex Minerals Plan consultation. Our clients jointly operate Crawley Goods Yard an established rail fed aggregates depot and safeguarded rail head. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure including a concrete batching plant and asphalt plant.

In the context of the above, the goods yard operators fully support the strategic objectives set out in the draft Joint Minerals Local Plan. This is with particular regard to SO5, which seeks, amongst other things, to protect and maintain existing mineral infrastructure including capacity for importation of minerals via the railhead at Crawley, and S011 which seeks, amongst other things, to maximise the use of rail to transport minerals.

However if these key strategic objectives are to be met then it is imperative that the related safeguarding policies within the minerals plan are robust and explicit in their requirements. This is particularly with regard to the how proposals for the introduction of noise sensitive uses in proximity to these type of safeguarded sites will be considered. The experience of the operators both in the context of Crawley Goods Yard specifically, but also from a number of other such safeguarded sites around the country, is that in practice these sites are increasingly coming under pressure from developments in their vicinity which have the potential to prejudice or constrain their existing or indeed future operation.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

N/A

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

See attached sheet FP1/A1/Cemex/Days/14.06.16

Policy M10: Safeguarding Minerals Infrastructure.

There is a clear policy drive and support in the National Planning Policy Framework (NPPF) for the need to safeguard minerals infrastructure, including railheads, sites for concrete batching and for producing coated materials (para 143). For safeguarding to be effective, however, it needs to deal comprehensively not just with the site itself but also with encroaching development on adjoining or nearby sites which could prejudice the existing and future operation of the safeguarded mineral infrastructure site.

Policy M10 does not go as far as it could in comprehensively safeguarding sites such as the Crawley Goods Yard from potential noise sensitive development coming forward in the vicinity of such safeguarded sites. Criterion (a) as currently drafted whilst including reference to development "near to" sites hosting existing minerals infrastructure – does not then in the subsections (i) –(iii) set out any further requirement in this respect. It deals solely with considerations related to development on the safeguarded site itself.

The potential impact of adjacent or nearby development is referred to, to some extent, within supporting text to the draft policy (principally para 6.10.15). However, it is key that this text should form a clear part of the policy itself. On this basis amended wording has been suggested below – which uses some of the text from draft supporting para 6.10.15 to form a new section (b) to the policy. To further strengthen the policy basis – it is recommend that some guidance is also provided it terms of what proposals which are for 'sensitive' developments will need to demonstrate in order to be supported. Wording is suggested in this respect.

Proposed amendments to Policy M10: Safeguarding Minerals Infrastructure (Note – deleted text shown struck through, proposed additional text shown underlined):

(a) Development on, or near to, sites hosting existing minerals infrastructure that would prevent or prejudice the use of existing minerals infrastructure will not be permitted unless: (or near to struck through for deletion)

(i) the site or infrastructure is no longer suitable for continued minerals use; or

(ii) redevelopment of the site or loss of the infrastructure would form part of a strategy or scheme that has wider social and/or economic benefits that clearly outweigh the retention of the site or the infrastructure for minerals; and

(iii) a suitable replacement site or infrastructure has been identified and permitted;

(b) Existing minerals infrastructure will be protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation. Sensitive uses proposed adjacent to or within 150 metres of a minerals handling site will not normally be supported. If sensitive uses are proposed that would prevent or prejudice the use of existing minerals infrastructure it will need to:

(i) clearly demonstrate how the development has been planned, designed and located to mitigate the impact of noise on future occupiers;

(ii) be supported by a suitable level of assessment including a noise impact assessment (new clause added under b)

(b)(c) Where safeguarded infrastructure is situated within a host quarry, wharf or rail depot facility, it is safeguarded for the life of the host site. (clause b renamed as clause c)

(c)(d) The following wharves and railheads are safeguarded for their minerals transportation purposes (clause c renamed clause d)

(i) ARC Wharf, Shoreham (inset map 3)

(ii) Tuberville and Penneys Wharf, Shoreham (inset map 3)

(iii) Halls Wharf, Shoreham (inset map 3)

(iv) Rombus Wharf, Shoreham (inset map 4)

(v) Railway Wharf, Littlehampton (inset map 4)

(vi) Chichester Railway Sidings (inset map 5)

(viii) Tinsley Goods Yard, Crawley (inset map 7)

(ix) Crawley Goods Yard (inset map 7)

(x) Crawley Goods Yard (inset map 7).

For avoidance of doubt it is confirmed that the specific safeguarding of Crawley Goods Yard at Section (c) (viii), (ix) and (x) of Policy M10 is fully supported. With regard to the extent of the area shown on Inset Map 7

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

N/A

Additional Comments

Related response to draft Minerals Safeguarding evidence consultation attached at sheet FR1/AI/Cemex/Days/14.06.16

RESPONSE TO DRAFT MINERALS SAFEGUARDING GUIDANCE

Draft Minerals Safeguarding Guidance has been issued for consultation at the same time as the consultation on the draft Joint Minerals Plan. The Safeguarding Guidance relates specifically to the implementation of Policies M9 and M10. In light of the comments made above the following consultation response is made to the Safeguarding Guidance.

Non-minerals proposals within, as a minimum, 150m of minerals infrastructure should be subject to consultation with the minerals authority. This is in keeping with the wording and reasoning set out at draft para 6.10.15 of the draft Joint Minerals Local Plan. However in respect of noise sensitive development (e.g. residential uses in particular) the consultation area should extend to a minimum of 250m from the boundary of a minerals infrastructure site. The Crawley Goods Yard Operators are currently dealing with residential development proposals coming forward in close proximity to their site and it is clear from the noise assessments undertaken already that even at 250m, and indeed beyond, noise can still be a key issue. If such proposals are not caught by the consultation area and are not robustly assessed they have the clear potential to prejudice the future operations of sites such as this. This is in conflict both with the safeguarding requirements in the NPPF and indeed the objectives of Policy M10 and the supporting Safeguarding Guidance.

It is helpful that the Guidance seeks to set out the information required to allow the MPA and LPA to make an assessment of proposals which could compromise the ability of a mineral infrastructure site to operate effectively. The list proposed is a good start but given the experience of the operators in dealing with proposals coming forward in the vicinity of their minerals infrastructure, could usefully be added to to ensure that the LPA and MPA have a clear basis on which to consider the proposals: (Note –proposed additional text shown underlined):

"1.3.5 ….Information, which allows the MPA and LPA to make this assessment, should be submitted with an application which addresses the following matters:

- the distance of the proposal from the safeguarded site;
- Any existing screening from buildings and vegetation;
- The potential of the site to deliver suitable mitigation – including the identification of the means in which the development has introduced layout, design and other mitigation measures to mitigate potential effect on and from the safeguarded site;
- Identification of pre-existing conditions, such as background noise and lighting;
- Confirmation of pre-application consultation/engagement with the minerals infrastructure operator (to demonstrate a full understanding of the existing and potential future operation of the site – including specifically: hours of operation, level of activity and likely sources of noise);
- Where appropriate a full noise impact assessment; and a
- Statement on the overall compatibility of the development with the minerals infrastructure use."

(additional text and bullet points proposed after 'mitigation' in 3rd bullet point)

* * *

01 - Organisation: Ardingly Parish Council (Response ID: 211 Respondent ID: 3045)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Thank you for the opportunity to comment on the draft West Sussex Joint Minerals Plan. We have not completed the consultation response form in full, but Ardingly Parish Council would like to note the following, which mainly relate to the Ardingly Neighbourhood Plan.

Ardingly Parish Council notes the safeguarding of the Ardingly Rail Depot in Policy 10.

This site is located within the High Weald AONB where great weight is given to conserving landscape and scenic beauty.

There are nine dwellings in close proximity to the Rail Depot which suffer significant detrimental impact in respect of noise, dust, fumes and light pollution. These matters appear not to have been resolved since the plant was redeveloped and enlarged in 2012.

The Rail Depot is located a considerable distance from the Lorry Route Network and access roads through Ardingly village are unsuitable for heavy goods vehicles. In recognition of existing problems of traffic speed and pedestrian safety, funds have been included in WSCC's Integrated Works Programme, 2016/17 for proposed traffic calming.

The Ardingly Neighbourhood Plan, which was passed through referendum in March 2015, includes policies relating to the Rail Depot:

Policy ARD 17: Ardingly Rail Depot

'The Neighbourhood Plan will support proposals that secure the long term use of this site as a reinstated railway station and museum.'

Policy ARD 22: Bluebell Railway

'Proposals for the reinstatement of Ardingly Station will be supported subject to consideration of traffic, access and car parking. Demolition of the station building will be resisted.'

Community Action: Bluebell Railway

'The Neighbourhood Plan supports the safeguarding of the route of the former Ardingly branch line between Horsted Keynes and Haywards Heath including Lywood tunnel for the future reinstatement of the railway link.'

The adopted Mid Sussex Local Plan, 2003 and submission Mid Sussex District Plan, 2016 also contain policies to safeguard the route to Haywards Heath station for the Bluebell Railway."

Additional Comments

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01 - Organisation: Arun District Council (Response ID: 140 Respondent ID: 3751)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

RE: Draft West Sussex Joint Minerals Local Plan Regulation 18

Thank you for consulting Arun District Council on the Draft West Sussex Joint Minerals Local Plan Regulation 18.

The document has been reviewed and Arun District Council's response is set out below. In order to meet your consultation deadline, of 17th June 2016, the response has been made at officer level. A report will be made to the Council's Local Plan Sub Committee, on 30th June 2016, in order to confirm the response made by the Council's officers.

In principle, Arun District Council (ADC) welcomes this positive commitment by the County Council to deliver the Vision and Strategic Objectives of the Plan to 2033.

The Arun Local Plan is currently at Examination stage and includes a Strategic Policy H SP1 which includes the Littlehampton Economic Growth Area including the West Bank. The Railway Wharf is included within that boundary and as such Policy M10 of the Draft West Sussex Joint Minerals Local Plan Regulation 18 poses various implications to this allocation for ADC.

The detail in the Plan requires adjustment to help ensure that the intentions of the County's proposals are clearer in relation to Policy M10 and the future intentions for the Railway Wharf in Littlehampton. Further details are set out in the following response.

Policy M10: Safeguarding Minerals Infrastructure.

In Background Paper 4 (June 2014) on Safeguarding Minerals Infrastructure (V2), maintaining current capacity was included under Scenarios W1 but W3-5 all included reduced capacity through not safeguarding Railway Wharf. The Background Paper mentions 'active mineral wharf at Littlehampton' but then says 'inactive areas of the wharf will no longer be safeguarded'. However, the options that were then included in the SA work all included Railway Wharf, there was no option of not doing so. No justification or further evidence appears to be provided either in the SA or the Background Document (April 2016), as to the exclusion of the safeguarding of Railway Wharf.

The closest explanation within the documents, at least, for the approach in the JMLP may be at the end of the Engagement event on 13th August 2014, towards the end on page 10 which include 3 points connected to infrastructure in Littlehampton. However, none of these would be strong enough to justify the change on their own as they all contain caveats. They suggest support for the original scenarios considered in the Background Paper 4 (V2). In the actual document there is the suggestion that the change is linked to the importation of marine dredged aggregates but it is not clear.

The Arun Local Plan is at examination and includes Policy H SP1 which is an allocation that has a boundary which includes Railway Wharf, Littlehampton. To this effect, it is recommended that paragraph 6.10.10 (see extract below) is revised.

6.10.10. The Local Planning Authorities will consult the Minerals Planning Authority and take account of its views before making a planning decision (in terms of both a planning application and an allocation in a local plan) for non-mineral related development proposed at, or within 150m of, safeguarded sites described in Policy M10.

The way the policy is currently worded it would seem to need to be a very strong case to be able to satisfy the requirements of (a)(ii). Additionally, the content of para 6.10.13 would equally place a burden on Arun District Council to find another location of the same size, either within the District or through Coastal West Sussex. This could well become the most significant constraint to aspirations for any contribution, apart from employment, to the Littlehampton Economic Growth Area being proposed in the Arun District Council Local Plan. To this effect, it is recommended that paragraph 6.10.13 (see extract below) is revised.

6.10.13. Proposals for non-minerals development at a safeguarded site will be considered against the ongoing need for the safeguarded minerals facility and whether adequate compensatory capacity can be provided elsewhere. Replacement capacity must be at least equivalent in terms of tonnage, accessibility, location in relation to the market, suitability, availability of land for processing and stockpiling of minerals, and, in the case of wharves, the size of the berth for dredgers, barges or ships.

It is requested that the supporting text for Policy M10 acknowledges the current proposal in the Arun District Council Local Plan which potentially impacts on the Littlehampton Railway Wharf, and that Policy M10 and the supporting text is reviewed to ensure that it is consistent with policies set out within the Arun District Local Plan.

We hope that our position on the matter is clear but are happy to discuss this further should you wish.

* * *

01 - Organisation: Ashurst Parish Council (Response ID: 157 Respondent ID: 3762)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Response of Ashurst Parish Council to the West Sussex Joint Minerals Local Plan.

Ashurst Parish Council fully supports Steyning Parish Council in its objection to the proposal of Ham farm as a potential site for the extraction of sand.

It is our opinion that Ham farm should not be included in the Joint Minerals Local plan on the following grounds:

1. Landscape and cumulative effect: Ham Farm lies adjacent to the SDNP and is highly visible from Chanctonbury Hill and the South Downs Way. There would be cumulative visual impact with Rock Common; this was considered as grounds for rejection of the proposed Buncton Manor Farm site. (Photographic evidence submitted by Steyning Parish Council)

2. Nature Conservation and biodiversity: the site is adjacent to Ancient Woodland which has been identified as potentially suffering moderate harm. There is also a risk to the Alderwood Pond site including migrating trout, Crested Newts and bats, all protected species.

3. Historic Environment: there are several nearby Listed Buildings and it is a site of archaeological interest with Palaeolithic and Roman remains.

4. Water Environment: 50% of the site has been identified as at high risk of flooding, yet no hydrology survey has been conducted. There is potential for significant impact on Alderwood Pond site and impact to the water table and surrounding agricultural land.

5. Air Quality: it is likely that increased HGV traffic and dust generated from the site will have an adverse effect on air quality, impacting on the Nursery School at Chanctonfold and on the Steyning Grammar School playing fields, both in close proximity.

6. Soil Quality: the site currently contains grade 2 and 3 soils, the best and most versatile agricultural land which will be permanently lost.

7. Public rights of way: views from the existing public rights of way would be negatively impacted.

8. Transport and access: in our opinion the WSCC Transport Assessment does not give an accurate representation of the current high volume of daytime traffic using the A283 and the high number of accidents, with consequent road closures and diversions via single track roads through Ashurst. Additionally, the loss of maize production on the site would result in additional traffic needed to supply the anaerobic digester at Wappingthorn farm, access via the B2135 on a dangerous corner. This would have specific road safety impact on Ashurst and Steyning residents. The proposed site access on the A283 would greatly irnpact on road safety.

9. Amenity: WSCC has acknowledged that a number of residential properties are located in close proximity to the site and residents will be subject to high levels of harm. This was not however taken into consideration in the summary and outcome. There is no acknowledgement of the businesses that will also be impacted.

Overall the WSCC RAG evaluation identifies a high number of Red and Amber concerns for which no mitigation is identified. We therefore believe that the conclusion drawn should be that the site is unacceptable, in line with other similar sites.

* * *

01 - Organisation: Ashurst Parish Councillor and resident (Response ID: 261 Respondent ID: 3988)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The choice of the Ham farm site appears to contradict many of the points expressed in the vision statement. It also fails to follow a number of the strategic objectives in particular SO2, SO7, SO8, SO9, SO10, SO11.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I oppose the inclusion of the Ham farm site in the plan for the following reasons:

The site is immediately adjacent to and definitely visible from the South Downs National Park, contrary to SO8, 'conserve and enhance the landscape'

An excavation of this nature will obviously impact on the water table and water flow in the area and yet it has been proposed without a hydrology survey

The A283 is acknowledged to be one of the most dangerous roads in Sussex, the considerable additional use will only increase the likelihood of accidents. Safe access to the site cannot be achieved without sacrificing site screening.

There is a danger that the site once established will increase in size along the lines of the previous proposals in 2004 with consequent significant additional impact.

The proposed operator has not restored other sites locally, there is potential for this site to suffer the same fate.

Environment agency guidelines allow sampling of inert waste by the contractor. In the absence of independent scrutiny there is every possibility that contaminated waste from brown field sites will be included in the landfill.

Despite significant impact on adjacent residents and businesses no account has been taken of this, and no compensation would be available for those impacted financially.

All the reasons for ruling out the potential site at Buncton Manor Farm apply at least equally to Ham farm.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Ham Farm should be removed from the draft plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

01 - Organisation: Ashurst Parish Councillor and resident (Response ID: 329 Respondent ID: 4105)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

They are fine in principal, but the Ham Farm site does not tie in with many aspects of the vision, nor does it adhere to a number of your strategic objectives.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

The vision and objectives are fine but when carrying out site selection, they need to be strictly adhered to.

While I agree that the SDNP should be protected from future development, I think due care needs to be taken of all those other areas with 'special qualities - be it of Built or Natural Landscapes. The site and surrounding area of Ham Farm is such a place.

Additionally, any site that is right on the boundary of the SDNP, should be excluded from consideration from a 'visual impact' perspective.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Not an appropriate site.

Dangerous access - off A283 - a road which is often reported as one of the most accident prone in West Sussex.

(This doesn't adhere to your 3rd stated principle above)

i)Visibility from and proximity to South Downs National Park.

ii)This area is of great historic value - Palaeolithic and Roman remains, and various listed buildings

iii)Likewise it is an area of great natural conservation and biodiversity - including Ancient Woodland, Alderwood Pond - with its migrating trout, crested newts and bats.

iv)There will be an adverse impact of air quality on the local community.

(None of these adhere to your 2nd stated principle above.)

This good soil quality of the site which already has a current use would be permanently lost.

(This doesn't adhere to your 1st stated principle above)

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

A more suitable site should be chosen where the various significant disadvantages listed above do not apply.

The criteria stated in your Vision, Strategic Objectives and 5 Guiding Principles should be strictly applied in order to arrive at the correct site.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

A more suitable site should be chosen where the various significant disadvantages listed above do not apply.

The criteria stated in your Vision, Strategic Objectives and 5 Guiding Principles should be strictly applied in order to arrive at the correct site.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

No

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Section 6

Since West Sussex has insufficient soft sand available, and since Ham Farm is obviously not a suitable site, then, unless there are other 'suitable' sites which fit the various stated criteria discussed above, then we should be looking to import all of our sand as necessary.

Section 8

In the case of the Development Management Policies, the first 8 stated categories are relevant for the Ham Farm Site - where a negative impact would result.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

01 - Organisation: Balcombe Parish Council (Response ID: 200 Respondent ID: 3787)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Herewith Balcombe Parish Council's response to the Draft West Sussex Joint Minerals Local Plan Consultation.

We do not support the plan as it stands, but we would support it IN PART with our amendments/comments included.

These are:

Strategic Vision

Balcombe Parish Council would like to see the strategy to protect the South Downs National Park be extended to include Areas of Outstanding Natural Beauty (AONBs) and Sites of Special Scientific Interest (SSSIs).

Economic Activity & Minerals

4.2.6. Mineral extraction is a temporary activity and once activity is complete, sites should be restored in order to enhance the local environment and landscape and longer term monitoring of the sites conducted.

Hydrocarbons

6.7.3 BPC feel that is it regrettable that there has been a change of definition of hydraulic fracturing.

Transport

Policy M20 Transport - Vehicle movements should be robustly assessed to include the assessment of HGVs when considering traffic volumes.

I would be grateful if you could acknowledge receipt of our response please.

* * *

01 - Organisation: Bluebell Railway (represented by The Rail Estate Consultancy Limited) (Response ID: 161 Respondent ID: 3767)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Bluebell Railway March 2013 route map included at top of email and hard copy versions of response)

West Sussex County Council and South Downs National Park Authority

Regulation 18 Draft West Sussex Joint Minerals Local Plan, April 2016

Representation on behalf of Bluebell Railway Plc

Introduction

1. Rail Estate acts as an adviser and consultant to Bluebell Railway Plc on property and planning matters, and, on behalf of our client, we welcome the opportunity to comment on the new draft Joint Minerals Local Plan.

2. Bluebell Railway Plc is the operator of the heritage railway (originally the Lewes & East Grinstead Railway) based at Sheffield Park Station, East Sussex, and owns the freehold of the entire railway formation between Sheffield Park and East Grinstead. It also owns the track formation of the former Ardingly branch line, to the west of Horsted Keynes, as far as the Ardingly Rail Depot.

3. The Bluebell Railway has been running scheduled passenger steam services from Sheffield Park since 1960 — and in Spring 2013 completed its longstanding project to take the line into East Grinstead, thereby linking with the National Rail network. The Bluebell line reflects in its restoration the history of the Southern Railway, operating in a traditional and commercial manner, using the best conservation and heritage engineering skills and practice in presentation of its historic locomotives, rolling stock and infrastructure. The popularity of the Railway has established it as one of the largest tourist attractions in Sussex.

Bluebell Railway Western Extension: Adopted and Emerging Safeguarding Planning Policies

4. The County Council will be aware of the longstanding ambition to extend the Bluebell Railway westwards from Horsted Keynes to Haywards Heath (the "Western Extension") via the former Ardingly station — now the site of Ardingly Rail Depot, operated by Hanson Quarry Products Europe Ltd. The route of the Western Extension is safeguarded within both adopted and emerging District Council Local Plan policies. Local Plan Policies R14, AR2, HK3 and indirectly HH8, safeguard the line for the possible reinstatement of the railway link to Haywards Heath. Recreation and Tourism Policy R14 provides that land along the route will be "... safeguarded from any development which could prevent its completion"; and Ardingly Policy AR2 provides assurance of the continued consideration of the reinstatement of Ardingly Station and/or other stopping places on the Safeguarded Route.

5. The District Council is continuing its robust support for the Western Extension in emerging District Plan Policy DP17: Sustainable Tourism, (Footnote 1 - Emerging District Plan policy DP17 provides that: "land will be safeguarded from development which will be required to deliver the proposed reinstated railway link and associated facilities for the Bluebell Railway along the route of the railway corridor between Horsted Keynes and Haywards Heath railway stations".) in line with its strategic objectives of achieving a healthy rural economy and enhancing Mid Sussex as an attractive visitor destination. In addition, local Neighbourhood Plans are in the process of coming forward including those for Ardingly and West Hoathly, both of which include welcome active support for the Bluebell Railway and which are now made part of the Mid Sussex Local Plan.

6. Notably of relevance to the Bluebell Railway, the Ardingly Neighbourhood Plan was made part of the Mid Sussex Local Plan in March 2015. Particularly significant with regard to the draft Joint Minerals Local Plan are the following:

- Policy ARD 17: Ardingly Rail Depot provides that : "The Neighbourhood Plan will support proposals that secure the long term use of this site as a reinstated railway station and museum." ;

- Policy ARD 22: Bluebell Railway and the associated Proposals Map provide that : "Proposals for the reinstatement of Ardingly Station will be supported subject to consideration of traffic, access and car parking. Demolition of the station building will be resisted."

— Community action: "The Neighbourhood Plan supports the safeguarding of the route of the former Ardingly branch line between Horsted Keynes and Haywards Heath within Ardingly Parish including Lywood tunnel for the future reinstatement of the railway link."; and

- Asset of Community Value: the Neighbourhood Plan provides that the Parish Council will seek to designate the former Ardingly station as an "Asset of Community Value".

Draft Minerals Plan Policy M10: Ardingly Depot and the existing Unilateral Undertaking to WSCC

7. It is understood that the Ardingly Depot is used for the importation of crushed rock by rail to serve West Sussex and neighbouring counties; and since 2010 new plant has enabled the recycling of asphalt so as to help reduce the need for raw materials.

8. Joint Minerals Local Plan draft Policy M10: Safeguarding Minerals Infrastructure, (c) (vii) safeguards the Ardingly Railhead in support of the Plan's Strategic Objective 5 (protection and maintenance of existing mineral development sites and infrastructure); and Strategic Objective 11 (maximising the use of rail and water transport for the movement of minerals). The Plan illustrates this as Map Inset 6 (extract below).

9. In the context of the Bluebell Railway's current preparations for its Western Extension from Horsted Keynes, supported by adopted and emerging strategic planning and neighbourhood development plan policies, the proposed ongoing safeguarding of the Ardingly Depot for minerals infrastructure up to 2033 is clearly of significant concern for the Bluebell Railway's ongoing project preparations for the reinstatement of the railway west of Horsted Keynes.

Left: Joint Minerals Local Plan Map Inset 6 (extract) Proposed Safeguarded Railhead, Ardingly. (Map included in email and letter versions of response)

10. The County Council will be aware that at the time of the 2010 planning application by Hanson Quarry Products Europe Ltd to modernise and expand the Depot's operation and capability at Ardingly (ref. WSCC/070/10/AR) this led to objections by Mid Sussex DC, by Bluebell Railway Plc and by the local parish council, due to the apparent conflict of the proposals with the safeguarded railway route towards Haywards Heath, and which appeared to prejudice unfavourably the reinstatement of the railway line.

11. At that time, the County Council acknowledged that the proposed development had "the potential to delay the reinstatement of the railway line" (Footnote 2 - West Sussex County Council, Report to Planning Committee, 28 September 2010.) but that the proposed use was lawful on land safeguarded as a railhead under Policy 37 of the Minerals Local Plan. The WSCC report to Planning Committee stated if "the current use ceases in the future and there is no longer a need for a railhead, then the reinstatement of the railway line may be possible in this area". It gave a modicum of comfort to the Bluebell Railway in reflecting that as the plant was "capable of being transported" it was likely it could be removed at the end of its life and therefore "its siting would not prejudice the possible reinstatement of the railway line." That report concluded that "the proposal complies with Policy AR2 of the Local Plan as the development by virtue of its siting and ability to be relocated, does not prejudice the possible reinstatement of the railway link to the north of the site."

12. In a proactive response to the planning application and in order to provide some certainty to its long-term planning, the Bluebell Railway entered into constructive negotiations with Hanson. This led to an agreement, prior to the Planning Committee committee meeting in 2010, that a Reinstated Railway Link would be capable of running around the application site within the Safeguarded Route at Ardingly Rail Depot: thereby potentially enabling the Railway Link to Haywards Heath to be reinstated at the same time as the Depot remained operational for mineral uses. This agreement was formalised In November 2010, when Hanson Quarry Products Europe Ltd gave a Section 106 Unilateral Undertaking to West Sussex County Council, so as to provide a mechanism for achieving this, with associated plans. (Footnote 3 - S106 Unilateral Undertaking, 29 November 2010, is attached at the Appendix.)

13. The Undertaking noted in its preamble (paragraph H) that the County Council had indicated that it sought to ensure that the Depot's re-development for minerals processing would not prevent the completion of the Reinstated Railway Link and thereby be contrary to Policies R14, AR2 and HK3 in the Local Plan; and that its purpose was thereby to allay the County Council's concerns (paragraph I) by covenants given by the applicant to the County Council.

14. The Undertaking provided that it would be effective with regard to the specified adopted Local Plan policies or any successor policies designed to safeguard the future reinstatement of the Railway Link between Horsted Keynes and Haywards Heath. The continuing effectiveness of the Undertaking in respect of successor Local Plan policies was raised on behalf of the Bluebell Railway with Mid Sussex District Council during the consultation process on the emerging District Plan in 2012. The District Council gave its view that the terms of the Undertaking would remain effective given any continuing intention behind replacement up-to-date policies which reiterate the intention to safeguard the route. (Footnote 4 - MSDC Head of Planning in correspondence to Rail Estate, 27 June 2012.) Proposed District Plan policy DP17 does so.

15. Substantively, the Undertaking provides that all future planning applications for all or any part of the Ardingly Rail Depot must have due regard to the safeguarding of the Reinstated Railway Link and only include proposals that would not prejudice it. The Undertaking thereby provided significant reassurance to Bluebell Railway Plc (as well as to the LPA and to the County Council) that both the existing and proposed uses could be accommodated at Ardingly Rail Depot. We understand it was registered as a land charge on 29 December 2010.

16. Nothing in the Undertaking prevents the operation of the Depot, and the Depot operator Hanson has undertaken to work in good faith with the Bluebell Railway in order to attempt to facilitate the reinstatement of the Railway Link, cooperating in the mutual interests of both parties. The Undertaking incorporates a scheme whereby the railway could be constructed around the Depot works should the Depot still be operating when the Railway Link is reinstated. This is shown on the Undertaking Plan No. 2 and called the "Preferred Line". The Undertaking also acknowledges that, should Hanson have ceased to operate when the Railway Link is reinstated, an alternative alignment could be appropriate.

17. The safeguarding of the route for the Bluebell Railway Western Extension and the provisions in the Undertaking are helpful. The Bluebell Railway recognizes that the County Council has expressed a desire that the Depot's operation should not prejudice the safeguarded railway route; and the Depot operator has committed to this in the form of the Undertaking, which in turn has provided reassurance to the Bluebell Railway as it progresses its preparations.

18. The area of land edged red proposed to be safeguarded for the Ardingly Railhead in Map Inset 6 may well be indicative; but it is notable that as shown it encompasses land required for the deviation alignment of the railway (the "Preferred Line"). The red line is understood to be contained within the existing Network Rail land ownership boundary, but it exceeds the amount of land included in the 2010 planning application, particularly to the north of the site.

19. Paragraph 6.10.9. of the draft Plan states that the Authorities may object to other, competing developments, which may put safeguarded facilities at risk of operating normally. Additionally, paragraph 6.10.15. states that existing minerals infrastructure will be protected from "inappropriate neighbouring developments" that may prejudice their continuing efficient operation; and that sensitive uses should not be located adjacent to or within, for example, 150 metres of a minerals handling site (while the actual buffer needed would depend upon the nature and impact of the proposed adjacent use). We also note at paragraph 6.10.10. the expectation that LPAs will consult the Minerals Planning Authority before making a planning decision (in terms of both a planning application and an allocation in a local plan) for non-mineral related development proposed at, or within 150 metres of, Ardingly Rail Depot.

20. The above references to "competing" or "inappropriate" developments are of significant concern to the Bluebell Railway. The Railway will not want to be seen as a potential competing development at any time during the life of the Plan until 2033, which is concurrently the period that the Western Extension will be constructed.

Accommodating the Railway in partnership with its Neighbours

21. As paragraph 5.3.3. of the Minerals Plan notes, planning legislation and the National Planning Policy Framework require that development that accords with an up-to-date Local Plan should be approved and development that conflicts with a Local Plan should be refused, unless material considerations indicate otherwise.

22. It is clear that at such time as an application to reinstate the Railway Link at the Ardingly Depot site is made, there will need to be close consultation by Mid Sussex DC with the Minerals Authority, particularly as the proposed railway line indicated in the Undertaking would be located within 150m of the Depot.

23. The Bluebell Railway seeks to avoid the type of conflict of competing interests that arose in 2010 when the plant at the Depot was upgraded, and seeks reassurance that the County Council has kept in mind the Safeguarded Route for the Reinstated Railway Link in preparation of the new Minerals Plan.

24. Preparations for the Western Extension and background feasibility work are increasing, including meeting with adjoining landowners to discuss third party issues such as rights of access. Preparatory work has included signalling work at Horsted Keynes station and initial design work for a new bridge at Station Approach, as well as acquiring the lease of Lywood Tunnel. The proposed works are being scoped that will most likely be included in a phase 1 planning application to reinstate the line to Ardingly — works also likely to be subject to

an order under the Transport & Works Act. A significant commitment of time and resources has therefore been made in seeking to progress the Western Extension project in order to secure the route on an unencumbered basis.

25. The Plan's Policy M10 states that where safeguarded infrastructure is situated within a rail depot facility, it is safeguarded "for the life of the host site", potentially until 2033. While there is no indication in the draft Plan that any extension to the Ardingly Depot is proposed during its life, neither is there any indication given of a commitment or an understanding that operations at the Depot will not prejudice the Safeguarded Route for the reinstatement of the railway between Horsted Keynes and Haywards Heath, which is equally safeguarded by strategic and emerging planning policies.

26. Given the indicative red line shown in Map Inset 6 as the safeguarded land, our client Bluebell Railway Plc would therefore welcome engagement with the County Council, so as to assist the Bluebell Railway's forward planning. Bluebell Railway Plc seeks to work proactively and cooperatively with both the Planning and Minerals Authorities. The Bluebell Railway would not wish to discover, at an advanced stage in preparation of the Western Extension that objections may arise from the Minerals Authority to what it might perceive as a "competing development".

27. Our client would therefore very much welcome :

(i) clarification of the exact location and amount of land proposed to be safeguarded at Ardingly for minerals infrastructure by draft Policy M10;

(ii) inclusion of a clause within the policy text of draft Policy M10 that the land to be safeguarded for minerals infrastructure at Ardingly will not prejudice the proposed Reinstated Railway Link between Horsted Keynes and Haywards Heath during the life of the Plan; and

(iii) an assurance that there is no contemplation of an extension to the existing Depot plant or operations at Ardingly that would compromise or prejudice the reinstatement of the Railway Link as safeguarded by local planning policies; and that the proposed safeguarding of land for minerals infrastructure at Ardingly takes account of the commitments and associated plans in the existing Unilateral Undertaking.

I trust these comments are helpful, and look forward to hearing from you at your earliest convenience.

(Appendix copy typed below from scanned pdf original)

APPENDIX:

Ardingly Rail Depot

Unilateral Undertaking given by

Hanson Quarry Products Europe Ltd to

West Sussex County Council

29 November 2010

Dated 29 November 2010

Unilateral Undertaking

given by

HANSON QUARRY PRODUCTS EUROPE LIMITED

to

WEST SUSSEX COUNTY COUNCIL

In respect of land at Ardingly Rail Depot, College Road, Ardingly,

Haywards Heath, West Sussex RH17 6SH

Sarah Youren Planning Solicitors Limited

Unit 11 Bridge Wharf

156 Caledonian Road

london Nl 9UU

Tel: 0845 481 8136

THIS DEED is made the 29 day of November 2010 by:

(1) Hanson Quarry Products Europe Limited incorporated and registered In England and Wales with company number [00300002] whose registered office is at Hanson House, 14 Castle Hill, Maidenhead SL6 4JJ ("the Applicant")

and constitutes a planning obligation by unilateral undertaklng for the purposes of Section 106 of the 1990 Act.

WHEREAS :-

A The County Council Is the County Planning Authority for the purposes of the 1990 Act for the determination of the Planning Application because the Planning Application is a Minerals Application which Is a County Matter.

B The District Council is the Local Planning Authority for the determination of planning applications which are not County Matters for the area in which the Application Site is situated and is responsible for the review and replacement of the Local Plan.

C The Applicant has a leasehold interest in the Application Site (the freehold title of which is unregistered) and has an interest in the Application Site within the meaning of Section 106 of the 1990 Act.

D Bluebell Railway Pic is a privately owned and managed company which has been running scheduled passenger steam railway services since 1960. Originally the route of the railway operated by Bluebell Railway Pic ran between Sheffield Park in East Sussex and Horsted Keynes. It is one of the most Important tourist attractions in the south-east of England and of value to the local and tourist economy and as a public transport link. The Bluebell Railway's operations are in the process of being extended northwards to East Grinstead which will further enhance its importance to the local and regional area.

At the southern end of the railway line operated by the Bluebell Railway Pic immediately south of Horsted Keynes Station Is a branch line (part disused) linking Horsted Keynes and Haywards Heath. The opportunity exists for the reinstatement of the entire branch line and this will further increase the potential of the Bluebell Railway. The branch line includes the Application Site.

E Policy R14 in the Local Plan states that the line of the Bluebell Railway is shown on the Local Plan proposals maps and will be safeguarded from any development which could prevent Its completion.

F Policy AR2 in the Local Plan states that the route of the disused railway branch line between Horsted Keynes and Haywards Heath is safeguarded for possible reinstatement of the railway link.

G Policy HK3 In the Local Plan states that the route of the disused railway branch line between Horsted Keynes and Haywards Heath Js safeguarded for possible reinstatement of the railway link.

H The County Council in considering the Planning Application has indicated that it would wish to ensure that the Development would not prevent the completion of the Reinstated Railway Link between Horsted Keynes and Haywards Heath In order that the Development would not be contrary to Policies R14, AR2 and HK3 in the Local Plan.

I To allay the concerns of the County Council the Applicant has entered into this unilateral undertaking and covenants in the manner hereinafter appearing.

NOW THIS DEED WITNESSETH as follows:-

1. Definitions

1.1 In this Deed the following terms shall have the following meanings:-

"1990 Act" means the Town and Country Planning Act 1990 as amended;

"Application Site" means the land known as Ardingly Rail Depot, College Road, Ardingly, Haywards Heath, West Sussex RH17 6SH shown edged red on Plan 1;

"Ardingly Rail Depot" means the land shown edged blue on Plan 1:

"Bluebell Railway Plc" means Bluebell Railway Plc of Sheffield Park Station, East Sussex TN22 3QL;

"Commencement of the Development" means the implementation of the Planning Permission by the carrying out of a Material Operation and "Commence the

Development" shall mutatis mutandis be construed accordingly;

"County Council" means West Sussex County Council of County Hall, West Street, Chichester, West Sussex P019 1RQ;

"Development" means the development described in the Planning Application and permitted by the Planning Permission;

"Local Plan Policy" means the Mid Sussex Local Plan 2004 Policy AR2 and Policy R14 and Policy HK3 and the accompanying text to the aforementioned policies together with the local plan proposal map or any successor policy (s) providing for the safeguarding of the Reinstated Railway Link;

"Material Operation" means a material operation described in Section 56 of the 1990 Act;

"Notice of Commencement" means notice in writing to advise of the date that Commencement of the Development occurred;

"Plan 1" means the drawing number 0115102.021.002 marked Plan No. 1 attached hereto;

"Plan 2" means drawing number RAILEST-AROINDRWG-001 marked Plan No. 2 attached hereto;

"Planning Application" means the planning application (including plans, statements and appraisals in support of the said application) submitted by the Applicant to the County Council (and which the County Council has given reference number WSCC/070/10/AR) seeking permission for erection of replacement asphalt, plant and demolition of existing plant and erection of works offices and weighbridge at the Application Site;

"Planning Permission" means the planning permission (with conditions) granted by the County Council pursuant to the Planning Application;

"Preferred Line" means the line of the Reinstated Railway Link within the Safeguarded Route shown marked in red on Plan 2;

"Reinstated Railway Link" means the reinstatement of the railway link between Horsted Keynes and Haywards Heath within the Safeguarded Route;

"Safeguarded Route" means the railway corridor shown by orange dots on the proposals map to the Local Plan and as referred to in policy R14 of the Local Plan.

2 Interpretation and legal Effect

2.1 The covenants in this Deed are planning obligations for the purposes of Section 106 of the 1990 Act in respect of which the Applicant holds a leasehold interest in the Application Site pursuant to a lease dated 22 December 1999 made between English Welsh & Scottish Railway Limited (1) and Hanson Quarry Products Europe Limited (2);

2.2 The County Council is the County Planning Authority entitled to enforce the provisions of this Deed and the covenants contained in this Deed shall be so enforceable;

2.3 This Deed is entered into in respect of the Application Site with the intent that it shall bind the Applicant's leasehold interest in the said Application Site and any subsequent leasehold interest that the Applicant may enjoy In respect of the Application Site;

2.4 This Deed shall be binding on all successors and assigns In title of the Applicant and any persons claiming title under or through them;

2.5 This Deed has been executed as a Deed and shall be registered by the County Council as a local land charge against the Application Site in accordance with Section 106(11) of the 1990 Act.

2.6 This Deed is made pursuant to Section 106 of the 1990 Act and all other powers enabling the parties to enter into such a Deed.

2.7 Nothing in this Deed is or amounts to or shall be construed as a planning permission or approval.

2.8 This Deed shall take effect on the Commencement of the Development pursuant to the grant of the Planning Permission.

2.9 If the Planning Permission shall expire before the Commencement of the Development or shall at any time be revoked quashed or withdrawn this Deed shall forthwith determine and cease to have effect but without prejudice to any of the covenants that arise to be performed prior to any such expiration or revocation.

2.10 No person shall be liable for a breach of a covenant in this Deed unless they hold an interest in the Application Site or held such an interest at the date of the breach.

2.11 Any reference to an Act of Parliament shall include any modification, extension or reenactment of that Act for the time being in force and shall include all instruments, orders, plans, regulations, permissions and directions for the time being made, issued or given under that Act or deriving validity from it.

2.12 Nothing in this Deed shall prohibit or limit the right to develop any part of the Application Site in accordance with a planning permission (other than the Planning Permission) granted (whether or not on appeal) after the date of this Deed.

2.13 This Deed Is governed by and interpreted in accordance with the law of England and Wales.

3 The Applicant's covenants

3.1 The Applicant HEREBY COVENANTS AND UNDERTAKES with the Council that the Applicant agrees:-

3.1.1 subject to clause 3.2 that the Preferred Line is acceptable to it and is the preferred route for the Reinstated Railway Link while the Applicant is operating its business from the Application Site;

3.1.2 subject to clause 3.2 not to object to or procure objections to the adoption of the Preferred Line as the safeguarded line of this part of the Reinstated Railway Link;

3.1.3 subject to clause 3. 2 not to seek to frustrate the adoption of the Preferred Line as the safeguarded line of this part of the Reinstated Railway Link;

3.1.4 the Applicant recognises that for so long as the Local Plan Policy falls to be considered in the determination of any planning application and the Applicant shall operate its business from the Application Site all future planning applications for all or any part of the Ardlngly Rail Depot, including the Application Site, must have due regard to the safeguarding of the Reinstated Railway link and only include proposals that would not prejudice the reinstatement of the Reinstated Railway Lik along the Preferred Line between points A and B on Plan 2;

3.1.5 the Applicant acknowledges that should it cease to have an interest at the Application Site then the safeguarded route of the Reinstated Railway Link could revert to an alternative alignment through the Application Site within the Safeguarded Route;

3.1.6 It will work in good faith with the Bluebell Railway Pic in order to attempt to facllltate the reinstatement of the Reinstated Railway Link through the Application Site cooperating in the mutual interests of both organisations.

3.1.7 that the Preferred Line and Plan 2 may be used by the District Council when reviewing updating or implementing any or all of Policies R14, AR2 and HK3 in the Local Plan;

3.1.8 to serve on the County Council a Notice of Commencement (marked for the attention of the County Council's Section 106 Compliance Officer) not more than seven (7) days after Commencement of the Development has occurred and such notice shall be deemed to have been properly served if sent by recorded delivery to the County Council at the address given above.

3.2 Nothing In this Deed shall prevent or restrict the Applicant from carrying out:

3.2.1 the Development or any part of it;

3.2.2 any development which may be permitted under the 1990 Act without an application for planning permission;

3.2.3 any operations in the course of its business which do not constitute development within the meaning ascribed to it in the 1990 Act.

4 Contracts (nights of Third Parties) Act 1999

4.1 Nothing contained in this deed shall give, or be construed as giving, any rights, privileges, powers or enforceability other than to the Council and to the specific person executing this deed as the Owner and their successors (if any) as defined in this deed and the provisions of the Contracts (rights of Third Parties) Act 1999 and any benefits or rights which could arise from it are expressly excluded to the intent that no other third party within the meaning of that Act shall have any rights of enforcement In respect of any matter contained in this deed.

IN WITNESS WHEREOF this DEED has been executed by the Applicant as a Deed the day and year first before written

EXECUTED as a DEED by

for and on behalf of Hanson

Quarry Products Europe Limited

Director (Redacted signature)

Director/Secretary (Redcated signature)

(Ardingly Depot Application Boundary and Land Ownership Plan Plan No. 1 included in email and hard copy version of response)

(Proposed deviation alignment for future Blubell Railway Operations Plan No. 2 included in email and hard copy version of response)

* * *

01 - Organisation: Bramber Parish Council (Response ID: 208 Respondent ID: 3792)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Bramber Parish Council objects to the principle of the proposed Ham Farm site being used for the extraction of minerals and as a subsequent landfill site, as proposed in the most recent West Sussex County Council Joint Minerals Local Plan of April 2016, on the following grounds:

The damage which would be caused to the local landscape and views from the SDNP, the damage to local ponds and water courses, the failure to acknowledge and accept the land is already designated for maize production and digestate distribution, the failure of WSCC to have deposits independently assessed and the serious effects this proposal would have on local roads, particularly the A283.

1. Landscape and cumulative effect.

Extraction of sand at Ham Farm would create an unacceptable impact on the landscape and character of the area. This site is highly visible from Chanctonbury Hill and other important view-points along the South Downs. Also the existing Rock Common and Chantry Lane sandpits are sequentially and simultaneously visible from the same and other points along the South Downs Way. Opening a further quarry in this location would lead to unacceptable combined cumulative impacts on the panoramic views from the chalk ridge.

The site would also cause significant light pollution.

2. Local Ponds.

Wiston Pond and Alderwood pond are highly valued local amenities which are sensitive to water levels and water quality. It is likely they would be harmed by the extraction.

3. Unresolved issues.

The Ham Farm site, within Wappingthorn Farm, was designated in a previous Horsham DC planning application DC/13/1958 to the internal production of maize and distribution of digestate for the Wappingthorn Farm anaerobic digester.

Dudman Ltd and the landowner tested the deposit and Dudman Ltd has submitted a forecast for extraction of 850,000 tonnes of sand which is inconsistent with the land owners estimate of 500,000 tonnes. WSCC have failed to obtain an independent assessment of what deposits exist.

As confirmed by WSCC, the adjacent existing Rock Common and Chantry Lane sites have not been satisfactorily restored by Dudman Ltd, the proposed operator, and there is no assurance that this site would be restored either. There is not enough inert landfill available within this county, subsequently out of county landfill would need to be imported in order to meet the assured time frame of 10 years for restoration.

4. Highways and Traffic.

Since the Shoreham aircraft crash in Aug 2015 when the A283 became the official diversion route from the A27, traffic volumes on the A283 have increased substantially and have not fallen back to their original volume even though the A27 has reopened.

The number of lorry movements has been severely underestimated, as contrary to WSCC's assumption it is very unlikely that the same lorries will remove sand and bring infill. Furthermore, no allowance has made for additional vehicles such as lorries to remove surface water and staff vehicles, equipment, maintenance and additional lorries to feed the digester if the Ham farm field is lost from maize production.

The 2015 Highways report statistics show that there will be a 26% forecast increase in traffic through natural growth on the A283 from 2015 to 2033. This will exacerbate the existing problems already experienced on the A283.

5. Health, well-being and loss of amenity.

There will be a detrimental impact on the Health and Well-being of residents, which has not been fully appreciated by WSCC in the report. On Horsham Road in close proximity to this site is a large and active pre-school crèche who are concerned of the effects of noise, light and particulate pollution. The playing fields of Steyning Grammar School (2000 pupils) is nearby.

6. Local economy.

The Steyning and District community partnership, which has responsibilities for local economy and tourism, have stated that there would be a severe detrimental effect to the interests of the community by this plan. WSCC have stated that there will be no effect, however, no reference was made to any research or consultation to support this statement.

* * *

01 - Organisation: Bramber Parish Councillor & resident (Response ID: 54 Respondent ID: 1363)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

The site is probably OK in terms of visual intrusion due the the topography and tree cover.

However I have major concerns regarding the number of additional HGV movements that will be generated (a 10 to 15% increase on 2014 levels) on what is an exceeding busy, narrow road with a relatively poor surface in places eg the Wiston bends (where there have been several accidents, possibly due to the combination of bend - poor sight lines - and undulating surface). Some amelioration might be found if quarry lorries were restricted to only southbound travel along the A283 between the A2037 and A24. This would also help access to and from the site, as there would be no need for vehicles to cross the southbound carriageway to access the northbound one. In view of the high speeds (relatively un-policed due to traffic police cut-backs) on this section of the A283, a roundabout junction at the quarry entrance should perhaps be considered (with 30mph limit), although the potential light pollution affecting the adjacent national park would need careful assessment and if problematic would be a clear negative marker for this development.

Staying with HGVs, I would expect the quarry vehicles to be restricted to the A283 ie no travel through Steyning (or Bramber) for sandwiches!

My next concern is that of restoration or reclaim of the land. Firstly it is vital that this is progressive as the quarry is worked, to minimise the risk of another Upper Beeding cement works fiasco. Likewise there should be a constraint on the quarry developmen with upfront deposition of a suitable financial bond to cover sympathetic reinstatement in the event of bankruptcy of the quarry company.

Finally, due to its proximity to Steyning, there should be a clear exclusion of the worked out quarry being used for domestic or commercial general refuse land fill.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Much greater detail on how the A283 will be improved / changed to cope with the additional HGV movements.

Use of a financial bond to cover reinstatement to be spelt out.

A clear statement that domestic or commercial general waste land fill will not be used.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Hydrocarbons: I believe that the National Policy on hydrocarbon extraction using hydraulic fracturing underneath national parks is wrong: it should not be allowed.

Likewise I believe that hydrocarbon extraction using hydraulic fracturing should never be allowed within the South Downs National Park, whatever the justification.

Policy M13 is a joke - "do what you like"! Similarly M17.

The words "including, where appropriate," should be removed from Policy M24(a)

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

01 - Organisation: Brighton and Hove City Council (Response ID: 236 Respondent ID: 3961)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Brighton & Hove City Council supports the approach to safeguarding minerals infrastructure set out in policy M10. In particular we support the identification of the wharves identified in M10 c) located at Shoreham and Littlehampton Ports. In 2014 BHCC, along with other interested parties, agreed a Statement of Common Ground (SoCG) the purpose of which was to underpin effective cooperation and collaboration in addressing strategic cross-boundary issues as they relate to planning for minerals infrastructure and safeguarding in Shoreham Harbour. The joint MLP proposals will compliment the approach set out in the SOCG and it's forthcoming revision.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

01 - Organisation: British Horse Society (Response ID: 137 Respondent ID: 211)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

The British Horse Society (BHS) is the UK's largest equine charity and equestrian membership organisation and the governing body for recreational riding. Its charitable objects include the promotion of equestrian safety, particularly on roads, and equestrian access to bridleways and other off-road multi-use routes for the public benefit. On behalf of The Society I would like to make the following comments:

West Sussex Joint Minerals Local Plan Consultation

The bridleway network across the county (useable by walkers, cyclists and equestrians) is particularly fragmented, and because of this these vulnerable road users have to cross and/or use both heavily trafficked busy A and B roads, and country roads and lanes, which provide links in the network. Whilst understanding that minerals can only be worked where they are found, it is very important that the roads used as links in the network are identified locally to any chosen site so that their use by HGVs and other vehicles as access to a site or the Lorry Route Network can either be avoided, or if this is not possible a temporary alternative safe link route provided.

To this end, communication and engagement with representatives of all users in the local community is essential, and commitment to this in the document is welcomed, although I would suggest this engagement should also include statutory user organisations and either the West Sussex or South Downs Local Access Forums (whichever is appropriate), who through their balanced membership can provide a useful overview.

2.2 Vision

9th para – this para is supported, as the eventual high standard restoration of these sites can bring great public benefit, the opportunity to provide safe links in the multi-use public rights of way (prow) network is especially important as the roads become busier and more dangerous for vulnerable users.

Health and Amenity

2.3.6 - support the commitment to take into account the impact on local communities, and where possible provide benefits.

Transport

2.3.12 – for reasons stated above, support commitment to minimise lorry movements and the use of local roads, and consider the impact of road transport on local communities and rural areas, but would emphasize the importance of gaining local knowledge through consultation.

Mitigation and Restoration

2.3.14 – support commitment to consideration of restoration at earliest possible stage. Consulltation with Local Access Forums, regarding the West Sussex Rights of Way Improvement Plan would be beneficial.

Health and Amenity

4.9.2 – good to see acknowledgement of adverse impacts of mineral extraction on public rights of way (informal recreation). These adverse impacts are not just on the use of particular prow, but on the access routes to them, if the links are roads or lanes.

National Planning Policy

5.3.5 - support commitment to NPPF environmental criteria.

NPPF – para 75, also states "Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks."

And para 188, "Early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community."

West Sussex Transport Plan

5.5.4 - The West Sussex Rights of Way Improvement Plan – A Strategic Framework 2007 – 2017 is also incorporated into this current Transport Plan.

Public Amenity and Health

Policy M18, point (b) - this policy is strongly supported. Public rights of way (especially bridleways which are multi-use) provide safe routes for vulnerable road users, and they are becoming increasingly important as vehicle numbers increase on all roads. Opportunities to provide much needed additional links in the network should be sought.

Transport

Policy M20, point (c) – all the points made in the policy here are supported, but especially important is " "minimal use of local roads" and "vehicle movements associated with the development will not have a severe impact on the safety of all road users". 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. If this cannot be avoided an alternative route must be provided.

Restoration and Aftercare

Policy M24, point (d) - policy and wording here is supported and very welcome.

Community Engagement

Policy M25: 8.14.2 – definitely welcome early discussions/engagement with local communities, but there is a need to ensure any site liaison group is fully representative of local interests. Early engagement should also include Local Access Forums who can provide a balanced overview.

* * *

01 - Organisation: Bury Parish Council (Response ID: 192 Respondent ID: 3150)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

West Sussex County Council

South Downs National Park Authority

Joint Minerals Local Plan

The Minerals Local Plan has been circulated to all Bury Parish Councillors, and their comments for this consultation are below.

Generally we agree with the overall plan and its vision. We appreciate the work that has been done and the recognition of the special qualities of the South Down National Park. The protection of the National Park is extremely important to us and the decision that there will be no new mineral extraction sites within the Park is excellent news.

In Bury we are very conscious of maintaining the beauty of the National Park, and consider the Bury Gate as the 'Gateway' to the National Park when travelling from the north. This is the first sight of the full vista of the South Downs to tourists.

The proposed sandpit at Horncroft would have ruined the area. The dust, the light pollution, the noise, the heavy traffic, the slow moving fully laden lorries using Bury Hill - it would have had a disastrous affect. We are therefore very relieved that Horncroft has been left off the current selections, and hope that this is never changed. The site is now even more visible and extends right up to the Fittleworth Road. We note that trees are now planted to disguise the extent, but actually have drawn attention to it. We will hold our breath.

There is no evidence to support the sand at Horncroft being high grade silica sand, and even if it does prove to be so, the SDNPA should seek to source silica sand from alternative sources outside National Parks, that do exist. No proven exceptional circumstances exist for silica sand extraction at Horncroft.

We have read the full document, and as a Parish Council feel that it has been well thought out and presented.

* * *

01 - Organisation: CEGA
(Response ID: 44 Respondent ID: 3594)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Various sites

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

See supporting document

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

See supporting document

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

see supporting document

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

see supporting document

Additional Comments

Representations to the Draft West Sussex Joint Minerals Local Plan (Regulation: 18)

Re: CEGA Offices, Land at Cheesemans Lane, Funtington, West Sussex

Introduction

We have been instructed by CEGA Group Services Limited to submit representations on their behalf to West Sussex County Council (WSCC) in relation to the draft Joint Minerals Local Plan (Regulation: 18) (April 2016). CEGA are a medical assistance and repatriation company who employ office based and flight staff including doctors, nurses, linguists and other professionals to provide 24 hour, 365 day support to clients in poor health overseas, working for insurance companies, private clients and corporates worldwide, sometimes organising immediate return to the UK. They also provide telephone based medical risk assessment and travel claims handling services to policyholders. Their professional advice and administration base is located at Funtington with an air ambulance aircraft stationed at Bournemouth International Airport. The Funtington office, on Cheesemans Lane currently employs approximately 350 staff from the local area. Their flight doctors and nurses are required to report to the Funtington site to collect and return their medical kit and assignment instructions for worldwide escorted repatriations on commercial aircraft, departing from major UK airports.

Naturally, CEGA have been very concerned as to what the potential allocation/minerals extraction might mean for their premises and their business operation with a number of sites for potential minerals extraction located close-by.

We have been in communication with WSCC (Rupy Sandhu) and have found the advice very helpful and professional. We have also been in communications with ……. who is Ward Councillor for the area within which CEGA's offices are located. Councillor ……. has pledged her support for protecting the interests of CEGA's operations in Funtington. This includes providing representations to the Draft West Sussex Joint Minerals Local Plan. We have also been in contact and provided a copy of previous representations to QinetiQ who are a local employer in close proximity to CEGA's operations. We have also provided Louise Goldsmith (Head of the County Council) with a copy of our previous representations in order to lobby support for the protection of CEGA's interests.

CEGA Offices Description

The CEGA office building is located within Funtington Park. Funtington Park is solely used by CEGA and consists of the aforementioned office building, associated car parking and outbuildings. To the south of Funtington Park is Hambrook Business Centre which is approximately half the size of Funtington Park and is occupied by small local businesses. On all other sides is agricultural land and woodland. The agricultural land is used for arable and pig farming.

Funtington Park and the Hambrook Business Centre are accessed from Cheesemans Lane. Cheesemans Lane is a single carriageway in either direction. Cheesemans Lane, to the south, connects to the A27.

The CEGA office building has many windows on all sides and does not benefit currently from double glazing or air conditioning. Ventilation is achieved through the opening of windows. The need for a quiet site is paramount as much of CEGA's operation is carried out on the telephone, including dealing with ill clients worldwide.

According to the Environment Agency the site is not currently considered to be at risk of flooding.

Draft West Sussex Joint Minerals Local Plan (Regulation: 18) (April 2016): Summary

Following numerous Minerals Site Studies, the Council has produced their Draft West Sussex Joint Minerals Local Plan and has issued it for public consultation ending on 17 June 2016. These representations relate to this Minerals Local Plan.

Following the careful review of all potential mineral sites within West Sussex, the plan proposes the allocation of only two sites which are as follows:-

- An extension to West Hoathly clay pit (clay);

- Ham Farm, Steyning (soft sand);

It is understood through discussions with WSCC that the reasoning behind the allocation of just two sites is based on the relatively low level of demand for minerals and their level of acceptability over others proposed, together with their availability.

The allocated sites are not in close proximity to CEGA's operations in Funtington and therefore we are pleased to support the allocations as they will have no detrimental impact on CEGA's operations.

We are aware however that a site does not require formal allocation in order to come forward for extraction. A Planning Application can be made at any time proposing minerals extraction. For this reason, the Development Management Policies are considered within this representation, as contained within the final chapter of the Joint Minerals Plan.

Draft West Sussex Joint Minerals Local Plan (Regulation: 18) – Background Document: Minerals Site Selection Report: Sites in Close Proximity to CEGA Offices

As mentioned in previous representations, there are four sites in close proximity to CEGA's operations in Funtington. These sites are Common Road West, Common Road East, Slades Field and Funtington West. All the sites are considered acceptable in principle by the Minerals Site Selection Report but have not been selected for allocation within the Joint Minerals Local Plan. The Minerals Site Selection Report is part of the evidence base for the West Sussex Mineral Local Plan which summarises the consultant technical reports produced on behalf of the Council. As mentioned previously, the reasoning, indicated verbally by the Council, for these sites not being allocated is due to demand and availability.

The sites that are in close proximity to CEGA's offices are considered acceptable in principle based on the following Technical Reports:-

- Habitat's Regulation Assessment;

- Landscape Sensitivity & Capacity Study;

- Transport Assessment;

- Strategic Flood Risk Assessment;

- Sustainability Appraisal (including Ecosystem Services).

The Minerals Site Selection Report assessed each of the sites in close proximity to CEGA's offices. The findings are summarised as follows:-

Site Name: Common Road West (7.36 hectares)

Site Code: M/CH/1B

The Common Road West site shares the northern boundary of Funtington Park and therefore is the closest site to CEGA's offices. The site is owned by Hanson and is therefore considered to be available and deliverable. The deliverability of the site will probably be in conjunction with the other sites close to CEGA's offices due to being under first refusal or ownership of Hanson.

WSCC have identified the following key issues and constraints:-

- Potential impacts on ancient woodland;

- Potential impacts on the setting of listed buildings close to the site;

- The site is located in an area of high risk of ground water flooding and therefore a Hydrogeological Risk Assessment would be required prior to allocation;

- There may be impacts on air quality management areas in Chichester as a result of HGV movements;

- The site is close to public rights of way which may be affected;

- The avoidance of protection of cables close to the site would be required;

- The potential impacts on local residents and businesses in terms of amenity;

- Cumulative impacts of the site coming forward at the same time as other sites in the Hambrook Grouping.

The Hambrook Grouping consists of six sites including the four in close proximity to CEGA's offices.

When reviewing the Site Selection Report for further detail, it was recognised that the key issues for CEGA's operations are the impact on amenity from noise, dust and light pollution and transport impacts. The report indicates that these impacts can be managed through moderate mitigation measures to avoid harm. These

would be implemented through the Development Management Policies, at the planning application stage, which are considered below.

The transport impacts were assessed, at the Council's request, by Peter Brett Associates. The Transport Assessment considered that the operation of this site would produce a 7% increase in traffic movements along Cheesemans Lane when cumulatively assessed in the Hambrook Grouping. These traffic movements would primarily be from (Heavy Goods Vehicles) HGVs. This was considered to cause a potential conflict with CEGA's operations which are primarily light traffic of commuters and visitors to the site. The report considers this to be a minimal issue and proposes activities such as improvements of junctions as mitigation measures. These issues would need to be considered as part of a Planning Application and assessed against the Development Management Policies.

Site Name: Common Road East (13.5 hectares)

Site Code: M/CH/1C

The Common Road East site is located to the north east of Funtington Park on the east side of Cheesemans Lane. The site is owned by ..... and is considered to be available as Hanson have first refusal, and the site is within one ownership. The site is considered deliverable if it becomes available and will potentially come forward as part of the Hambrook Grouping.

Through their Minerals Site Selection Report, WSCC have identified the following key issues and constraints:-

- Potential impacts on ancient woodland;

- Potential impacts on the setting of the listed buildings and Conservation Area;

- Part of the site is at high risk of ground water flooding and therefore a Hydrogeological risk Assessment would be required prior to allocation and a Flood Risk Assessment required at the Planning Application stage;

- A Routing Agreement would be required to avoid air quality management areas;

- A Southern Gas main is located on the eastern side of the site;

- Potential impacts on residential properties and businesses particularly in terms of amenity;

- Cumulative impacts of the site coming forward at the same time as other sites in the Hambrook Grouping.

As mentioned with Common Road West, the primary concern and key issue for CEGA's operations is the impact on amenity. The Minerals Site Selection Report considers that this could be managed through moderate mitigation measures to avoid harm. This could be controlled through the Planning Application process via the Development Management Policies to be reviewed later in this document.

As with Common Road West, the impact of the site, when cumulatively assessed in the Hambrook Grouping, on transport grounds is likely to result in a 7% increase in traffic along Cheesemans Lane. Although the report considers this to be a minimal impact, it may be considered significant for CEGA's operations. The significance is considered high due to the interaction of the light traffic associated with CEGA's commuters and visitors and the HGV's connected to the minerals extraction operation.

Site Name: Slades Field (26 hectares)

Site Code: M/CH/1D

The Slades Field site is located to the south east of Funtington Park on the east side of Cheesemans Lane. The site is part owned by Hanson. The remainder of the site is owned by Bolsoms Farm but Hanson have first refusal on the land through ARC Minerals who are within the same group as Hanson. It is therefore considered to be available and deliverable, probably in conjunction with the other sites within the Hambrook Grouping.

WSCC through their Minerals Site Selection Report have identified the following key issues/constraints:-

- Potential impacts on the setting of the listed buildings and Conservation Area;

- The majority of the site is at high risk of ground water flooding and therefore a Hydrogeological Risk Assessment is required prior to allocation and a Flood Risk Assessment is required at the Planning Application stage;

- Routing Agreement would be required to avoid air quality management areas;

- A small part of the site contains best and most versatile soil;

- A Southern Gas main is located on the eastern side of the site;

- There is potential impacts on the residential properties and business in terms of amenity and transport;

- Cumulative impacts of the site moving forward at the same time as other sites in the Hambrook Grouping.

The key issues to draw out in respect to CEGA's operations as with the previous two sites are the impacts on transport in terms of a cumulative 7% increase to traffic movements along Cheesemans Lane from the operation of the site and the impact upon amenity in terms of noise, dust and light pollution.

The Minerals Site Selection Report considers that through appropriate mitigation measures, these issues can be managed. Should the sites come forward, this will be assessed through the Development Management Policies which will be scrutinised later in this document.

Site Name: Funtington West (46.55 hectares)

Site Code: M/CH/1G

The Funtington West site is located to the north east of Funtington Park on the north side of Common Road. This site is owned by Hanson and is therefore considered to be available and deliverable by WSCC. The deliverability as with the previous sites is potentially going to be in conjunction with the other sites within the Hambrook Grouping.

The key issues and constraints identified by WSCC within the Minerals Site Selection Report are as follows:-

- Potential impacts on the South Downs National Park;

- Potential impacts on the ancient woodland;

- Potential impacts on the setting of the listed buildings and Conservation Area;

- The majority of the site is at moderate risk of ground water flooding and therefore a Hydrogeological Risk Assessment would be required prior to allocation and a Flood Risk Assessment required at the Planning Application stage;

- Routing Agreement would be required to avoid air quality management areas;

- The site contains best and most versatile soil;

- Potential impacts on public bridleway 254 but the extraction minerals on the site could result in a new bridleway;

- Services and utilities at present on this site;

- Potential impacts on residential properties and businesses in terms of amenity and transport;

- Cumulative impacts of the site coming forward at the same time as other sites in the Hambrook Grouping.

Due to the size and location of the Funtington West site, the key issues are of greater significance here, particularly in terms of landscape visual impacts with the South Downs National Park, nature conservation and geological impacts, historic environmental designations, soil quality, services and utilities, amenity and cumulative impacts.

As with previous sites, the primary key issues for CEGA's operations in the area for minerals extraction relate to transport and amenity with a cumulative 7% increase in traffic along Cheesemans Lane from the Hambrook Grouping and the impact in terms of noise, dust and light pollution. The report believes that through moderate mitigation measures, the harm can be managed. Should these sites come forward, this will be managed through the Development Management Policies which will be discussed below.

Cumulative impacts from the Hambrook Grouping

West Sussex has grouped six sites including the four aforementioned sites within a Hambrook Grouping as a result of ownership or other interest in the sites. Should planning applications be made for minerals extraction for any of the sites it is in the interests of CEGA's operations that the potential cumulative impacts are carefully assessed. There is a likelihood of significant amenity and transport impacts on CEGA's operations if the cumulative impact is not carefully mitigated.

Draft West Sussex Joint Minerals Local Plan (Regulation: 18) (April 2016): Development Management Policies

Although the sites surrounding CEGA's offices are not allocated within the draft West Sussex Joint Minerals Local Plan there is still a possibility that the sites may come forward through the normal planning process. Should one of the sites or all of the sites come forward they would be assessed based on the Development Management Policies outlined in the Minerals Local Plan.

The Development Management Policies focus on the following points:

- Character;

- Landscape (CEGA's offices and the mineral sites within close proximity are not within the South Downs National Park or areas of outstanding natural beauty);

- Historic environment;

- Air, soil and water quality;

- Biodiversity and geodiversity;

- Public amenity and health;

- Flooding;

- Transport;

- Aerodrome safeguarding;

- Cumulative impact;

- Design and operation of minerals' facilities;

- Restoration and aftercare;

- Community benefits and engagement;

- Recycled and secondary aggregates.

As mentioned in the introduction, CEGA's operation employs approximately 350 staff from the local area. It is predominantly telephone based and requires an environment in which these activities can be undertaken without amenity impacts such as noise. Therefore the Development Management Policies are of primary importance to CEGA's activities. The key Development Management Policies that relate to CEGA's operations in Funtington are as follows:

- Character – CEGA are currently located in a rural character setting where a quiet environment is enjoyed and allows for a smooth operation.

- Public amenity and health – CEGA currently employs over 350 staff and deals with clients overseas who are often contacted in relation to difficult situations where sensitivity and focus are required. Noise impacts would be very detrimental to CEGA's operation in this regard. In addition the quality of the working environment for CEGA's employees and their clients is of the utmost importance and they would not want to see this detrimentally impacted by minerals extraction nearby.

- Transport – with over 350 staff, visitors and clients any impact upon this highway network would impact the quality of a client's visit and the journey to work currently experienced by CEGA employees.

- Cumulative Impact - it is referenced throughout the Mineral Site Selection Report that if one of the sites in close proximity to CEGA's offices were to come forward then the remainder of the Hambrook Grouping would be developed in conjunction, as a comprehensive development. This would obviously increase the potential impacts on CEGA's operations.

- Design & Operation of Minerals Facilities - if minerals extraction were to commence then the operations would require careful management in order to be respectful of the existing employment uses in the locality particularly the requirement for a quiet environment.

- Community Benefits & Engagement – CEGA would like to remain a key consultee for any proposals for minerals extraction of sites local to their offices. This includes being notified of planning applications and

having a named contact with which to discuss impacts on CEGA's operations throughout the process of minerals extraction.

Policy M12 (Character)

This policy explains that the Council would not want to see any proposals for mineral development that detract from the local character and its distinctiveness. Although CEGA's offices and the surrounding mineral sites are not located within specific landscape character areas such as the South Downs National Park or Areas of Outstanding Natural Beauty there is a character to the area which is valued. This is a quiet countryside farming environment with small pockets of employment uses. These employment uses are highly valued and the countryside location attracts people to live and work in this environment. It is encouraging that this policy is included within the Development Management Policies as large scale minerals extraction has the potential to be detrimental to the local character of this quiet countryside location.

Policy M18 (Public Health & Amenity)

This policy details that proposals for minerals development would only be permitted provided that the light, noise, dust, odours, vibration including those arising from traffic are controlled to the extent that there will not be an unacceptable impact on public health and amenity.

We are pleased to see the inclusion of this element of the Policy as CEGA currently employs over 350 staff who require a quiet environment. Calls are made to clients in difficult medical situations where any interruption to the conversation would impact the operation. Therefore maintaining a quiet working environment where staff can concentrate and hear calls is essential. As the sites are located in close proximity to CEGA's offices there would also be health and amenity issues in terms of the working environment for the employees which could arise from operations on the minerals extraction site. We also request that a similar policy wording to Policy M18 Part A is included for operations on the site to ensure that light, noise, dust, odours, vibration and other emissions from on site activities are controlled to a level acceptable that would allow CEGA's operations to continue as they currently operate.

Although not suggested for insertion within the policy, we request that CEGA are consulted on any proposed mitigation measures put forward in assessments that accompany relevant planning applications. This will ensure that CEGA can be technically satisfied that the mitigation measures proposed to reduce the amenity impacts from the light, noise, dust, odours and vibration from traffic and operations on the site are appropriate. This would allow CEGA to continue to operate in a quiet and uninterrupted environment.

Policy M20 (Transport)

This policy details that proposals for mineral development will be permitted provided that transport links are adequate to serve the development or can be approved to an appropriate standard without an unacceptable impact on amenity, character or the environment. The policy further requires that where the need for road transport is demonstrated:

- The materials are transported with minimal use of local roads;

- Vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network;

- There is a safe and adequate means of access to the highway network, and;

- Vehicle movements associated with the development will not have a severe impact on the safety of all road users.

The inclusion of this policy is welcomed as CEGA has over 350 staff and a large number of visitors and clients attending the site on a regular basis. The employees, clients and visitors attend the site predominantly by car using the local roads. Without careful transport assessments and management of HGVs attending the mineral sites the ability for CEGA's employees and visitors to attend their offices will be impeded. The existing roads surrounding CEGA's offices are narrow, in some parts single carriageway. Without significant upgrade they do not have the capacity to support HGVs. Therefore any planning applications submitted for minerals extraction will need to be carefully assessed and accompanied by mitigation measures including junction improvements and road widening.

We request that CEGA are provided with copies of transport assessments should a planning application for minerals extraction be submitted so that they may comment on the mitigation measures proposed.

Policy M22 (Cumulative Impact)

This policy details that proposals for minerals development will be permitted provided that an unreasonable level of disturbance to the environment and/or to residents, businesses and visitors does not result from minerals development either individually or as a cumulative effect alongside other sites operating simultaneously. The policy continues by stating that planning conditions may be used to coordinate the working thereby reducing any cumulative impact.

We are pleased to see the inclusion of this policy given the location of a number of potential mineral extraction sites close to CEGA's offices which are either owned or within first refusal of Hanson. As part of the Hambrook Grouping the sites are likely to come forward in conjunction creating potential significant cumulative impacts.

We request visibility of any planning applications submitted for minerals extraction on the sites. This will allow comment in terms of the potential cumulative impacts of the Hambrook Grouping in respect of amenity and highways impacts on CEGA's offices.

Policy M23 (Design & Operation of Minerals Developments)

This policy details that proposals for minerals developments will be permitted provided that, where appropriate, the scale, form and layout (including landscaping) take into account the need to integrate with, and where possible enhance adjoining land uses and minimise potential conflicts between land uses and activities.

We are pleased to see this inclusion within Policy M23 but would request, as under Policy M18, that the policy is further elaborated to ensure that any impacts are controlled to an acceptable level to allow neighbouring uses to continue to operate. This is important as CEGA's operations, adjacent to potential minerals extraction sites, require office workers to converse over the telephone in a quiet, sensitive manner in an undisturbed environment.

Policy M25 (Community Engagement)

This policy details that proposals for minerals development will be permitted provided that where necessary a site liaison group is established by the operator to address issues arising from the operation of a minerals development or facility.

We are pleased to see the inclusion of this policy within the minerals local plan as, from time to time, it may be necessary for CEGA to contact the minerals extraction operator to discuss potential issues arising from the extraction.

Any approved planning application for minerals extraction near CEGA's offices must include a condition relating to provision of regular updates to and a method by which issues can be raised with the operator.

Summary

In conclusion we are pleased to see that the sites known as Funtington West, Common Road West, Common Road East and Slades Field are not allocated for minerals extraction as this would potentially have a detrimental impact on the operations at CEGA's offices. These representations are therefore made to support the Plan allocations as currently proposed.

We note however that there is potential for planning applications to be made for the extraction of minerals at the sites although not allocated within the Plan. We have therefore considered the Development Management Policies and consider the majority to be acceptable with a minor modification to the wording to consider the potential amenity impacts on CEGA's operations from any on site minerals extraction activities.

With the above minor wording change, relating to the management of amenity impacts, the Plan is supported.

Should you wish to discuss the contents of this letter and representation please do not hesitate to contact Vail Williams on the below and above details.

* * *

01 - Organisation: Cemex (Response ID: 173 Respondent ID: 3779)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

(Response to question 1.2 - 'Partly')

Yes see comment sheet attached

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

See comment sheet attached

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

Cemex promote the inclusion of site 7 land easy of West Heath which also can be worked for soft sand and meets the five guiding principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Allocation of additional soft sand site - Land East of West Heath to ensure an adequate and steady supply of mineral is provided throughout the plan period in West Sussex/SDNP

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

(Response to 3.1 "NO M2")

See comment sheet for policies supported and those requiring change

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

See comment sheet

Additional Comments

(Additional comments sheet)

West Sussex and South Downs National Park Joint Minerals Local Plan (Regulation 18) April 2016- Representation by CEMEX UK Operations Limited - June 2016

Thank you for giving CEMEX UK Operations Limited (CEMEX) the opportunity to comment on the Draft West Sussex Joint Minerals Local Plan (Regulation 18) April 2016. CEMEX have the following comments to make in relation to the plan:

Vision - Section 2.2

CEMEX object to the approach in the vision, in particular in relation to the move away of mineral working from the South Downs National Park (SDNP). The vision includes the statement - "to see mineral activity move away from within the South Downs National Park".

This approach of moving mineral extraction away from the SDNP is not strictly in compliance with the tests for working minerals in National Parks as set out the NPPF and is not sustainable. The NPPF sets out in paragraph 144 that "as far as practical, provide for maintenance of landbanks of non-energy minerals from outside of National Parks." It does not provide a moratorium. CEMEX object to the vision and consider it is not sustainable or practicable to expect future soft sand provision to be from outside of the SDNP or indeed outside of West Sussex. No evidence has been provided to demonstrate that this vision is achievable or deliverable in the draft Plan period.

Paragraph 145 of the NPPF requires MPAs to plan for an adequate and st eady supply of aggregates in their area. The Assessment of Need for Aggregates" 2016 identifies that there is a need for additional soft sand provision in West Sussex. The majority of soft sand resource lies within the SDNP. An approach to move mineral extraction away from the SDNP is at odds with WSCC/SDNPA making provision for aggregates " in their area".

The vision also includes statements about transportation of minerals in the SDNP. It says it "Will be a place where the production and transportation of minerals does not detract from it (SDNP) having communities and being a special place to live and visit. In particular impacts associated with the transport of minerals by road will have been minimized".

CEMEX consider that this statement conflicts with the approach that the South Downs National Park Authority (SDNPA)/West Sussex County Council (WSCC) are taking to importing soft sand into the County from surrounding areas, rather than working it locally and minimizing HGV mileage. By encouraging a provision of soft sand from outside of the SDNP, they are looking to their supply from surrounding counties. This will increase mineral HGV mileage and HGV mileage through the National Park and associated adverse impacts.

The vision includes a statement of self reliance for West Sussex and the SDNP for minerals and no recognition of its regional or national contribution. This also conflicts with the increasing reliance that will be placed on winning soft sand from within the SE Region and not from within the SDNP or West Sussex itself.

Strategic Objectives- Section 2.3

CEMEX support SO1 - but are concerned that WSCC/SDNPA will not be able to deliver this in this draft plan - as regard has not been had to market demand in the plan area.

CEMEX support S02 - but WSCC/SDNPA need to be aware that land won aggregates cannot always be substituted and are required to meet the British Standard demands of particular products and materials.

CEMEX object to S03 - the objective does not reflect paragraph 2.3.3 or the NPPF. The objective only makes provision for a declining amount of soft sand extraction within the SDNP over the Plan Period. The vast majority of the soft sand resource is only found within the SDNP in West Sussex. CEMEX believe that soft sand can be worked sustainably within the SDNP, in appropriate locations, and that the objective should be amended to say that soft sand provision will be made in the SDNP in the Plan Period where the exceptional

circumstances tests are met and where it can be demonstrated that it is in the public interest. This change would reflect more accurately the policy thrust of para 116 of the NPPF.

CEMEX object to S04 - it should be amended to read "To protect the SDNP by only providing for silica and soft sand from within it in exceptional circumstances and when in the public interest."

CEMEX support SO5 - there is a real risk that this infrastructure will be lost through mixed use and more sensitive land uses being permitted.

CEMEX support S06 - safeguarding of mineral resources from sterilization.

CEMEX support SO11 - Transport - but consider that the lack of allocation of soft sand sites within West Sussex will not see this policy delivered as there will be more lorry movements travelling greater distances to deliver soft sand aggregate to West Sussex.

CEMEX support SO13 - securing mitigation and restoration measures.

Soft Sand - Paragraphs 6.2.13 - 6.2.23 and Policy M2, Policy M11

As already stated CEMEX object to the plan's strategic objectives for soft sand provision. CEMEX also object to the allocation of only one soft sand site - Ham Farm in Policy M11 and to the wording of Policy M2 as it is currently drafted.

The strategy for soft sand provision set out in the plan is not truly sustainable and does not balance the three arms of sustainable development - economic, environmental and social. The strategy is one of reliance on the existing permitted mineral reserves, the allocation of only one new proposed site at Ham

Farm and increasing imports from other areas in order to facilitate a "managed retreat" from working soft sand within the SONP. CEMEX consider this does not meet the NPPF requirements of facilitating the sustainable use of minerals. The approach does not plan for a steady and adequate supply of aggregates from within West Sussex based on the Local Aggregate Assessment (LAA) or consider the productive capacity of permitted sites and their ability to meet 10 years average sales of around 365,000 per annum.

Paragraph 6.2.17 of the draft plan states that "the strategy accords with national policy as it will conserve the landscape and scenic beauty of the National Park". However CEMEX contend that this statement is only one part of national policy relating to national parks and ignores national policies on supply of minerals, economic and sustainable development.

In Paragraph 6.2.17 of the draft plan, the SDNPA/WSCC make the case that the plan assessment (Mineral Sites Selection Report (April 2016)) demonstrates that there are no exceptional circumstances and is not in the public interest to allocate sites. Their case is set out in Appendix 7, but CEMEX disagree with the the case put forward as there is no real evidence base to support the claims that soft sand can be supplied by other quarries in the south east or that the amount and quality of material required can be substituted by marine dredged sands.

As stated above CEMEX object to policy M2 as currently drafted. The paragraph below set out the detailed reasons for this and the changes that should be made.

Firstly, Policy M2 states "proposals for land won soft sand extraction, including extensions of time and physical extensions to existing sites will be permitted.." CEMEX object to the wording "physical extensions" in the policy M2 and believe this should be amended to just read "extensions".

CEMEX are promoting inclusion of a soft sand site "Land to the east of West Heath". This is promoted as an extension to the existing West Heath Common site - as it would use the same established access and quarry infrastructure as the main quarry site (weighbridge, site office and parking). However, the extension is physically removed from the main quarry in order to avoid working part of the CEMEX landholding which adjoins the existing quarry extension site, but CEMEX consider this land would be environmentally unsuitable as an extension site. CEMEX wish to leapfrog this area of landholding and do not wish to include it as an extension area because of environmental impacts but wish to work the land beyond were impacts of working the soft sand would be acceptable. As such the plan should not only consider physical extensions, but extensions to sites which would make use of existing processing plant, access and mineral site infrastructure. The wording of this policy should be amended to reflect this.

Secondly CEMEX object to policy M2 as it makes provision for only one soft sand site and the policy sets out that this site should come forward first, before other land is considered. CEMEX consider that the criterion a) "it can be demonstrated that extraction cannot take place on the site allocated within Policy M11 of this plan" should be deleted. It is not for other applicants to prove that a site allocated in a plan cannot take place. Indeed, whether the site allocated in Policy M11 does or does not having merit to be worked as a soft sand mineral site is inconsequential to the fact that the plan has only allocated one site when there clearly is a need for more sites. The reliance on only one site is inflexible in terms of plan delivery and leaves a significant shortfall in future soft sand provision in the county of West Sussex. This is discussed further below.

Need for Additional Sites/Minimum Landbank of at Least 7 Years/Productive Capacity

Paragraph 6.2.14 of the draft plan identifies that the 10 year average sales for soft sand are 365,000 per annum (2005-2014) and it recognizes that the average sales per annum may be as high as 423,000. This means for the plan period 2015-2033 provision of some additional 6,115,600 tonnes is required. This figure is based on the 10 years average sales and a land bank of some 7 years at the end of the plan period 2033.

The Assessment of Need for Aggregates Report April 2016 looks at the current permitted reserves of 3,009,400 tonnes in 2015 from five permitted soft sand sites. It assesses that based on current 10 year average annual sales, 365,000, the land bank is 8.2 years. A landbank of 8.2 years with no new sites and if current average sales are maintained would see a landbank of 0 tonnes/years by 2023. The assessment also looks at a higher future sales, 423,000, and this would see the land bank diminish sooner by 2022 if no new sites are allocated.

The NPPF has a requirement for MPAs to maintain a land bank of a minimum of 7 years. The plan proposes to allocate only one additional site during the plan period at Ham Farm which would contribute 850,000 tonnes of sand - approximately 2.5 years to the land bank. This leaves West Sussex/SDNPA with a potential shortfall of some 5,265,600 tonnes in its provision of soft sand. The plan needs to allocate a significant number of additional sites to ensure that a steady and adequate supply of soft sand is maintained in the county of West Sussex and the plan has flexibility in terms of supply.

The approach by West Sussex is not to make provision of this within the County itself but to rely on imports from the region from surrounding counties such as Surrey, Kent, and Hampshire. CEMEX object to this approach and consider the plan fails to meet the requirements of the NPPF and is therefore unsustainable.

There is no indication in the draft Plan that there has been a Duty to Co-operate and that other counties in the region have agreed to make additional provision in their soft sand allocations to supply West Sussex as well as their own county needs. In addition there is no evidence that the South East Aggregate Working Party supports the approach for West Sussex to be reliant on other neighboring authorities for imports of soft sand to meet their shortfall in provision.

Exceptional Circumstances and Public Interest Test applied:

The NPPF sets out that Exceptional Circumstance should consider

• the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

• the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and

• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Appendix 7 of the Site Assessment Paper - April 2016 sets out WSCC and the SDNPA case for not making provision for additional sites within the SDNP.

Firstly they consider need and believe that soft sand provision in West Sussex is not meeting a national need but rather a regional and local one. However, the National Planning Policy Framework requires all MPAs when preparing their minerals plans to make an adequate and steady supply of minerals. If West Sussex/SDNPA as the MPA fails to make adequate provision for soft sand in West Sussex, this then in turn can have a knock on impact of regional provision and ultimately national provision of soft sand/aggregates.

There is no evidence base to support the fact that only one additional soft sand site of 850,000 tonnes is sufficient to meet future need for the plan period. As shown above the re will be a clear shortfall in the land bank during the plan period, which will fall below the minimum land bank requirement of 7 years.

As such CEMEX consider that there is a clear need to provide additional sites from within the SDNP. In addition, there is no evidence base to demonstrate that there is a commitment from quarries outside of West Sussex to supply the County with soft sand. Whilst counties such as Surrey have a large soft sand landbank, this is due to recently permitted reserves. No analysis has been undertaken of the productive capacity of these sites and their ability to meet West Sussex sale needs. For example some of the quarries in Surrey, whilst contributing to the high landbank total, have restrictions either on their productive capacity or on their HGV movements, which means that this permitted reserve is unlikely to be available for exportation, as the productive capacity permitted will go to serve the existing market. The ability of the remaining permitted sites in West Sussex to maintain a productive capacity of 365,000 tonnes per annum is also questioned. CEMEX consider that Washington sandpit has minimal permitted sand reserve left to be worked and that Rock Common Sandpit is due to cease working by 2020. Additionally no analysis has been made of the current productive capacity from the existing 5 permitted sites of West Heath Common, Rock Common Sand pit, Washington Sand Pit, Chantry Sand Pit and Sandgate - to ensure that they are capable of maintaining the land bank even in the short term or at the beginning of the plan period.

Reliance for need is placed on the Soft Sand Study of 2012. This points to a few existing quarries in West Sussex and the fact that the sand was exported outside of West Sussex to the Heathrow area and Petersfield. One of the example's for this was CEMEX's West Heath Quarry in the SDNP and the fact that at one time some of the soft sand from West Heath was being exported to CEMEX's Kingsmead site in west London/Berkshire - a distance of some 45 miles. However, this exportation of sand from West Heath to Kingsmead in Berkshire was temporary. It was only enabled because of CEMEX's own internal

market situation, whereby soft sand was required to blend with course sand being recovered at Kingsmead to produce a saleable product. Usually, the economic case for exportation of soft sand over distances of 30 miles is less viable.

The plan has put great reliance on this longer distance of movement of soft sand and has assumed that if soft sand can be exported out from West Sussex by 45 miles that soft sand could be imported in by West Sussex over this distance. CEMEX question the economics of this long distance movement of soft

sand and also the environmental impact in terms of HGV increased mileage. CEMEX believe no weight or assessment has been made of the environmental impact and sustainable impact of moving soft sand across the region, rather than winning it locally, even if it is within the SDNP. Background work for site

assessment has shown that there are sites, including Land to the East of West Heath which can be worked without detriment to the National Park.

The NPPF states that as far as possible, MPAs should provide for the maintenance of landbanks from outside of National Parks. However, in West Sussex the Folkstone Formation runs through the South Downs National Park. As minerals can only be worked where they are found it is difficult for WSCC/SDNPA not to identify any soft sites within the SDNP area. Background work has shown that it is possible to work soft sand sites in the National Park without determinant to the park or its purpose for recreation. CEMEX believe that soft sand sites can be found within the SDNP which can be worked sustainably and with less overall impacts than alternative sites beyond West Sussex.

There are no realistic substitutes for land won primary soft sand aggregates. The draft Plan points to the Soft Sand Study of 2012 and the possibility of substituting soft sand supply by dredged soft sands from the English Channel, as it done in Bristol, but there is no evidence to support the quality and quantity of soft sands that could be supplied this way and whether the infrastructure is in place for sand to be won in this way or what the requirement and impacts would be of recovering this sand off-shore. CEMEX believe that much greater evidence needs to be produced to show that this is a real alternative in the lifetime of the plan and what the impacts would be.

In addition to substitutes of soft sand material, WSCC/SDNPA, in Appendix 7 of the Site Assessment Report, have looked at alternative supply not from within their own County, but outside of their area and are looking to other South East MPAs to provide West Sussex with their soft sand shortfall over the

plan period.

However, CEMEX consider no real evidence has been produced in the draft Plan or supporting documentation to show which quarries beyond the West Sussex boundary have a surplus in their annual productive capacity to not only be able to contribute to their own counties annual sales, but to the

annual sale needs of West Sussex's too. No evidence has been produced to demonstrate that this is a realistic or sustainable supply.

In Appendix 7 the assessment of the "Environmental Effect" of allocating sites in the SDNP area shows that there are sites where soft sand can be won without detriment to the Park, but this is not assessed and balanced against the impacts of winning soft sand beyond the County and moving it greater distance in to the County and Park and the environmental impact that this will have.

CEMEX considers that this is not a sustainable approach in terms of the transport of minerals and its associated impacts in terms of traffic noise, air quality and energy usage. Nor is this sustainable when local jobs and a local "rural" industry will be phased out - mineral working has taken place in West Sussex for over 100 years.

Effect on the Environment and Potential Mitigation

The assessment of this part of the exception text does recognize that certain sites within the SDNP area could be worked for soft sand without detrimental effect on the environment and landscape. These sites also offer opportunity for recreation. WSCC/SDNPA identify 4 potential areas - including CEMEXs promoted site - "Land East of West Heath". CEMEX welcome this assessment of its site and concur that this land can be worked sustainably without significant harm to the character and environment of the SDNP. Indeed, CEMEX believes it can develop a working scheme which will deliver appropriate environmental mitigation and a restoration scheme that will enhance the landscape character and recreational opportunities further in this part of the SDNP. The plan has not balanced or considered the benefits and public interest of maintaining soft sand extraction in the local area against the impacts or working it elsewhere and transporting it long distances into the County. Nor has it assessed the longer term environmental impacts or depleting reserves of soft sand from other areas in the region and what the knock on longer term impact will be to future sand supply in the area and region.

Site 7 - Land to the East of West Heath

CEMEX believe that this site should be included in the draft Plan in Policy 11. The site would make provision for some additional 1 million tonnes of soft sand in the Plan period. The Minerals Site Selection Report - April 2016 - concludes that the site could be worked as an extension to the existing site.

There is a clear need for the plan to allocate additional soft sand sites to ensure an adequate and steady supply of minerals throughout the plan period. Secondly, the site can be worked as an extension to the existing West Heath site, where use can be made of the existing site access and mineral infrastructure. The draft plan in its introductory chapters recognizes that mineral activity has taken place in West Sussex for over 100 years - as such it is an important established local industry. It provides material to the local economy and is also important in providing local building materials - such as soft sand for mortar which maintains the character of local houses and buildings in West Sussex and the South Downs National Park, but little weight is placed on this benefit to the local economy of West Sussex and the SDNP in balancing whether exceptional circumstances exist and whether it is in the public interest to work soft sand in the SDNP.

CEMEX believes that in certain locations, such as at West Heath, where soft sand is found within the South Downs National Park, that the mineral can be worked and the site restored without significant harm to the character or purpose of the SDNP. The extraction of soft sand can contribute to the local economy in terms of jobs and local building materials and with careful restoration the design the scheme can provide enhancements to the SDNP in terms of landscape, biodiversity and recreation opportunities.

At the existing West Heath quarry the site has been worked for mineral - sand - for many years without detrimental effect on the former Area of Outstanding Natural Beauty (AONB) and more recently the National Park Designation. The semi-enclosed nature of the site can accommodate the proposed landform and a proposed mix of dry and wet heathland and acid grassland cover without further adverse effect upon the South Downs National Park. It is considered the area identified for a possible extension to West Heath further to the east of the existing site - can be accommodated similarly.

In terms of the local economy- mining is a traditionally rural activity similar to forestry and agriculture. The quarry directly employs 3 staff and supports a further 15 drivers. The operation of the quarry contributes to the local economy by way of the use of local services, the payment of business rates and the use of local contractors for site maintenance, restoration works, fencing, tree felling, earth works, cleaning and food.

Nearly all the staff at the existing West Heath quarry live within a distance of 10 miles from the quarry. A future extension will enable these existing local jobs within the SDNP and West Sussex to be retained for a further period and enable the site to continue with its contribution to employment and the local economy.

In terms of landscape the working of West Heath quarry and its current extension in the SDNP will enable the quarry to be restored to a combination of heathland, acid grassland wetland, open areas of sand and small areas of scrub tree and shrub regeneration. This will increase visual and habitat diversity, complement the adjacent areas of heathland creation, and increase the future nature conservation potential of the area. The restoration proposals will bring long term positive benefits to the area as a whole, providing an area of re-instated heathland with increased opportunity for biodiversity.

CEMEX consider that the easterly extension will provide similar opportunities and benefits to this part of the SDNP. As such it is considered that the proposed site should be included in the plan as it will be able to meet the exceptional circumstances and public interest test for major development set out in the NPPF.

Draft Policy M8 - Plant, Processing and secondary activities - CEMEX support the intent of this draft policy.

Draft Policy M9 - Safeguarding Minerals - CEMEX support the intent of th is safeguarding policy and suggest a clause is added to ensure that any development permitted close to mineral safeguarding does not prejudice the ability of the mineral to be worked in the future because of adverse amenity impacts from noise or air quality etc.

Draft Policy M10 - Safeguarding Minerals Infrastructure - CEMEX has made separate comments to this policy - see response prepared by First Plan Limited on behalf of Aggregate Industries, CEMEX and Day Group Ltd.

Draft Policy M12 - Character - CEMEX supports the purpose of this draft Policy to ensure that mineral development protect the character of the National Park and AONB.

Draft Policy M13 - Protected Landscapes - CEMEX supports the intent of this policy, but considers that the draft Plan has not allocated sufficient mineral sites within West Sussex.

Draft Policy M14 - Historic Environment, Draft Policy M15 - Air and Soil , Draft Policy M16 - Water Resources, Draft Policy M17 - Biodiversity an Geodiversity, Draft Policy M18 - Public Health and Amenity and Draft Policy M19 Flood Risk Management- CEMEX supports the intent of these policies.

Draft Policy M20 - Transport - CEMEX support the intent of this policy, but consider that as only one soft sand site has been allocated - HGV mileage and impacts associated with soft sand provision in West Sussex and the SDNP will be exacerbated on the road network.

Draft Policy M24 - Restoration and Aftercare - CEMEX support the intent of this policy.

* * *

01 - Organisation: Central Bedfordshire Council (Response ID: 132 Respondent ID: 3749)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Covering email information)

Please find attached a formal response to the Minerals Local Plan consultation. We are submitting a holding objection to the Plan on behalf of Central Bedfordshire Council, but we welcome discussions with you on this to see whether our concerns can be resolved.

As Sibelco is promoting a site within the National Park, It may be useful to you to know that they have recently ceased silica sand production in Bedfordshire. I suspect that they may argue that the situation nationally is not as positive as the Cuesta report may suggest. I trust that it will actually be helpful to you to consider the issues that we are raising now, in advance of a public inquiry and I am sure it would be beneficial if we could arrive at an agreed position prior to that.

Please note that, as a shared service, we also represent Bedford Borough, but we have no comments to make on their behalf as there are no silica sand deposits within their area.

(Main response information)

Subject: West Sussex Joint Minerals Local Plan Consultation

I am responding to your current Minerals Local Plan consultation and wish to register an objection to section 6.3 of the Plan on behalf of Central Bedfordshire Council. I have not completed a formal response form as our sole concern relates to the strategic issue of Silica Sand and we have no direct interest in more detailed local considerations.

In many respects the Plan is very positive in that:

- It is based upon a recent independent study of Silica Sand within the UK.

- It recognises silica sand as a mineral of national importance and acknowledges its scarcity within the UK.

- It proposes the safeguarding of deposits meeting the criteria for industrial sands.

- Draft Policy M3 makes provision for the future granting of permissions, acknowledging that there is likely to be pressure to work reserves in West Sussex at some stage.

- The policy of reducing soft sand production, particularly within the National Park, will potentially have the consequential effect of reducing the volume of industrial quality sands being used for aggregate purposes.

- The application of stringent criteria for the working of minerals within the National Park or AONB is appropriate since these are, in themselves, an important national resource.

- One of the actions under Policy M3 is to monitor silica sand sales and to liaise with other producing authorities.

However, we are concerned that the Plan may not stand the test of soundness in that it fails to realistically assess the current reserves of silica sand available within the UK and therefore dismisses potential sites put forward without proper consideration, i.e. the need may be more imminent than suggested.

We appreciate that it is difficult to obtain comprehensive and up-to-date information on production and reserves. However, given the strategic significance of this issue, we feel that the Duty of Care would dictate detailed discussions with other authorities that have silica sand deposits within their area before the Plan is finalised. We acknowledge there was an exchange of correspondence last year, but we were unaware of the context of this at the time, it did not lead (as it might have done) to further discussion and there has been a significant change in circumstances within our area since then.

As you are aware silica sand is produced from the Greensand outcrop in the Leighton Buzzard Area of Central Bedfordshire. Through our own Minerals & Waste Local Plan, we are committed to maintaining landbanks of at last 10-years reserves for individual silica sand sites, wherever possible, and to granting new permissions where necessary to ensure this. Moreover, to ensure the overall supply of silica sand during the Plan period, a specific new strategic site has been identified in the Plan.

However, a number of sites within our area have recently ceased production and a reevaluation of workable reserves is taking place by the industry, which may significantly reduce the contribution that this area is making to satisfy national demand. This issue will need to be reviewed when we update our own Plan, but the implication of this for you is that it would be wrong to place too much reliance on the data in the Cuesta report.

We note that there are no current silica sand quarries in West Sussex that are specifically identified as such. Some material from 'soft sand' sites is acknowledged to be used for industrial purposes, but this appears not to be quantified. Depending on the significance of this there could be a case for establishing a land bank, even without consideration of the national situation. Indeed, if pressures increase elsewhere in the UK, it is possible that a higher proportion of soft sand produced from existing sites in your area, might be used for non-aggregate purposes.

Finally, since your draft policy allows the potential to grant permissions in the National Park for silica sand production, but not soft sand, we wonder whether you have thought about how you would control production to ensure that sites justified on the basis of the need for silica sand are not subsequently used primarily to supply aggregates.

I can advise that Bedford Borough Council has no comments on the Plan.

* * *

01 - Organisation: Chichester City Councillor (Response ID: 160 Respondent ID: 3766)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(email submission 1)

1)The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas extraction is particularly worrying because of the high levels of methane emissions associated with the process.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3)The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure? Food security should also be considered and whether minerals development may contaminate the land needed to produce food.

4)The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5)Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

(email submission 2 - Friends of the Earth template response)

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

01 - Organisation: Chichester District Council (Response ID: 217 Respondent ID: 1818)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

General Comment:

The footer (30) on page 57 appears to tail off – there may be some wording missing.

Minerals Safeguarding - Policy M9 and Consultation Question: What types of planning application should be excluded from consideration of minerals safeguarding?

The MCA within Chichester District will potentially cover Chichester City and the settlements in the East West Corridor. All planning applications within this area would then be subject to consultation with the Minerals Planning Authority. There is concern that this consultation process at planning application stage may slow the planning process. The Council therefore has the following comments:

• The need for prior consultation on sites within settlement boundaries particularly Chichester city is not considered appropriate. For example during 2015 (Jan-Dec) there have been 323 planning applications for development within Chichester city (excluding preliminary enquiries, permitted development, change of use). Small scale development within urban areas/settlement boundaries (where mineral deposits are already sterilised by the built up nature and it would be unfeasible to extract the mineral resource) or developments involving a temporary use should not be subject to consultation. Similarly, the erection of a garage or extension within a curtilage of an existing building is unlikely to affect possible future extraction of minerals.

• Given the number of potential planning applications which fall within the Minerals Consultation Area it is suggested that a size threshold is applied to the exceptions criteria. Consultation should be required as follows:

o Residential applications for sites of 10 dwellings or more, or if the number is not already known, where the site area is 0.5ha or above:

o Non-residential development, where the floorspace to be created is 1000sq metres or above, or if the site area is 1ha or above.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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01 - Organisation: Chichester District Councillor (Response ID: 91 Respondent ID: 3735)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I am Councillor for Funtington Ward of Chichester District Council.

I was asked by CEGA Group, possibly the largest employer in my ward, to attend a meeting with them and their advisers Vail Williams, to discuss the draft West Sussex Joint Minerals Local Plan 2016. I was told of their serious worries about the possible impact to their business of the sites proposed in the previous published draft of the Minerals Local Plan, notably Common Road West, Common Road East, Slades Field and Funtington West.

The meeting took place in CEGA's offices, from which it is possible to see that not only do these sites almost completely surround their offices, but they are amazingly close by and any mineral workings would be very intrusive indeed.

In fact, I would wonder whether CEGA could possibly continue to run its business there. For CEGA to move out would no doubt be a disaster for them and enormously costly, but it would also impact very badly on my ward.

So I greatly welcomed the issue of the draft West Sussex Joint Minerals Plan 2016 (Regulation 18), and the fact that these sites have now been excluded from the plan.

I also support the Development Management Policies of the Plan, and, in my view, any inroads into the protection these policies afford CEGA would be completely inappropriate.

I appreciate that, when the Plan is adopted, these Policies will guide the future planning process in respect of any planning applications that may be brought forward to win minerals from sites which are not included in the plan.

Can I say that, although asked to write in support of CEGA, I want you please to take these comments as being made on behalf of residents and businesses in Funtington Ward, in respect of the 4 sites mentioned above and any other sites that may have been proposed in the previous versions of the plan, including those at the east end on the ward at and near Densworth House and Sennicotts. I also consider that these comments are applicable to the Woodmancote site, although this isn't in my ward, but is immediately adjacent. With the prevailing wind and that proximity, any minerals workings would impact greatly Funtington.

Finally, it is appropriate for me to say that I live *…(redaction)..* will be writing separately to express out personal support for the plan as published.

* * *

01 - Organisation: Chichester Harbour Conservancy (Response ID: 84 Respondent ID: 3672)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Whereas the National Park is identified as a protected landscape, no mention is made of the AONB, afforded the same protection under paragraph 115 of the NPPF, albeit the boundary of the AONB is at least shown on the Key Diagram on p.114 of the draft plan. Can this be recognised in supporting text please.

The Conservancy is pleased to see that no strategic allocation under draft Policy M11 affects the Chichester Harbour AONB.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Whereas the National Park is identified as a protected landscape, no mention is made of the AONB, afforded the same protection under paragraph 115 of the NPPF, albeit the boundary of the AONB is at least shown on the Key Diagram on p.114 of the draft plan

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

It is noted from the Key Diagram that areas of sand and gravel fringe the north-west corner of the plan area, overlapping into the Chichester Harbour AONB. Whereas policies M1 to M3 cover sand based reserves and seem to be caveated by cross-referring to M11 and M13 and that that proposals be for land won minerals, the

Conservancy would wish to be re-assured that adequate protection of the AONB would be provided and reference should be made to a prohibition of dredging proposals to win minerals from the Harbour (i.e. water/intertidal area). Why is M12 not cross-referred to as well?

The Conservancy supports Policies M12, M13, M14, M15, M16, M17, M18, M19, M20, M22, M23, M24, M25 and M26.

The Conservancy has no particular views on Policy M21.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

None

Additional Comments

N/A

* * *

01 - Organisation: Chidham & Hambrook Parish Council (Response ID: 199 Respondent ID: 3295)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Re: Draft West Sussex Joint Minerals Local Plan (Regulation 18), April 2016 and Mineral Sites Selection Report, April 2016

I am writing to express the Chidham & Hambrook Parish Council's concerns and comments raised following perusal of these two reports. Our concerns and comments relate specifically to the four sites in the so-called 'Hambrook Grouping': Slades Field, Common Road West, Common Road East and Funtington West.

The Parish Councillors have read the detailed comments and analyses of the Draft West Sussex Joint Minerals Local Plan (Regulation 18) April 2016 and the Mineral Sites Selection Report April 2016 prepared by *…(redaction)..* and the Parish Council wishes to express its strong support for these.

The Parish Council also wishes to highlight its own particular concerns raised by Parish Councillors:

Whilst the sites in the Hambrook Grouping have not been allocated in the Draft Plan they are considered to be 'acceptable in principle' in the Minerals Sites Selection Report…*(redaction)..* has looked in detail at the assessments of these four sites. He concludes that:

- the four sites fail when tested against the Government Guidance, and the Vision, Guiding Principles, Strategic Objectives, and Development Management Policies in the Draft Plan;
- there are some very serious omissions from the report and many other errors and inconsistencies which tend, in general, to favour retention rather than rejection of the four sites;
- the overall conclusion that the four sites are 'acceptable in principle' is not supported by the assessment scores of the issues considered; and
- the full range of evidence properly considered indicates quite clearly that the sites are not acceptable.

The Chidham & Hambrook Parish Council fully supports the view that the four sites should be declared unsuitable for any future mineral extraction.

1) Mineral extraction from all the sites in the Hambrook Grouping would negatively affect a wide area of the Parish through increased traffic, noise, dust, vibration and air pollution.

2) The impact of noise, vibration and air pollution caused by heavy goods vehicle traffic, which would be used to transport the processed gravel away from the processing plant, will be experienced by the many residences and businesses fronting the roads in the Parish such as Cheesmans Lane, Broad Road and the A259. This increase in traffic was not a consideration when planning permission was granted for the Taylor Wimpey and Mildren Homes housing developments in Broad Road. It is estimated that a total of approximately 125 residences which front onto roads in the Parish would be directly affected and many other indirectly affected.

3) The four sites would clearly severely and adversely impact the character of the area. The CDC Local Development Plan and the NPPF are referred to in the Draft Plan, but not the Chidham and Hambrook Neighbourhood Plan which clearly highlights the importance of preserving the environment in the Parish, together with expressing concerns over the existing volume of traffic. This document is due to go to public referendum on 13th September 2016 and precedence should be made regarding its content when considering the environmental impact of any future mineral extraction from the four sites.

4) The Parish Council is extremely concerned by the length of time which is proposed for the extraction from the four sites with no information given regarding the time it will take to return the landscape to its original state, particularly given that the sites are all in close proximity to the South Downs National Park. The Parish Council would seek to ensure that if future mineral extraction were to take place from any of the sites in the Hambrook Grouping, then extraction and subsequent reinstatement times would be minimised.

5) The potential impacts of any workings on the water table levels under gardens, residences and commercial properties were recognised in the Minerals Local Plan 2003 but have not been included in the MSS Report and the Draft Report. This needs to be rectified and details of the impact on the water environment (including flooding) reported with professional supporting evidence prepared by qualified persons.

6) Another major concern is that the mineral extraction would cause Cega to consider relocating as they will be directly impacted for a prolonged period. Cega employ 350 staff in Cheesman's Lane and are a

significant employer in the area. Their relocation would represent a major loss to local employment opportunities.

7) None of these sites make commercial sense when all the road changes, compensation to householders and the cost of returning the sites to their original state is included.

8) The Draft Plan clearly seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

9) The Draft Plan fails to recognise the precautionary approach to the development of unconventional hydrocarbons through an extraction process of creating fractures to allow the gas to flow. Risks recently assessed in a report for the European Commission assessed the cumulative impact of fracking at several sites as having a high risk of causing local environmental problems including groundwater contamination, surface water contamination, water resource use and air pollution.

10) Policies M7a and M7b fail to take account of the need to tackle the causes of climate change; do not protect the South Downs National Park, Area of Outstanding Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these areas with minimal safeguards; fail to take account of cumulative impact and indirect impacts; fail to take account of public health concerns and the production of waste; fail to implement a distance from residential developments.

In summary, The Chidham & Hambrook Parish Council strongly opposes any future mineral extraction from the four sites known as the 'Hambrook Grouping'. It is recommended by the Parish Council that a further review of the suitability of the four sites in the Hambrook Grouping is undertaken, with an update to the Minerals Survey document that correctly assigns an 'unacceptable' rating for the sites.

* * *

01 - Organisation: Cow Shed Studio (Response ID: 177 Respondent ID: 3799)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

SO2, SO4, SO7, SO8, SO9, SO14: In my opinion these objectives are not being met! The impact on local small businesses and residents is not being considered.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Land based abstraction should not be considered. The impact on local communities, the countryside, trees, wildlife and local businesses will be enormus. If this plan goes ahead SO14 is Lau

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I am a botanical artist and the cow shed studio is my studio, it lies approximately 15 meters to the east of the proposed site. As a member of the Society of Botanical Artists, a winner of 3 Royal Horticulture Society medals, and a listing in the Who's Who In Art people come from all over the south to be taught by me. As you have stated in your assessment highlighted in red/amber, we will suffer from noise, light, vibration and sand pollution it would be impossible for me to continue my business! In addition to this we run Art Exhibitions from the studio once or twice a year, were local artists and makers can exhibit. These bring a lot of visitors to the area and into the town of Steyning as well. This would stop.

I am aware that I am just small fry in comparison to others, but if this quarry goes ahead my income would stop.

On top of that living next to a quarry/ landfill site which will be operating from 7am until 6pm, you will have destroyed all our quality of life. 15 years may seem temporary to you sitting in an office, but for us it isn't. We won't be able to realise the value of our property, I feel that we are stuck here until well into our dotage!

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The current plan should in no way continue. It doesn't conserve or enhance the beautiful countryside of West Sussex. Adding to pollution in West Sussex!

Unsuitable site please remove from your plan. This site is visible from Chanctonbury Hill and the development is not in the public interest.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B3.1- I don't think soft sand, sharp sand, silica sand, gravel chalk, clay etc should be extracted from the countryside. Marine source should be looked at!

B3.2- I do support the policies set out in section 8.

However you as a County Council are ignoring almost all of the points in section 8.

B3.3- Please remove site from your plan! Extraction of sand from this site will have an unacceptable impact on the landscape. Also West Sussex County Council have dismissed the impact on residents. I always thought County Councils were there to look after the well being of the residents of their countys. Not this time.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Its time to change the way we build new homes. The environmental issues should always come first. Then the impact on the character of West Sussex. Please remove from your plan.

Additional Comments

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* * *

01 - Organisation: CPRE Sussex (Response ID: 266 Respondent ID: 4042)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

CPRE Sussex (the Sussex branch of the Campaign to Protect Rural England – CPRESx) welcomes this opportunity to comment on your draft Joint Minerals Local Plan proposals. Our comments below are limited to those draft Plan paragraphs and policies on which we suggest amendments or additions.

CPRESx works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

In our view, the emphasis of the Vision and Strategic Objectives need to be more inclusive of designations in addition to the National Park, particularly the two Areas of Outstanding Natural Beauty (AONB) as AONBs' statutory right to protection under Countryside & Rights of Way Act 2000 and NPPF paras 115/6 is substantially similar to National Parks.

The Vision and Objectives should also not support hydraulic fracturing for shale oil/gas within West Sussex. It is a fundamental tenet of the NPPF that development should be only allowed if it is sustainable and under the NPPF, sustainability requires economic benefits to be balanced against the social and environmental implications of the development proposal. We believe that the adverse social and environmental impacts of hydraulic fracturing techniques are significant and would lead to unacceptable harm to the Sussex countryside (see later comments in respect of Policy M7b and M16) Furthermore, CPRESx strongly challenges the assertion that hydraulic fracturing for shale oil (apparently the more likely hydrocarbon mineral beneath West Sussex) is justified on energy security grounds. The Government has never provided a public interest or sustainability case for shale oil extraction. The only case it has made has been in respect of shale gas, and the main argument deployed to justify its case for exploitation of shale gas, namely that the country will be dependent on gas powered electricity generation for the foreseeable future, simply doesn't apply to shale oil since there are no oil-fuelled power stations in the UK. Extraction of shale oil in the UK does nothing to protect the UK from price fluctuations, and would require huge, industrial scale, exploitation before it served to secure supplies to the UK market to a significant extent in the event of a long term oil supply crisis. Nor has the Government undertaken a sustainability appraisal to support its promotion of shale oil.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

The Vision bullet point 1

CPRESx would like to see the addition of "and Areas of Outstanding Natural Beauty" after "South Downs National Park" in order to put the local AONBs on the same footing as the SDNP. AONBs' statutory right to protection under Countryside & Rights of Way Act 2000 and NPPF paras 115/6 is substantially similar to National Parks and they are equally valued by local communities.

The Vision bullet point 4

CPRESx suggests an amendment from "Will be a place that seeks to meet its own need for minerals while aspiring to source more and more minerals from alternatives to extraction of indigenous resources" to "Will be a place that seeks to meet its own need for minerals and encourages the sustainable use of natural resources, whilst aspiring to source minerals from alternatives to extraction of indigenous resources"

The Vision bullet point 9

CPRESx would like to see the addition of “and Areas of Outstanding Natural Beauty” after “South Downs National Park” and “and the management plan of the AONBs” after ‘the purposes of the SDNP.

Strategic Objective 12 Strategic objective 12 should be changed from:

“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”

to:

“Strategic Objective 12: To protect the environment and local communities in West Sussex from unacceptable impacts of any proposal for oil and gas development, recognising the national commitment to UK carbon reduction targets”

Strategic Objective 14

This Objective mainly relates to carbon emissions through the design and transportation of exploitation and does not recognise the carbon emissions associated with the extraction and use of oil and gas. We are disappointed that no connection is made here or in policy M7 between climate protection, the proposed hydrocarbon policy and Government policy to reduce the nation’s dependence on fossil fuels. This should be addressed.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

CPRESx strongly disagrees with Policy M11’s presumption that the allocation of this site for sand extraction “is acceptable, in principle, for that purpose”, and considers that its usage for soft sand extraction would be contrary to the ‘Vision’ of the ‘Joint Minerals Local Plan’, in particular:

“By 2033, West Sussex :“Will be a place where minerals are produced in ways which conserve and enhance the beautiful outdoors of West Sussex, in particular the special qualities of the South Downs National Park, for the benefit or current and future generations” (page 15),

for the following reasons:

1. Although the site is located outside of the South Downs National Park, its southern boundary abuts the northern boundary of the National Park. Accordingly, usage of the site for soft-sand extraction would impact on the special qualities and landscape setting of the National Park, in particular two of the National Park’s special qualities - Tranquil and Unspoilt Places and Diverse Inspirational Landscapes. Note that

“Within the diversity of the English countryside, the Parks are recognised as landscapes of exceptional beauty, fashioned by nature and the communities which live in them. The National Parks and Access to the Countryside Act 1949 (“the 1949 Act”) enabled the creation of the National Parks, and ensures that our most beautiful and unique landscapes have been, and will continue to be, protected in the future. It makes provision for everyone to enjoy them”. (‘English National Parks and the Broads, UK Government Vision and Circular 2010’. DEFRA, March 2010).

A Sand pit would be visually intrusive.

2. A sand pit at Ham Farm would be visually intrusive and visible from the South Downs Way National Trail as well as from other locations, as is acknowledged by the ‘West Sussex Minerals Landscape Sensitivity and Capacity Study for Potential Mineral and Waste Sites – Minerals Addendum May 2015’ (March 2016): ‘Site Characterisation’ (page 82), which advises that:

“visibility of this site from the surrounding area will be available from the east, with some long distance visibility from the northeast around Partridge Green, from the east along the A281 and from the southeast around Upper Beeding and Shoreham-by-Sea (along the A283 and A2037). There is also some visibility from the south up to the South Downs Way National Trail which lies 2.3km to the south at its closest proximity, although this is likely to be limited by woodland and tree cover across the surrounding area. The site is visually sensitive in views from the top of the scarp slope in sections where woodland does not block wider views”.

Impact on tranquility.

3. NPPF paragraph 123 stipulates that ‘Planning policies and decisions should aim to

• identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. (Fourth bullet)

3.1. According to the ‘Site Characterisation’ (page 82) “CPRE data indicates that the site lies within an area defined as ‘disturbed by noise’ and of medium tranquillity, with the northern parts being of a higher tranquillity”. However, this statement seems to be a misinterpretation of the CPRE ‘data’ and assessment.

3.2. CPRE’s tranquility map at http://maps.cpre.org.uk/tranquillity_map.html

shows that on CPRE’s tranquillity scale, in which areas shown in red have the lowest tranquillity scores, yellow/khaki mid-range tranquility and green the highest tranquility, the site lies at the lower end of the green spectrum, therefore part way between medium tranquillity and the highest tranquillity.

3.3. As is acknowledged by the ‘Site Characterisation’ the noise is caused by road traffic on the A283, which the site abuts at its southern boundary.

3.4. However, the impact that the extraction of sand, including noise emitted by on-site plant and generated by the ingress and egress of lorries, employed to transport sand away from the site, would have on the tranquillity of the National Park is of vital importance.

3.5. Disturbingly, the potential of the proposed sand-extraction operation at Ham Farm to cause significant harm to tranquillity seems not to have been assessed.

Impact on the setting of listed buildings.

4. As is explained in the ‘West Sussex Minerals Landscape Sensitivity and Capacity Study for Potential Mineral and Waste Sites – Minerals Addendum May 2015’, page 83:

“There are numerous listed buildings within proximity to the site. The Grade II listed Horsebrook Cottage is directly adjacent to the site to the west (some visibility, although predominantly restricted by vegetation); Grade II listed Old Rectory and Roundhouse 300m to the west of the site (although currently screened by trees and hedgerow); Grade II listed Water Tower and Sun Room at Wappingthorn, to the northeast of the site (restricted visibility due to screening by trees); and numerous listed buildings to the southwest in the grounds of the Grade I listed Wiston House (visibility from house and buildings to the site is restricted by woodland at the northern boundary of Wiston Park, but partial views are possible from the Park itself onto the site from the Park’s northern boundary”.

4.1. This summary omits to mention that the Grade 1 listed Wiston House and the ‘numerous listed buildings’ within the house’s grounds are located inside the National Park.

4.2. Whether the sand pit and its impact on the setting of these listed buildings would accord with the National Park’s purpose of conserving and enhancing cultural heritage- and the requirement stipulated by paragraph 115 of the NPPF that the conservation of cultural heritage “should be given great weight in National Parks’, have to be important considerations for decision takers.

4.3. In addition, Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides:

“General duty as respects listed buildings in exercise of planning functions. (1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.

4.4. The correct approach to Heritage Assets was dealt with by the Court of Appeal in Barnwell Wind Energy Ltd v East Northamptonshire District Council, English Heritage, National Trust & Secretary of State for

Communities & Local Government [2014] EWCA Civ 137 and by the High Court in R. (Forge Field Society,. Martin Barraud & Robert Rees) v Sevenoaks DC and West Kent Housing Association [2014] EWHC 1895 (Admin) and reaffirmed more recently by the High Court in the case of Forest of Dean DC v Secretary of State for Communities and Local Government and Gladman Developments Ltd [2016] EWHC 421 (Admin).

4.4.1. These judgments stress the importance of planning authorities genuinely, not merely by way of lip service, paying "special regard" to the General duty as respects listed buildings', including setting, 'in exercise of planning functions' placed upon them by Section 66, and also section 72, of the Planning (Listed Buildings and Conservation Areas) Act 1990.

4.4.2. In the case of R.(Forge Field Society, Martin Barraud & Robert Rees) v Sevenoaks DC [2014] EWHC 1895 (Admin) the Judge said (at paragraph 48 of the latter) that:

"As the Court of Appeal has made absolutely clear in its recent decision in Barnwell, the duties in sections 66 and 72 of the Listed Buildings Act do not allow a local planning authority to treat the desirability of preserving the settings of listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell it has now been firmly dispelled".

4.5. Note that Historic England's 'The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning:3' (March 2015), includes "lighting effects and light spill" and "noise" in its 'check-list of the potential attributes of development affecting setting that may help to elucidate its implications for the significance of the heritage asset'.

4.6. Note, too, the NPPG (Paragraph: 013 Reference ID: 18a-013-20140306) stipulation that

"Setting is the surroundings in which an asset is experienced, and may therefore be more than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not." And that

"The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places". And that:

"The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance".

4.7. Unfortunately, the potential impact on the setting of the listed buildings of light, dust and noise pollution that would result from sand extraction at Ham Farm has not been considered and taken into account.

The Ham Farm site has been allocated for soft-sand extraction without first determining whether its usage for that purpose is truly 'acceptable in principle'.

5. Of major concern, too, is the weasel wording of the concluding paragraph (paragraph 1.89) of the 'Draft West Sussex and South Downs National Park Joint Minerals Local Plan (JMLP) (Regulation 18): Sustainability Appraisal (SA) including Strategic Environmental Assessment Non-Technical Summary' (April 2016), where it advises that "In general, the Draft JMLP has been found to have a wide range of positive effects on the SA objectives", before explaining that:

"significant negative and a number of minor negative effects have also been identified (mainly in relation to the potential for one or both of the two allocated sites (Policy M11) to affect landscape, biodiversity, water resources and flooding", the "severity of these impacts will depend very much on the nature and scale of the proposed development at the allocated sites, which cannot be known until the planning application stage, and how well proposals adhere to the development principles contained in the supporting text to Policy M11, as well as other relevant development management policies in the Draft JMLP.

5.1. These 'negatives' and the 'severity of these impacts' are fundamental issues of the utmost importance that should have been assessed in the detail at the site-selection stage and before the consultation, and presented for consultees to examine and comment on; not deferred until after the Plan has been adopted for consideration at the 'planning consultation stage'.

5.2. Crucially, the Sustainability Appraisal shows that it has not been determined "how well proposals adhere to the development principles contained in the supporting text to Policy M11, as well as other relevant development management policies in the Draft JMLP". This makes nonsense of the statement in JMLP Policy M11 that the allocation of Ham Farm for sand extraction "is acceptable, in principle",

5.3. Clearly, the allocation of the Ham Farm site for soft-sand extraction has been made without first determining whether its usage for that purpose is truly 'acceptable in principle'.

5.4. This is unacceptable – and the omission undermines the credibility of both Policy M11 and the Plan.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Policy M11. Ham Farm, Steyning (soft sand)

CPRESx would like to see the removal of this allocated site from the Plan. We believe that the methodology used in the Sustainability Appraisal should be revised and sites reappraised as set out in our response to consultation question B2.3 above.

Policy M11 (Strategic Minerals Site Allocations) – General points

CPRESx would like to see amendments to this Policy to ensure consistency the requirement in NPPF para 144 (bullet 2) that the maintenance of non-energy minerals landbanks should avoid World Heritage Sites, Scheduled Monuments and Conservation Areas as well as National Parks and AONBs.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Policy M11 (Strategic Minerals Site Allocations) and paras 7.2.5 – 7.2.6 – West Hoathly Brickworks

Monitoring of this policy by WSCC should be extended annually to ensure that events have not occurred that would make continued safeguarding of the West Hoathly site for brick clay extraction unnecessary.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

As above

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Para 6.1 It would be helpful to include a statement recording the extent (if any) to which any decision to build a second runway at Gatwick Airport, with related infrastructure and housing requirements, would be likely to impact on the view expressed in section 6 that the two selected sites are the only new sites requiring allocation.

Policy M2 (soft sand)

CPRESx would like to see the removal of

"(a) it can be demonstrated that extraction cannot take place on the site allocated within Policy M11 of this plan;"

for the reasons outlined in our response to Policy M11

Policy M5 (Clay)

CPRESx supports the principle of this policy, but considers that para (a) (i) should be amended to delete "at least" so as to preclude excessive site development.

Para 6.7.3

The proposed restrictions on hydrocarbon development only within the SDNP and two AONBs fails to take account of the statutory obligation imposed on planning authorities to have regard to development outside a designated area that would adversely affect the natural beauty of the designated area: see e.g. CROW Act 2000 s.85. This paragraph and polices M7a and M7b need to reflect that statutory protective responsibility of the Authorities.

CPRESx also considers that this paragraph should make reference to NPPF paras 118 and 119 and the protective regimes mentioned there in respect of other types of environmental and/or scientific designation.

Note 30 contains incomplete text.

Policy M7a, Conventional hydrocarbons

CPRESx is concerned that, as it stands Policies 7a and 7b do not sufficiently reflect the NPPF sustainability principle of balancing economic, social and environmental impacts of a development plan or proposal in circumstances where adverse environmental and social impacts (especially, but not only, in relation to unconventional exploitation of hydrocarbons) are widely discussed and create much public disquiet. We also suggest that the role of NPPF chapter 11, and particularly paras 117 -119, need more visible recognition in the content of policies M7a and M7b.

For these reasons please consider adding at the end of para M7 (a) (iii) language to the effect of: "whereby the risk of social and environmental harm does not outweigh the benefits of the proposal, and having regard to (A) Chapter 11 of the National Planning Policy Framework (Conserving and enhancing the natural environment), (B) the purposes of any special designation of any land or heritage asset that would be affected by the proposal and (C) cumulative impact in accordance with Policy M23".

Paras (a) (iv) and (b) (iii) should both be amended so as to include the following words at the beginning "satisfactory financial arrangements exist to ensure that …".(Those financial arrangements need not necessarily be in the form of a bond or guarantee where this is frowned on by the NPPF, but should take account of both the operator's and the landowners' shared responsibility for restoration).

Paragraphs (a) (iv) and (b) (iii) should also include a requirement as to the time frame within which restoration must be completed after earlier of drilling ceasing or licence expiring.

In both policies M7a and M7b, we think that para (c) is confusing because it overlaps with paras (a) and (b) and that it imposes an additional condition over and above those in (a) and (b) where exploitation within or proximate to a designated area is involved. If para (c) is to be retained it needs to be made clear that para (a) (ii) – (iv) apply equally to development permitted by virtue of para (c). The requirement in para (c) that it must be demonstrated that "special care will be taken to avoid harming the setting and/or special qualities and/or value of these designated areas" must not be capable of being read as displacing the exceptional circumstances/public interest tests in NPPF para 116. We would suggest that any proposals which may affect the setting of designated areas should be refused unless there are exceptional circumstances/public interest as per NPPF para 116. The reference in para (c) to water "Source Protection Zone 1" is nonsensical in the context of the paragraph and should be a separate criteria. We are also puzzled as to why, if para (c) is considered necessary, it does not also make reference to other types of designated area referenced in the NPPF, particularly at paras 118 and 119, or to heritage assets.

Policy M7b (Non-conventional hydrocarbons)

CPRESx cannot support this policy. In our view, proof of sustainability is so unlikely that the policy should document the Authorities' presumption against allowing non-conventional hydrocarbon extraction to occur

anywhere within the Plan area. We do not see on what criteria the LPA is going to determine whether the adverse impacts can be "minimised, and/or mitigated, to an acceptable level".

If the Policy is retained, consideration should be giving to adding at the end of para (a) (iii) language to the effect of: "whereby the risk of social and environmental harm does not outweigh the benefits of the proposal, and having regard to (A) Chapter 11 of the National Planning Policy Framework (Conserving and enhancing the natural environment), (B) the purposes of any special designation of any land or heritage asset that would be affected by the proposal and (C) cumulative impact in accordance with policy M23".

Paras (a) (iv) and (b) (iii) should be amended so as to include the following words at the beginning "satisfactory financial and other arrangements exist to ensure that …"

Please add new paras (a) (v) to (vii) using language to the effect of:

"(v) No significant adverse impacts would arise from the on-site storage or treatment of hazardous chemicals and contaminated fluids above or below ground or their transportation from (or in the case of hazardous chemicals to) the site";

(vi) The proposed operations do not entail injection of fluids under pressure into geological strata at any location where there is evidence of faulting or fracturing, or where pressure injection could induce migration of contaminants to the detriment of surface or groundwater resources. Full independently procured geological and hydrogeological surveys have determined that no material risks would arise from any of the activities which the proposer would be authorised to carry out at or from the site."(see CPRESx comments in relation to policy M16 and para 4.7.5)

(vii) Appropriate and assured community benefits will be made available by the applicant to affected local communities"[Despite what is said at para 8.1.12 there is no policy re assuring community benefits in your draft Plan.]

A consequential amendment would be required to para (b) (i) of M7b so as to cross reference paras (a) (i) – (vii).

Please also refer to our comments above re para (c) of policy M7a, which apply equally to M7b.

We also suggest that fracking permission requirements listed in M7b should make reference to the various minimum drilling depth requirements inserted last year into the Petroleum Act 1998.

Para 6.17.4

This paragraph should be amended to recognise that light pollution is as significant an issue for the Plan area's two AONBs as it is for the SDNP.

Policy M13 (Protected Landscapes)

Paras (a) (ii) and (b) of this policy should be setting an objective of ensuring that any development within or outside a designated area should seek to achieve a positive enhancement of landscape character– see relevant designating statutes and NPPF paras 9 and 114.

The text of para (c) misguidedly implies that the 3 tests of acceptability (lifted from NPPF para 116 are tests that will answer both the "exceptional circumstances" requirement in para 116 and the separate "public interest" test. In fact the three tests are designed to inform (but not decide) only the "exceptional circumstances" requirement. They shed no light on the public interest test. We suggest that para (c) should simply read: "Proposals for mineral development within protected landscapes will not be permitted except in exceptional circumstances and where it can be demonstrated they are in the public interest in accordance with paragraphs 116 and 144 of the National Planning Policy Framework".

And

"All minerals development within or affecting protected landscapes should take account of the purposes of the SDNP and the objectives of the AONB Management Plans"

Where Policies (such as M7a and M7b) state that proposals "will be permitted provided that…." It should also be stated clearly that proposals must not only conform with this specific Policy but also all the Policies within the Plan as a whole.

M15 (Air and Soil)

We would like to see added an additional paragraph on the lines of "(d) adequate on-site controls can be effected to minimise the spread of particles and dust from extraction operations onto surrounding land". This addition would be consistent with the fourth bullet of NPPF para 144.

Policy M16 (Water Resources)

Please add "and wetlands" at the end of para (c).

The geology of the Weald is such that the Jurassic Clays are overlain by a succession of permeable water bearing strata serving most of the County's domestic, industrial and agricultural requirements, and sustaining the baseflow of the region's rivers and wetlands. Full development of any shale gas or oil reserves would normally involve high volume and high pressure injection of a water and sand mixture with a cocktail of hazardous and in some cases toxic chemicals; the purpose being to disaggregate the shales and release the constituent fluid hydrocarbons. However, the Weald is a geologically unstable region; and in some cases, this process can also result in the fracturing of the adjacent rocks and the re-activation of ancient geological faults; thereby opening passage ways for the migration of 'return' fracking fluids into any over-lying aquifers. This makes for a very high risk operation, threatening the quality of our rivers and groundwater reserves; and this, in a region identified by the Environment Agency as one in which the balance of public supply has been assessed as "seriously stressed".

The House of Commons Environmental Audit Committee report of 21st January 2015 entitled "Environmental Risks of Fracking" makes reference to the risk to groundwater quality, emphasising the Precautionary Principle, which so far appears not to have been applied, pointing to the need for more robust enforcement of protection measures. This has implications for the WSCC policy and the recommendation is made that M7a and M7b should provide for the total prohibition of all fracking operations within and beneath groundwater protection zones 1, 2 and 3; where the latter in effect defines the entire catchment area. Such provisions of course, only apply to strategic groundwater sources, but the Precautionary Principle must also be invoked wherever there is a perceived threat to our increasingly fragile water environment.

We question how the Authorities will be in a position to satisfy themselves that this long-term risk is "acceptable" for the purpose of policy M16 para (a) in reaching a determination that an application to permit unconventional drilling for hydrocarbons should be allowed.

Policy M17 (Biodiversity and Geodiversity)

In para (d), please

(i) delete" where appropriate," and substitute "maximise the opportunity for…"and

(ii) (ii) add ", Nature Improvement Areas identified in Local Plans" (a phrase lifted from NPPF para 117) after "Biodiversity Opportunity Areas"

Please consider adding a new para (f) on the lines of "development will be compatible with paragraphs 117 – 119 of the National Planning Policy Framework" since these paragraphs identify biodiversity and geodiversity protection criteria for various types of protected areas, and are not otherwise referenced anywhere in relation to this policy M17.

Para 8.12.6

CPRESx is unclear as to what para (vi)'s call for a working programme that covers "a mitigation/compensation scheme for any other environmental impacts and enhancements" actually means.

Policy M25 (Community Engagement)

If real community engagement and transparency are to be encouraged we would invite you to consider the following amendments to draft Policy M25:

(i) deleting "where necessary" and substitute "(a) if requested by the local town or parish council,"

(ii) adding "the establishment and" before "operation"; and

(iii) adding a new sentence at the end the lines of: "and (b) the operator undertakes to publish annually a report, independently verified, on (i) compliance with planning conditions, (ii) progress on implementation of any biodiversity or other enhancement arrangements agreed with the Authorities in connection with the grant of any development permission, (iii) the measures referred to in paragraph (c) of Policy M23 and (iv) in respect

of hydrocarbon minerals development, water and air quality, and peak activity noise levels, at times and locations reasonably requested by the local council."

The public environmental reporting used by the operators of Wytch Farm, Dorset serves as a useful model and precedent to support the type of report we are suggesting through this amendment.

Policy M26 (Maximising the use of Secondary and Recycled Aggregates)

CPRESx applauds the principle of this policy, which is consistent with the NPPF paras 143 (bullet 2) and 163. However we fail to see how this policy will, in practice, deliver increased usage of recycled and secondary aggregates; or how it integrates with other proposed Plan policies or with Local Plans of other planning authorities in West Sussex. A more practical, interventionist policy is required if significant changes are to be achieved in the practices of developers and others.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Para 4.4.8

The description of the High Weald AONB in West Sussex as "Extensive woodlands combine with the terrain and restricted views out to the surrounding plains and downland to create a secret and secluded character" is not true of large open swathes of the High Weald including much of Ashdown Forest with its extensive vistas. The plan should reflect this.

Para 4.7.5/4.7.6

'A Strategic Flood Risk Assessment (SFRA) will be prepared to bring together all available information on this topic and help inform work on the Joint Minerals Local Plan. The principal component of the SFRA is to assess the potential flood risk within the County and inform the Sustainability Appraisal of the Plan.'

It is unfortunate that specific sites are proposed for allocation without any flood risk or hydrogeology assessments as to their suitability. These assessments should be undertaken now.

Para 4.10.2

"National energy policy supports the use of energy minerals as part of the energy mix. Balancing the possible local impacts of exploration and extraction with the use of fossil fuels as supported by national policy is the responsibility of many organisations/agencies. The Joint Minerals Local Plan must be prepared in line with national policy and take account of local evidence as it comes forward."

This section is somewhat vague and needs greater clarity. As explained in relation to Strategic Objective 12, there is NO published national policy regarding the exploitation of Wealden shale for oil.

Para 5.3.8

This section should also recognise the obligation of planning authorities to have regard to the purpose of conserving and enhancing the natural beauty of the Plan area's two Areas of Outstanding Natural Beauty under part IV of the Countryside & Rights of Way Act 2000.

Other points

We have not identified any policy proposal that would address the provision within the NPPF para 117 (bullet 1) and 146 (bullet 1) re cross border co-operation with neighbouring Minerals and Local Plan Authorities.

Additional Comments

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01 - Organisation: Crawley Borough Council (Response ID: 319 Respondent ID: 1558)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Policy M9: Safeguarding Minerals

As required by WSCC, Crawley Borough Council has identified the three protected railheads on the Local Plan Map and referred to the safeguarded status of these in the Local Plan 2015 (para 5.43)

The council is however concern about the proposed requirement to delineate the Mineral Safeguarding Area/Consultation Area on the Local Plan Map. This is because the large extent of Weald Clay and Stone in the borough would take up much of the map, potentially making it very challenging and impractical to read given the amount of local information/designations already displayed. Equally, para 1.2.2 of the accompanying

guidance note states that the GIS base layer may change over time – this again presents challenges as it will necessitate additional work updating the Local Plan Map.

As an alternative, it is suggested that WSCC adopt an approach similar to the EA Flood Map for Planning, where LPAs and applicants refer to a central county-wide map produced by WSCC. This would ensure a consistent approach across the county, and would enable WSCC to centrally update data sets if required, thereby avoiding confusion if there is delay in the LPA updating its maps. A simple constraints map such as this would be valuable in supporting the planning application validation process.

Policy M10: Safeguarding Minerals Infrastructure

Crawley Borough Council welcome the addition of 'Applications with an area of one hectare or less within urban areas included within MSAs' to the exceptions criteria identified in the draft Minerals Safeguarding Guidance.

There is however concern that WSCC maps which define the urban area are not easy to read. For consistency it will be important to clarify how the urban area as defined by WSCC been identified, as it will need to be consistent with Built-up Area Boundary information provided by LPAs in order to avoid confusion.

It would be appreciated if clarity could also be provided as to whether the LPA or would be responsible for validating a Minerals Resource Assessment. It would be useful to understand if the process is envisaged as being similar to a transport assessment, whereby the application would be registered by the LPA upon receipt of the MRA, and then WSCC would provide feedback on the content. Is it intended that WSCC would provide a view as to whether appropriate detail is included in the statement before the LPA can formally validate/register an application? Is it anticipated that WSCC feedback provided to LPAs on minerals would take a similar form and status as for comments on highways matters? Both are considered to be important questions as CBC does not have the minerals expertise in-house and would anticipate being able to consult/utilise WSCC expertise in these situations.

For clarity, it would also be helpful if WSCC could advise how would the process of mineral extraction (if required) be enforced. It is assumed that this would be as a condition on the planning application, and in scenario would WSCC have a role in the LPAs discharge of any conditions?

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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01 - Organisation: Day Group Ltd (represented by Firstplan) (Response ID: 151 Respondent ID: 3758)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

N/A

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

N/A

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

See attached sheet ref: FP2/Days/14.06.16

Policy M10: Safeguarding Minerals Infrastructure.

Firstplan are instructed by Day Group Ltd (Days) to provide the following response to the draft West Sussex Minerals Plan. These representations are made specifically in the context of their operations are Kingston Railway Wharf, Brighton Road, within Shoreham Harbour. (Separate representations have been made with regard to their operation at Crawley Goods Yard and submitted jointly with the other two operators for that site).

There are a number of wharves within Shoreham that are currently safeguarded in the West Sussex Minerals Plan 2003. These currently include Kingston Railway Wharf operated by Day Group Ltd for the importation of aggregate by barge together with an aggregates bagging operation. The Wharf is operated under temporary planning permission granted in the context of the emerging regeneration proposals for Shoreham Harbour. The permissions are due to expire in September 2016 but Days will be looking to renew the consents for a further temporary period.

The Draft Join Minerals Local Plan does not propose the continued safeguarding of Kingston Railway Wharf. Whilst not stated in the draft plan this is predicated on the regeneration objectives for this part of Shoreham Harbour (the Western Harbour Arm).

However, the existing and emerging policies in respect of the regeneration proposals for Shoreham Harbour, which include: Interim Planning Guidance (IPG) for Shoreham Harbour (2011), Western Harbour Arm Development Brief (2013); Shoreham Joint Area Action Plan (2014) (JAAP); and the Adur Local Plan – Submission Draft (2016) – are all consistent in confirming that the regeneration objectives are long term and could take some time to achieve. These policy documents are also all clear in supporting the approach that planning permission on sites for continuation of current employment uses may be granted for temporary periods on a case-by-case basis. Indeed, the most recently published document, the Adur Local Plan Submission Draft - states that (our underlining):

"2.96 The release of sites at the harbour for redevelopment is a long term process which requires careful management. The successful delivery of the JAAP proposals will be dependent upon the ability of the local authorities to work positively with existing site owners and businesses during this period of transition. There is a strong commitment from the Partnership to ensure that any release of sites is backed up by an accompanying strategy which minimises impact on existing business operations and retains local firms and associated jobs in the area. ('is a long term process which requires careful management' underlined)

2.97 It is essential to ensure that the initial phases of development do not compromise the operations of businesses on sites which are unlikely to come forward until later in the process. In accordance with the Shoreham Harbour Interim Planning Guidance, and the Western Harbour Arm Development Brief prior to sites coming forward for redevelopment to alternative uses, planning permissions for continuation of current employment uses may be granted for temporary periods on a case by case basis." (last sentence underlined)

The draft West Sussex Minerals Plan includes no reference to the proposed removal from safeguarding of Kingston Railway Wharf. Critically it fails to confirm that it will remain an important part of the minerals infrastructure within the Plan area and that subject to proposals not prejudicing the regeneration objectives for the area that temporary planning permission for minerals related development should be supported on this wharf. Where continued use can be made of the wharf facilities (even for a temporary period) it is clearly good planning practice to ensure that this is supported and facilitated. This approach is underpinned by the National Planning Policy Framework requirement – in terms of a presumption in favour of sustainable development and to ensure in plan-making that Plans are sufficiently flexible to adapt to rapid change (para 14).

The throughput of aggregate via Day's existing operation at Kingston Railway Wharf is approximately 135,000 tonnes per year. Again in this context the NPPF acknowledges the important role minerals play in the economy stating that "minerals are essential to support sustainable economic growth and our quality of life" and that it is "important that there is sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs" (paragraph 142).

There is no pressing need for the existing port-related uses on Kingston Wharf to relocate in the short or even medium term, as has been set out in the JAAP and other related policy documents which supports such uses continuing until the redevelopment of the area comes forward. On this basis the continued safeguarding of the wharf for a temporary period is fully justified. This is in keeping with the safeguarding requirements in the NPPF – para 143 which emphasise the important of retaining wharves with current potential mineral use. (current underlined) On this basis Policy M10 should confirm the continued safeguarding of the wharf on a temporary basis. Additional supporting text to the Policy should also be added confirming this position and ensuring that the Minerals Plan is consistent with other development plan documents for this area – in terms of the approach to the grant of temporary planning permissions and that this would be supported.

Amendments to Policy M10 are proposed as follows – and to be inserted as a new section at the end of the current proposed policy wording (additional text shown in bold and underlined):

Policy M10: Safeguarding Minerals Infrastructure

(c) The following wharves and railheads are safeguarded for their minerals transportation purposes:

(i) ARC Wharf, Shoreham (inset map 3)

(ii) Tuberville and Penneys Wharf, Shoreham (inset map 3)

(iii) Halls Wharf, Shoreham (inset map 3)

(iv) Rombus Wharf, Shoreham (inset map 4)

(v) Railway Wharf, Littlehampton (inset map 4)

(vi) Chichester Railway Sidings (inset map 5)

(viii) Tinsley Goods Yard, Crawley (inset map 7)

(ix) Crawley Goods Yard (inset map 7)

(x) Crawley Goods Yard (inset map 7).

(d) The following wharf is safeguarded for minerals transportation purposes on a temporary basis.

(i) Kingston Railway Wharf (inset map X) (additional clause d proposed)

Additional supporting text is proposed as follows – and it is suggested would fit well after para 6.10.12 of the draft Minerals Plan as drafted

"The continued safeguarding of Kingston Railway Wharf for minerals related development is for a temporary period only to ensure it does not prejudice the objectives of the emerging Shoreham Harbour regeneration proposals. Proposals for Minerals related development on this wharf will be supported on a temporary basis where this is not in conflict with other development plan policies and objectives. It is recognised that such temporary permissions can contribute positively to ensuring a steady and adequate supply of minerals to the area."

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

N/A

Additional Comments

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01 - Organisation: Dudman (represented by Terrestria) (Response ID: 171 Respondent ID: 1510)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

(Combined comments given in response to Q1.3 and Q1.4)

The Vision as set out in Chapter 2 of the draft JMLP sets the scene for what is stated as being "sustainable minerals development" to be achieved in the County by the end of the Plan period.

The Vision when considered as a stand-alone aspiration is difficult to challenge, point by point. However, when considered against the policy detail in the Plan, there are many contradictions between the Vision and policy.

By way of example, the Vision refers to the County having "contributed to the supply of minerals" and also "meet(ing) its own needs for minerals" two aspirations which are not supported by policy.

In summary, therefore, whilst the Vision could be supported, the aspirations in the Vision must be consistent with the policy detail found elsewhere in the Plan.

Turning to the Strategic Objectives.

STRATEGIC OBJECTIVE 1

SUPPORTED subject to the words "prudent and" being deleted as these are unnecessary and "prudence" is a subjective measure.

STRATEGIC OBJECTIVE 2

SUPPORTED

STRATEGIC OBJECTIVE 3

NOT SUPPORTED

Strategic Objective 3, which concerns soft and silica sand, makes clear the importance of the soft sands which are found in the Sandgate and Folkestone formations, along with the potential for silica sand from the Folkestone formation to be used in industrial processes and for recreational uses.

The Strategic Objective states that mineral working should only occur in the National Park in "exceptional circumstances". National Policy is that planning permission should be refused for major developments except in "exceptional circumstances" and where it can be demonstrated they are in the "public interest" (NPPF, para 116). The first "test", therefore, is to establish whether a proposal constitutes "major development" and by implication not all proposals will be "major development".

In addition, the NPPF refers to other aspects of an application which must be taken into account, including need and the impact on the local economy and the extent to which impact (on the environment, landscape and recreational opportunities) can be moderated. In other words, National Policy does not state that all development (including mineral extraction) in the National Park should be refused and neither is the only "test" that of "exceptional circumstances".

The Objective to secure "a declining amount of extraction from within the [National Park]" prejudices future planning applications that could satisfy National Policy, which is more than just an "exceptional circumstance" test.

STRATEGIC OBJECTIVE 4

NOT SUPPORTED

As with Strategic Objective 3, this Objective pre-empts any proposal that might come forward which satisfies National Policy, which, as considered above, is more than just "exceptional circumstances".

STRATEGIC OBJECTIVE 5

SUPPORTED

STRATEGIC OBJECTIVE 6

SUPPORTED

STRATEGIC OBJECTIVE 7

SUPPORTED

STRATEGIC OBJECTIVE 8

SUPPORTED

STRATEGIC OBJECTIVE 9

SUPPORTED

STRATEGIC OBJECTIVE 10

Whilst the Objective itself is SUPPORTED, the preamble to the Objective states that "new minerals development will not be located in areas at the greatest risk of flooding". This wording should be amended in order to provide for proposals in such areas where the applicant has worked closely and agreed working proposals with the Environment Agency.

STRATEGIC OBJECTIVE 11

SUPPORTED

STRATEGIC OBJECTIVE 12

SUPPORTED

STRATEGIC OBJECTIVE 13

SUPPORTED subject to deletion of the words "mitigation and" and amending the main heading to read "Restoration" as "mitigation" is incorrect and not actually referred to in the text.

STRATEGIC OBJECTIVE 14

SUPPORTED

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Buncton Manor Farm (M/HO/7)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

The non-allocation of Buncton Manor Farm is NOT SUPPORTED.

This site extends to approx 23 hectares and has a potential gross reserve of c 1million tonnes of soft sand.

The Mineral Sites Selection Report (Aprii2016)("MSSR") concludes that "there are significant issues relating to landscape at this site for which reason it is ruled out".

The site lies outside of the National Park and as such satisfies relevant elements of the Plan's Vision,

- the conservation of the special qualities of the National Park
- meeting the County's own need for minerals from indigenous resources outside the National Park

The site also satisfies relevant elements of the Plan's Strategic Objectives including,

- making provision for soft sand to meet the needs of West Sussex from outside the National Park

The landscape concerns as detailed in the MSSR have been over emphasised and insufficient examination of mitigation has been included in the assessment: "there is some potential to further limit views into the site", "there is potential for providing appropriate screening of part of the site". Impact from the slopes of the National Park are accepted as being within the "wider panorama" and reference is made to the cumulative impact (referring to the site's proximity to the existing Rock Common Sandpit) although there is the possibility that development of this site could be delayed until operations at Rock Common are completed. There is acceptance that there is scope for improving the condition and habitat value of the site.

The National Park landscape officer, whilst referring to impacts on views from the National Park, accepts that "in some locations these impacts are screened" by topography and existing woodland and even where the site is visible this is accepted as being "at distance within a wide panorama". The officer goes on to say that planting "could be effective at reducing...impact". As regards cumulative impact, the officer states that unacceptable cumulative impact would only occur if the site were to be developed before the sites at Chantry Lane and Rock Common were restored.

In common with any development the impact on landscape would need to be addressed as part of a detailed planning application. The landscape assessment for this site identifies some concerns. At the same time the assessment accepts that many visual impacts are either already screened or there is potential to improve screening. As regards mitigating any cumulative impact, this would only be a question of timing and if it were to be developed after Chantry Lane and Rock Common had been restored then this would not be an issue.

In summary, this site represents an important and significant proven reserve of soft sand which lies outside of the National Park. Developing this site would meet the relevant elements of both the Plan's Vision and Strategic Objectives. The reason for ruling out this site are issues relating to landscape, issues which have been over emphasised. On detailed examination there would be potential to deal with these visual issues (as accepted in the landscape assessment). This site, should therefore, be allocated in the Plan for future soft sand extraction.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Duncton Common (SDNPA) (M/CH/10A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

The non-allocation of Duncton Common is NOT SUPPORTED.

The Mineral Sites Selection Report (April 2016)("MSSR") ruled out this site at Stage 4 (desk-top assessment) meaning that the site did not go forward for a detailed technical assessment and sustainability appraisal. The outcome of the assessment was that whilst the site could be worked as an extension to an existing site (Heathend Quarry) the site should be ruled out "due to the potential ecological harm mineral extraction could cause; and due to the high landscape value and sensitivity of the site".

The site lies within the National Park and currently comprises areas of commercial forestry with some heathland.

The proposal would be to work the soft sand from this site and process the material at the existing plant sited in Heathend Quarry. Processed sand would then be exported via the existing Heathend Quarry access on to the A285, which links with the A272 Local Lorry Route.

This site would be worked following completion of sand extraction at Heathend Quarry and following the restoration of that site (apart from the plant area). There would not, therefore, be any issue of cumulative impact.

In landscape terms, it must be recognised that the site is predominantly a commercial forestry plantation and the existing trees will at some point be felled. Sand extraction could be contained within the plantation which would provide screening to any development.

As regards impact on important habitat both within the site and in the immediate vicinity, the proposed site extends to some 28 hectares gross and of course when detailed proposals are prepared then the final working design would take full account of areas of ecological interest in the site and these areas would either be excluded altogether or protected in other ways.

In summary, therefore, this is a site which has the potential to provide significant reserves of soft sand and which can be worked as an extension to an existing site, making use of this site's existing infrastructure. The landscape character will in any event change in time as the commercial forestry is cropped. The site is large enough to be able to be designed so as to exclude and/or protect ecologically sensitive areas. This site should therefore, be allocated in the Plan for future soft sand extraction.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Coopers Moor (SDNPA) (M/CH/10C)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

The non-allocation of Coopers Moor is NOT SUPPORTED.

The Mineral Sites Selection Report (April 2016)("MSSR") ruled out this site at Stage 4 (desk-top assessment) meaning that the site did not go forward for a detailed technical assessment and sustainability appraisal. The outcome of the assessment was that whilst the site could be worked as an extension to an existing site (Heathend Quarry) "the landscape impact...would be so severe it cannot be adequately mitigated".

This site has a potential gross reserve of 500,000 tonnes of soft sand.

The site lies within the National Park. The site had previously been considered acceptable (Minerals DPD Issues and Options November 2005).

The single, key issue concerns landscape and visual impact. The site comprises largely mature, commercial woodland with no nature conservation designations. Central areas of the site are less heavily wooded.

Mineral extraction would be contained within the mature woodland, retaining existing mature trees as a perimeter screen. The mineral would be processed using the existing plant at Heathend Quarry and the finished product would be exported using the existing Heathend Quarry access on to the A285, which links with the A272 Local Lorry Route

This site would be worked following completion of sand extraction at Heathend Quarry and following the restoration of that site (apart from the plant area). There would not, therefore, be any issue of cumulative impact.

Reference is made in the assessment of potential views from higher ground to the south of the site. The ridge (and Duncton Viewpoint) lies some 2.5km from the site. If parts of the site contained within the mature

woodland were to be visible then this would only be in the wider panorama of extensive, open views and would not be significantly visually intrusive.

In summary, this proven reserve would be worked as an extension to the existing Heathend Quarry making use of the existing processing plant and access. The overall impact of developing this site would be minimal when compared with the alternative of opening up a new, greenfield quarry. There is the opportunity to make use of existing infrastructure and processing plant. The site would be contained within and screened by existing, mature woodland thereby restricting views at a local level, and serving to break-up any views from the higher ground to the south, where views are in any event of a wider panorama. This all accords with Paragraph 116 of the NPPF and so meets the "exceptional circumstances" test. This site should therefore, be allocated in the Plan for future soft sand extraction.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Madam Green Farm (M/CH/4CDE)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

The non-allocation of Madam Green Farm is NOT SUPPORTED.

The Mineral Sites Selection Report (April 2016)("MSSR") ruled out this site at Stage 4 (desk-top assessment) meaning that the site did not go forward for a detailed technical assessment and sustainability appraisal. This site has a potential gross reserve of c 1.5 million tonnes of sharp sand and gravel (concreting aggregate).

The site lies outside of the National Park and as such satisfies relevant elements of the Plan's Vision,

- the conservation of the special qualities of the National Park
- the provision of construction aggregates to support growth
- meeting the County's own need for minerals from indigenous resources outside the National Park

As detailed in Appendix 5 to the MSSR, the key issues for this site were the water environment, soil quality and amenity.

Amenity

The assessment recognises that mitigation may "allow the site to be worked without causing harm".

Soil quality

Restoration of the site would result in the loss of some "best and most versatile" agricultural land. This would be in conflict with National Policy (NPPF, paragraph 112). However, the loss of agricultural land must be measured against the benefits to be gained from the final restoration of

the site which, in this case, may be related to flood alleviation providing added protection to the city of Chichester. Alternatively, the land could be progressively restored back to the original ground levels using inert, restoration material and so returned to an agricultural afteruse. Modern-day restoration techniques can ensure that land is restored to a productive and high quality agricultural use as well as providing opportunities to contribute to increased biodiversity.

Water environment

The site is adjacent to the Lavant Flood Alleviation Scheme. Contrary to what is stated in the summary, the Environment Agency does not state that this rules out mineral extraction, rather that it would require

adequate protection to the scheme. As suggested above, there may be opportunities to increase the effectiveness of the flood alleviation scheme during the restoration of the site.

In summary, this site would provide a much-needed concreting aggregate for the local markets. The key issues identified are capable of being mitigated against (as recognised in the assessment and by the EA). Developing this site would meet relevant elements of both the Plan's Vision and Strategic Objectives. This site should therefore, be allocated in the Plan for future sharp (concreting) sand extraction.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Chantry Lane Extension (SDNPA) (M/HO/2)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

The non-allocation of Chantry Lane Extension is NOT SUPPORTED.

The Mineral Sites Selection Report (April 2016)("MSSR") concludes that "the site is acceptable in principle only if it can be designed so as to avoid an unacceptable landscape impact and designed to ensure that all access issues are resolved".

This site is an extension to an existing, permitted quarry. The potential gross reserve is 1 million tonnes of soft sand. The existing site lies outside of the National Park; the Chantry Lane Extension site lies in the National Park. The new access proposed at the "Call for Sites" stage would be within the National Park. However, there is another potential point of access which is outside of the National Park and which would also connect the site directly with the A283 slightly closer to Storrington, at Manleys Hill.

An important consideration which is not referred to in the MSSR is that the proposed working of this site will involve relinquishing the right to extract soft sand from an area of woodland along the south-west boundary of the existing quarry (which has the benefit of planning permission for sand extraction) and so preserve this wooded area. In other words, the retention of this mature woodland would be in "exchange" for permission to work the sand from the proposed Chantry Lane Extension. This would meet the test of "exceptional circumstances" as discussed at Paragraphs 47 onwards in the MSSR.

Applying the benefit to be gained by relinquishing part of the existing permitted sand extraction area so as to preserve mature woodland in exchange for extraction from a less sensitive adjacent area is an "exceptional circumstance" and in so doing, reducing the detrimental impact on the landscape which would be caused by removing the existing woodland, would be in the "public interest".

In addition, the proposal is to create a new access on to the A283 Washington Road which would serve both the existing quarry and the extension and so end the use of the Chantry Lane access. To summarise, in the event of planning permission being granted for Chantry Lane Extension then this would be beneficial in that a large area of mature woodland would be preserved and the current access via Chantry Lane (which exits on to the A283 in the heart of the town) would be discontinued.

This proposal satisfies relevant elements of the Plan's Vision,

- minerals will be produced in a way which helps conserve and enhance the "beautiful outdoors of West Sussex", in this case by preserving a significant area of mature woodland
- impacts associated with the transport of minerals by road will be minimised (by the creation of a new access away from the town centre)
- the County will meet its own needs for minerals

The site also satisfies relevant elements of the Plan's Strategic Objectives including,

- making provision for soft sand to meet the needs of West Sussex
- protection of the amenity of residents (by retaining the mature woodland)
- conserving the landscape of West Sussex (by retaining the mature woodland)

As indicated above, the MSSR concludes that the site is "acceptable in principle" subject to the satisfactory mitigation of the impact of the proposed new access which is within the National Park. There is no reason why the access option within the National Park could not be designed so as to overcome the concerns expressed. At this stage in the process, the detail of the design of the new access (in terms of levels, signage and boundary treatment) is not provided. This is detail which would be included and considered as part of a planning application, accordingly the assessment can only speak in terms of potential impacts. For the assessment, at this stage, to refer to impact being "significant" in the absence of the necessary detail is premature and potentially misleading. Furthermore, there is an alternative viable point of access which lies outside of the National Park.

In summary, this site represents an important and significant proven reserve of soft sand. Developing this extension would meet the "exceptional circumstances" test and would result in significant landscape and access benefits. Developing this site would meet the relevant elements of both the Plan's Vision and Strategic Objectives. This site, (which is regarded as being acceptable in principle subject only to access issues being resolved) should therefore, be allocated in the Plan for future soft sand extraction.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

The proposed allocation of the Ham Farm site is SUPPORTED.

The JLMP Policy M11 allocates the proposed site known as Ham Farm for soft sand extraction.

Inset Map 1 (Appendix C) identifies the gross area of the proposed allocation. It should be noted that the area identified on Inset Map 1 is different to that submitted at the "Call for Sites" stage in April 2014, although the proposed allocation is as initially issued as site M/H0/4A in the April 2014

Mineral Sites Study. There is no explanation provided which might explain the change in the area.

It should be noted that the reserves as assessed at the "Call for Sites" stage (850,000 tonnes) was based on the area as submitted and not that identified at Inset Map 1 of the JMLP. This area was c 14 hectares.

The area of the allocated site is approximately 15.4 hectares. This marginally larger area may provide a slightly increased gross yield which, if applied pro rate, would be 935,000 tonnes.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Minsted West (SDNPA) (M/CH/8A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

The non-allocation of Minsted West is NOT SUPPORTED.

The Mineral Sites Selection Report (April 2016)("MSSR") concludes that "the site is acceptable in principle only if landscape and hydrological issues can be overcome".

This site is an extension to an existing, permitted quarry. The potential gross reserve is 2 million tonnes of Folkestone Beds silica sand plus soft sand. Both the existing site and the Minsted West extension lie within the National Park.

The landscape concerns as detailed in the MSSR have been over emphasised and insufficient examination of mitigation has been included in the assessment. Both the existing site and the proposed extension are extremely well screened by expansive areas of mature woodland. The assessment recognises this: "broadly enclosed with views into the area restricted by existing vegetation" . The potential of new planting to further mitigate visual impact is recognised.

As regards water quality (the existing and extension sites would be wet worked) the assessment concluded that "the site would not harm the Arun Valley SPA/Ramsar" . The potential impact on water levels on Stedham Common within the lping Common SSSI would need "to be considered".

Under the section of the MSSR headed "Water Environment" reference is made to a Habitat Regulation Assessment undertaken in 2010/11 which appears to have reached a different conclusion regarding sediment impact than the later (2015) assessment referred to in the previous section. This discrepancy should be rectified as the wording under the "Water Environment" section is inaccurate, contradictory and confusing.

There is a negative comment regarding "deliverability" which should be clarified. The Minsted West site is within the same ownership as the existing quarry and the landowner supports mineral extraction from the extension site.

In summary, this site represents an important and significant proven reserve of silica sand as well as soft sand. Silica sand is an industrial mineral resource of national importance used for a range of specialist uses and as such the test of "exceptional circumstances" is met: "the need for the development...in terms of any national considerations" (NPPF, Paragraph 116).

The site is not a new site within the National Park but an extension to an existing site which has limited reserves remaining and which is in the process of being progressively restored.

The extension, even though it lies within the National Park, is regarded as being "acceptable in principle" subject to landscape and hydrological issues being satisfactorily dealt with. Landscape issues are considered to have been over emphasised. On detailed examination there would be potential to deal with these visual issues (as accepted in the landscape assessment). A detailed assessment of the hydrological regime would be dealt with at the planning application stage and where necessary appropriate mitigation would be agreed with the Environment Agency at that time. This site, should therefore, be allocated in the Plan for future silica sand (with soft sand) extraction.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

(Comments given in response to Q3.1)

POLICY M1: SHARP SAND AND GRAVEL

The Policy as currently worded is NOT SUPPORTED.

The Policy should be amended deleting the words "extensions of time and". Separate policy criteria should apply where a quarry which is inside the National Park has the benefit of an existing planning permission and a developer seeks an extension in time. In this instance, and where there are genuine reasons for the need to apply for a time extension (such as downturn in demand) and where there are to be no other material changes to the planning permission, for the developer to have to demonstrate "exceptional circumstances" and "public interest" is unduly onerous.

As regards the preamble to the policy, the statement that "additional allocations for sharp sand and gravel sites are not required" is NOT SUPPORTED as in the interests of certainty, and to ensure adequate supply to meet demand during the plan period (and beyond, ensuring that at least 7 years of supply is maintained at the end of the plan period) then the Plan should include allocated sharp sand and gravel sites. The statement that the current landbank for sharp sand and gravel is "nearly 35 years" is disputed and marine dredged aggregate (and imports from outside the County) should not be heavily relied upon to make-up any shortfall.

POLICY M2: SOFT SAND

The Policy as currently worded is NOT SUPPORTED.

The Policy should be amended deleting the words "extensions of time and". Separate policy criteria should apply where a quarry which is inside the National Park has the benefit of an existing planning permission and a developer seeks an extension in time. In this instance, and where there are genuine reasons for the need to apply for a time extension (such as downturn in demand) and where there are to be no other material changes to the planning permission, for the developer to have to demonstrate "exceptional circumstances" and "public interest" is unduly onerous.

Additionally, the Plan accepts that there will be a significant shortfall in reserves over the plan period. The Vision is that the County "will have contributed to the supply of minerals, in particular aggregates" and "will be a place which seeks to meet its own needs for minerals". The proposal, therefore, that there will be a reliance on "increasing levels of imports from other areas" is contrary to the Vision. Reliance on importing sand from other counties not only leads to uncertainty as regards supply and the prospect of developers applying for sites within the County on an ad hoc basis but transferring the problems of mineral extraction to other counties is not an acceptable way of dealing with development control. Reliance on importing from further afield has implications for sustainability (increased fuel usage, impact of traffic over a wider area, and so on). West Sussex has sufficient proven reserves of soft sand both outside and inside the National Park and therefore to have a policy which promotes increased reliance on imports from outside of the County cannot be justified.

The Plan proposes to allocate just one site for future soft sand extraction, a site which would contribute just 850,000 tonnes (which is a gross figure and so this actual contribution is likely to be less) or less than 20% of the Scenario 3 projected shortfall.

Additional soft sand sites should be allocated within the Plan so that the Vision of the County "meeting its own needs" is met. The proposal that shortfalls will be met by increasing imports from other counties should be removed from the Plan.

The Policy refers to "physical extensions" to existing sites and in the explanatory text states that "physical extensions to existing sites generally benefit from established infrastructure and other facilities which means that it may be more appropriate to continue activities...rather than develop new sites" (Paragraph 6.2.22). Whilst this statement is supported, the caveat to be found at Paragraph 6.2.23 is NOT SUPPORTED. There may be many valid reasons why an existing site, for which an extension is proposed, might have "outstanding or unresolved issues" . Often these issues can be resolved as part of the process of considering extended working

and consideration of the wider proposal. It is not appropriate for the Plan to prejudge an application and state that proposals to extend will "only be supported" where there are no "issues". The starting point is a presumption in favour of development and thereafter a proposal is to be considered having regard to local and national policy. The statement in Paragraph 6.2.23 does not appear in Policy M2, nor does it appear in either of the Policies relating to other minerals or in the explanatory text for those other minerals. Paragraph 6.2.23 should therefore be deleted in its entirety.

POLICY M3: SILICA SAND

The Policy as currently worded is NOT SUPPORTED.

The Policy should be amended deleting the words "extensions of time and". Separate policy criteria should apply where a quarry which is inside the National Park has the benefit of an existing planning permission and a developer seeks an extension in time. In this instance, and where there are genuine reasons for the need to apply for a time extension (such as downturn in demand) and where there are to be no other material changes to the planning permission for the developer to have to demonstrate "exceptional circumstances" and "public interest" is unduly onerous.

POLICY M4: CHALK

The Policy as currently worded is NOT SUPPORTED.

The Policy should be amended deleting the words "extensions of time and". Separate policy criteria should apply where a quarry which is inside the National Park has the benefit of an existing planning permission and a developer seeks an extension in time. In this instance, and where there are genuine reasons for the need to apply for a time extension (such as downturn in demand) and where there are to be no other material changes to the planning permission for the developer to have to demonstrate "exceptional circumstances" and "public interest" is unduly onerous.

Policies M1 to M4 should all make it clear that the "exceptional circumstances" test which is to be applied to proposals within the National Park, should only apply to "major development" which is, of course, National Policy. This is necessary to ensure consistency with Policy M13 which distinguishes between small scale and major development.

POLICY MB: PLANT, PROCESSING AND SECONDARY ACTIVITIES

SUPPORTED

POLICY M9: SAFEGUARDING MINERALS

SUPPORTED

POLICY M1O: SAFEGUARDING MINERALS INFRASTRUCTURE

SUPPORTED

(Comments given in response to Q3.2)

Unless otherwise stated below, Policies M12 to M26 inclusive are SUPPORTED.

POLICY M20: TRANSPORT

This Policy as currently worded is NOT SUPPORTED.

Paragraph (c) sub-section (i) states that where a need for road transport is demonstrated then the Lorry Route network should be used and that there should be "minimal use of local roads, unless special justification can be shown".

The reference to "special justification" should be removed.

National Policy already makes provision for applications to be accompanied by a Transport Statement or Transport Assessment (NPPF, Paragraph 32) which includes an assessment of "safe and suitable access to the site" . The wording of Policy M20 (c) (i) already refers to "minimal use of local roads" and therefore to add-in a further (high) test of "special justification" is unnecessary and unduly onerous.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

No comment to make regarding the content of the Plan.

Additional Comments

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* * *

01 - Organisation: Duncton Parish Council (Response ID: 64 Respondent ID: 3974)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Duncton Parish Council wishes to express its support for the draft West Sussex Joint Minerals Local Plan. We appreciate the level of accurate detail and summary given in the case of Coopers Moore and Duncton Common

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

01 - Organisation: East Sussex County Council (Response ID: 96 Respondent ID: 3737)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Thank you for consulting us on the draft West Sussex Joint Minerals Local Plan. This Officer level response is from East Sussex County Council (ESCC) as minerals planning authority. My comments are as follows:

- ESCC has no objection to the joint MLP approach to the provision of sharp sand and gravel. With regard to soft sand, ESCC notes the approach of a "managed retreat" from working soft sand within the South Downs National Park. The County Council would however be concerned if as a result unacceptable demands were placed on East Sussex to provide additional soft sand to serve the wider area. (M1, M2 and M11 a)

- ESCC supports the approach to safeguarding minerals infrastructure set out in policy M10. In particular we support the identification of the wharves identified in M10 c) located at Shoreham and Littlehampton Ports. In 2014 ESCC, along with other interested parties, agreed a Statement of Common Ground (SoCG) the purpose of which was to underpin effective cooperation and collaboration in addressing strategic cross-boundary issues as they relate to planning for minerals infrastructure and safeguarding in Shoreham Harbour. The joint MLP proposals will compliment the approach set out in the SOCG and it's forthcoming revision.

- ESCC has no objection to the identification of the extension to West Hoathly Brickworks (M11 b)) which is located close to the County boundary, provided that any forthcoming permission for this site does not result in an intensification of vehicular activity.

- There a number of areas in the Plan where I consider it would be useful to make to clarifications and/or amendments:

- Paragraph 3.4.2 – Details regarding imports of land-won and marine sand and gravel to East Sussex need amending. Sand and gravel (not marine dredged) is received at Rye Port (figures can not be disclosed for business reasons). Halls Wharf at Shoreham straddles the B&H border and is active for import of marine imports.

- Section 6.10 - It would be useful to include reference to the the Joint Area Action Plan for Shoreham Harbour and the background to the safeguarding approach for minerals wharfage. This would aid understanding and strengthen the argument for safeguarding the particular wharves set out in M10 c), as well as the consequential capacity.

- It is acknowledged that Rombus Wharf identified in M10 c) not currently in mineral use. I understand that the wharf is owned and operated by Shoreham Port Authority who have stated that they are happy for the site to be safeguarded and would seek to bring the site back in to minerals use in future should demand arise for it. For the purposes of clarity this information should be included in the joint MLP.

- Page 71 Monitoring table – It would be useful to identify the role the adjoining mineral planning authorities BHCC and ESCC would have in implementation of the safeguarding approach at Shoreham Harbour.

- In order to encourage the better use of inert material and secondary aggregates on existing and proposed minerals sites the MLP may be strengthened by more cross-referencing in the supporting text nd the adopted WSCC Waste Local Plan in relation to inert waste recycling, secondary aggregate recycling, disposal of waste to land, and restoration of minerals.

* * *

01 - Organisation: Elan Nursery (Response ID: 34 Respondent ID: 4070)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Issues that directly affect us;

We operate a busy children's day nursery on the Chanctonfold Estate and believe that we would be directly and adversely affected by the large scale extraction of the sand. We have chosen to operate our business in a rural area of natural beauty, so having an industrial process on our doorstep would be hugely detrimental to our business.

Being so close to the proposed site, it would be difficult to envisage that anything could be done to avert the amount of air pollution that would affect our nursery. This is both in terms of the dust in the air and the emissions from increased haulage traffic (both transporting and idling.) Poor air quality leads to breathing difficulties, and we have 72 babies and young children everyday to consider, as well as keeping our staff healthy and safe. We open our windows for fresh air, and we have a lovely garden for them to enjoy, neither of which will be particularly pleasant with poor air quality. It would also be unacceptable to have an increased amount of dust and dirt settling within the nursery and garden.

Another impact for us would be the amount of noise created by the extraction process throughout the day and the noise from the increased level of traffic on the nearby Steyning bypass.

A further issue for us would be the impact on our staff and customers that the increase in traffic on the local roads may have. Congestion, increased risk of accidents with lorries pulling out and the greater risk of pot holes and general damage to the highways through increased use, may all affect the choice of our customers and staff to stay with us.

General issues that affect our local environment;

The 16 hectares currently highlighted for mineral extraction is rich agricultural land with a couple of ancient woodlands adjoining the site. It's within the South Down's National Park which is home to a wealth of diverse flora and fauna, so it's difficult to see how this would not be adversely affected by mineral extraction over a long period of time.

There are power cables, power lines and water mains all on or adjacent to the proposed site which may have to be moved, and we and our neighbours would not want to incur any major interruptions to our services.

Given the proposed site's proximity to businesses and dwellings and the proposed duration of extraction, it is difficult to see how this will not impact upon property valuations for the immediate area, and the knock on effect for the local economy

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

A change of location for the mineral extraction.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

01 - Organisation: Environment Agency (Response ID: 174 Respondent ID: 3054)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Draft West Sussex Joint Minerals Local Plan (Regulation 18)

Thank you for consulting the Environment Agency and giving us the opportunity to comment on your Joint Minerals Plan. Generally we think that the document is clear and well laid out. It gives strong direction and guidance for minerals development in West Sussex whilst considering the sensitivity of the environment.

We have no significant concerns to express but have some minor comments detailed below that we think would aid in the clarity of the document.

General comment

We would suggest that it should be made clearer that many of the activities described within the document will not only require planning permission but also a permit from the Environment Agency.

Specific Comments

2.3 Strategic Objectives

2.3.11 – We support the inclusion of the Flood Risk and Water Resources objective. We are pleased to see both the recognition of flood risk issues and the particular need to safeguard aquifers from contamination.

2.13.13 – Within this objective we welcome the fact that the protection of the environment is at the forefront when considering oil and gas exploitation.

Section 4.7

4.7.3 – We particularly support the recognition of the impacts of climate change in this paragraph. Please be aware that the Environment Agency has updated their guidance on how climate change could affect flood risk to new development - 'Flood risk assessments: climate change allowances' (Link: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances). This was published on gov.uk on 19th February.

It has been finalised in the last few months following user testing with practitioners in 2015. It has been updated in line with best available scientific evidence to help ensure new housing and other developments remain safe and resilient to flooding, without increasing flood risk elsewhere. We will update the advice should new scientific evidence become available through future work, such as the National Resilience Review, the next Climate Change Risk Assessment and the next UK climate projections.

The main changes are to the peak river flow allowances. They are provided for each river basin district rather than a single national allowance. A range of allowances are provided based on different probabilities for each epoch, rather than a single allowance for each epoch. The allowances for the upper end of the range are significantly higher than the previous single national allowance.

There is also a small change to peak rainfall allowances. Rather than a single allowance, a range of allowances is provided. The allowance at the upper end of the range is slightly higher than the current single allowance. As previously, the allowances are provided at a national scale.

4.7.5 – We support the production of a Strategic Flood Risk Assessment (SFRA) and are pleased that this will help inform the minerals plan. Please however be aware of the above comments regarding the revision of the climate change allowances. These should be considered in the SFRA.

4.7.6 – We are pleased that the importance of the hydrogeology is recognised in this paragraph. As you have stated this can have a major bearing on the suitability of sites for mineral working and it is important that groundwater sources are protected.

6. Strategic Minerals Supply

6.7 – Hydrocarbons

M7a and M7b

Whilst we welcome the intention of this policy to ensure that any exploration of hydrocarbons is undertaken in the most appropriate places while protecting the environment, we think that some of the wording in these policies is confusing and a bit misleading. We understand that it is important that such exploration is not ruled out but as they currently stand we feel that the policies are almost promoting the exploration. We feel that

rewording of the policy is required to ensure that the environment is fully protected in any exploration that occurs.

Throughout the policies the reference to SPZ1 should also include SPZ1c. These subsurface zones are as important as the traditional SPZ 1 designation.

We think the bullets in policy M7b (a) (i) are very good and would suggest that these are replicated in the same way in policy M7a as the same is applicable.

Our main concerns with these policies relate to bullet © in both. This considers 'activity beneath or proximate to designated areas'. Whilst we recognise that this approach is preferable to activity within these designated areas it should be recognised that such activity may still pose a risk to the environment and in our opinion bullet © does not reflect this. We would ask that more caution is added with recognition that each proposal will be assessed on a case by case basis. Minor changes to the policy wording such as changing 'will be permitted' to 'may be permitted' could help with this.

M11: Strategic Minerals Site Allocations

We have no comments to make at this time regarding the proposed allocations. We are pleased to see that a site specific flood risk assessment has been detailed as a requirement in the development principles for both sites. We also support the reference to development being in accordance with the policies of the plan. In terms of our remit we would suggest that policies M15 and M16 are especially relevant in this regard.

M15: Air and Soil

We support the inclusion of this policy and the points contained within it.

M16: Water resources

We support the inclusion of this policy and the points contained within it. The supporting text is also very relevant and provides clear direction in what a planning application would need to consider to ensure the water environment is protected.

M17: Biodiversity and Geodiversity

We support the inclusion of this policy and the points contained within it.

M19: Flood Risk Management

We support the content of this policy but would suggest that the order of the points covered are reconsidered to follow more closely the flood risk management hierarchy. Currently the first point raised deals with mitigation. The starting point should be avoidance where possible, demonstrating a sequential approach. This is covered in point (b) of the policy but we would suggest that this is moved to become the first issue considered. The other aspects can then be considered.

M24: Restoration and Aftercare

We support the inclusion of this policy and the points contained within it, especially point (g). As we have previously raised above, it might be worth making clear somewhere in the supporting text that permits for these activities may also be required from the Environment Agency

If you require any further information or wish to discuss the contents of this letter please do not hesitate to contact me using the details below.

* * *

01 - Organisation: Fittleworth & District Association (Response ID: 204 Respondent ID: 586)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I would like to submit the following brief comments on the Mineral Site Selection Report(MSSR) which was recently issued and for which there is a consultation period which finishes today June 17th 2016.

Our comments relate to the Horncroft Sand site SDNPA,M/CH/11) - Page 311 in the MSSR

Our organisation – Fittleworth & District Association – represents residents in Fittleworth and neighbouring areas.

1 - Fittleworth and the surrounding areas are very grateful for the decision you have reached to exclude Horncroft as a potential site at this stage of the process. We support your decision

Your decision and the report recognises the many adverse factors concerning this site.

2 – We are concerned about your Conclusion.

Your conclusion statement that the site is unacceptable as there is significant potential for landscape harm on the Eastern side of the site , seems to indicate that this is the only reason from exclusion.

We feel this is wrong to focus on this one issue as you have indicated there are many other aspects for exclusion.

The applicant has responded to your single specific reason for exclusion by planting, in the past few months, many trees on this east side of the Horncroft site,

As a result, within a couple of years, the current clear attractive view of the South Downs seen when driving south along the B2138 will be lost, so having a significant adverse impact on the landscape.

We also fear that you are encouraging the applicant to reapply which is most regrettable as this site is not appropriate for the South Downs National Park in many respects – not this one

3- In recent years we have worked with …*(redaction)..* who is a resident very close to Horncroft .

…*(redaction)..* has made a detailed submission to you on the consultation.

We would like to record our support for the responses …*(redaction)..* submitted to you on June 13th and ask that full consideration is given by you to those submissions

* * *

01 - Organisation: Frack Free Balcombe Residents Association (Response ID: 303 Respondent ID: 3943)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

You say this is a vision of West Sussex 'by 2033', that the plan shows 'direction of travel'. Much could be damaged and 'restored' between now and 2033. We should insist on meeting aims and standards now, constantly, and right up until 2033. The oil industry could drill wells across the Sussex Weald, test, extract, 'restore' and be gone by 2033. (Unlike conventional wells, fracked and acidised wells decline rapidly in production, and more must be drilled – hence many wells, individual ones quickly spent and cosmetically restored.)

There are at least two writing styles and viewpoints in this report. Someone clearly cares deeply about West Sussex in all its beauty and diversity. Other parts are very bureaucratic. Whoever wrote those parts seems to care only about adhering to planning rules and policies. Those parts are badly written and need editing. They also need to be considered critically, because there comes a time when we all need to take a stand against things that are illogical or morally wrong.

The Frack Free Balcombe Residents Association (FFBRA) has approached this response mainly with oil exploration and production in mind. We would propose changes to both the vision and the strategic objectives, but even as they stand, it is clear to us that they would rule out further exploration for hydrocarbons in West Sussex, whether conventional or unconventional. If the objective is 'to minimise and mitigate potential impacts' and 'to ensure that there would be no unacceptable harm' to character, health and amenity, businesses, visitors to West Sussex, to historic and natural environment, and 'to ensure that mineral extraction contributes to a low carbon, circular economy', well, WSCC can't be in favour of fracking or acidising or any intensive-extensive oil and gas exploration.

Throughout the proposal there should be more emphasis on the circular economy and a true move towards a low-carbon economy. As explained later, we do not consider natural gas to be 'low carbon'.

To avoid repetition and to explain our points more clearly, we have commented AND suggested changes in the 'changes' box below.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

VISION

Bullet 1: Remove 'enhance'. The idea that mineral extraction could 'enhance the beautiful outdoors of West Sussex' cannot have been thought through. Just because the NPPF used the term 'enhance', this does not mean that their poor logic should be blindly adopted. This bullet mentions 'conserving' and 'enhancing' only the National Park – why does it not also include the AONBs, SSIs and other special places?

Bullet 2: 'Minimised' is a vague term – how is this defined? It could mean a deterioration by 2033, worse traffic inconvenience, pollution and danger than today, the deterioration simply being kept to someone's idea of 'a minimum'.

Bullet 4: This point needs writing in plainer English. 'Alternatives to extraction of indigenous resources' is ambiguous. We would like to see SSSIs included here.

Bullet 5: We would not like to see hydrocarbons transported by rail.

Bullet 6: Again we question the use of the word 'enhance'. How can mineral extraction 'enhance the historic and natural environment'? Circular economy yes, but there should be more emphasis on this throughout the

rest of this document. Low carbon – are energy conservation and low carbon practices truly going to be encouraged? It would be good to see a clearer intention to do this throughout this document. Low carbon – we agree that this should be an aim. But how can a low carbon vision be reconciled with the prospect of extracting more hydrocarbons in West Sussex? Particularly, with reference to unconventional or tight oil, shale oil, and oil from micrite and other 'tight' calcium-rich strata, whether by fracking or by hydrofluoric/hydrochloric mixture acidisation.

Bullet 7: No indeed, please do not build over our reserves of silica sand. It's a rare resource that we should keep for vital uses and future generations. Equally, please do not allow this very special sand to be squandered on fracking.

Bullet 8: Note that restoration of oil pads is not simply a question of 'grassing over' – however much biodiversity they introduce. The cement and metal components of wells deteriorate over time. All wells leak eventually. Wells are for ever. Out of sight, out of mind, they are still there, gently crumbling and corroding. Between 10 and 90 per cent of the fracking fluids used returns to the surface. Fracking flushes out and releases other liquids and contaminants from underground – salts, heavy metals, various hydrocarbons, radioactive substances. The portion that does not flow back to the surface remains down there, and will migrate underground over time. It may find its way via the well bore or via man made or natural cracks and faults (of which we have so many in West Sussex) to our aquifers, or to the surface. Please be aware that restoration of oil sites is not as simple as the industry might suggest. Anyway, what exactly are these 'highest standards'? Who will pay in the event of contamination once the oil company has abandoned the well and the shell company set up to carry out the project vanished in a puff of pollution?

STRATEGIC OBJECTIVES

SO1: A 'prudent' approach to mineral extraction is good. When appropriate we would like to see the Precautionary Principle applied. We would like to see it mentioned in this point. 'Promote' is a weak word? 'Demand' is the word.

SO2: We are in favour of recycling, but concerned about despoiling the sea and the sea bed.

SO4: (Find a better expression for 'providing for'!) And who decides what is in the public interest? Please don't just take instruction from central government. Please think about what is truly in the interests of WSCC's electors, the people of West Sussex, and beyond.

SO7: (Consider better use of commas for greater clarity.) This point would rule out unconventional oil and gas exploration and production. Fracking has been shown to be detrimental to the health of both workers and local communities. New studies linking fracking to poor health now emerge constantly. The CEO of UKOG (over the 'border' at Horse Hill in Surrey) recently announced his plans for hundreds of wells, and well pads, and the need for well pads 'back to back'. A multiplicity of wells is needed whether fracking or acidisation is used. The same would be true in Sussex – the cumulative effect of many wells has to be considered. A patchwork of wells across our countryside will hardly 'enhance' amenity and health. Is 'enhance' used here in the sense of clean up some operations that are currently ugly and detrimental to health? If so, this could be explained more clearly. If this is not the meaning, we would remove the word 'enhance'.

SO8: Similarly, consider whether 'enhance' is the appropriate word to be used here.

SO9: Ditto, 'enhance'.

SO10: This point is inconsistent with allowing the oil industry to industrialise the landscape, or even establish just a few isolated unconventional wells, whether for fracking or acidisation or both. WSCC's strategic objective is 'to safeguard water resources from contamination, and ensure the quality and quantity of the water environment is conserved and enhanced.' The industry's record elsewhere shows that water resources, in quality and quantity, cannot be safeguarded if fracking or acidising is allowed. Industry and government will tell you that 'gold-plated' British regulations will mean that things will be different here. In reality we have inadequate regulations, and the industry is allowed by DECC, the EA and HSE to self-monitor. We know, from experience in Balcombe, that these agencies cannot be relied upon to do their job. The Precautionary Principle would demand at least a moratorium on unconventional hydrocarbons (amongst which hydrofluoric/hydrochloric mixture acidisation of tight oil formations would also be counted).

SO11: We are very uncomfortable about the prospect of transporting hydrocarbons by rail. We are also uncomfortable about transporting them by road. In view of the added danger, we would like a specific policy

to be developed on transportation of hydrocarbons. In truth, however, we do not want them to be extracted in the first place. We do not want to see any intensive/extensive hydrocarbon extraction in West Sussex. We want no expansion of hydrocarbon extraction. We believe it would be detrimental to climate, public health, environment and landscape.

SO12: The NPPF (para 93) states that the planning system, 'has a key role in helping shape places to secure local reductions in greenhouse gas emissions', and para 94 encourages the development of 'proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations. This is inconsistent with oil development across the Sussex Weald. Similarly, in national planning practice guidance for England, 'In addition to supporting your delivery of appropriately sited green energy, effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment.' Protection of local communities, our climate and the beautiful landscapes of the Sussex Weald should trump party politics and a Conservative obsession with fossil fuels at national level. It is WSCC's duty, as our planning professionals and elected representatives, to investigate the truth, not just to believe what central government says. We challenge the assumption that home-grown hydrocarbons are necessary for our 'energy security'. This is an argument based in any case around gas, which is unlikely to be found in serious quantities in West Sussex. Britain buys much of its gas from Norway, the remainder from sources that are not at risk. What's more, gas is now available from the USA, soon from Australia. In any case, at peak industrial production, having drilled thousands of wells, the UK is unlikely to produce more than 15 per cent of our gas needs. Oil and gas are traded on international and European markets – British oil and gas will not necessarily be used in the British market. Oil looks set to be in glut around the world for some time; gas likewise. Our tiny local production is and can be of little significance to our national 'energy security'. How much of our countryside are we willing to sacrifice for so little? In terms of climate change, it is even harder to justify oil extraction than gas extraction. If we are to compare gas (spuriously) with coal as an energy source, then yes, burning gas produces less carbon dioxide than coal. But recent science shows that the methane escaping during gas exploration and production, treatment and transport makes it a more climate-damaging fuel than coal, because methane is a more damaging greenhouse gas than carbon dioxide. More methane has been shown to escape from frack sites than from conventional sites. Recent climate modelling at University College London shows that we have already passed the point where natural gas could have been considered a 'bridging fuel' if we want to tackle climate change. And we repeat, here we have oil. There is no good argument for oil. Even if the national government will not truly commit to tackling climate change, we look to our local government to do so. As for the 'unacceptable impacts' from which WSCC will protect us – who decides what is unacceptable? If WSCC is forced by planning law to rely on reassurances from the EA, HSE etc, and is forced to assume that these agencies do their job properly, the matter is taken out of WSCC's hands, unless the WSCC Planning Committee has the courage to contest the bureaucratic contortions and limitations of our planning laws, and make a stand as councillors in Lancashire made a stand.

SO13: As outlined above, an oil company might say that an oil pad has been 'restored', and has been made safe, but wells deteriorate, and liquids and gases migrate, up the well bore, and though faults. Who will decide what is 'high quality'? How much have the planners and planning committee researched 'mitigation and restoration' in terms of oil wells?

SO14: (This point in the Draft Plan needs editing for clarity) This section absolutely must include the issue of fugitive methane from oil and gas well pads, production facilities and transportation as a significant contributor to climate change. It is unacceptable to address only carbon dioxide. This section must include the need to eliminate methane emissions. Methane is 85 times worse than carbon dioxide over the 20 year period in which we have to tackle climate change. For carbon dioxide, we query the vague word 'minimise'. Emissions could increase whilst being 'minimised'. WSCC's aim should be to reduce emissions, year on year, starting now. WSCC should consider how much energy is being expended in drilling, fracking, refining, transport and waste treatment to extract how little energy (waste treatment is hugely energy intensive if adequately done). Is this a good balance, climate-wise? Is this a Ponzi scheme that WSCC would be allowing to destroy our climate? Just because the industry applies to exploit hydrocarbons, and the Government is keen to encourage them, that doesn't mean that WSCC has to indulge them all, to forget the declared values and visions and strategies, and grant permission. Government policy here is truly incompatible with WSCC's stated vision of tackling climate change.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

6.7.1 Onshore oil and gas contribute minimally to our energy security, and would contribute minimally even if a new fracking/acidising industry is allowed to develop. It is not true that our energy security is at risk – except from the current government's withdrawal of support from renewables and energy conservation. Oil is in world-wide glut. We do not need 'extreme' oil, extracted at great expenditure of energy and at risk to our health, environment, landscape and climate, by fracking or hydrofluoric/hydrochloric mixture acidisation. The vast majority of scientists worldwide agree that we need to move away, and fast, from all the uses of hydrocarbons listed here. West Sussex does not have to be a dinosaur just because central government tells it to be a dinosaur. Let's look forward. Let's tell central government (and the media) that West Sussex instead wants to support energy conservation, new-build carbon-neutral houses, low-carbon transport, battery development and renewables.

6.7.2 Acceptable to whom? Protect us how, and why has this not been done until now in Balcombe and elsewhere? Why have WSCC planners and planning committees not listened to us out in the communities? Acceptability MUST be judged with regard to public and local opinion. Petitions, consultation responses and letters must be used as a barometer to judge what is 'acceptable'. Again, energy security is a spurious argument.

'exceptional circumstances' and 'public interest'. What are exceptional circumstances? There should be NO circumstances under which it is allowed in these areas. 'Public interest' .Previous permissions around Balcombe made a mockery of democracy and the purpose of public consultations. If WSCC is to retain any credibility in using these procedures, as it correctly does, they must not be a paperwork exercise alone. Public interest should be judged using local opinion as it's core. Petitions, consultation responses and letters must be used as the evidence to show public opinion and, therefore judge if these developments are in the public interest.

6.7.3 WSCC must also address the issue of hydrofluoric/hydrochloric mixture acidisation. Applications to acidise should be considered in exactly the same way as fracking applications. The risks to water and air, landscape and climate are all still present. Over the 'border' in Horse Hill, Surrey, in Balcombe and undoubtedly elsewhere across the Sussex Weald, the industry will first target calcium-rich strata by acidisation. They will then, having taken the easy stuff, go for the oil in the shale beneath. The intention to frack will come

later. Fracking will arrive via 'permission creep'. We disagree with WSCC's strategy of allowing fracking. Please study the issues, and do not blindly follow central government dictates. The sacrifice of our health and countryside is too great for WSCC simply to abrogate responsibility. Communities in West Sussex should not be forced to be guinea pigs in a government experiment. Please clarify in this section the WSCC strategy for sites such as Balcombe, where planning permission has already been given twice. We are in an AONB, but we understand that the 'rule' applies only to new applications, and of course only for operations that fit the new definition of fracking. What if Cuadrilla later wanted to come back and frack the shale below the micrite in Balcombe? Although we are in an AONB, would fracking here be considered as an existing site in 'exceptional circumstances'? Oil development 'not involving hydraulic fracturing' would include hydrofluoric/hydrochloric mixture acidisation – and since for the time being Cuadrilla wants to acidise in Balcombe they have the necessary permission. We repeat, the WSCC plan really needs to address acidisation, which is in itself an invasive process requiring wells at regular intervals across the landscape, as opposed to a single, 'traditional' well that draws up oil from a pool or through porous rocks. We contest the terms 'exceptional circumstances and 'public interest'. There should be NO circumstances in which fracking is allowed in special areas. As for 'public interest', previous permissions for Balcombe made a mockery of democracy and the purpose of public consultations. If WSCC is to retain any credibility in its use of public consultations, proper weight MUST be given to local opinion voiced in whatever form, petitions, consultation responses, letters…

6.7.4 National policy supporting hydrocarbon development is in direct conflict with the government's obligations to tackle climate change. This is misguided policy and any planner or councillor with the interests of future generations at heart would oppose such government policy. WSCC should take a stronger approach to protecting its sensitive areas. Oil and gas development should not be allowed to take place in these areas, or under them (by placing the drill heads outside and drilling horizontally below the protected area.)

Policies M7a and M7b - We disagree with the policy of assuming that the oil and gas industry has a general right to access conventional oil and gas deposits in West Sussex. We believe that we, the people, have a right to decide what happens to our land, our environment and our climate. 'Public interest' must be defined by local opinion and national public opinion, through all the channels of our democracy, letters, communications, petitions, consultations and all mechanisms that have been set up to ensure that we live in a healthy democracy. WSCC should be the guardians of our rights, not facilitators for industry. It should be written into this policy that concerns and planning impacts identified and expressed by local communities should be addressed. We know through research that adverse effects cannot be minimised or mitigated to 'an acceptable level' and well sites cannot be safely restored. The industry will play with definitions – the new definition of fracking, what processes and geological formations they now decide to call conventional or unconventional. We also object to the siting of wells on the edge of national parks and other special areas. Air and water pollution knows no special boundaries. We do not want oil and gas development, but should it be forced on us or any other community, we feel strongly that this policy should specify a minimum distance from residential property.

6.7.7 Once permission has been granted for earlier stages, the foot is in the door. We consider this point to be naive. 'Permission creep' is one of the pernicious aspects of British planning law as it relates to unconventional oil and gas. WSCC knows well that refusing permission for a subsequent stage would risk the expense of appeal, and that this fact would almost certainly determine the outcome of a planning application.

6.7.8 WSCC 'must assume' that other regulatory bodies 'operate as intended'. In our experience this is very often not the case – they do not operate as intended, and they allow the industry very largely to self-monitor. For example, the HSE never visited Balcombe, and never held meetings with the EA on the subject of Balcombe, as they were required to do. The EA and PHE failed properly to address air emissions issues at Balcombe. Yet calculations made by Balcombe resident Professor Dunne (an expert in chemical physics who has worked in drill simulation) suggest that sulphur dioxide emissions could exceed levels permitted in air quality directives by a factor of three. PAHs could be 24 times the maximum levels specified in the national air quality objectives, and particulate matter could be four times the permitted level, particularly for residents closest to the site. Based on this alone, work should not be allowed to continue. When intelligent members of the public pick up on profound problems that the agencies involved have not adhered to, they should be listened to.

It is simply not ethical for WSCC to hide behind bureaucratic cop-out clauses. It is not ethical for WSCC to take decisions without considering points of import that are in reality NOT being properly addressed by 'other regulatory bodies' whose job it should be. We all know that these are under-funded, understaffed bodies

under great pressure from industry and government. ‘Consulting with other regulatory bodies’ must not be a matter simply of ticking the box, brain switched off, party loyalty switched on. There will be times when WSCC needs to do its own research, to listen to evidence that regulatory bodies are not actually doing the job, and to make a stand. We hope WSCC will have the courage, dedication and integrity to do that. The operators can also not be assumed to be undertaking self-monitoring and controls properly. They should be checked every step of the way.

6.7.9 A problem here is that exploratory drilling for hydrocarbons does not in general ‘require’ an Environmental Impact Assessment. Much damage can be done at the exploration stage while staying within current planning regulations.

6.7.10 This section fails to acknowledge the requirement for multiple wells for unconventional extraction, whether by fracking or by hydrofluoric/hydrochloric mixture acidisation. Incidentally, we wonder if the ‘major development test’ was met at Balcombe? According to Stephen Sanderson, CEO of UKOG, the company drilling at Horse Hill, ‘This type of oil deposit very much depends on being able to drill your wells almost back to back, so it becomes very much like an industrialised process.’ (A need here for plain English: ‘Account will also be given to whether sites are deliverable.’ What does this mean?)

6.7.11 Good, if WSCC actually enforces this point properly. At Lower Stumble, Balcombe, bats were not properly considered.

6.7.15 In the case of unconventional oil wells, it seems that flowback/produced water will be held in tanks on site. (It seems that no one has a clue what to do – legally, economically - with the flowback from fracking.) Note that there have been cases in North America and Australia of flowback/produced water tanks being carried off by floods, shedding their load into rivers and flood waters. This liquid waste is very highly saline (several times the salinity of sea water), it is often radioactive, and contains heavy metals and hydrocarbons. There is ever more evidence from elsewhere in the world of contamination of groundwater, aquifers, rivers and soil by surface spills, migration via the well bore or migration through the ground. Sussex has a highly faulted geology. If there’s a way, fluids will find it.

6.7.16 and 6.7.18 As discussed above, restoration of an oil site can be little more than cosmetic. The only way not to risk after-effects is to follow the Precautionary Principle and not drill in the first place. How can WSCC imagine that the complex forest floor of ancient woodland can be removed, then restored later? We should protect our ancient (carbon capturing) woodland, industry should go nowhere near it.

6.7.19 No, we do not want to be schmoozed and fed a one-sided story by the oil industry (and government) PR machine, and we do not want their bribes. WSCC ignored overwhelming public opinion against flow-testing the Balcombe well. We were unable to object to the original planning application to drill owing to our parish council’s ‘unconventional’ procedures at planning stage in 2010.

Policy M8: Plant, processing and secondary activities - This policy should specify greater scrutiny of plant, processing and secondary activities. For example in the case of oil exploration or production there could be a need for on-site waste water treatment plant – perhaps truck-mounted mechanical vapour condensation equipment, involving movement of highly toxic liquids. There would be a need for compressor stations. Each secondary activity should be properly scrutinised.

Policy M12: Character ‘will be permitted’ – why is there an assumption that mineral development will be permitted? Local people should have a say. What is ‘unacceptable’ and who defines it? For example, drilling for hydrocarbons was permitted in Balcombe, within the AONB. We, the community, found that unacceptable. Our council at the time, without debating and minuting the matter in the normal manner, and without properly informing the community, found it acceptable. The WSCC Planning Officer, found it acceptable. Local people did not. ‘Reinforce’? In what way could mineral developments ever ‘reinforce the distinctive attributes’ of our countryside – except maybe by making a historic mine look even more like a mine? Consider the logic of this last point?

8.2.3 Again, what is ‘acceptable’? This is too vague a term to form part of a mission statement/minerals plan/policy.

Policy M13: Protected Landscape - Who says what are ‘exceptional circumstances’ and ‘in the public interest’, ‘in the national interest’ and ‘satisfactory mitigation of detrimental effect’? All these terms are a matter of opinion.

8.3.4 How true!

8.3.7 Who determines what is a 'national need' and is it our/WSCC's duty to query this?

8.3.9 A 'small development' 'i.e. development which does not have the potential to cause a significant adverse impact by reason of its scale, character or nature on the natural beauty, wildlife, cultural heritage and recreational opportunities of the SDNP or AONBs'. Who determines what is significant? Communities may disagree strongly and must be listened to.

Policy M15: Air and soil - Again, what is 'acceptable'? As far as hydrocarbons are concerned, there is clear and multiple scientific evidence of air and soil contamination, and emerging evidence of cover-ups of contamination by industry and regulatory bodies outside the UK. This policy would therefore rule out hydrocarbon exploration and production.

Policy M16: Water resources - Again, the definition of 'unacceptable', and in whose eyes, is fundamental. WSCC will agree that fracking will cause 'unacceptable' risk to quality and quantity of water resource, if the evidence is properly scrutinised. Consider whether 'enhance' is an appropriate word.

8.5.2 Again, what is unacceptable? And again, please have the courage and moral integrity to question the judgement of other agencies if WSCC has reason to believe that they are not doing their job adequately and independently.

8.5.4 (Consider putting the first sentence into plain English.) This point seems to presume the right of the applicant to extract minerals, or at least to give them wriggle-room to plead that they will not contaminate water.

8.5.5 We are concerned that WSCC will rely uncritically on reassurances.

8.5.6 How sure can WSCC be that, in the case of hydrocarbons, there will not be migration of fluids and gases 'beneath the water table'?

8.5.7 Why is this point here under water and not above, under soil? Anyway, agreed. Soil is important, please do not let it be contaminated.

8.5.8 Who will demonstrate that development of agricultural land is 'necessary' and how? This again seems to predict imposition of a policy from central government, to which WSCC should be ready to object, in support of public opinion, logic and morality.

Policy M17: Biodiversity and Geodiversity - Again 'will be permitted' suggests pre-determination. We believe it is wrong to assume a company's right to extract minerals. What is 'significant harm', 'adequate mitigation', what are 'adverse impacts'? Who will decide whether adverse impacts are 'outweighed'. Given that the impacts will be felt primarily by the local communities, it is surely they who must make the decision. 'Where necessary', 'where appropriate'. Who defines these concepts? Is compensation ever a real solution? What is envisaged as 'proper compensation' and to whom in the case of harm to wildlife? It is impossible to compensate wildlife and habitats. Under point a), points (ii) and (iii) make point (i) meaningless. (This whole section is really badly written, but in particular, the last sentence of point b) needs reworking. It is incomprehensible. Also in point c), maybe find a clearer way to express what is meant by 'the objectives of the designation'? Point d) is impenetrable and also needs rewriting.)

From 8.6.3 onwards, sections are particularly badly written – poor punctuation, grammar and writing style... There are some interesting ideas here, but they need editing. It is hard to follow. WSCC owes it to its electors to write in good, plain English. And by the way not everyone accepts the idea of 'natural capital' and 'natural services'. We do not all value everything in terms of monetary worth. The beauty and health of our natural environment is beyond price.

Policy M18: Public health and amenity - We believe that this policy rules out any hydrocarbon exploration or production, especially unconventional oil and gas. In point a), every item in our view risks unacceptable consequences to health and amenity when applied to oil and gas extraction. There are too many unknowns, and there have been too many cover-ups about the potential negative consequences of fracking. Who decides on what is an 'unacceptable impact'? Mineral extraction could cause all of these impacts on local communities - lighting and noise, dust and odours, vibration etc. Allowing hydrocarbon exploration and extraction in the face of overwhelming public objection would be an abuse of power. Re point b), in Balcombe a right of way was closed (across Vintens field and the railway line) and no suitable alternative was provided.

8.7.2 This is a ridiculously long sentence. Chop it up for clarity.

8.7.5 Yes, 'certain pollution control matters can also be material to the determination of minerals planning applications'. WSCC needs to take responsibility here, not just hope the other agencies are doing their job.

Policy M19: Flood risk management - This policy does not address the risks of flooding in the case of oil wells/pads. The wells themselves can be flooded, storage tanks for chemicals and flowback/produced water can be overturned or carried away, spilling their contents. Contaminants will include brine (very high total dissolved solids), drilling and fracking chemicals, hydrocarbons both gaseous and liquid, heavy metals, radioactive substances… all these pollutants might be set free in the environment by flood water. This happened in the recent floods along the eastern coast of Australia – tanks were washed away and shed their contents, a river bubbled with methane just 60 miles north of Sydney. Accidents happen. Especially in view of increased risk of flooding, drilling for hydrocarbons, most particularly unconventional hydrocarbons, is too great a risk to take in highly populated countryside of great agricultural importance – throughout West Sussex and especially in its protected areas.

8.8.4 Flood Assessments for sites is required when they measure one hectare or above. Exploratory sites are generally kept to below one hectare and therefore they avoid the need for Environmental Impact Assessments and, yes, Flood Assessments. This is typical of the lack of proper control and scrutiny of hydrocarbon sites at exploratory stage. Much can go wrong on a site of just under one hectare.

Policy M20: Transport - It is important that this policy should insist that developers provide true traffic statistics, with a proper count of HGVs. They should not, for example, as happened in Wisborough Green and Balcombe, be allowed to use definitions of HGVs that include estate cars. At Lower Stumble, planning officer Jane Moseley calculated the increase in HGV traffic as 'unlikely to exceed 10% for the bulk of the operation', but that was because she used the 1.5 tonnes definition, bigging up light delivery vans and estate cars as HGVs. She then used this calculation to support her conclusion that, 'The number of vehicles required to carry out the development is not significant enough to raise concerns regarding highway capacity or safety.' If the definition of HGV had been taken as 7.5 tonnes and over, the increase would have been significant and would have provided a reason for the councillors to reject the application. A 7.5 tonne definition of an HGV would also align with people's understanding. This is, after all, the size of vehicle that requires drivers to obtain a special HGV licence. Also, as explained above, we would not be happy if oil were transported by rail. Please Google 'bomb trains'. What are 'adequate transport links', what is 'unacceptable impact'? In whose eyes?

Policy M22: Cumulative impact - Note that the oil and gas industry, as outlined above, will want wells 'back to back' on industrial scale, potentially thousands across the Sussex Weald. Otherwise they will not be able to exploit their PEDL areas fully. This will most definitely create 'an unreasonable level of disturbance'. Thus, multiple wells should not be allowed, and the prospect of applications for and the refusal of multiple wells needs to be addressed at the very initial stages of planning. WSCC needs specific policy on this issue. The search for unconventional hydrocarbons risks industrialising the Sussex Weald. WSCC must make policy to address this hugely important issue.

Policy 8.12: Design and operation of mineral developments - 'will be permitted' suggests presumption in favour of developers. Consider whether the word 'enhance' is appropriate. With regard to hydrocarbons, point c) is contradictory. It should rule out fracking and acidisation. (i) Fracking in particular uses very large quantities of water that cannot be adequately treated and returned to the water cycle. This month, June 2016, a meeting is planned between industry, regulators and academics to discuss the dilemma of how to dispose of produced water and returned frack fluid, and how to do it while still making a profit. This liquid waste is very hard to treat. It seems probable that the waste will be injected into disposal wells (this would require a change in regulation) or diluted with other effluent (until levels of contaminants are legal) and dumped at sea. Our seas are polluted enough already. Drilling, fracking, processing and waste treatment are very energy-intensive. (ii) Fugitive methane is an as yet unresolved consequence of oil and gas drilling and typically more methane escapes from fracked wells. Methane is 85% worse than CO2 over the 20 years in which we need to tackle climate change. Exactly how much is lost in fracking operations is unsure, but as the volume of research builds up, the figures are rising. Only this month official complaints were made that much-cited industry-sponsored research in Austin, Texas used faulty measuring equipment and minimised figures for fugitive methane from fracking sites. These Austin Texas figures were used in evidence to councils in Lancashire and Yorkshire. The very fact that we are considering exploiting these hard-to-access unconventional hydrocarbons flies against the commitments we made in Paris to combat climate change. Recent climate/energy use modelling from UCL shows that we cannot afford to use fracked gas. The government is currently withholding

a report by the Committee on Climate Change that is expected to say the same. WSCC cannot have a policy of 'avoiding or at least minimising' greenhouse gas emissions and then agree to fracking. If WSCC can see that the central government has got it wrong, please have the courage to stand up to them. (iii) 'Minimise the use of non-renewable energy' – a lot of diesel goes into a frack and the whole operation surrounding it – and then the resulting methane gets used, burnt. WSCC cannot have this policy and allow fracking. 'Maximise the use of lower-carbon energy generation' – yes; please support wind farms, solar and tidal energy. 'Maximise the use of lower-carbon energy generation …including the recovery of energy from gas?' Gas produces less carbon dioxide than coal when burned, but all that fugitive methane makes it worse for the climate. Polls show that the public want renewables. The public voted this council into office, to represent them. The planning department is a servant of the council, not a slave of central government.

8.12.2 Consider the use of the word 'enhancement'.

Policy M24: Restoration and aftercare - 'will be permitted' suggests predetermination. (a) We explained above that restoration of oil sites is cosmetic. Beneath the ground fluids and gases may be migrating, and the bore hole itself will in time corrode and crumble. (b) What is high quality? 'Practicable' suggests that you may not demand such high standards if restoration proves difficult. In the context of hydrocarbons, WSCC fails to address the national debate about long-term legal responsibility for maintaining sites and dealing with contamination that emerges after abandonment. There has been discussion, for example, of requiring companies to take out bonds to cover restoration and future liability. Cuadrilla Balcombe is a typical little offshoot company that can, if times become hard, go bankrupt or, over time, disappear. (g) Out of sight, below the new green sward, who will know whether and whither fluids and gases are migrating? Beware cosmetic restoration of oil pads.

8.13.3 Why does the NPPF say that 'bonds and other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances?' We would contend that they should always be sought, and certainly in the case of hydrocarbon sites. Slavishly following the NPPF just because they said so could be considered irresponsible or negligent.

Policy M25: Community engagement - We would like this policy to say 'a site liaison group approved by the local communities and representing a wide variety of interests and opinion across the community'. The majority of Balcombe residents felt unrepresented by the members of the parish council who liaised with Cuadrilla. That said, in Balcombe we do not accept the presence of the oil and gas industry, and have therefore no need or desire to liaise with them on details of their plans.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

1.7.2 and 1.7.3 You are hoping to make 'minor changes only'. This has been the first opportunity for the public to respond. No doubt others have made a lot of new suggestions. We know you consulted previously with parish councils, but at the time of consultation some of us feel that the Balcombe parish council was not representative of the majority opinion of the village. We hope you will see the need to make more than minor changes.

4.3 Geology does not mention shale. Maybe shale is included in 'clays'? But given the importance of the current debate, it would be good to call this particular spade a spade.

4.10.2 We hope you appreciate the woolliness and lack of logic in the following: 'The use of energy minerals, such as burning of coal, oil or gas, in the UK is likely to result in impacts on the climate. National energy policy supports the use of energy minerals as part of the energy mix. Balancing the possible local impacts of exploration and extraction with the use of fossil fuels as supported by national policy is the responsibility of many organisations / agencies. The Joint Minerals Local Plan must be prepared in line with national policy and take account of local evidence.' WSCC can't be in favour of tackling climate change and also in favour of chasing new sources of hydrocarbons, such as fracked-for oil. According to DLCG, Online Planning Practice Guidance, March 2014, 'To be found sound, Local Plans will need to reflect this principle [addressing climate change] and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with: the provisions and objectives of the Climate Change Act 2008 and co-operate to deliver strategic priorities which include climate change.' The SDNP Partnership

Management Plan insists that exploitation of fossil fuels should be a 'last resort', given commitments to protect the climate. There is no mention of this in the Draft Joint Minerals Plan. It needs to be in there.

This draft plan does not adequately consider the issue of emissions to air from oil and gas installations. For example, sulphur dioxide even at low levels causes death of vegetation. Emissions to air including emissions from flares carry a cancer risk in the long term. This must be considered when contemplating a single well pad, and all the more so when contemplating an industrialised scenario of potentially hundreds of wells across the Sussex Weald.

The character of landscapes will be altered by flaring. This document should consider flares, particularly in the 'light' of the dark-skies protected region.

We question the use of the adjective 'sustainable' for mineral extraction. Mineral extraction cannot by its very nature be sustainable. In particular, the planet cannot be sustained if we continue to extract hydrocarbons. In our view, the policies as they stand in this draft plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

We question the need for and wisdom of obedience to government dictates on the subject of hydrocarbons when clearly the government is failing in its obligations on climate change. When central government acts immorally or illogically, it is down to the people and their immediate local representatives to tell central government that they are wrong. The UK has signed up to the recent Paris Climate Change Agreement. The objectives of the Paris Agreement must be reflected in this plan. The plan must show specifically how it supports the Paris Agreement.

The most fundamental needs for all forms of life are clean air, clean water and safe sources of food. The UK imports about 40% of the food it consumes and the proportion is rising. The projected increase in our population will place further pressures on food provision, and on our water supplies. Consequently this plan must prioritise clean air, clean water and the provision of safe food before any need for minerals. We cannot afford to lose any source of water and any source of food, nor increase air pollution. It is vital that farmland is retained and indeed expanded to increase UK food security. Any extraction of minerals close to water sources or farmland must be prohibited. Farmland must not be given up for mineral exploration and extraction.

The 'vision' action points should include the provision for and encouragement of renewable energy to avoid the adverse impacts of oil/gas mining on landscape, human and animal health, environment and climate.

On page 10 you state that, 'The purpose of the planning system is to operate in the public interest and provide a better quality of life for everyone, now and in the future.' The extraction of unconventional hydrocarbons cannot be allowed if that future is to exist.

Additional Comments

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01 - Organisation: Friends of the Earth (Response ID: 325 Respondent ID: 3973)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

1. There is insufficient recognition of the objectives and vision for the South Downs National Park.

2. There is also insufficient regard to the requirement to ensure that policies as a whole contribute to the mitigation and adaptation of climate change. In fact there is no mention of the reduction of greenhouse gas emissions or adaptation specifically in the vision, although it is partially picked up in the objectives.

3. The vision to "contribute to the supply of minerals…oil and gas, to support growth in West Sussex" is inconsistent with the later commitment to "contribute to a low carbon, circular economy". Oil and gas are fossil fuels, and their extraction (inevitably resulting in direct emissions through methane leakage or flaring, and consequent emissions through their use) must be considered in the context of the recent Paris Agreement and the latest scientific evidence on the impact of exploiting fossil fuels on global, national and local efforts to tackle climate change. The Committee on Climate Change (CCC) has acknowledged in a letter to the Secretary of State for Climate Change (28 January 2016) that the commitment in the Paris Agreement to hold the increase in global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit to 1.5°C goes "well beyond" the CCC's previous assumption. This therefore draws into question whether three distinct, but inter-related, aspects of the UK climate regime are still sufficiently ambitious: the fifth carbon budget advice, the 2050 target and the most appropriate target for the UK after 2050. In addition, CCC's recommendation for the Fifth Carbon Budget is that the Government should develop policy approaches consistent with reducing carbon intensity of the power generating sector to below 100gCO2/kWh in 2030. Gas-fired electricity, which typically emits between 350 - 450gCO2/kWh, would still be 3.5 – 4.5 times higher than this policy approach would permit.

4. The CCC have also warned, in a strongly-worded letter to the Department for Energy and Climate Change, that 'excessive use of unabated gas-fired capacity… would be incompatible with meeting legislated carbon budgets' and the Climate Change Act.[Reference: http://hmccc.s3.amazonaws.com/EMR%20letter%20-%20September%2012.pdf]

5. Peer-reviewed evidence suggests shale gas is more polluting than conventional gas, and could be more polluting than coal. [Reference: http://www.springerlink.com/content/c338g7j559580172/ and http://www.postcarbon.org/reports/PCI-Hughes-NETL-Cornell-Comparison.pdf]

6. Researchers in the US have concluded that "Compared to coal, the footprint of shale gas is at least 20% greater perhaps twice as great on the 20 year horizon and is comparable to coal over 100 years". [Reference: http://www.climateactionprogramme.org/news/shale_gas_worse_for_climate_than_coal/]

7. There is growing concern around the impact of methane leakage in the US. [Reference: http://www.ncwarn.org/2016/06/whistleblower-epa-official-covered-up-methane-leakage-problems/]

8. The Tyndall Centre at Manchester University conducted an assessment of the climate and environmental risks from shale gas and concluded that shale gas extraction poses 'significant risks to human health and the environment' and that there is no evidence to back-up industry claims that shale gas could be a transition route to a low carbon future. This concluded that "the CO2 emissions from burning shale gas are estimated to occupy a substantial proportion, over a quarter, of a budget associated with a better than 50:50 chance of avoiding 2°C warming" (page 69). Tyndall add that this figure is likely to be a conservative estimate as firstly, it only calculates carbon dioxide emissions from combustion (and so does not include for example the impact of fugitive methane emissions); and secondly it uses estimates of global shale gas reserves from the

US Energy Information Administration which do not include figures for Russia and Central Asia, the Middle East, South East Asia and Central Africa (page 68). Tyndall also assessed the potential impact of shale gas on meeting the UK's legally-binding climate change targets. They conclude that emissions from using the UK's potential shale gas reserves could represent up 14.5% of the total UK greenhouse gas budget for the period 2010 to 2050 (page 67). Again, this only includes carbon dioxide emissions from combustion, and so does not include the impact of fugitive methane emissions. [Reference: http://www.tyndall.ac.uk/shalegasreport]

9. The Inter-Governmental Panel on Climate Change (IPCC) recently confirmed that there are unprecedented levels of greenhouse gases in the atmosphere and that it is extremely likely (95-100%) that human influence has been the dominant cause of observed warming since the mid-20th century. It confirmed that there will be more frequent temperature extremes, heat waves will occur with a higher frequency for longer, and there will be more intense and frequent extreme rainfall, resulting in flooding.

10. There should be no assumption that hydrocarbons are needed without a proper assessment of the impacts of this assumption through the Strategic Environmental Assessment, and in terms of ensuring that cumulative climate change impacts are considered through planning control. We are concerned about the basis on which this assumption is made, as it does not seem to be reflected in the National Planning Policy Framework.

11. Recent statements by Government (see for example the Onshore Oil and Gas planning practice guidance (PPG) updated as online Planning Practice Guidance, DCLG, March 2014: http://planningguidance.planningportal.gov.uk/blog/guidance/minerals/planning-for-hydrocarbon-extraction/) and Written Ministerial Statement simply lack the evidential underpinning to provide an adequate local plan policy. In addition the Government clarified to Friends of the Earth that the WMS was merely the Governments' view. So far as legality is concerned, the oil and gas PPG is merely guidance, hence the planning authority is entitled to diverge from it where it has good reason to do so. Such reasons might include the extent to which its contents conflict with the authority's climate change obligations; and the lack of evidence underpinning assumptions made in the guidance (e.g. on energy security). In addition the recent announcements such as the cancellation of the CCS programme in autumn 2015 have promptly put out of date the previous Government plans around gas, as they were underpinned in terms of achieving climate change objectives by this commitment.

12. Given that Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive) applies to the minerals plan, the authority is required to consider reasonable alternatives under Article 5(1).

13. Section 39(2) of the Planning and Compulsory Purchase Act 2004 makes it a statutory duty to act with the objective of achieving sustainable development. Section 1(1) of the Climate Change Act 2008 provides that it is the duty of the Secretary of State to to ensure that the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline. Section 19(1A) of the Planning and Compulsory Purchase Act 2004 provides: "Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change."

14. These objectives are adumbrated throughout the NPPF. Achieving sustainable development is summarised at paragraphs 6 and 7 - and paragraph 151 of the NPPF re-states that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. A test of soundness for the plan is also whether it is in line with sustainable development policies.

15. An aspect of achieving sustainable development which the NPPF expressly alights upon is the objective to "mitigate and adapt to climate change including moving to a low carbon economy". At paragraph 94 the NPPF encourages the development of "proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations."

16. In addition we draw your attention to the conclusions of the Chat Moss Peat Works appeal, where the Secretary of State endorsed the reasoning of Inspector Alan Robinson to refuse an appeal in relation to the variation and extension of certain planning conditions. The Inspector had found that:

"960. In conclusion, it is not disputed that the continued extraction of peat from Chat Moss would release substantial amounts of CO2 into the atmosphere. I am not convinced by the appellant's argument that if extraction was not to take place at Chat Moss it would inevitably lead to peat extraction elsewhere that would

generate higher levels of emissions. This argument pays insufficient account of non peat media coming forward in the period that peat extraction is proposed on Chat Moss. Whilst the proposal is to restore the site eventually to lowland raised bog, which when established would have the potential to sequester carbon, there would be a lapse of time before this happens. There are other restoration options that are likely to result in the sequestration of carbon without the emission, in the short term, of CO2 from peat extraction, but this is a matter to be discussed later.

961. The loss of the carbon stored in the site through continued peat extraction and the difficulties that this would pose in meeting the challenge of climate change would be contrary to policies within the Development Plan which seek to minimise greenhouse gas emissions and to have regard to the need to minimise the impact of development on climate change. The pertinent Development Plan policies in this regard are SUDP ST14 and RSS DP1 and DP9. It would also be contrary to paragraph 93 of the Framework, which also seeks to reduce greenhouse gas emissions."

The Secretary of State commented that:

"17. The Secretary of State agrees with the Inspector's conclusion in IR961 that the loss of the carbon stored in the site through continued peat extraction and the difficulties that this would pose in meeting the challenge of climate change would be contrary to policies within the Development Plan which seek to minimise greenhouse gas emissions and to have regard to the need to minimise the impact of development on climate change. He further agrees with the Inspector that this would also be contrary to paragraph 93 of the Framework which also seeks to reduce greenhouse gas emissions (IR961)."

17. We therefore suggest that this Plan must consider climate change in more depth, and in particular in relation to developments that will have direct and indirect significant cumulative climate change emissions impacts.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

18. Friends of the Earth suggest that Section 2 of the plan's vision is amended as follows:

- The vision is amended to differentiate between conventional and unconventional oil and gas

- The vision specifically references the plan's duties to contribute to the mitigation and adaptation of climate change

19. Further the strategic objectives of the plan should be amended as follows:

- Strategic objective 1 should specifically mention the constraints in the plan area e.g. the National Park

- Strategic objective 7 should particularly seek to avoid impacts on health and amenity rather than only minimise them

- Strategic objective 10 should specifically invoke the precautionary principle in relation to groundwater (aquifers)

- Strategic objective 12 should delete the political view 'national commitment to maintain and enhance energy security in the UK' and replace with the legal duty 'recognising the obligations to tackle climate change'

- Strategic objective 14 should be amended to reflect the need to 'mitigate' i.e. reduce carbon emissions, rather than minimise, and include the wording "helping to shape places to secure radical reductions in greenhouse gas emissions and supporting the delivery of renewable and low carbon energy and associated infrastructure".

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Policy M7a: Hydrocarbon development not involving hydraulic fracturing

Policy M7b: Hydrocarbon development involving hydraulic fracturing

We object to the 'yes, if' approach taken in these policies. The exploitation of unconventional oil and gas are as described – unconventional. Only one well has been fracked in the UK at Preese Hall, and that resulted in a deformed well bore, the incorrect disposal of waste through a standard waste water treatment works, and earthquakes (as described by the report given to DECC) which led to a moratorium. It is a mistake to attempt to deal with a new and emerging technology as if the knowledge and experience are there to justify a standard policy.

Instead we suggest that a precautionary approach should be taken, which allows the local planning authority to ensure that in protecting its communities and putting forward a plan that is sound, its policies are evidence-based. As there is little evidence from the UK itself, the planning authority has either to rely on evidence from other countries such as the US and Australia, or to acknowledge that there is a great deal of uncertainty present in the decision-making processes around unconventional oil and gas, and to reword its policy accordingly.

In addition, we note the following issues. The licensing round did not take account of impacts such as wildlife which it was said would be dealt with by planning authorities. There are measures in the Infrastructure Act 2015 which are the responsibility of planning authorities.

Furthermore there can be no assumptions of the benefits of scale e.g. energy security (which are disputed anyway), instead policies should be firmly linked to evidence. Nor should the benefits at scale be taken into account when the disbenefits at scale have never been assessed or accounted for.

In our view the current policy is also incompatible with the requirements of the EIA Directive. The Institute of Environmental Assessment and Management (IEMA) in 2010 in its Principle Series (2010), on Climate change mitigation and EIA, advises that since greenhouse gas emissions are likely to have a cumulative and significant effect on other matters to be considered under the EIA Directive, then this is an issue that needs to be considered by decision-makers in order to minimise the impact on climate change. In our view, every decision matters when it comes to climate change mitigation.

We note that both tourism and farming sectors as illustrated by the unredacted DEFRA report 'Shale Gas and the rural economy' could be adversely affected by hydrocarbon exploration and production must be weighed in the balance of 'public interest'.

We therefore suggest the following amendments to both policies:

- Policy M7a explicitly puts in place a presumption against hydrocarbon development as being incompatible with the purposes of the national park, AONBs, SSSIs, SPZs.

- Both policies should read: “Proposals will be considered…” with deletion of the word ‘permitted’, this allows for the discretionary nature of planning decision-making.

- Both policies should explicitly state when development will not be permitted e.g. “development will not be permitted which would adversely affect the quality of ground water”.

- And on climate change “the proposals will make a positive contribution to the reduction in greenhouse gas emissions directly and indirectly”.

- Both policies must explicitly set out that the planning authority is required to be satisfied, by the provision of appropriate information that material social, economic and environmental impacts can be eliminated or reduced to acceptable levels.

- Assessment of proposals will take into account baseline environmental conditions and neighbouring land uses.

- Planning impacts identified by the community are fully addressed.

- In assessing proposals, health impact assessments will be sought.

- Where it cannot be demonstrated by the provision of appropriate information to the satisfaction of the minerals and waste planning authority that the impacts can be controlled to prevent unacceptable adverse impacts, the development will not be supported.

- It has been demonstrated beyond all reasonable scientific doubt that any risk of adverse impacts has been eliminated.

- Positive contributions will be expected to the existing local economy.

Policy M16: Water Resources

We are concerned that applications, particularly unconventional hydrocarbons, are likely to be opportunistic and speculative and therefore the plan policies should have rather more direction around where these may come forward.

Policy M18: Public Health and Amenity

We refer you to the following issues on health.

New York State Department of Health ‘Public Health Review of High Volume Hydraulic Fracturing for Shale Gas’ (December 2014), which concludes (taking a precautionary approach):

“As with most complex human activities in modern societies, absolute scientific certainty regarding the relative contributions of positive and negative impacts of HVHF on public health is unlikely to ever be attained. In this instance, however, the overall weight of the evidence from the cumulative body of information contained in this Public Health Review demonstrates that there are significant uncertainties about the kinds of adverse health outcomes that may be associated with HVHF, the likelihood of the occurrence of adverse health outcomes, and the effectiveness of some of the mitigation measures in reducing or preventing environmental impacts which could adversely affect public health. Until the science provides sufficient information to determine the level of risk to public health from HVHF to all New Yorkers and whether the risks can be adequately managed, DOH recommends that HVHF should not proceed in NYS.”

In addition, we draw your attention to the Medact report, which highlights the risk of cumulative impacts, on the basis that these are currently not properly understood, hence the need for a precautionary approach. Medact states in its report that:

“Outdoor air pollutants include volatile organic compounds, tropospheric ozone, and diesel particulate matter. Pollutants in ground and surface water include benzene, hydrocarbons, heavy metals and naturally occurring radioactive material. Occupational hazards at the well pad include airborne silica exposure. These various pollutants include carcinogens, mutagens, teratogens, respiratory irritants and neurological, endocrine and haematological disrupters/toxins. While some pollutants are known to have toxic and harmful properties, many have not been adequately studied while others have not been studied at all. Furthermore, while health-based safety standards for some chemicals and radioactive material have been established on the basis of sound empirical data, few of them take account of any ‘cocktail’ effects resulting from simultaneous exposure to multiple hazards.”

Planning practice guidance on health impacts (Ref: 53-003-20140306) points to the need to consider impacts on human health in development proposals. We would further suggest that there is a need to consider the impacts on health of anxiety and stress caused by applications for unconventional oil and gas.

Policy M22: Cumulative Impact

We recommend that 'cumulative and indirect impacts of extraction' should be added to the assessment of climate change mitigation and adaptation measures otherwise the policy fails to be in line with the Climate Change Act as the authority is required to incorporate environmental criteria for taking into account cumulative impacts under paragraph 143.

Policy M25: Community Engagement

Community engagement is not merely secured through a site liaison group. Any proposals should have to demonstrate how community concerns on planning impacts have been taken into account.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

We are concerned that the precautionary principles does not seem to be reflected accurately in the plan.

The application of the precautionary principle – for instance to groundwater - means that unless it can be proven that there will be no groundwater contamination a development should not go ahead.

The National Planning Policy Framework 2012 in its preamble lists the five principles of sustainable development as set out in the UK 2005 strategy – including using “sound science responsibly” which was further explained at the time of its publication to mean: “Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.”

Planning practice guidance for England also references the precautionary principle in relation to Environmental Impact Assessment: “the local planning authority must have regard to the amount of information available, the precautionary principle and the degree of uncertainty in relation to the environmental impact.”

The 1992 Rio Declaration on Environment and Development states that, “where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation”. The Interdepartmental Liaison Group on Risk Assessment (ILGRA), in its 2002 paper ‘The Precautionary Principle: Policy and Application’, made a number of important points including noting that the precautionary principle should be invoked when:

- there is good reason to believe that harmful effects may occur to human, animal or plant health, or to the environment; and

- the level of scientific uncertainty about the consequences or likelihood of the risk is such that best available scientific advice cannot assess the risk with sufficient confidence to inform decision-making.

There is evidence to support the proposition that unconventional oil and gas extraction in particular high volume hydraulic fracturing carries with it significant risks of groundwater contamination as for instance covered by the British Geological Society’s paper on this (Potential groundwater impact from exploitation of shale gas in the UK”, Stuart, 2012). This report concludes that “Groundwater may be potentially contaminated by extraction of shale gas both from the constituents of shale gas itself, from the formulation and deep injection of water containing a cocktail of additives used for hydraulic fracturing and from flowback water which may have a high content of saline formation water” (page 19). The BGS report further states that “There are examples of surface water contamination from releases of fracturing water or flowback water. Documented instances of groundwater contamination from the U.S. are all related to the leakage of methane into groundwater.” (page 20). It is therefore essential this is properly recognised in plan-making and development decisions.

The EU Water Framework Directive and environmental law provide for the precautionary principle to be considered in planning. In addition it is linked to the use of Environmental Impact Assessment.

A summary of the Water Framework Directive is as follows:

The case of groundwater is somewhat different. The presumption in relation to groundwater should broadly be that it should not be polluted at all. …But for general protection, we have taken another approach. It is essentially a precautionary one. It comprises a prohibition on direct discharges to groundwater, and (to cover indirect discharges) a requirement to monitor groundwater bodies so as to detect changes in chemical composition, and to reverse any anthropogenically induced upward pollution trend. Taken together, these should ensure the protection of groundwater from all contamination, according to the principle of minimum anthropogenic impact.

[Reference: Water Framework Directive: http://ec.europa.eu/environment/water/water-framework/info/intro_en.htm]

This approach is also reflected in the Groundwater Directive which prohibits the input of "hazardous substances" into groundwater. This should include methane which shale gas companies are drilling for as well as the other chemicals used in the unconventional hydraulic fracturing process.

Nor is there sufficient mention of the waste hierarchy and policy in relation to the significant production of polluted waste water created by hydraulic fracturing. This production of waste is most definitely contrary to the waste hierarchy. The planning authority must have an interest in the overall provision of waste treatment capacity as waste planning authority.

In an area of overall water scarcity and special watercourses this is where the precautionary principle arises.

We further raise the need to consider bonds for unconventional or novel technologies.

Additional Comments

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01 - Organisation: Gatwick Airport Ltd (Response ID: 90 Respondent ID: 1704)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Re: Draft West Sussex Joint Minerals Local Plan Consultation

Our Ref: LGW3195

Thank you for your email dated 14 April 2016, regarding the above mentioned document.

We are pleased to see section 8.10 covering aerodrome safeguarding. As you rightly point out, it is important that the birdstrike risk to the airport is not increased. Other elements that have the potential to impact on airport operations are the heights of buildings and other structures including cranes, lighting proposals, gas flaring, wind turbines etc

Policy M21 'Aerodrome Safeguarding' is important, in that it will ensure that no proposed minerals developments will adversely impact on the safety of the airport for which we thank you.

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01 - Organisation: Graffham Parish Council (Response ID: 104 Respondent ID: 3446)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

Graffham Parish Council is unable to comment on proposals for sites which are not in its locality.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

The following clauses in the plan lack positive direction and definition of clarity. In several instances the Policies conflict with each other.

Policy M1 – Sharp Sand and Gravel

Whilst under Policy M1 for Sharp Sand and Gravel, the SDNP and the adjoining Areas of Outstanding Natural Beauty have been excluded from carrying out mineral extraction, the wording of the plan has been framed to allow sites to be allocated in the future under "Exceptional circumstances"

There is no definition for “Exceptional Circumstances”. It leaves the door wide open for any commercial company to make a case for mineral extraction within the National Park on the grounds of overwhelming National Need.

Policy M2 Soft Sand

The Policy for extraction of Soft sand states again that no sites within the SDNP have been allocated for extraction and extensions of time and physical extensions to existing quarries will not be permitted, however the same over riding clause referring to exception circumstances has been included.

This places Heath End Quarry in a indeterminate situation as the Licence to allow sand excavation to continue ran out on 31st December 2013 and SDNP have issued stop orders which have been appealed by Dudman Group and work seems to have continued illegally until proved otherwise when the Appeal is heard and determined.

The new plan makes no reference to permitted methods of extraction and leaves it open to developers to select the most economic method which might well be detrimental to the local environment and stability of the excavations. A clause must be included in the plan, which prevents unauthorized and unapproved methods being used.

There are a number of agencies involved in the approval process none of whom take overall responsibility for controlling the excavations as the work proceeds. The present lack of control arises from hindsight inspections which may not pick up problems after they have occurred. It is nearly always impossible to correct pollution once it has been allowed to occur and excavation instability can lead to irrevocable damage to surrounding structures. It is important therefore for a methodology to be agreed before excavation work is commenced.

There must be one Authority responsible for controlling the works from start of the excavations to final reclamation of the site with full power to give instructions to prevent environmental damage and site instability.

The plan makes no provision for mandatory site monitoring by Local Parish Councils (Policy M25 allows for Groups to be set up by the Operator).. Heath End Quarry is a prime example of continuity provided by the Monitoring Committee ensuring that the works proceed in accordance with the approved planning permission. In the recent changes of planning control between the County Council and the National Park, the only continuity of control came from the Monitoring Committee. Unfortunately the present Operator (Dudman) refuses to attend meetings and takes no notice of instructions from SDNP to stop work. This makes nonsense of the whole planning process in its present form.

3.3.10 Onshore Hydrocarbons

Policy M7b Hydrocarbons Development involving hydraulic fracturing

This Policy again stipulates that fracking will not be allowed in National Parks or Areas of Outstanding Natural Beauty. However the same over riding clause would allow fracking in “Exceptional Circumstances”.

In sub clause (c) there is a reference to extending the wells horizontally to increase production over a wide area from each drilling site, but avoids giving rules for well construction and sealing to prevent leaks. This means that a drilling company can set up a drilling site just outside the Park Boundary and then drill horizontally under the Park, which literally undermines any protection which sub clause (a) is suppose to give by preventing drilling within the Park boundary.

In the Infrastructure Bill 2015 drilling horizontally from outside the so called “Protected Areas” will be allowed provided it is below 300m. Bearing in mind that the Sussex Weald under which most of the oil and gas deposits exist, the sedimentary overlying rock strata is heavily faulted and stratified making it very permeable to highly pressurized gas (methane). Once the methane gas is released from the shale by injecting pressurized water and chemicals into the methane /oil deposits, there would be nothing to prevent it percolating upwards into the aquifer. Pollution of the aquifer would destroy our water supplies and destruction of all the vegetation in the surrounding area.

The attached paper gives more detail and reasons for not allowing fracking to be carried out. Once pollution by escaping gasses commences there is no way of stopping it, as no amount of cement grout will seal off a leaking well.

To some extent Policy M16 Water Resources gives protection by allowing mineral development to take place providing it would not cause unacceptable risk to the quality of the water. As far as drinking water is concerned there must be no risk at all to the quality. In any case, risk assessment depends so much on the ability of the assessor and can easily be influenced by political and commercial interests.

Policy M7(a) Hydrocarbon development not involving hydraulic fracturing

This policy carries the same clauses of limitation, but also allows drilling under the Park from sites located outside the Park boundary.

Policy M24 Restoration and Aftercare

This Policy seems to cut across all the limitations provided for in Policies M1, M2 and M7 where SDNP and AONB are excluded in the first instance for permitted mineral extraction, by stating "Proposals for mineral extraction and temporary minerals infrastructure will be permitted" with provisions none of which exclude the Park and AONB from development.

Policy M25 Community Engagement

This Policy enables Parish Councils and local communities to be included in the monitoring and site liaison of minerals developments. Once again it is unlikely to be an effective policy because it states : "Proposals for mineral development will be permitted provided that, where necessary, a site liaison group is established by the operator to address issues arising from the operation of a minerals development or facility"

Again this clause seems to open the door to developers to extract minerals everywhere. In any case, it cannot be left to the whim of the developer whether or not to set up local monitoring groups. It must be the Minerals Authority, which is responsible for setting up and administering the liaison groups. It is obvious that SDNP have not learnt lessons from Dudman at Heath End where he refused to attend meetings with an already established group.

Recommendations for changes to the Plan

1) If full protection to the Park and the AONB is to be maintained then no drilling sites should be located within 5.5 miles of the protected areas. The distance of 4 miles is based on the assumption that the shale gas is located 8000 ft below ground and the horizontal part of the well extends 2 miles +1ml.zone of fracture from the drilling site with a gas distribution at 450 + 1ml.safety zone.

2) The references made in the plan to "exceptional circumstances" must be removed otherwise there will be no protection afforded to "protected areas"

3) The Monitoring Groups referred to in Policy M25 must be established by the Minerals Authority not by the Operator.

4) Policies M24 and M25 must be modified to prevent conflict with Policies M1, M2 and M7

5) The plan must provide for safeguarding sites against developers going into liquidation before site restoration has been completed. Increasing sums of money should be deposited with the Mineral Authority commensurate with the size of the development. The sums would be held and increased with inflation and only paid back to the developer as and when each stage of the restoration work has been completed.

6) The Plan must make it mandatory for a Methodology to be agreed before mineral extraction is allowed to commence.

7) There must be only one Agency responsible for controlling the extraction and reclamation of all mineral sites.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Recommendations for changes to the Plan

1) If full protection to the Park and the AONB is to be maintained then no drilling sites should be located within 5.5 miles of the protected areas. The distance of 4 miles is based on the assumption that the shale gas is located 8000 ft below ground and the horizontal part of the well extends 2 miles +1ml.zone of fracture from the drilling site with a gas distribution at 450 + 1ml.safety zone.

2) The references made in the plan to “exceptional circumstances” must be removed otherwise there will be no protection afforded to “protected areas”

3) The Monitoring Groups referred to in Policy M25 must be established by the Minerals Authority not by the Operator.

4) Policies M24 and M25 must be modified to prevent conflict with Policies M1, M2 and M7

5) The plan must provide for safeguarding sites against developers going into liquidation before site restoration has been completed. Increasing sums of money should be deposited with the Mineral Authority commensurate with the size of the development. The sums would be held and increased with inflation and only paid back to the developer as and when each stage of the restoration work has been completed.

6) The Plan must make it mandatory for a Methodology to be agreed before mineral extraction is allowed to commence.

7) There must be only one Agency responsible for controlling the extraction and reclamation of all mineral sites.

Additional Comments

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* * *

01 - Organisation: Hambrook and District Residents Association (Response ID: 143 Respondent ID: 3603)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(2 separate attachments attached submitted under response 135 also attached to this response)

Reference : Draft West Sussex Joint Minerals Local Plan (Regulation 18), April 2016

Mineral Sites Selection Report, April 2016

I have been chairman of Hambrook District Residents' Association (HDRA) for almost 2 years and a local Hambrook resident for 4 years. HDRA represents over 150 residences in the Hambrook, Chidham, Nutbourne and surrounding areas.

I attach comments on the above two reports prepared by one of our members, *…(redaction)..* I am writing on behalf of HDRA to express my strong support for *…(redaction)..* analyses and comments.

First, on the Draft West Sussex Joint Minerals Local Plan

Like *…(redaction)..*, I am very concerned about one particular aspect of the Draft Plan.

Paragraph 7.1.4 of the Draft Plan says: "Although the allocated sites are currently available for mineral uses during the Plan period, circumstances may change and they may not come forward as expected. Private sector businesses (and, therefore, commercial considerations) will determine whether extraction will actually take place. Therefore, the Plan allows, under the use-specific policies in the preceding chapter, for other sites that are acceptable in principle to come forward for mineral extraction. Such provision will provide additional flexibility and compensate for any allocated sites that do not come forward for minerals extraction. Accordingly, the fact that a site is not allocated in the Plan does not mean that a proposal for mineral extraction on an unallocated site will not get planning permission at some future date."

At the moment, the Hambrook sites are considered to be "acceptable in principle" in the Mineral Sites Selection Report (but see below).

Should Hanson submit a planning application, you might think that Policy M1 would be our first line of defence. This says:

"Policy M1: Sharp sand and gravel

Proposals for land won sharp sand and gravel extraction, including extensions of time and physical extensions to existing sites, will be permitted provided that:

(a) the proposal is needed to ensure that a landbank equivalent to at least seven years supply is maintained;"

The Draft Plan shows that the current landbank is equivalent to 35 years' supply, which is why no sites for sharp sand and gravel are allocated.

By defining the Hambrook sites as "acceptable in principle", the risk is that Hanson will take encouragement from paragraph 7.1.4 and submit a planning application in order to test the strength of condition (a) in Policy M1.

Condition (a) is not worded very clearly. The current landbank is equivalent to 35 years' supply, which is "at least seven years supply". Adding to the current landbank would add to the 35 years and there would continue to be "at least seven years supply".

There is some alignment here: the Hambrook sites, although not allocated in the Plan, are declared to be "acceptable in principle" in the MSS Report; the Plan says that exploitation is a commercial matter and that sites not allocated in the Plan could get planning permission; and the policy which is supposed to prevent planning permission being granted unless the landbank falls to below seven years' supply does no such thing.

The MSS Report suggests that the working of the Hambrook sites could take between 15 and 23 years, with a system of conveyor belts linking the sites with the processing site at Woodmancote permanently in place for that period. As it stands, the Draft Plan invites Hanson to make the prospect a horrifying reality. HDRA feel very strongly that the Draft Plan needs to be amended to safeguard against this possibility.

Secondly, The Mineral Sites Selection Report

The Mineral Sites Selection Report, published as background to the Draft Joint Minerals Local Plan, concludes that the sites forming the Hambrook Grouping are all "acceptable in principle". *…(redaction)..* has looked in detail at the assessments of the four sites – Common Road East, Common Road West, Funtington West and Slades Field. He concludes that:

- the four sites fail when tested against the Government Guidance, and the Vision, Guiding Principles, Strategic Objectives, and Development Management Policies in the Draft Plan;

- there are some very serious omissions from the report and many other errors and inconsistencies which tend, in general, to favour retention rather than rejection of the four sites;

- the overall conclusion that the four sites are 'acceptable in principle' is not supported by the assessment scores of the issues considered; and

- the full range of evidence properly considered as stated in the report provided by *…(redaction)..* indicates quite clearly that the sites are not acceptable.

I have met with *…(redaction)..* on a number of occasions to go through his findings. As Chairman of HDRA, I am particularly concerned about the almost complete absence of any consideration of the impacts on properties in the vicinity of the workings, both from the workings and the lorries, and on residences and businesses in Hambrook and Nutbourne from the lorries. Based on the thorough assessment carried out by *…(redaction)..*, HDRA agree that the four sites should be declared unsuitable and therefore rejected.

I am a Quality Specialist for a Pharmaceutical Company and my role includes writing technical documentation and approving protocols, quality risk assessments and change control documents submitted by others to meet regulatory requirements. The technical content of the MSS Report should have been checked by a senior officer but, based on the document provided, clearly this hasn't happened. The serious omissions in the MSS Report suggest to me that the report has been written to favour retention of the sites. I also fear that the people involved in carrying out the assessment and approving its content have not made themselves familiar with the sites geographically as a visit to the sites would have made the local impacts obvious.

HDRA would like to see the report reworked to ensure that it presents a full and balanced assessment and this should be done as a matter of urgency to deter the operator from pointlessly seeking to progress these sites.

Of course, had the Local Aggregate Assessment been done correctly at the start of the process in late 2013, instead of late in 2015, there would have been no need to call for gravel sites to be nominated and no need to prepare and publish the Mineral Sites Study. The unnecessary work carried out to create the MSS has also meant that a great deal of unnecessary documentation has been created. It is an impossible task for most residents to plough through the vast amount of material to assess whether they wanted to make comments. *…(redaction)..* has worked diligently through some, but not all, of the layers of documentation provided. I have looked at all the documentation I am able to in the time available to me and I am in agreement with *…(redaction)..* findings.

* * *

01 - Organisation: Hampshire County Council (Response ID: 272 Respondent ID: 4044)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Policy M2 Soft Sand

Hampshire County Council (HCC) is a Minerals Planning Authority and neighbours West Sussex. HCC has a Hampshire Minerals and Waste Plan (adopted October 2013) which allocates sites and makes provision for a steady and proportionate supply of aggregates until 2030.

Much like West Sussex, considerable areas of Hampshire are covered by National Parks or Areas of Outstanding Natural Beauty, bringing with them constraints to the site selection process and the task to provide sufficient aggregates locally. Therefore, HCC fully understands the careful balance that must be struck

between protecting designated areas and meeting the aggregate supply need in accordance with national planning policy.

HCC notes that policy M2 would lead to an underprovision of around 3 million tonnes of soft sand during the West Sussex Mineral Plan period. The justification centres around the location of most soft sand resources (within the South Downs National Park (SDNP)) and the ability to import soft sand from other areas, including Hampshire.

The Hampshire Minerals and Waste plan contains a similar underprovision (2.91mt of sharp sand and gravel and 0.16mt soft sand), however the shortfall is to be met through unplanned opportunities within Hampshire, including extensions to sites, new sites, borrow pits and safeguarded resources that may become available through development. The safeguarded resource at Whitehill-Bordon is one such opportunity that may contribute to Hampshire's needs for soft sand.

HCC also notes that the Frith End and Kingsley quarries are the sites located in Hampshire that the draft West Sussex Minerals Plan (through the West Sussex Minerals Site Selection Report) considers as viable sources of imported minerals. However, as noted in the Report these sites are a source of silica sand, protected under national planning policy principles regarding silica sand. Furthermore, even at the time of preparing the Hampshire Minerals and Waste Plan, these sites did not have the nationally prescribed 10 year landbank. Finally, both quarries are near the SDNP.

The above leads HCC to believe that there is little scope to cover the soft sand shortfall in West Sussex through imports from Hampshire, as any increase in imports to West Sussex would likely lead to proportional reduction in resources available to Hampshire. This would in turn deplete the provisions made in the Hampshire Minerals and Waste Plan faster than anticipated, leading to an increased shortfall of soft sand in Hampshire, a resource identified as scarce in Hampshire.

Further provision of soft sand from Hampshire would therefore either be unfeasible or require further sites, which are likely to put further pressure on the designated areas within Hampshire, including the SDNP.

HCC would also like to stress that a key factor in striking the balance between aggregate extraction and protecting designated areas is the particular nature of soft sand extraction. This includes:

- the reduced ability to source soft sand from alternate sources (such as recycled aggregate or marine-won material);
- the distinctiveness of each site, with very differing impacts depending on local circumstances; and
- its temporary nature, with considerable opportunities for restoration either to the previous state of the site or leading to improvements in biodiversity, amenity etc.

HCC therefore recommends, in view of the constraints in Hampshire listed above, that WSCC gives further consideration to other additional potential sources of soft sand provision beyond those currently listed to help address any shortfall in soft sand provision in West Sussex.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

01 - Organisation: Hassocks Parish Council (Response ID: 336 Respondent ID: 3895)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

In response to the DRAFT WEST SUSSEX JOINT MINERALS LOCAL PLAN CONSULTATION I am writing to advise you that this document was considered by the Hassocks Neighbourhood Plan Working Group and the Hassocks Parish Council Planning Committee.

It was ratified at the Full Council Meeting held on 14 June 2016 where it was resolved that Hassocks Parish Council supports the DRAFT WEST SUSSEX JOINT MINERALS PLAN.

Please let me know if you require any further information on this matter.

* * *

01 - Organisation: High Weald AONB Unit (Response ID: 158 Respondent ID: 3763)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

High Weald AONB Unit Response to the West Sussex and South Downs National Park Minerals Local Plan – Regulation 18 Consultation

Thank you for consulting the High Weald AONB Unit on your draft plan. I would make the following comments:

2.2 Vision

The Vision for the Minerals Local Plan is set out in nine small paragraphs or bullets on page 15 of the Plan. These place great emphasis on the need to protect the South Downs National Park, which is understandable given that the National Park Authority is co-author of the Plan. However, the Areas of Outstanding Natural Beauty hold equal weight to National Parks in the NPPF and Section 85 of the Countryside and Rights of Way Act 2000 requires public bodies and statutory undertakers to have regard to the purpose of conserving and enhancing the natural beauty of AONBs in making decisions that affect it. The vision should reflect this, particularly:

- Amend the first paragraph to "Will be a place where minerals are produced in ways which conserve and enhance the beautiful outdoors of West Sussex, in particular the special qualities of the South Downs National Park and Areas of Outstanding Natural Beauty, for the benefit or current and future generations";

- Amend the last sentence of the ninth paragraph to "Restored sites will increase opportunities for recreation and responsible tourism and for habitat creation within the South Downs National Park and the Areas of Outstanding Natural Beauty, recognising the purposes of the SDNP and the objectives of the AONB Management Plans".

Policy M7a: Hydrocarbon development not involving hydraulic Fracturing

It is noted that this policy supports such development subject to criteria, including that "the site is located outside the South Downs National Park, High Weald AONB or Chichester Harbour AONB unless it has been demonstrated that there are exceptional circumstances and that it is in the public interest, and in accordance with Policy M13". This approach is supported subject to the suggested changes to M13 set out below.

Policy M7b: Hydrocarbon development involving hydraulic fracturing

It is noted that this policy supports such development provided that any surface development is located outside of protected areas including the High Weald AONB. It does however state "Proposals for exploration, appraisal and production of oil and gas, involving hydraulic fracturing, will be permitted underneath or in close proximity to the South Downs National Park, AONBs, Source Protection Zone 1 and Sites of Special

Scientific Interest, which demonstrate that special care will be taken to avoid harming the setting and/or special qualities and/or value of these designated areas". This approach is supported subject to the suggested changes to M13 set out below.

Policy M11: Strategic Minerals Site Allocations

b) Extension to West Hoathly Brickworks

The extension of the clay workings into adjacent fields will have an adverse impact on the landscape which is wholly within the High Weald Area of Outstanding Natural Beauty. Great care will need to be taken to avoid damaging key characteristics of the AONB such as historic field boundaries (especially that between the new and old workings) and adjacent ancient woodland. The road infrastructure surrounding the site is predominantly historic routeways that are ill-suited to heavy goods vehicle traffic. The extension of the life of the clay workings will also extend the amount of time that these roads are subjected to this traffic, potentially resulting in highway works which are out of character with the High Weald.

The restoration scheme proposed for the existing and proposed working is critical to mitigate the impact of the proposal in the longer term.

The type of restoration scheme will also impact on traffic generation as a full restoration to original levels is likely to require the importation of material to fill the void created by the clay extraction. The High Weald AONB Unit would wish to be involved in any discussions about the exact form of restoration at the appropriate time.

Policy M13: Protected Landscape

This policy currently just repeats national policy in a slightly different way which is confusing. It should be made more locally distinctive by referring to the purposes of the National Park and the objectives of the AONB management plans. It should also acknowledge that development outside but close to the boundary of designated areas can also affect these purposes and objectives. It is recommended that this is amended to:

“Proposals for major mineral development within protected landscapes will not be permitted except in exceptional circumstances and where it can be demonstrated they are in the public interest in accordance with paragraphs 116 and 144 of the National Planning Policy Framework.

All minerals development within or impacting on protected landscapes should take account of the purposes of the SDNP and the objectives of the AONB Management Plans”.

I hope these comments are helpful. Please let me know if you wish to discuss any of these matters.

* * *

01 - Organisation: Highways England (Response ID: 198 Respondent ID: 3786)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

West Sussex Joint Minerals Local Plan Consultation update

Thank you for inviting Highways England to comment on the West Sussex Joint Minerals Local Plan Consultation update.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network.

Within the document there are a number of references to the Highways Agency which no longer exists as an organisation. Please change any reference within the document from Highways Agency to Highways England. I noted two occurrence's one at para 4.8.3 and the other in the table contained at para 8.9.9. There may be other references to Highways Agency and therefore suggest that word search is used to correct all such references.

We have no further comments.

* * *

01 - Organisation: Historic England (Response ID: 209 Respondent ID: 3077)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Draft West Sussex Joint Minerals Local Plan Consultation

Thank you for your email of 14 April 2016 inviting comments on the above document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process and welcomes the opportunity to comment upon this key planning document.

Please note that all references to "English Heritage" in the document should now be to Historic England (except where historic publications are referred to).

We are able to offer the following comments on the content of the draft Minerals Plan and they are as follows:

We are encouraged by the inclusion of a strategic objective for the historic environment (Strategic Objective 9), particularly because the minerals safeguarding areas for a number of mineral types cover a broad area of West Sussex and there are considerable designated and undesignated heritage assets including buildings, landscapes, conservation areas and archaeology as examples. It would also be beneficial, however, to include an expanded reference to the protection of the historic environment within Section 2.2 Vision of the Plan (p 15) to reinforce this recognition of the importance of the historic environment in the county.

We welcome a clause within Policy M4 relating to the use of chalk for the repair of historic buildings. We suggest that inclusion of such a statement regarding repair (as against restoration) would also be appropriate to other mineral types, notably Stone (Policy M6), and potentially Clay for brick-making (Policy M5).

We would also seek more explicit recognition of the importance of minerals for local building stone/roofing materials to local vernacular building types and local distinctiveness, and would request reference to English Heritage's Strategic Stone Study.

We would also request specific text relating to archaeology as this will be a key consideration in the context of this Plan. We would recommend that an assessment is carried out to understand the archaeological value of any sites identified for new or extended mineral workings in advance of development, and that assessments and carried out by appropriately qualified archaeological professionals.

We would welcome additional detail provided in Policy 7a (iii) and &b (iii) and would recommend that the wording is modified to refer specifically to designated and undesignated heritage assets and their settings.

We support the reference in para 6.9.10 to the safeguarding of sites for winning local stone for historic building repair. This could be extended additionally to the preceding section (Brick Clay, para 6.9.9) which is a distinctive part of the built heritage of the sub-region in relation to both bricks and roof tiles. We are unclear as to why this sentiment is not reflected in the associated safeguarding policy, Policy M9.

We support a reference to the prior archaeological assessment of the safeguarded sites at Ham Farm, Steyning and West Hoathly Brickworks within Section 11, Safeguarding Minerals Site Allocations. We do, however, consider that additional detail within Policy M11 (not just in the justification text) is required to expand upon what this will mean.

We welcome Policy M13 on Protected Landscapes. Additionally, reference could be made here to the Historic Landscape Characterisation Study and some information included about key considerations from this study that will need to be taken account of in particular areas.

Policy M14: Historic Environment is worded in such a way that it may actually undermine what it clearly intends to achieve; i.e. the preservation and enhancement of the heritage assets of West Sussex. We suggest that wording of this policy is tightened up and made more explicit in its intention (rather than being hedged about as presently drafted) in order to better reflect NPPF advice (ref. Section 13, para 143 sixth bullet), and so that it more

clearly reflects the justification text that follow it.

We support Policy M23, is so far that it is relevant to the historic environment, but it should include specific reference to heritage assets and their setting (e.g. by including them in bullet (b) (iii)).

We support Policy M24: Restoration and After Care but we consider that the wording is too general and specific reference should be made to opportunities to enhance historic landscape character and heritage assets and their settings through the restoration of mineral sites.

We would welcome reference in the Plan to the following guidance documents:

Minerals Extraction and the Historic Environment (2008) –
http://www.englishheritage.org.uk/publications/mineral-extraction-and-historic-environment/

Minerals Extraction and Archaeology: A Practice Guide (2008) -
http://www.englishheritage.org.uk/publications/mineral-extraction-and-archaeology/

Historic England would strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the Minerals Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment.

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

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01 - Organisation: Horncroft (Landowner) (represented by MPG) (Response ID: 152 Respondent ID: 826)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Paragraph 1.2.1 notes that "Minerals are essential to our way of life. They have been used to create the towns and villages in which we live and are present in the products we consume. Minerals found in West Sussex are needed to ensure that we continue to enjoy a good standard of living and are key to our prosperity".

However, the Vision in paragraph 2.2 states that West Sussex "Will be a place which seeks to meet its own needs for minerals while aspiring to source more and more minerals from alternatives to extraction of indigenous resources …". This is seeking to place additional mineral extraction in other parts of the Country. This runs counter to mineral supply and certainly for nationally important minerals which can only be found in very limited areas of the UK.

Paragraph 2.3.1 says "the County Council must ensure that a steady and adequate supply of minerals is achieved in order to meet market demand …..". Market demand is not local demand.

Strategic Objective 1 is to: "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".This suggests again that the Mineral Plan will only have regard to market demand in the Plan area and not wider (including national) considerations which are of particular relevance for industrial minerals including silica sand.

Strategic Objective 6 is to: To safeguard potential economically viable mineral resources from sterilisation.

This is welcomed. However, while the Vision and paragraph 6.9.7 indicate that silica sand will be safeguarded. There is no mention of silica sand in Policy M9.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Clarity on the objectives for mineral supply in the wider national context (in accordance with Government guidance) and whether the Vision and Strategic Objectives, as drafted, apply correctly to perceived local (West Sussex) requirements - even for the supply of nationally important minerals.

Clarity and certainty on the proposed safeguarding of silica sand. The Plan is not positively prepared in relation to silica sand and silica sand supply.

B2. Mineral Site Allocations

B2.1 Name of site

Horncroft (SDNPA) (M/CH/11)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Please see attached: - Appendix B2.3

Appendix B2.3

B 2.3 Please detail any comments you have about the site and the development principles:

In the “Call-for-Sites” exercise West Sussex County Council (WSCC) and South Downs National Park (SDNP) officers have been supplied with a wealth of geological and supplementary evidence on Horncroft site that proves, beyond any doubt, the presence of an exceptionally high-grade silica sand deposit of strategic national importance.

Paragraph 6.3.1 of the consultation draft says “Silica sand (also called ‘industrial sand’) is found in very few parts of the United Kingdom, it is an industrial mineral resource of national importance”.

Paragraph 6.3.3 says “…. At present, evidence shows that adequate provision for silica sand is being made nationally and there is no requirement for West Sussex to meet any identified shortfall elsewhere”.

This statement runs completely counter to the findings of the SDNP and WSCC own commissioned report (Soft Sand and Silica Sand Study (2015)). This study recognises that supply of high quality silica sand for glass making is progressively diminishing with two of the four know UK-wide resource areas having landbanks below the minimum levels required by Government (page 2 of the 2015 Soft Sand and Silica Sand Study report). The study also notes (on page 2) that the Folkestone Formation should be considered as a strategic resource (our underlining). The report goes on to say on page 2 that “ … alternatives [for glass sand manufacture and sodium silicate manufacture] … in other parts of the country are becoming increasingly scarce, and there will be a need to consider the role which the South Downs area may need to play in maintaining a long-term, strategic, continuity of supply of these materials.”

The foregoing evidence indicates that the conclusions of paragraph 6.3.3 cannot be substantiated.

The information provided of co-operation with other Mineral Planning Authorities shows no proper evidence in relation to the national supply and realistic availability of silica sand. The information merely indicates that selected Mineral Planning Authorities are undertaking Mineral Plan reviews to seek to provide silica sand.

Even if other Mineral Planning Authorities with silica sand resources are seeking to provide for silica sand supply in the Plan period, this does not mean that there is sufficient supply. This may be due, for example, to the use of ‘Areas of Search’ by the Mineral Planning Authorities. In Areas of Search there is no certainty that mineral of suitable quality exists; no certainty that a mineral operator/developer will come forward to investigate or develop the site; and no certainly of landowner support. Areas of Search are a crude and hugely uncertain tool in seeking to satisfy future silica sand requirements.

Norfolk County Council (NCC) responded to SDNP officers under the Duty to Co-Operate on 2nd October 2015. NCC noted in answer to Question 1 that the landbank for silica sand at 31/12/2014 was under 5 years. No new applications have been lodged and consequently no new permissions have been granted since that date. This is below NPPF requirements.

NCC is currently undertaking a Single Issue Review of Silica Sand to attempt to address the shortfall in planned silica sand allocations.

In answer to Question 4, NCC state that “There are significant resources of silica sand within Norfolk and it should be possible for suitable sites to come forward”. We do not concur with this view. The existence of the outcrop of the Lower Greensand (as mapped by the British Geological Survey) is no indication that economic resources of silica sand exist and certainly no indication of suitable quality for glass manufacture.

In answer to Question 5, NCC state that “ ….qualities of the silica sand in Norfolk are scarce and not found widely in other silica sand resources …….. And that there are currently sufficient resources to continue to supply silica sand in Norfolk”. This is a contradictory sentence. There is no indication or evidence that there are sufficient resources to continue to supply silica sand in Norfolk. Also, since NCC is currently conducting a single issue silica sand review (as required by the Planning Inspector) there would appear to be insufficient resources to last until the end of the current adopted Norfolk Mineral Plan period (Dec 2026). This silica sand provision is below NPPF requirements.

Surrey County Council (SCC) responded to SDNP officers under the Duty to Co-Operate on 21st September 2015. SCC noted in answer to Question 1 that from “… the results of the AM2014 Survey …… the landbank for silica sand in Surrey based on sales recorded in 2014 is between 5 and 10 years”. No new applications have been lodged and, consequently, no new permissions have been granted since that date. This silica sand provision is also below NPPF

requirements.

King's Lynn Quarry in Norfolk and North Park/Pendell Quarry in Surrey are the only two sites in England currently producing sand of suitable quality for clear glass manufacture (bottles and jars, windows and windscreens). In addition, North Park Quarry is the only site in the UK producing sand of suitable quality for sodium silicate manufacture.

Given the real shortage of future silica sand provision in England, we are of the firm view that the Horncroft site should properly be allocated as a Specific Site in accordance with SDNP option SS1. This option is one of a selection presented by SDNP to other Mineral Planning Authorities during correspondence in relation to the Duty to Co-operate in 2015 and 2016. Option SS1 calls for the identification of "… specific sites for silica sand to serve and identified need". The replies from both Norfolk County Council and Surrey County Council (the two English Local Authority areas from where all silica sand for clear glass and

sodium silicate manufacture is presently sourced) make clear that neither Local Authority has sufficient silica sand to satisfy NPPF requirements, or in the case of Norfolk County Council, even to the end of the Mineral Plan period in 2026.

SCC note in their correspondence dated 21st September 2015 that " … In Surrey, the AONB has not prevented us from identifying suitable sites and bringing these forward for development …."

In addition the same SCC correspondence says "Our existing sites at North Park Quarry and land North East of Pendell Farm are both partly within the AONB" ….. "In terms of the allocation of Pendell Farm, the key development requirements stated in the Surrey Minerals Plan require any application to demonstrate the public interest in working the land within the Surrey Hills AONB, assess visual impact and impacts on landscape character and features of

the area giving particular attention to the potential effect on the natural beauty, local character and distinctiveness of the Surrey Hills AONB". The Pendell site is now permitted and operational until end 2020.

We are of the view that the Horncroft site can satisfy the five criteria for allocated sites provided in paragraph 7.1.6 of the draft consultation document. In addition, with appropriate design and mitigation the Horncroft site, containing as it does an exceptionally high quality silica sand resource, can satisfy the relevant draft policies and criteria.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The Allocation of the Horncroft site on the basis of the existence of a proven silica sand resource of exceptionally consistent and high quality. The site is required due to a national need for silica sand and the site can be designed, mitigated and delivered to comply with the draft Plan policies.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Please see attached: - Appendix B3

B3.1 Do you support the 'mineral specific' policies set out in Section 6 of the Plan?

NO

Policy M9 makes no reference to silica sand and it should do so, taking into consideration that the Vision and paragraph 6.9.7 indicate that silica sand will be safeguarded.

Policy M11 should include the Horncroft site for the reasons given in answer to Question B2.3. In addition an Exceptional Circumstances Test (dated 8th June 2016) is provided to WSCC and SDNP planning officers in support of the Horncroft site.

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

NO

We strongly object to the entry in the "Implementation and Monitoring" table after paragraph 8.3.9. The entry says "No trend/targets identified, as it is not expected that unacceptable proposals will progress to planning applications or be permitted". This refers to the "Number of applications refused in the AONBs and SDNP …". This entry strongly suggests that proposals for mineral workings in SDNP are being pre-judged even at this stage – and being pre-judged as being unacceptable1. This is not positively prepared and potentially makes the Plan unsound. (footnote 1 - Disenfranchising potential applicants)

B3.3 Please detail any comments you have about the 'mineral specific' (Section 6) and 'development management' policies (Section 8) of the plan, clearly labelling which Policies you are commenting on. If you have answered 'no' to questions 3.1 and or 3.2 above, please explain why and set out any changes you would like to see to the Plan in the space below. Please use additional paper if needed and refer to the relevant question and policy numbers in the left hand column.

Policy M9 to make reference to silica sand (as explained above in answer to Question 3.1)

Policy M11 should include the Horncroft site (as explained above in answer to Question 3.1)

It would appear from the Mineral Sites Selection Report (published in April 2016) and the RAG Score for Horncroft (page 156) that:-

" The site contains reserves of soft/silica sand which could be worked as a new site.

The site has a dual score for landscape because it has a medium-high landscape sensitivity on the western side (and therefore a red/amber score) and a high sensitivity along eastern side of the site (and therefore a red score). For this reason it is prudent for the site to be included for technical assessment."

In relation to Policy M12 (Character) - we have considered the landscape implications of the proposed Horncroft allocation as if it were at planning application stage and are confident that silica sand extraction operations can be appropriately mitigated in landscape terms both from the east and the west.

Implementation and Monitoring (on page 84) to be positively prepared with respect to proposals made with AONBs and SDNP (as explained above in answer to Question 3.1). The contents of the Table on page 84 runs counter to the principles of 'presumption in favour' and 'applications to be considered on their merits'.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

See Appendix B2.3

See Appendix B3

See Exceptional Circumstances Test regarding:

- Chapter 2 (2.3.3 & Strategic Objective 4)

- Chapter 5

- Chapter 6

- Chapter 7

Additional Comments

(Additional information)

HORNCROFT, BARLAVINGTON ESTATE

EXCEPTIONAL CIRCUMSTANCES TEST

1.0 Consideration of NPPF Para 115

“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 conservation of wildlife and cultural heritage are important

considerations in all these areas, and should be given great weight in National Parks and the Broads”

1.0.1 Protection of landscape and scenic beauty and the conservation of wildlife and cultural heritage are clearly very important considerations in a National

Park. Therefore, any development proposal within a National Park must have the highest regard for the reasons for the reasons for designation and associated conservation objectives.

1.0.2 The Horncroft site contains an exceptional resource of the highest quality silica sand to be found in the UK and if the site is to be developed great

weight will rightly be given to all conservation objectives. Preliminary indications of development options are discussed under consideration of

NPPF paragraph116 below.

1.1 Consideration of NPPF Para 116

“Consideration of such applications (e.g. The Horncroft Site) should include an assessment of:

• the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the

local economy;”

1.1.1 Minerals can only be worked where they exist and where the quality is such that saleable products can be produced to satisfy customer requirements. In the case of the proven silica sand resource at Horncroft, West Sussex (South Downs National Park - SDNP) this deposit is located on the Cretaceous Lower

Greensand outcrop.

1.1.2 Silica sand is a specialist mineral used in the manufacture of a wide range of essential products for diverse end uses including glass containers (clear and coloured bottles and jars); float (flat/sheet) glass (windows, automotive windscreens); insulating materials; foundry sand; ceramics; water filtration;

sports, leisure and horticultural sands as well as food preservative (sodium silicate) etc.

1.1.3 In England, the Cretaceous Lower Greensand geological horizon (present at the Horncroft site) is known to contain high quality silica sand in only discrete places although the majority of the horizon outcrop does not contain mineral of suitable quality for specialist end uses due to natural geological variations such as excess iron, chromium etc. It is extremely rare for silica sand deposits to have such low levels of impurities and such even distribution as at the Horncroft site.

1.1.4 Silica sand is recognised as a mineral of national strategic importance by Central Government in the National Planning Policy Framework (NPPF). The

British Geological Survey Factsheet on Silica Sand (2009) also provides an overview of the mineral; extraction methods; processing; markets; supply and

UK resources of this specialist mineral.

1.1.5 Reserves and resources of silica sand are extremely limited in the UK, with only four quarries capable of supplying sand for the manufacture of clear

glass products, only two of which are in England. Silica sand reserves are already in short supply with less than the minimum required stock of permitted

reserves in England (10 years per site as required by the NPPF paragraph 146). In order for the UK glass industry to be supplied even in the near

term, further resources need to be identified, allocated and permitted in the coming years and well before 2033.

1.1.6 The deposit at Horncroft has been drilled and the geological samples analysed in detail. The deposit is of exceptionally high quality and will be

suitable for a wide range of end use applications including glass manufacture (clear containers and sheet glass); insulation materials (fibre glass); and

sodium silicate manufacture. The sand will also be suitable for water filtration and a range of sports and leisure uses (including drainage, football pitches,

golf course and equestrian uses). These latter end uses would be derived as ancillary co-products of the production of primary glass grades.

1.1.7 Analytical results show a very high quality deposit of silica/industrial sand at Horncroft. The sand here in the area is up to 25 metres thick which makes it one of the thickest deposits of high purity silica sands in the UK.

1.1.8 Typical analysis of the Horncroft silica sand shows a very good natural grading distribution throughout the whole deposit. The chemical analysis

indicates a very high purity sand, with in excess of 99% SiO2 and very low amounts of other constituents. After processing the SiO2 content is raised to

in excess of 99.5%. Typical iron oxide levels are as low as around 0.030% to 0.035% making the sand ideally suited for clear glass manufacture (hand

blown art glassware, float glass and containers – bottles and jars). Not only is the deposit of exceptional quality but it is remarkable for its consistency both

horizontally and vertically to an extent not evident at any other current operational site or known silica sand resource in the UK.

1.1.9 Of particular interest is the potential for the future use of the Horncroft sand in sodium silicate manufacture. In the UK, only sand from the Lower Greensand of south and south-east England can be used for sodium silicate manufacture due to the very low alumina content of these sands (which is required for sodium silicate) which is not recorded in any other known UK silica sand deposit. There is now only one UK quarry currently extracting glass sand

quality sand from the Lower Greensand in the south and south-east of England (Note: - Coates Pit, adjacent to the proposed Horncroft site, contains

silica sand to an appropriate specification for the manufacture of sodium silicate. However, the site has a restricted access and requires a 'ROMP'

review in order to become operational).

1.1.10 Sodium silicate (water glass) is used in a very wide range of end uses including detergents, sealants, adhesives, water treatment, refractories, fire

protection and food preservation. For use in foodstuffs very stringent specifications must be adhered to. The very high silicon dioxide (SiO2) content of the Horncroft sand means extremely low content of other elements. This will make the Horncroft sand suitable for the most stringent sodium

silicate food preservation uses.

1.1.11 The impact of permitting the Horncroft deposit for extraction will form the assessment of any application which comes forward at the site. The impacts

should be viewed in the local and national context in relation to need of the special mineral present (a mineral of national importance) – and in relation to

the impact on the site itself and its surroundings together with any appropriate and agreed mitigation proposals.

1.1.12 In relation to the local economy, permitting the site would result in local employment on the site. This would constitute employees for the mineral

excavation and possibly local employees for the transport of the mineral from the site. Local employment will also involve a range of contractors including

landscaping, fencing, woodland management, land management, earthworks and monitoring. Estate employment may also result directly from the permitting of the site, not only including some aspects noted above but also potentially in specialist hand-blown glass making on the Estate using the local

sand from the Horncroft site the viability of which will be thoroughly investigated and reported in any future planning application.

1.1.13 In relation to the wider economy, the exceptionally high quality of the sand at Horncroft is such that the site, if permitted, would undoubtedly become a nationally important satellite site for silica sand for clear glass manufacture (float and containers), sand for sodium silicate manufacture as well as other

high-end industrial applications.

1.1.14 If the site was not allocated as a "Preferred site" and consequently was refused planning permission, there would be no local employment, no site

related transport employment and the effective sterilisation of a proven high quality silica sand resource suitable for contributing to the UK indigenous

supply for many years. A lack of supply of glass sand in the UK can only result in either increasing imports of silica sand (to the detriment of the national

balance of payments) and/or the cessation of some glass manufacture in the UK and its relocation abroad. These scenarios are significant future possible

outcomes for the UK silica sand industry and the UK glass manufacturing industry that, we consider, weigh in favour of the Horncroft site being allocated

as a 'Preferred Area' for future extraction.

1.1.15 As per Paragraph 14 of the NPPF, no development can be approved unless it can be considered sustainable'. Sustainability principles include equal

consideration of economic, social and environmental aspects at a local and national level. It is clear that the high quality mineral resource present at the

Horncroft site is of national importance and the potential local effects (positive and negative) will need to be balanced against national considerations.

1.1.16 WSCC Draft Minerals Local Plan Policy M13 (C) (ii) states:

"Proposals for major mineral development within protected landscapes will not be permitted unless there are exceptional circumstances and

that it is in the public interest as informed by an assessment of:

• the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way…"

1.1.17 Specifically for the production of sodium silicate there is no other known future silica sand deposit of suitable quality in the UK due to required alumina

content. There is therefore no scope for developing elsewhere outside the outcrop of parts of the Cretaceous Lower Greensand in the south and

south-east of England. In terms of sand for glass manufacture, there are only two sites (North Park Quarry, Surrey and King's Lynn, Norfolk) in

England suitable for supplying the manufacture of clear glass and in each the reserves (permitted) at these sites are limited to less than 10 years. Opportunities to develop resources elsewhere in the UK are extremely limited due to the high quality of sand required and will be further limited in the very

near future as the present sites become worked out.

1.1.18 The demand for many of the end uses of specialist silica sand cannot be met in other ways. Sodium silicate manufacture requires specific high quality sand and there is no alternative constituent possible in the process. The use of recycled glass is at levels, which currently are not likely to be increased for

technical reasons, and there is a low level of recycling of sheet glass for practical reasons of recovering glass from buildings etc. The use of recycled

glass (cullet) actually increases the demand for even higher quality new sand to enhance the cullet quality (as an essential additive), making the Horncroft

site even more critical to UK glass supply in the near future. There is no known future alternative to sand for the manufacture of sodium silicate.

1.1.19 Minerals can only be worked where they are found. In addition, they must be present in sufficient quantities and be of the required quality'. Given that

the presence of clear glass grade silica sand is so scarce in the UK it is perhaps inevitable that, since resources in non-designated areas will have

been developed already, further resources may well be found in, or close to, designated land. Indeed, a nationally important supply of silica sand is

currently supplied from within an Area of Outstanding Natural Beauty in Surrey. (Ref: North Park Quarry, Bletchingley).

1.1.20 An 'alternative' to consider is to source raw material from outside the UK. This raises a debate about whether the UK should advocate exporting potential environmental impacts and effects and then rely on imports of raw materials or import finished products with attendant environmental impacts of transport and other costs (financial and environmental). As noted above, a lack of supply of glass quality sand in the UK will result in either increasing imports of sand and/or the cessation of some glass manufacture in the UK and its relocation abroad. This would undoubtedly be a real and significant challenge for the wide range of affected "upstream" and "downstream" industries in the UK.

1.1.21 WSCC Draft Minerals Local Plan Policy M13 (C) (iii) states:

"Proposals for major mineral development within protected landscapes will not be permitted unless there are exceptional circumstances and

that it is in the public interest as informed by an assessment of:

• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."

1.1.22 The environmental effects of developing the Horncroft site will be addressed in any planning application which may come forward. However, to support a Mineral Local Plan allocation in the first instance the type of development and development options can be subject to an overview assessment.

1.1.23 A National Park constitutes the highest designation for landscape and any proposed development within such and area must be carefully considered and sensitively designed. The few silica sand operations in the UK require specific processing capability (in order to ensure consistent products to individual

customer requirements) and these must be delivered to specification on a day to day basis.

1.1.24 The processing facilities at existing silica sand sites tend to be large in area due to the need for: raw material handling; several processing steps in one or more buildings; product stockpiling; blending; drying; transport loading (road and rail); water supply and water circuit management; tailings (silt and clay) treatment and handling etc.

1.1.25 For Horncroft, such a development footprint could potentially be seen as incompatible with the setting within a National Park. In order to reduce effects

to a minimum any development must consider the options for minimising:

• visual and landscape impact throughout the life of the site;

• the development footprint;

• the access and transportation effects;

• noise and dust generation;

• open areas during silica sand extraction by undertaking progressive restoration throughout the life of the site;

1.1.26 The Horncroft site is well screened from distant views due to its topographic location and with well-designed advance planting the proposed access point to the highway can also be adequately screened. Potential near views from the west have also benefited from advance planting. The site is located in a

commercial coniferous woodland with non-coniferous trees on the western boundary. Longer range views have been initially assessed and further work

will enable the design of appropriate development phasing and progressive restoration incorporating existing natural screening.

1.1.27 Due to the exceptional consistency of the sand quality at Horncroft, it is clear that only small areas of the site need to be open at any one time, allowing for “tight” phased extraction and restoration. Consistent raw sand will be able to be sourced on a day-by-day basis from a small area, thereby minimising the overall operational area at any one time.

1.1.28 A processing facility on the Horncroft site could possibly be regarded by some as a significant impact and so the proposal, at this stage, is for there to be no on-site processing. The raw (as-dug) sand could therefore be loaded directly into lorries within the site for direct transportation to existing

processing facilities some 40 miles away at North Park Quarry, in Surrey. In this way the on-site activities could be restricted to storing soils, the

undertaking of restoration works for a few weeks per year and daily loading of lorries within the actual phased working.

1.1.29 The proposed transport route from the site would be southbound only on the B2138 to join the strategic highway network at the A29 approximately 1mile from the site.

1.1.30 The restoration landform of the site and opportunities for after-uses would need to be determined as part of any planning application / environmental

assessment when precise material volumes would be fully understood and appropriate final landform options considered as a result.. Examples of uses

of the restored site could be envisaged as containing, for example:

• designed habitats for Sand Martins;

• appropriate flora habitats;

• heathland particularly to benefit the Field Cricket;

• geological exposures;

• facilitating appropriate access etc.

2.0 CONCLUSION

2.0.1 The recently discovered, but now geologically proven Horncroft silica sand deposit is clearly a new significant national resource for the UK glass and

sodium silicate manufacturing industries.

2.0.2 The resource is without doubt able to pass the 'exceptional circumstances’ test subject to appropriate mitigation incorporated into any draft concept of

extraction and progressive restoration. Since silica sand is a mineral of national importance and one which is in very short supply throughout the country then it must be in the public interest for the Horncroft site to be developed to contribute to national supply.

2.0.3 Paragraph 15 of the NPPF makes clear that policies of local plans should follow the approach of the presumption in favour of sustainable development.

2.0.4 To achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning

system (NPPF paragraph 8).

2.0.5 Pursuing sustainable development involves …… "making it easier for jobs to be created in ….. towns and villages"; "moving …. to achieving net gains for

nature" (NPPF paragraph 9).

2.0.6 Sustainable development is about "… positive growth, making economic, environmental and social progress for this and future generations" (NPPF –

Ministerial Foreword).

2.0.7 The Horncroft site can deliver on these aims within a framework of a robust adopted local plan. The site can play an economic role by providing local

employment not only in the operation of the site over many years, but in site establishment; on-going maintenance and progressive restoration. Local

employment and business opportunities will flow from the development itself, thereby addressing both the economic and social pillars of the NPPF.

2.0.8 The environmental pillar would be addressed by site design throughout the life of the development. The Horncroft site, which is the subject of a proposed site allocation for silica sand is, for the most part, non-deciduous woodland. Opportunities exist during design and operational phases to deliver a more ecologically diverse site (such as heathland) complementing nearby land uses and improving biodiversity.

2.0.9 By well-planned design the Horncroft site can satisfy the key requirements of the NPPF.

2.0.10 The site which is the subject of the proposed allocation in the mineral plan is very well screened from distant and local viewpoints. Careful design of

phasing, progressive restoration and access at the time of a planning application can mitigate any identified adverse effects on landscape and

visual amenity.

2.0.11 The mineral resource identified at the site is of clear importance in a national context and with an appropriate scale of development and an appropriate scale of transportation, the site can be designed and worked in such a way that the resource can be developed sustainably. The Horncroft site is able to pass the 'exceptional circumstances' test subject to appropriate mitigation being incorporated into the evolving extraction and progressive restoration

schemes.

(Horncroft, SDNPA, M/CH/11 Minerals Sites Study site boundary included in email submission)

* * *

01 - Organisation: Horncroft Farm (Landowner) (Response ID: 144 Respondent ID: 3087)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Yes, see below:

We are greatly encouraged by the joint WSCC & SDNP's stance on not allowing any new minerals sites to be dug in the South Downs National Park and strongly endorse this to become policy. We strongly support this objective and its recognition of the SDNP's unique landscape, its beauty and tranquility. Any new minerals sites within the National Park will irrecoverably scar the National Park and drastically damage the enjoyment of many locals and tourists alike.

We welcome the decision that the MPA plans not to allocate any new sites within the Park for minerals extraction and bridge the gap by allocating one soft sand site outside the Park and import the rest from neighboring counties and re-focus on the increased production and use of recycled aggregates and glass. We welcome this approach of a 'managed retreat' from extracting minerals from within the National Park and to only make provision for a declining amount of extraction within the SDNP over the plan period in recognition of the outstanding beauty, tranquility, unique landscape and un-spoilt public amenity that constitutes the South Downs National Park and its reasons for designation as a National Park.

We strongly endorse the strategic objective to protect the SDNP by only providing for silica sand from within it in exceptional circumstances and when it is proven to be in the public interest.

Any small positive effect on local employment from new minerals sites will surely be outweighed by the consequential serious negative impact on local employment and business' from the loss of tourism, recreational visitors and locals use of the National Park as a consequence of Minerals extraction scaring this unique, beautiful and irreplaceable landscape and public amenity for many, many years.

We would like to congratulate the SDNP authority in recognizing the extremely high value of this unique landscape and amenity that the SDNP provides that would be lost if new minerals sites were to be allocated within the National Park within the minerals plan.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Draft Minerals Plan:

2.3.3- Soft and Silica sand - Agreed but, existing and new sites should be assessed as to their capacity for the production of high grade industrial Silica sand which should be prioritized, if present, over soft sand end uses and the sale of this high grade industrial silica sand should be guaranteed for industrial non-aggregate end use.

Strategic Objective 4:

We also strongly endorse the strategic objective to protect the SDNP by only providing for silica sand from within it in proven* exceptional circumstances and when it is proven* to be in the public interest. * Proven should be added to the plan.

2.3.14 Mitigation and restoration. Agreed, but more consideration and weight should be given to the length of time any restoration would take effect. Sites should not be considered without a phased restoration plan (not after workings have been finished) and consideration of the negative impacts of the long term periods before any restoration can have effect, and the subsequent loss of public amenity in the National Park in particular before restoration can have any effect.

3.3.9. Silica Sand:

Please see attached report by GWP and also our further comments about Silica Sand below.

3.3.9. Silica Sand: New soft sand sites, should first be assessed as to their capacity for the production of industrial high grade silica sand which should be prioritized over soft sand end uses, the sale of this high grade silica sand, for non-aggregate industrial end use should be guaranteed and the sale of silica sand for aggregate end use should be forbidden. Assessment of sites, and prioritization of silica sand sites outside the National Park in West Sussex should take place before the consideration of any new silica sand sites within the National Park.

Any new silica sand sites should only be considered within the National Park if the applicant can prove exceptional circumstances and when it is proven to be in the public interest.

Any new silica sand sites should only be considered within the National park if the applicant can guarantee that all the high grade silica sand present at the site will be sold as a nonaggregate high end industrial end product and that this information will be made available to be examined in public.

4.2.6. Economic Activity and Minerals

Agreed, but more consideration of the long period that new sites can be active for and therefore the long periods of time that restoration can take to have any positive effect should be given weight within any new applications.

B2. Mineral Site Allocations

B2.1 Name of site

Horncroft (SDNPA) (M/CH/11)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Horncroft Sandpit site (Silica Sand): Mineral Sites Selection Report April 2016.

The welcome exclusion of the Horncroft site from the list of potential sites is in keeping with the decisive rejection of the site (in a smaller version) by an inspector for the West Sussex Minerals Local Plan in 1999 and again by the County Council in 2005 in considering options for the West Sussex Minerals Development Plan.

On both these previous occasions the landscape effects of the use of Horncroft for minerals extraction was considered unacceptable.

In his 1999 report the inquiry inspector stated:

"…Not only are the surroundings rural, they are remote, which is part of the attraction of this part of the AONB. Consequently, I consider that the harm to the landscape if mineral workings were to take place at the proposed site would be serious and, in addition, the commercial activity would damage the enjoyment of the area for people who come to appreciate the remote and tranquil character of the AONB. There may well be a need for identification of more sand in the Plan but the need would have to be far greater for me to recommend this site for inclusion under Policy 34."

In 2005, in the Council's "Issues and Options Consultation Paper" (November 2005) the site was rejected as a possible extraction site on the basis that it is "Not acceptable in principle due to landscape impact".

Horncroft is manifestly still a site of beauty, remoteness and tranquility but unlike in 1999 and 2005, it is now within a National Park.

This strengthens further the case that it ought not to be a site considered appropriate for minerals extraction and should quite rightly be removed from the list of sites for consideration.

We congratulate the SDNP and WSCC in recognizing this by excluding the Horncroft site during the technical assessment stage of the Minerals Site selection report 2016 which should be adopted within the new Minerals Plan.

However, we believe that Horncroft should have been excluded at the Desk Based Assessment stage 4 or earlier.

It is unclear from the available site information what is actually now being proposed at Horncroft which appears to be something quite different and larger (in volume) from what has been previously proposed in the 2010 withdrawn application.

We would like to point out that the technical assessments of the Horncroft sand site seem to have been mainly based on the withdrawn 2010 application that relates to a very different site to what is now being proposed. The Horncroft site is now being promoted as a far larger (in volume) silica sand site. The Horncroft site would require a large on-site processing plant that has not been adequately addressed within the Minerals Site Selection report 2016.

Our GWP (attached) report suggests that an onsite processing plant at Horncroft will be required;

"Sand will need processing in a similar manner to that at North Park Quarry in Surrey where the processing plant and stockpiles occupy an area of 6.1ha (excluding water treatment pond), introducing a range of environmental impacts that would be challenging in such a sensitive and tranquil location. This would be a significant industrial development."

When the Barlavington Estate applied for permission to extract minerals at Horncroft in 2010/11 (subsequently withdrawn), there were not only several hundred objections and general condemnation of the application from individuals and local residents but also objections from our local MP Nick Herbert, Bury Parish Council, Sutton & Barlavington Parish Council, Fittleworth Parish Council, Coldwaltham PC, Bignor Parish Council, Chichester District Council, The Fittleworth Society, Campaign for the protection of Rural England, The Woodland Trust, Natural England, The South Downs Society, English Heritage and many, many others.

The Horncroft site is now being promoted as a silica sand site and the site owners and operators will, I am sure, be arguing the case for the importance of new minerals extraction sites within the National Park and the scarcity of silica sand and its National Importance. We would welcome the opportunity to engage and consult on any new information that they provide during the consultation period and to have any site-specific technical information made publically available. Any new claims and information should be made publically available so we can commission our own professional reports to verify their claims.

The site owners and operators claims about silica sand, information that remains "commercially confidential", needs to be made publically available to ascertain independently whether any silica sand is viable to extract, what the main end product would be, and whether this would be the majority of the sand present at Horncroft and the methods that will be used to process the silica sand on-site.

This information would be of great importance as Barlavington Estate's previous track record of miscalculating quantities of sand at Horncroft does not add weight to its present claims and much of this vital information is deemed commercially confidential and therefore cannot be investigated properly in public.

Potential yield at Horncroft is now stated as being 2-4mt. When the Barlavington Estate applied for planning permission in 2010, a substantial error was made by the applicants as to the potential yield of the site. This was pointed out by our minerals experts GWP at the time, and as a result the applicant modified the projected yield for soft sand and gravel to approximately 1.43 mt.

That, however, was for a site that was for a substantially larger area than that now appearing in the MSS. All of this points to 2-4 mt being a very vague estimate of yield at Horncroft. Which needs to be clarified in more detail for the site list.

Silica Sand at Horncroft.

We are enclosing a newly commissioned 2016 review of evidence for a nationally important silica sand resource at Horncroft by GWP consultants.

Barlavington Estate now claims that the Horncroft site contains 90% Silica Sand within the 2-4Mt and that the silica sand present has a 99% silica content. But this cannot be verified, as this information is not available to be examined in public due to "commercial confidentiality". This should be made publically available and substantiated.

Confidential, 'cherry picked', pre-washed samples from Horncroft were provided by the developers for the Cuesta Soft Sand and Silica Sand Study 2016. They have no "provenance", are unverifiable and should

therefore be disregarded until made fully available to be independently substantiated and examined within the public domain.

The information regarding where the sampling method, geology and variability of the sand samples are derived from have not been provided. Other than giving an indication of one of the limits of a range of sand quality, these samples should be considered insufficient information to support claims of a “nationally important silica sand resource” at Horncroft (see GWP review conclusions)

Why, if the resources at Horncroft are so rare and important, would there be a need for commercial confidentiality?

Our experts; GWP, suggest, that if the site at Horncroft does indeed contain a high percentage of Silica sand, a site of this type would need to be a much, much larger, major industrial development than that is now being promoted and may need to include on site processing, separating, screening and washing. Indeed, the site may need to function as 24-hour operation on site as suggested within The British Geological Society’s Factsheet On Silica Sand:

Extract:

“Planning issues

• Amenity of processing plants—the processing of silica sand is often complex and generally requires a high level of capital investment. In many cases processing plants operate on a continuous (24 hours) basis, which means that the siting of such plants has to take account of the impact on local residential amenity;”

https://www.bgs.ac.uk/downloads/directDownload.cfm?id=1369&noexcl=true&t=Silica%20sand

Consequentially, this may mean a much larger negative impact on the local environment, public health, increased noise & dust and larger numbers of HGV (possibly 24 hour) movements, that are currently being suggested for the Horncroft site.

Until recently two sites were producing chemical and clear glass grade Silica sand from the Folkestone Formation

Similar Silica sand sites at Hanson at Reigate (now closed) used a chemical process to clean the impurities from the sand – potentially very polluting. Sibelco, the potential site operator at Horncroft, use a magnetic separation technique at their North Park site near Oxted. The latter would be several million pounds worth of processing plant requiring a good-sized reserve of suitable material.

Sibelco have permission to work their extension to the North Park site until 2022 and may be looking for alternative locations to follow on. Horncroft may be one of several sites that they are considering. If Sibelco are looking at the Horncroft site for potential glass and chemical sand then it is reasonable to assume that they would need a similar plant area and would probably need to be thinking of the longer term and the potential extension of this site.

Quite clearly the currently promoted, Sibelco operated, Horncroft site area is not accounting for a probably much larger scale processing operation and processing machinery that would be needed for viable silica sand extraction and processing at Horncroft.

Map: North Park Farm plant area (Sibelco operated) from non-technical assessment 2007 overlay onto Horncroft site area. (GWP) HORN14A1605-DG03 plant: (Map enclosed by email and letter)

If the silica sand within the National Park is of such high value and permission subsequently granted the operators and developers should be forced to guarantee the end use of the silica sand, to be sold only for silica sand “non-aggregate” industrial end use products.

The “strategic” use of silica sand classification by developers for planning purposes does not mean that the silica sand end product that silica sand classification was intended for will be guaranteed, at present. If permission were to be granted for any new silica sand sites within the National Park, guarantees should be put in place that the main end product is being used for its intended non-aggregate industrial end use, this should be a guarantee not just “discouragement” of aggregate end use of a valuable resource. This should be adopted within the new Minerals Plan.

Possible designation of a reserve as silica sand (and potentially therefore a greater likelihood of planning permission), but subsequent extraction and sale for lower grade purposes, may either constitute a circumvention of proper planning control or misuse of a valuable resource.

Operators and developers should be forced to guarantee the end use of the silica sand, to be sold only for silica sand “non-aggregate” industrial end use products. Information should be publically available, in advance, as to what the end use of silica sand at these sites would be and any by-products. Especially when a proposed site is within the National Park.

It would be unreasonable to allow the National Park to be dug up in favour of a main silica sand end product that would be sold for equestrian, aesthetic sporting recreational end products.

Similar silica sand is obviously present throughout the Folkstone Beds as well as elsewhere in the country. High-grade silica sand from sites outside the National Park should be utilized first before any new silica sand sites are allocated within the SDNP. This sand should be used to supply silica sand non-aggregate industrial end products rather than aggregate sand.

The 2012 Capita Symonds Soft sand study for the SDNP 2012 concludes that:

. In the case of specialist ‘silica’ sand, the specification requirements (though generally rather vague) are more exacting in terms of limiting the opportunities for substitution. The primary use of these specialist sands is for horticultural and sports (particularly equestrian) applications, where the primary qualities are the high silica content, rounded grains and pale colour. It is therefore unlikely that the existing source of silica sand within the study area (at and around Kingsley in Hampshire) could be substituted by sands from elsewhere in the study area, although more detailed analysis of soft sands from other sources would be needed to confirm this. It is also the case that specialist sands command higher prices and thus tend to travel greater distances to areas of demand. For this reason, and notwithstanding the relative scarcity of these materials, alternative supply sources further afield may well be able to substitute for those produced within the study area.

. There may also be possibilities of finding further reserves in the areas already permitted around Kingsley and Frith End (in areas outside the Park). Significant parts of the resource outcrop within these areas lies outside the National Park boundary and there may thus be scope for this area substituting for existing sources in both this part of Hampshire and neighboring parts of West Sussex. Subject to more detailed analysis, some of these areas might be suitable for providing specialist silica sand as well as more general building sand. The Whitecliff Sand Member to the north east of Southampton and Fareham may offer the best alternative to resources within the National Park in the more immediate future, particularly given the proximity to the rail network which might be looked at for its potential to supply the resources from here to parts of West Sussex.

The Cuesta Soft sand and Silica sand study 2016:Concludes that:

7. 6.8 It can be seen from Figure 6.1 that the majority of resource outcrops and silica sand quarries fall outside the National Parks and Areas of Outstanding Natural Beauty (AONBs). The exceptions are Weatherhill Quarry, which lies entirely within the North Pennines AONB; the dormant Blubberhouses Quarry, which falls within the Nidderdale AONB; some of the resources to the north of the Leziate sites, which overlap with the Norfolk Coast AONB; part of the northern edge of the resources in Kent which, along with Addington East Quarry, fall within the Kent Downs AONB; and part of the northern edge of the resources in Surrey, which extend slightly into the Surrey Hills AONB.

Summary

8. 6.32 This brief review has confirmed that there are alternatives to the Folkestone Formation resources of the South Downs National Park, at least with regard to the relatively low purity applications relating to agricultural, horticultural and leisure end-uses. These include limited geological resources in certain parts of the country, which, for the most part fall outside nationally designated landscapes. In some (but not all) applications, the alternatives include the additional option of utilising recycled glass.

9. 6.34 Whilst additional silica sand resources have been identified by the BGS in these and other areas, and whilst many of the resources fall outside nationally designated landscapes, it should not be assumed that they are entirely unconstrained or capable of being developed. It is beyond the scope of this study to examine each of the alternative sources in any detail, not least because of the confidentiality of technical data relating to both existing sites and areas of exploration for future development.

10. 7.3 This study has demonstrated the high potential for specialist silica sands, of varying characteristics, to be produced from much if not all of the Folkestone Formation within, and adjacent to, the National Park. Although alternative sources of supply do exist in other areas, they are gradually being depleted and there will inevitably be increasing pressure on the National Park for the release of new reserves. For the time being, it will at least be necessary to safeguard those resources, in anticipation of a likely future demand for their exploitation within suitable locations.

11. 7.2 It is too early to confirm whether any of the individual sites that have been examined in this study are likely to justify strategic status but (as noted earlier) the proposed site at Horncroft has been described (in the report by OTB Engineering, 2014), as being of 'national importance', on the basis of its apparent suitability for glass and sodium silicate production. It is not unreasonable to assume that at least some other parts of the Folkestone Formation within this area will also prove to be of similar, strategic significance, for the same reasons. This will apply most especially to sites which prove to be capable of supplying high purity sands for glass-making and/or sodium silicate manufacture, but it could also apply to other sites which are capable of supplying a wide range of other end-uses – not least because of the rapid growth and increasing diversity of new markets, and the relatively limited distance of economically viable transportation for such materials, which effectively limits the number of alternative supply sources.

However, Our 2016 Review of Evidence for a Nationally Important Silica Sand Resource at Horncroft by GWP Consultants concludes that:

" Geological information available to GWP does not support the assertation by Barlavington Estate and their agents that there is a nationally important resource of high grade silica sand at Horncroft or in the immediate area. Borehole logs provided with the 2010 planning applications indicate that most of the sand that could be excavated from the site identified within the Site Selection Report would not be identified as 'silica sand'. If recent investigations at Horncroft have shown otherwise, evidence should be released to support their claim.

Identification of a potential resource combines an assessment of both the quality and quantity available. Given that investigations have been carried out, the Barlavington Estate seem very reticent about releasing information and this leads to the suspicion that data presented has been 'cherry picked'.

And our GWP consultants report states (at GWP 5.2.1):

"In section 3.32 of the Cuesta silica sand report the requirements for silica sand for Na-silicate (sodium silicate) manufacture <0.05%Fe_2O_3 and <0.1% Al_2O_3. This is in agreement with information obtained by GWP from industry sources in 2010. Unfortunately Table 5.1 of the Cuesta report identifies different and erroneous requirements and therefore mistakenly concludes that on the basis of iron content, the Folkstone Formation in the study area is generally suitable in its natural state for sodium silicate manufacture. This is clearly not the case, and if not corrected could lead to misinformation about the value of the sand."

The Capita Symonds Soft sand study and The Cuesta Soft sand and Silica sand study conclude that: Soft sand and Silica sand material may well be available from other sources without the need to release sites within in the National Park. It is also noted that the manufacturers of high end glass that the Horncroft silica sand is purported to contain and be used for, are based in Cheshire, Liverpool and Yorkshire which would mean (according to the Cuesta report 11.72 " the relatively limited distance of economically viable transportation for such materials, which effectively limits the number of alternative supply sources") that extraction at Horncroft, if this sand is present, could be economically in-viable in any case.

Alternative supplies of Silica Sand: From Outside the National Park:

The idea that the silica sand reserves at Horncroft or at other sites within the National Park is nationally unique and of such special "national importance", (as claimed by OTB Engineering within The Cuesta Soft Sand and Silica Sand Study 2016) must be questioned when there are plentiful supplies of high quality Silica sand in other parts of the UK and in particular large resources in Scotland that are outside any National Parks that are closer, both in distance and journey times by road, to the to the specialist glass manufacturers based in Cheshire and Yorkshire.

The Cuesta Soft Sand and Silica Sand Study 2016 fails to mention the substantial silica sand resources in Scotland at all.

The: "Silica sand: Geology and mineral planning factsheets for Scotland" states that (Extract from http://www.gov.scot/resource/doc/178913/0050918.pdf):):

“Supply: Scotland accounts for about 10% of UK silica sand supply with an estimated output of 473 000 tonnes in 2004, of which some 70% was glass sand (Figure 1). This is small compared with the total production of construction sand in Scotland (about 4.2 mil- lion tonnes in 2004). Recent data for silica sand sales in Scotland are confidential but the total appears to have been in the range 400 000 – 500 000 t/y (Figure 2). With significant permitted reserves and unworked resources, Scotland may become of increasing importance as a source of silica sand for UK industry in the future.

Reserves: In mineral planning, the term ‘reserves’ or ‘mineral reserves’ refers to material that has a valid planning permission for mineral extraction. Permitted reserves of silica sand include a wide range of different qualities, many of which are not inter- changeable in use. No systematic survey of permitted reserves of silica sand in Scotland has been under- taken. However, permitted reserves within the Passage Formation of Central Scotland are of the order of 18 million tonnes, although this figure includes a range of qualities. At the Lochaline Mine permitted reserves and unconsented resources are reported to be some 40 million tonnes.”

Indeed, the “British Geology Silica Sand Fact sheets: 2009” States that (Extract from:

https://www.bgs.ac.uk/downloads/directDownload.cfm?id=1369&noexcl=true&t=Silica%20sand)

“Supply: In comparison to the production of construction sand (about 42Mt in the UK in 2007) silica sand output is relatively small (about 5Mt in the UK in 2007). Peak production of silica sand in Great Britain was some 6.3 million tonnes in the mid-1970s, but following a decline in the early 1980s production steadied to between 4 and 5Mt/y for a number of years (Figure 2). Of total output in 2007, just under 90% was produced in England, with most of the remainder from Scotland. However, with significant identified resources, Scotland may become of increasing importance as a source of silica sand for UK industry in the future.

Consumption

The UK is essentially self-sufficient in silica sand with a total consumption of about 5 million tonnes. Imports are mainly into Northern Ireland and exports are principally from Scotland. Small quantities of water filtration sands and resin-coated foundry sands are also exported

The main silica sand producers in Scotland are: Sibelco UK, Levenseat Quarry, West Lothian Fife Silica Sands Ltd, Burrowine Quarry, Fife O-I Devilla Forest Quarry, Fife, Hugh King Ltd, Hullerhil Quarry, North Ayrshire

Important and extensive silica sand resources occur in central Scotland. These are principally associated with medium to coarse-grained sandstones of the Passage Formation, which is Carboniferous in age. The Passage Formation comprises a cyclic sequence dominated by sandstones, which are white, grey and pale yellow in colour, but also includes mudstones, siltstones, seatearths and thin coals. The sandstones were deposited and then exposed to weathering in a humid tropical environment, which resulted in the decomposition of less stable minerals to produce softer, friable sandstones composed mainly of quartz. The main silica sand sites are now located on the eastern side of the Central Basin, with workings at Burrowine Moor and Devilla Forest in Fife, and Levenseat in West Lothian. The sands have a range of industrial and construction applications. The sandstones are also capable of being processed to produce sand with less than 0.035% Fe203 for colourless glass manufacture. The operations in Fife supply container glass manufacturers in Scotland and Yorkshire. The sandstone resources of the Passage Formation appear to be extensive and may become of increasing importance as a source of glass sand for the wider UK market in the future. Small quantities of silica sand are produced from sandstones within the Carboniferous Upper Limestone Group at Hullerhill in North Ayrshire.”

The Joint Minerals Plan should consider the alternative supplies of Silica Sand particularly in Scotland (outside National Parks) that are closer both in road distance and journey times to the to the specialist glass manufacturers based in Cheshire and Yorkshire.

Silica Sand road journeys:

Road journeys to specialist glass manufacturers:

- 280-mile road journey to Cheshire from Fittleworth (source Cuesta Silica Sand Report 2015)
- 216-mile road journey to Cheshire from Levenseat (Silica Sand Site) in West Lothian. (Google Maps)
- 244 or 253 miles from Fittleworth to St Helens Yorkshire (Google Maps)
- 201 miles from Levenseat in West Lothian to St Helens Yorkshire (Google Maps)

Our enclosed commissioned 2016 review of evidence for a nationally important silica sand resource at Horncroft by GWP consultants concludes:

“8.2 Alternative Supplies.

This report only considers the evidence for a high-grade silica sand resource which might be considered an ’exceptional circumstance’ for major development in the National Park if national need is proven. Reserves and resources suitable for leisure, horticultural, specialist construction and other industrial uses are available elsewhere in England and Scotland as acknowledged by the Cuesta Soft Sand and Silica Sand Study 2016 for the SDNP.

The Cuesta report excludes all production or potential production of high-grade silica sand from Scotland acknowledged by the BGS to be the probable source of more silica sand as the reserves and resources in England become depleted. Haulage from Scottish sites to the main manufacturing centres for glass is more favorable than from the more rural South Downs National Park and there is a least one additional site in England which has potential to exploit a new resource of high grade sandstone in the longer term.”

Alternative Materials:

The recycling industry is developing to such an extent that materials from recycled glass can supply most of the specialist end uses that Silica sand now provides and sales are increasing year on year. As the recycling industry technology improves and progresses in the future, it will further develop the technology so that we can increase our reliance on recycled products rather than use newly extracted Silica sand.

The “British Geology Silica Sand Fact sheets: 2009” States:

(https://www.bgs.ac.uk/downloads/directDownload.cfm?id=1369&noexcl=true&t=Silica%20sand)

“Alternatives/Recycling

Recycled glass (cullet) from bottles is increasingly used to make new glass. The use of cullet has a number of environmental benefits. It not only reduces the demand for new silica sand (and other components of the glass batch) but, because cullet melts more readily, it saves energy and also reduces emissions. Moreover, glass can be recycled more or less indefinitely. However, it is important that glasses of different colours are not mixed and that, as with silica sand, the cullet is free from impurities, in particular metals and ceramics. In 2006, UK-manufactured glass containers contained an average 35.5% recycled glass. There is a surplus of green cullet, some of which is exported and some used as an aggregate in materials such as asphalt. However, even with increased glass recycling rates the industry is still very short of colour separated cullet, a situation which is likely to get worse if the trend by local authorities to collect mixed cullet grows. Recycled, crushed and closely-sized glass from coloured bottles is also being developed as an alternative to sand for water filtration.”

We therefore welcome the SDNP & WSCC’s decision to encourage the sourcing of soft and silica sand from outside the National Park and existing sites, which should furthermore be encouraged to sell and guarantee their silica sand, when present, for non-aggregate industrial end use only.

We welcome the SDNP & WSCC’s decision to not allow permission for any new soft or silica sand sites within the National Park as quite clearly alternative supplies exist that are closer to the specialist manufacturers that use silica sand and are geographically more environmentally friendly.

B3 continued:

Mineral Sites Study - April 2016.

Site Comments on the Horncroft Site Description: Pages 146 -154 & 307-31 of the Mineral Sites Study - April 2016

We have set out below a number of comments about how the Horncroft site is described in the MSS report 2016 of Appendix 5: Stage 4 RAG assessment outcomes pages 146-154.Then Appendix 6: Stage 5 RAG assessment outcomes, taking account of technical assessments pages 307-318.

We believe that the descriptions are inadequate in some important respects, as follows:

• Site description (page 146 & page 307)

The red line plan shows a larger area than that rejected in 1999 and 2005 on landscape grounds. It also shows a much larger area of Horncroft Common proposed to be used, presumably for access and processing and

separation purposes, than that proposed as part of the application for planning permission made in 2010, to excavate the site at Horncroft. The application was substantially amended and then withdrawn altogether in 2011.

The Site Description of the Horncroft sand site seems to have been mainly based on the withdrawn 2010 application that relates to a very different site to what is now being proposed. The Horncroft site is now being promoted as a far larger Silica sand site that would require a large on-site processing plant that has not been adequately addressed within the Minerals Site Selection report. Our GWP report suggests that an onsite processing plant at Horncroft will be required;

"Sand will need processing in a similar manner to that at North Park Quarry in Surrey where the processing plant and stockpiles occupy an area of 6.1ha (excluding water treatment pond), introducing a range of environmental impacts that would be challenging in such a sensitive and tranquil location. This would be a significant industrial development."

The North Park Quarry's processing plant also includes a building housing part of the plant that is 25m high. The potential negative impacts from an on-site processing plant have not been addressed within the Minerals Site Selection reports.

• Potential yield (page 146 & page 307)

This is now stated as being 2-4mt. 2-4mt is a rather vague figure. When planning permission was applied for by the Barlavington Estate in 2010, there was a substantial error made by the applicants as to the potential yield of the site. This was pointed out by our minerals experts, GWP, and as a result the applicant modified the projected yield for soft sand and gravel to approximately 1.43 mt.

That, however, was for a site that was substantially larger in area than that now appearing in the MSS. All of this points to 2-4mt being a very substantial over-estimate of yield. This needs to be clarified in more detail by the developer and made publically available.

Current use page 146 & 307:

This should be amended to include the commercial pheasant shoot (a public amenity) that currently operates within the proposed site. We question whether it should be deemed "commercial woodland". Many residents of Fittleworth enjoy the "unofficial "bridleway that runs through the woodland on the site (in the 2010 application the owner agreed to keep this bridleway in operation). Users have not seen any activity of a commercial nature apart from the Pheasant shoot. The owner has described his woodlands on his Estate as being both commercial and amenity. This woodland on the proposed site is "amenity woodland".

Restoration options (page 147 & page 308):

The Horncroft site needs no restoration. It ought to be left as a site of tranquility, beauty and biodiversity, deep in the National Park.

"Restoring the site to support a mix of nationally important heathland habitats including a mosaic of open heather heath, acid grassland, gorse, woody scrub, and oak-birch woodland."

The site already contains a mix of nationally important habitats and biodiversity. Restoration would not be beneficial as the site is already important and surrounded on 3 sides by SSSI and SNCI's which contain a biodiversity and rare species inventory that are present around and at the site already.

Site-specific information (operational considerations). Pages 147 & 308:

Our experts suggest, that if the site at Horncroft does indeed contain a high percentage of high grade Silica sand, a site of this type would need to be a much, much larger, major industrial development than that is being promoted at this stage and may need to include on site processing, large equipment for separating, screening and washing. Indeed the site may need to function as 24-hour operation on site as suggested within The British Geological Society's Factsheet On Silica Sand (see above extract). The equivalent North Park Quarry's processing plant includes a building housing part of the plant that is 25m high. The potential negative impacts from an on-site processing plant have not been addressed within the Minerals Site Selection reports. This should be considered.

Planning history (page 147 & page 308):

Should be amended to include:

The site, in a smaller version, was considered in 1999 and rejected by an inspector for the West Sussex Minerals Local Plan as it was not considered acceptable due to landscape impact.

Reference should be made to the 1999 inspector's report in which the site was decisively rejected as a suitable minerals extraction site. It is very important to record this finding here because the inspector provided an independent and authoritative view that would have led to the exclusion of the site at the options stage of the West Sussex Minerals Development Plan in 2005.

Availability page 147 & 308:

“The site is within single ownership (Barlavington Estate) and is therefore considered available.”

Although this is partly correct and the site land itself is in single ownership, the site boundary plan shows that the proposed site boundary immediately adjoins the boundary of the land belonging to Horncroft Farm not the Barlavington Estate. In particular to the northeast at Horncroft Farm Pasture SNCI C125, Horncroft Plantation, and the eastern site access at the sites most northeasterly boundary. (Horncroft Farm Boundary map) enclosed by email and letter.

A buffer from the proposed site and land at Horncroft of at least 250m from land not owned by the Barlavington Estate should be enforced, along with a buffer of 250m from other nearby residential properties.

Key Criteria • Landscape and visual designations page 148-9 and 309-310);

We agree that the entire site should have a “high” sensitivity to extraction, not ""medium to high"". Amendment to ""high sensitivity"" would be consistent with the Inspector's findings in 1999 and the Council's rejection of the site in 2005. Although the assessment is quite detailed we disagree with the medium - high impact rating, particularly for the views from the west and north of the site and from both the two adjacent PROW’s and the open access land at Coates Common & Lords’ Piece that have clear views of the proposed site from higher ground.

Although we agree that the site has a “high sensitivity” along the Eastern side of the site in particular:”

We disagree that; “The site has Medium-High landscape sensitivity on the western side of site.”

This should have an overall high negative impact sensitivity rating. The site has high landscape sensitivity on the western side of site, particularly from the open access land at Coates Common and the adjacent PROW’s. It would have a negative high visual impact, noise impact, and dust impact from both the west and the northern PROW (BW762) particularly from the higher ground that the PROW takes from Horncroft Farm and along the PROW below Lords’ Piece.

In the main, the report only considered negative visual impact (within Landscape and visual designations), which in itself should be of overall high impact. However the report fails to acknowledge adequately the high negative impact on the landscape designation from the loss of tranquility caused by the dust, and noise of the extraction of the sand, its processing, separation, and washing. This has not been adequately taken into account within the report as an important contributor to the loss of public amenity.

We strongly urge that the report is corrected to recognize the high impact due to loss of this valuable public amenity, indeed the landscape is already considered to be of “High Landscape Value” which should be stated within the report.

Section 8.7.2. Of the Draft Minerals Plan states:

. “ 8.7.2. The NPPF states that, when preparing local plans, Local Authorities should set out environmental criteria, in line with the policies in the NPPF, against which planning applications will be assessed so as to ensure that permitted operations do not have unacceptable adverse impacts on human health, including those from noise, dust, visual intrusion, traffic, tip- and quarry-slope stability, differential settlement of quarry backfill, mining subsidence impacts from individual sites and/or a number of sites in a locality. . 8.7.3. As minerals developments can lead to significant impacts on local communities (including residents, visitors and local businesses) if they are not adequately controlled, it is important that robust policy protection for local amenity

is in place. This can help ensure that potential adverse impacts are minimized and allow development to take place in locations where it may otherwise be unacceptable. Potential impacts can include 'sensory' factors such as noise, dust, vibration from blasting, visual impact and wider amenity impacts."

Indeed, there may be the possibility of 24-hour operation at Silica sand sites:

"In many cases processing plants operate on a continuous (24 hours) basis, which means that the siting of such plants has to take account of the impact on local residential amenity" – (The British Geological Society's Factsheet On Silica Sand.)

This would have further negative impact on visual designation and the South Downs National Park's designation as an International Dark Skies Reserve.

The report at page 310 also states that:

"the proposed working area has been reduced to a degree which significantly minimizes the potential impacts on the surrounding highly sensitive landscape and it is considered that there is potential to overcome the remaining issues excepting the proposed access which is considered to have significant impacts on the SDNP"

I would suggest that this statement is premature as there is no available precise information in regard to the size and requirements of processing and separating silica sand at Horncroft.

Noise: This has been omitted as a Key Criteria. Noise was determined as a key issue in 2010; both from the quarrying processes and traffic noise. Silica sand requires processes that will cause even more noise in an area that is recognized for its remote and tranquil beauty. The site access has also now been brought nearer to the homes on the B2138 and Horncroft Farm.

It is also noted that tree planting has recently taken place on the eastern boundary of the site access in an attempt to mitigate in advance of an application at Horncroft. These trees and bushes are very small deciduous saplings that would provide scant cover even after 20-30 years growth and little or no cover in the winter months. The tree planting will not have any effect of mitigating the high negative visual impact from the southern, higher ground views of the site from South Downs Way and Westburton Hill amongst other views.

Photograph taken from the edge of eastern access area of the site towards the south and higher ground of the South Downs Way: which shows in reverse, the impact of the views of the site (not just the access area) from the South Downs Way and Westburton Hill. Enclosed by email and letter.

Therefore the site should be considered to have high sensitivity on all aspects of landscape impact to a degree that it is recommended for exclusion.

• Nature conservation geodiversity designations (page 149) & pages: 311-312:

I commissioned a Desktop Biodiversity report from the Sussex Biodiversity Record Centre (SBRC). A copy of the report in PDF was attached to our solicitor's letter of September 2014.

The report is drawn from the species data held by SBRC and concerns the Horncroft site as identified in the MSS and a 500m buffer area around it.

The report speaks for itself as to the abundance of species reported as present, including numerous rare species (see, for example, the summary report that immediately follows the 3 maps near the beginning of the report). It further underlines the value of Horncroft as regards biodiversity.

You have mentioned this report in the 2016 site list but the number of rare and endangered species is inaccurate. This should be corrected to 86 (not 59) rare and endangered species of flora and fauna within the 1km radius from the site. This includes 12 European protected species, 7 on the Protected species register ((not including bats, badgers, otters or birds), 18 BAP species (not including bats or birds) For correction purposes I am enclosing the 2014 report again (by email and letter).

In Addition there are 23 sensitive bird records (i.e. breeding season records of 15 Schedule 1 and three other sensitive bird species) that have been flagged up for the enquiry area. Please email the Sussex Ornithological Society for further information: conservation@sos.org.uk including the four figure grid reference (e.g. SU9713) for each km2 for which you require information.

The site assessment also notes that The Barbastelle Bat would not be under threat from the site: “Mens SAC is designated can travel up to 7km from the SAC but it was concluded that no bat flight lines in the study were located south of the A283.”

However, your report fails to mention other bats present in close proximity and probably within the site too, within the 1 km radius area. This includes recorded sitings within the Biodiversity Record Centre (SBRC) report, of Bechstein’s Bat a BAP species, It is the rarest British Myotis species of BAT and was recorded at Coates Common. Also present is the Brown Long-eared Bat another BAP species that has many recordings that include Lower Horncroft and Coates Common, amongst many other bat species present (see enclosed Desktop Biodiversity report from the Sussex Biodiversity Record Centre).

The Horncroft entry also fails to mention that the proposed site is bordered by the two designated SNCIs at Horncroft Farm to the North and North East of the site one of which immediately borders the proposed site. SNCI C125 - Horncroft Farm Pasture,

Map of Horncroft Farm Pasture SNCI C125: enclosed by email and letter.

This land belongs to Horncroft Farm not to The Barlavington Estate. There should be at Least a 250m buffer from these and other SNCI’s.

Section 8.6.4 of the Draft Minerals Plan states that:

“Monitor of Engagement with the Natural Environment Report 2015). The most recent visitor survey for the South Downs National Park showed that wildlife is a key attraction for over a quarter of the visitors (26%) to the Park. This equates to 11.5 million visits per year to see wildlife and habitats.”

This entry should be changed to a “RED” high negative impact sensitivity rating.

• Water environment (including flooding) pages - 151 & page 313:

It would be impossible to make an accurate assessment at present as to the nature of the impact on the water environment by the site as no information is available as to the production techniques, scale of processing, washing and sand separation techniques. This could have a far greater negative potential to affect the watercourse immediately adjacent to the site that drains into the River Rother and into the Arun Valley SPA/Ramsar than is being assumed. There is therefore a potential pathway for sediment to impact this European site.

Indeed it may be that some of the sand at Horncroft may need to be worked “wet” from beneath the water table (see enclosed GWP report).

This should be a “red” high negative impact until site-specific information proves otherwise.

• Air Quality pages - 152 & 314:

Although the assessment warns that traffic would have a negative impact on an Air Quality Management Area and an Air Quality Assessment would also be required. The report should assess and note the potential for air quality pollution from silica sand; its extraction, separation, and processing which should be considered along with the risks to local residents and visitors health from silica sand dust and its dangers. The impact of the health risks of silica sand extraction should be properly investigated and taken into account before any rating can be applied. The possibility of serious health issues related to respirable crystalline silica (RCS), dust or groundwater pollution from any silica sand extraction at Horncroft should be considered .

• Public rights of way - pages 152 & 314:

We strongly disagree with the: “GREEN rating No Public Rights of Way within the site. None of the Public Rights of Way which run close to the site (e.g. Public Bridleway 762 and Serpent Trail) would be affected.”

Although there are no PROW’s within the actual proposed site, the BW762 and Serpent Way intersects close to the edge of the site to the North and the views from all the PROW’s would be badly affected and the noise and dust would deter and impede users enjoyment and health, of this popular public amenity. It would have a negative high visual impact, noise impact, and dust impact from both the west and the northern PROW

(BW762) and particularly from the higher ground that the PROW takes from Horncroft Farm and along the PROW below Lords' Piece

Photograph of the PROW BW762 intersecting with the proposed site at its northeast corner: enclosed by email and letter.

In addition, some of the routes through the site itself may now have attained public footpath/bridleway status as they have been used and enjoyed for many decades by walkers and riders.

Photographs of one pathway through the Horncroft site (western side) that may have attained PROW status: enclosed by email and letter.

The draft minerals plan states that:

• "8.7. Public Amenity and Health 8.7.1. The relevant strategic objective is 7: To protect, and where possible, enhance the health and amenity of residents, businesses and visitors. "

And Policy M18: Public Health and Amenity:

"Proposals for mineral development will be permitted provided that:

. (a) lighting, noise, dust, odours, vibration and other emissions, including those arising from traffic, are controlled to the extent that there will not be an unacceptable impact on public health and amenity and

. (b) the routes and amenity of public rights of way are safeguarded, or where temporary or permanent re-routing can be justified, replacement routes of comparable or enhanced amenity value are provided."

Clearly this would be the case at Horncroft due to the loss of PROW amenity and a potential for an unacceptable impact on public health and amenity.

This entry should be changed to a "RED" high negative impact sensitivity rating. For Public Rights of Way.

• Transport and access - page 153 & pages 315:

We strongly disagree with the: "GREEN/AMBER" rating

The B2138 is not suitable for use by heavy goods vehicles and indeed there are signs on the road to that effect that have been in place for many years. Nor is the junction between the B2138 and the A29 suitable for use by heavy goods vehicles, for reasons explained in our representations in respect of the 2010 planning application.

The proposal is expected to generate approximately 144 two-way vehicle movements per day over the course of a 15-year lifespan.

144 two way journeys would have high negative impact rating and the proposed mitigation of re-directing HGV traffic to enter the site from the South would be unenforceable

"Accessible by sustainable modes of transport and close to the existing highway network":

This entry fails to record any of the serious issues identified in the 2010 application – in particular the impact on the B2138 which is a key access road into the SDNP and has been described as the "Gateway to The South Downs National Park" It is already deemed unsuitable for HGVs; so adding more than 144 site traffic movements on the B2138 (stated in the 2010 application) would have a major additional impact on the environment and community.

WSCC Highways comments on Horncroft in February 2011 stated that there was "The Planning Authority may wish to consider the environmental impact of increased HGV flows upon the surrounding highway network."

The new proposed Horncroft site is for a much larger site; 2-4mt and is being promoted as a silica sand site. As the new proposed site is now larger, and would need onsite processing for silica sand this would probably mean that 144 HGV journeys is a large underestimate and far more HGV journeys than are being stated in the transport assessment will be required.

Transport assessment report 2015:
https://www.westsussex.gov.uk/media/7383/mlp_transport_assessment.pdf

The December 2015 Transport Assessment is based on the now outdated 2010 Horncroft withdrawn application data which was for a soft sand site of 1.4 mt. The new proposed site is for a much larger site 2-4mt and is now being promoted as a Silica Sand site. Which may even operate on a 24-hour basis.

The 2015 Transport Assessment Report states:

. 14.7.1 The preferred routing strategy has been shaped by West Sussex Country Councils comments in response to the 2010 planning application. The routing strategy discounted any development-related traffic arriving / departing from the north (A283), due to the adverse impact that it would have on Fittleworth and Lower Fittleworth. All HGV development-related traffic would therefore arrive to and depart from the site via the A29 / B2138 Tripp Hill junction.""

The proposed mitigation of re-directing HGV traffic to enter the site from the South is unrealistic and would be both unworkable and unenforceable. There would be no way to stop HGV's arriving from the north on the B2138 turning around on the slip road between the B2138 and the A29 junction and then travelling back north up to the site on the B2138. The same would apply to the HGV's outbound journeys. It also appears from drawings at Appendix G Horncroft (drawing 16) that the proposed improvements to the presently one-way slip road between the B2138 and the A29 junction include making this one-way slip road two way. There is currently a campaign by local residents to change this junction to a roundabout to improve road safety at this already busy junction. If this did happen this would further increase the probability of HGV's arriving from any direction they choose.

. 14.7.2 The 2009 Transport Assessment for Horncroft proposed a 70% (south) / 30% (north) distribution of traffic at the A29 / B2138 junction, and this has assumption has been kept for consistency. The previous Transport Assessment also assumed that development-related traffic travelling north would use the one-way route to the north of the main junction, following minor highway improvements. ""

The assumption of "a 70% (south) / 30% (north) distribution of traffic at the A29 / B2138 junction" is based on outdated plan information. The site is now being promoted as a silica sand site and claims that the material is suitable for specialist glass manufacture. If that is, in fact the case the sand would need to travel to the north to the specialist glass manufacturers in the North (Cheshire, Liverpool, Yorkshire).

The drawings at Appendix G Horncroft
(https://www.westsussex.gov.uk/media/7382/mlp_ta_appg_horncroft.pdf) shows an access point that does not correlate with the proposed Horncroft site access and drawn within the Draft Minerals Plan. The MP drawing implies that the site access would be further to the north at which point visibility of the B2138 is worse.

This entry should be changed to a "RED" high negative impact sensitivity rating.

• Amenity: pages 153 & 315:

We strongly disagree with the: AMBER rating and that "moderate mitigation measures could be adopted to ensure local residents do not suffer any harm from the site." There are no details of any mitigation that could mitigate the impact of such a large new major industrial development.

The impact of the health risks of silica sand extraction should be investigated and taken into account before any rating can be applied, there is a possibility of serious health issues related to respirable crystalline silica (RCS) and dust or groundwater pollution from silica sand extraction at Horncroft.

Cumulative impact pages 153 & 316:

The document states that there is a former mineral working located to the north west of the site. This wrongly implies a precedent for quarrying in this locality, which would be misleading. The dormant Coates sandpit is very old, hidden from view and was a "cottage industry" far smaller in scale than anything that would be proposed at Horncroft. In the 2010 application Barlavington Estate had to recognize that they had failed to

restore this old quarry as required. It is in fact now designated as a SNCI.

Site-specific information pages 154 & 316:

"Sibelco indicated that the silica content of the sand is approximately 99% (based on exploratory borehole drilling)."

There is no publically available information to support these claims as the developer has deemed this borehole information "commercially confidential" and these claims should be dismissed until this information is made publically available so it can be independently verified.

Summary and outcome of scoring pages: 317-318 Key issues/constraints :

. "The site has medium-high landscape sensitivity on the western side of site. High sensitivity along eastern side of the site. Low to moderate capacity for mineral activities. The high sensitivity score for the site is largely due to the access requirements for the site and the existing topography of the site which could expose working to the wider landscape without careful phasing of the works."

This should be amended to include our comments (above at Key Criteria • Landscape and visual designations page 148-9 and 309-310):That the site should also be of high negative impact to the West and North and South of the site.

. The site does not contain any nature conservation designations however a number of local and national designations are located within close proximity to the site."

This should be amended to reflect that the site immediately borders local designations and a number of local and national designations are located within close proximity to the site. Indeed if these rare species are present in such close proximity to the site they are extremely likely to be present at the site itself which should itself have designation and protection.

. There are no PROW located within the site. Sutton Common, which is dedicated Open Access Land, is located 220 meters to the west.""

This should be amended to reflect that although there are no PROW's within the actual site, the BW762 and Serpent Way intersects close to the edge of the site to the North and the views from all the PROW's would be badly affected and the noise and dust would deter and impede users enjoyment of this popular public amenity. It would have a negative high visual impact, noise impact, and dust impact from both the west and the northern PROW (BW762) and particularly from the higher ground that the PROW takes from Horncroft Farm and along the PROW below Lords' Piece and from the open access land of Lords' Piece Itself.

In addition some of the routes through the site itself may now have attained public footpath/bridleway status as they have been used and enjoyed for many decades by walkers and riders.

Sustainability Appraisal Conclusions page 317:

We disagree that:

• The site is likely to have a 'minor negative' impact on Recreation, Soil quality and reducing greenhouse gas emissions. It may also have a 'minor negative' impact on Health and amenity, the Historic Environment, Air quality and Water quality, although such impacts are uncertain and would be dependent on the nature of the proposal (including its design and method of working).""

The impact of the health risks of silica sand extraction should be investigated and taken into account before any rating can be applied. The possibility of serious health issues related to respirable crystalline silica (RCS), dust or groundwater pollution from silica sand extraction at Horncroft should be considered.

As it is unclear as to what methods of working and processing would be used at Horncroft and the impact of these workings, it should be assumed that the impact would be major negative until proven otherwise and site-specific information is made publically available.

We disagree that:

- The site would have a ‘minor positive’ impact on the Local economy as the development of the site may lead to new employment opportunities during site preparation, operation and restoration; however the scale of the impact is unlikely to be significant.""

The “minor positive “impact on the local economy and potential new employment opportunities does not take into account and reflect adequately the potential negative effect that the site would have from the loss of revenue and employment at local tourism related business, as locals and visitors to the park who will not want to visit an area with a major minerals site development or a wider area with large amounts of new HGV traffic.

Section 8.6.4 of the Draft Minerals Plan states that:

“Monitor of Engagement with the Natural Environment Report 2015). The most recent visitor survey for the South Downs National Park showed that wildlife is a key attraction for over a quarter of the visitors (26%) to the Park. This equates to 11.5 million visits per year to see wildlife and habitats.”

We disagree that:

- the site is acceptable in terms of Transport (subject to a revised Transport Assessment detailing any mitigation measures).""

As, It is unclear as to what methods of working and processing would be used at Horncroft and the impact of these workings, it should be assumed that the impact would be unacceptable until proven otherwise and site specific information is publically available. The traffic assessment itself is based on outdated 2010 information for a smaller (in volume) soft sand site.

In any case, 144 two way HGV journeys would have high negative impact and any proposed mitigation of re-directing HGV traffic to enter the site from the south would be unenforceable. The proposed re-routing of these HGV journeys particularly on their in-bound journeys would be un-workable and un-enforceable.

Ecosystem Services Conclusions page 318:

- “The site could have a minor negative impact on the cultural ecosystem services of objective 2 (Recreation opportunities)”

This should be amended to be a “major negative impact” As It is unclear as to what methods of working and processing would be used at Horncroft and the impact of these workings it should be assumed that the impact would be major negative until proven otherwise and site specific information is made publically available.

Conclusions page 318:

- “The site is unacceptable in principle as there is significant potential for Landscape harm on the eastern side of the site”

This should be amended to reflect our comments above and we conclude that:

The site is unacceptable in principle as there is significant potential for Landscape harm on the eastern, western, southern and northern sides of the site. There would a major negative impact on landscape and visual designations, recreation, transport, public rights of way, air quality,health, noise, water environment and nature conservation geodiversity designations.

Conclusion:

It would not be in the public interest for minerals extraction to take place at Horncroft within the protected landscape of the South Downs National Park.

1 Extraction at Horncroft would have a major adverse impact on the tranquility, wildlife, recreational opportunity, amenity and biodiversity of the National Park.

2 Extraction would constitute an unacceptable impact on the character, distinctiveness, sense of place of the special qualities of the National Park.

3 We strongly agree that Horncroft should not be on the MSS list of proposed sites for consideration on account of an unacceptable impact on landscape character and loss of amenity.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

(answers to 3.1 & 3.2 are "yes, but see below comments")

Draft Minerals Plan: Policy M2: Soft Sand:

Agreed, but M2 should be amended to include:

. (c) the proposal is located outside the South Downs National Park unless there are 'proven' exceptional circumstances and that it is 'proven' to be in the public interest, in accordance with Policy M13, to locate within those areas;

Draft Minerals Plan: Policy M3: Silica Sand: Agreed but should be amended to include:

6. Strategic Minerals Supply:

6.3.2. "The relevant strategic objectives are;

. · 4: To protect the South Downs National Park by only providing for silica sand in exceptional circumstances and when 'proven' to be in the public interest."

6.3.5: Should be amended to include:

·"Should evidence come forward that shows that any existing soft sand sites are required to provide a 10-15 year landbank specifically for silica sand, then they will be considered against the criteria in Policy M3. This will include applicants demonstrating, through the submission of 'publically available' borehole data and geological analysis, that the sand meets the specifications for the proposed silica sand end uses. As silica sand is a specialist mineral in terms of its use (i.e. for non-aggregate uses), the use of silica sand for non-aggregate uses 'only' should be 'guaranteed'."

7. Strategic Minerals Site Allocations

7.1.6. Should be amended to include

"Second element: Places without a sensitive natural, 'tranquil', or built environment and away from communities, in order to protect the amenity of residents and visitors to West Sussex ".

Policy M13: Protected Landscape. Should be amended to include:

. (c) Proposals for major mineral development within protected landscapes will not be permitted unless there are 'proven' exceptional circumstances and that it is' proven' to be in the public interest as informed by an assessment of:

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Covering letter information)

Draft West Sussex Joint Minerals Local Plan Consultation (14 April–17 June 2016)

I am writing on behalf of *…(redaction)...* You have received various letters from our solicitors Bircham Dyson Bell in the past in regard to the Horncroft Sandpit.

We are writing to comment on both the Draft West Sussex Joint Minerals Local Plan and the Minerals Site Selection report 2016 with specific regard to the proposed Horncroft site and its entry within the Mineral Sites Study along with the Draft Minerals Plan itself.

We are greatly encouraged by the joint WSCC & SDNP's stance on not allowing any new minerals sites to be dug in the South Downs National Park and strongly endorse this to become policy. We strongly condone this objective and its recognition of the SDNP's unique landscape, its beauty and tranquility. Any new minerals sites within the National Park will irrecoverably scar the National Park and drastically damage the enjoyment of many locals and tourists alike.

We have commissioned and are enclosing a 2016 Review of Evidence for a Nationally Important Silica Sand Resource at Horncroft by GWP Consultants. The report includes a review of the Cuesta Soft Sand and Silica Sand Study 2016, that questions some of this study's findings and challenges Barlavington Estate's and their agents claims that there is a source of nationally important high grade Silica sand at Horncroft or in the immediate area.

The GWP report also highlights some important omissions within the Cuesta study in regard to alternative supplies of high grade Silica sand from outside the South Downs National Park in particular from the large resources of high-grade silica sand in Scotland. See The British Geology Silica Sand Fact Sheet: 2009 (Link) & enclosed Review of Evidence for a Nationally Important Silica Sand Resource at Horncroft by GWP Consultants.

The claims that the silica sand reserves at Horncroft or at other sites within the National Park are of "national importance" (as claimed by OTB Engineering within The Cuesta Soft Sand and Silica Sand Study 2016), must be questioned when the are plentiful supplies of high quality silica sand in other parts of the UK and in particular, large resources in Scotland that are outside any National Parks which are closer both in distance, and journey time by road from West Sussex to the to the specialist glass manufacturers that are based in Cheshire, Yorkshire and Merseyside.

Although we welcome the exclusion of Horncroft from the site list, we have corrections and comments on the site-specific selection entries for Horncroft (within the Minerals Site election report 2016) that should be addressed and amended by the WSCC/SDNP, that we are enclosing within this letter and the online Draft Minerals Plan Consultation Response Form.

We would also like to point out that the technical assessments of the Horncroft sand site seem to have been mainly based on the withdrawn 2010 application that relates to a very different site to what is now being proposed. The Potential yield at Horncroft is now stated as being 2-4mt. When the Barlavington Estate applied for planning permission in 2010 there was a substantial error made by the applicants as to the potential yield of the site. This was pointed out by our minerals experts GWP at the time. As a result the applicant modified the projected yield for soft sand and gravel to approximately 1.43mt.

The Horncroft site is now being promoted as a far larger silica sand site that would require a large on-site processing plant, which has not been adequately addressed within the Minerals Site Selection Report 2016. Our GWP review suggests that an onsite processing plant at Horncroft will be required;

"Sand will need processing in a similar manner to that at North Park Pit Quarry in Surrey where the processing plant and stockpiles occupy an area of 6.1ha (excluding water treatment pond), introducing a range of environmental impacts that would be challenging in such a sensitive and tranquil location. This would be a significant industrial development."

The Sibelco operated North Park Quarry's processing plant includes a building housing part of the plant that is 25m high. The potential negative impacts from an on-site processing plant have not been addressed within the Minerals Site Selection reports, nor has a realistic traffic assessment been addressed for this proposed new site. The traffic assessment has been based on the 2010 application for 1.43mt of soft sand not 2-4mt of silica sand.

See attached scale drawing at page 23 of GWP review - HORN14A1605-DG03 plant.pdf: A comparison of the Horncroft site area from the Draft Mineral Site Report (April 2016) with the equivalent processing area at North Park Farm Quarry.

Our 2016 Review of Evidence for a Nationally Important Silica Sand Resource at Horncroft by GWP Consultants concludes that:

" Geological information available to GWP does not support the assertation by Barlavington Estate and their agents that there is a nationally important resource of high grade silica sand at Horncroft or in the immediate area. Borehole logs provided with the 2010 planning applications indicate that most of the sand that could be excavated from the site identified within the Site Selection Report would not be identified as 'silica sand'. If recent investigations at Horncroft have shown otherwise, evidence should be released to support their claim.

Identification of a potential resource combines an assessment of both the quality and quantity available. Given that investigations have been carried out, the Barlavington Estate seem very reticent about releasing information and this leads to the suspicion that data presented has been 'cherry picked'.

Sand Quality

Information regarding quality of sand somes mainly from the silica sand report by Cuesta Consulting. A total of 14 samples were anyalised by XRF from 6 locations.

• Particle size data for samples tested by Cuesta is entirely consistent with grading envelopes typical of the Folkstone Formation. The range of graded products attainable with sand sizing plant is demonstrated at existing sites where horticultural and sports sands are produced to comply with industry standard specifications.

• Samples provided by Cuesta and chemical analyses were not washed and cannot therefore be directly compared with each other or with recognized highgrade silica sands from elsewhere in the UK.

• Among the highest grade (lowest iron) samples were from Sandgate Quarry, which lies outside the National Park and is operated by Cemex for construction sand. The reason it is not classified as 'silica sand' is because it is not marketed as such by Cemex whose commercial interests and customers are in the construction materials sector.

• Analyses provided by the agents of Barlavington Estate have no 'provenance' and the information regarding the sampling method, geology and variability of the sand these are derived from have not been provided. Other than giving an indication of one of the limits of a range of sand quality, these samples should be considered insufficient information to support claims of a 'nationally important silica sand' resource."

Our GWP report concludes that the analyses carried out by Cuesta for the soft sand and silica study on unwashed samples are of limited value as chemical analyses are of greatest significance in identifying sand that is capable of satisfying the requirements for high grade silica sand end uses either after washing and sizing, or after additional processing. None of the Cuesta analyses approach the values of feedstock typical for colourless glass sand.

Moreover by not removing clay, it is not possible to determine the suitability of these samples for the production of sodium silicates that require a low Al203 content.

Confidential, 'cherry picked', pre-washed samples from Horncroft were provided by the developers for The Cuesta Soft Sand and Silica Sand Study 2016. They have no "provenance", are unverifiable and should therefore be disregarded until made fully available to be independently substantiated and examined within the public domain.

Why, if the resources at Horncroft are so rare and nationally important, would there be a need for commercial confidentiality?

Our GWP consultants report states (at GWP 5.2.1):

"In section 3.32 of the Cuesta silica sand report the requirements for silica sand for Na-silicate (sodium silicate) manufacture <0.05%Fe2O3 and <0.1% Al2O3. This is in agreement with information obtained by GWP from industry sources in 2010. Unfortunately Table 5.1 of the Cuesta report identifies different and erroneous requirements and therefore mistakenly concludes that on the basis of iron content, the Folkstone Formation in the study area is generally suitable in its natural state for sodium silicate manufacture. This is clearly not the case, and if not corrected could lead to misinformation about the value of the sand."

At present site-specific information for the Minerals Site Selection report 2016 is partly based on the 2010 Horncroft application. This was for a soft sand site. What is now proposed is a much larger (2-4mt) silica sand

site but no site specific information is present to support this new site and the consequential larger major industrial development proposed.

If further investigations establish that the reserves of silica sand are not viable then the arguments for inclusion as " a silica sand site" on the report cannot be sustained.

Enclosures:

• We are enclosing again our commissioned Sussex Biodiversity Report for the Horncroft Site (2014), as this has not been correctly entered into the Horncroft Minerals Site Selection report.

• Our new GWP consultants Review of Evidence for a Nationally Important Silica Sand Resource at Horncroft,.

• A boundary map of farmland at Horncroft ,that adjoins the proposed site (land not owned by the Barlavington Estate) page 11b.

We will also be entering our detailed comments within your Consultation Response Online Form too but this does not have the facility to upload attachments.

(Sources of information and drawings included as list at end of word document response document)

Selected Sources of Information:

1. The Draft West Sussex Joint Minerals Local Plan 2016:

https://www.westsussex.gov.uk/media/7682/mlp_draft_reg18plan.pdf

4. The Minerals Site Selection report 2016:

https://www.westsussex.gov.uk/media/7504/mineral_site_selection_report_v5.pdf

3. The 2012 Capita Symonds Soft sand study for the SDNP 2012:

http://www.southdowns.gov.uk/wp-content/uploads/2015/03/Soft-Stand-Study.pdf

4. The Cuesta Soft sand and Silica sand study 2016:

https://www.southdowns.gov.uk/wp-content/uploads/2015/12/Soft-and-Silica-Sand-Study-Final-Report-secured.pdf

5. 2016 Review of Evidence for a Nationally Important Silica Sand Resource at Horncroft by GWP consultants Enclosed

6. Desktop Biodiversity Report for Land at Horncroft + 500m buffer,ESD/14/516 Prepared for *…(redaction)..* 22nd September 2014 . Enclosed

7. The Draft West Sussex Joint Minerals Local Plan Consultation form:

https://www.westsussex.gov.uk/media/7361/pdf_form.pdf

8. The British Geology Silica Sand Fact sheets: 2009:

https://www.bgs.ac.uk/downloads/directDownload.cfm?id=1369&noexcl=true&t=Silica%20sand

9. Silica sand: Geology and mineral planning factsheets for Scotland:

http://www.gov.scot/resource/doc/178913/0050918.pdf

10. Transport assessment report 2015:

https://www.westsussex.gov.uk/media/7383/mlp_transport_assessment.pdf

10B. Drawings at Appendix G Horncroft

https://www.westsussex.gov.uk/media/7382/mlp_ta_appg_horncroft.pdf .

Drawings/Attachments:

1. 2016 Review of Evidence for a Nationally Important Silica Sand Resource at Horncroft by GWP consultants.

1.1. Drawing:HORN14A1605-DG03 plant.pdf: Comparison of Horncroft site area from Draft Mineral Site Report (April 2016) with processing area at North Park Farm Quarry.

2. Desktop Biodiversity Report for Land at Horncroft + 500m buffer, ESD/14/516 Prepared for *…(redaction)..* 22nd September 2014.

3. Smiths Gore Horncroft Farm land Boundary Map & Horncroft Farm Pasture SNCI C125 boundary Map.pdf

(The following additional reports were submitted with the main response:

Desktop Biodiversity Report for Land at Horncroft + 500m buffer, ESD/14/516 Prepared for …(redaction).. 22nd September 2014.

2016 Review of Evidence for a Nationally Important Silica Sand Resource at Horncroft by GWP consultants.)

* * *

01 - Organisation: Horncroft Residents Association (Response ID: 333 Respondent ID: 1755)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

We endorse the W.S.C.C/SDNPA Strategy that no new mineral sites be allowed in the South Downs National Park. We hope that this site will become official policy.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

That silica sand sites must be proved to be included in the strategy as of exceptional circumstances in the public interest.

Other silica sand sites exist within the UK, outside of National Parks and with better transportation facilities these must be given priority.

B2. Mineral Site Allocations

B2.1 Name of site

Horncroft (SDNPA) (M/CH/11)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site was registered by the inspector in 1998, as being in a tranquil and rural part of an AONB a further application was withdrawn in 2011 following extensive objections. Today, Horncroft is part of the South Downs National Park and should be protected from the damage caused by extensive industrialisation and transportation difficulties. The inspectors comments in 1998 are still valid in 2016 and the future.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

That Horncroft be rejected on the grounds of pollution (air quality, water course quality, diesel fumes from transportation) and the detrimental affect such development would have on a much visited are of the South Downs National Park.

The transportation review is flawed as it does not mention the B2138 as “unsuitable for HGV’s” and should be red-flagged for access difficulties and connections to the A.L.R’s via A29 & A283, both of which cannot sustain such and increase in movements.

B3. ‘Mineral-specific’ and ‘Development Management’ Policies

B3.1 Do you support the ‘mineral-specific’ policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the ‘development management’ policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

M2 & M3| Both must be proven to be of exceptional circumstances to warrant excavation within the National Park. External sources should be given serious consideration.

M13| The SDNP landscape should be protected against mineral excavation at all costs.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

01 - Organisation: Horsham District Council (Response ID: 172 Respondent ID: 3778)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Draft West Sussex Joint Minerals Local Plan (Regulation 18) Consultation

Thank you for consulting Horsham District Council on the current draft of the Joint Minerals Plan. The Council is recognises the need to plan for mineral supplies in the future and is supportive of the vision and strategic objectives outlined in the document.

It is noted that within Horsham District, land at Ham Farm, Steyning is allocated for soft sand extraction. The Council understands the need to provide for such sites and Horsham District Planning Framework (HDPF) paragraph 4.5 and criteria 2 of Policy 26 – Countryside Protection provides support for Minerals Plans to enable the extraction of minerals. Horsham District Council is however concerned about the potential for increased traffic on the A283, including potential impacts on the existing capacity of the Washington roundabout. In addition, there is a possibility that development of the site may result in increased lorry usage through the Air Quality Management Zone in Storrington High Street as the nearest Advisory Lorry Routes do not provide a convenient route to and from the west of the Ham Farm site. We would therefore draw your attention to HDPF Policy 24 – Environmental Protection, and also draw your attention to the 'Planning Advice Document: Air Quality and Emissions Reduction' which you can view from the attached link:

https://www.horsham.gov.uk/planningpolicy/planning-policy/detailed-planning-guidance. Should this allocation proceed, any future development should therefore seek to ensure that measures set out in this document are taken into account to minimise any further adverse impacts to air quality. I would also draw your attention to the poor road structure A283, and we would wish to ensure that the impact of increased traffic on road capacity and structure is taken into account.

In addition to the above, we accept in principle the safeguarding area and the 250m buffer beyond as set out in the draft plan. We do however wish to continue further dialogue in how the safeguarding will be implemented through the development management process to ensure that this is as effective as possible.

I hope that this letter is of assistance to you – please do not hesitate to contact one of my officers in the Strategic Planning Team should you have any further queries.

Yours faithfully,

…(redaction)..

Cabinet Member for Planning and Development

Horsham District Council

* * *

01 - Organisation: Ibstock Group (Response ID: 335 Respondent ID: 497)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Ibstock welcome the opportunity to comment on the Joint Minerals Local Plan. I have reviewed the JMLP on the website along with the separate Safeguarding document. Our comments are set out relative to the respective chapters below.

On the whole, may we congratulate West Sussex County Council in the preparation of a detailed JMLP and for the time spent liaising with Ibstock during the plan preparation. We are grateful for the regard given to 'brick' throughout the plan document, highlighting the importance of this as a mineral and construction material in the County Plan Area.

Section 2.2 – Vision

Amplifying the comment above, we thank you for drawing specific attention to brick in the County Vision for the plan period through to 2033.

Para 2.3.11 – Flood Risk

The text states that Mineral Development will not be located in areas of greatest risk of flooding, however this does not recognise the benefits the minerals industry could have during both the operational and restoration phases of the site in assisting flood management policies.

Section 3.2 – Types of Minerals

It is considered that in subsection 3.2.1 the final sentence commencing 'These include……' should be moved to the commencement of 3.2.2 so to avoid the opening paragraph to define 'minerals' predominantly relating to aggregates'.

Para 3.2.3 seems quite short relative to the section on aggregates and we would respectfully suggest the same bias be applied to both aggregates and 'other' minerals.

Section 6.5 – Clay

Para 6.5.3 – Whilst the statistic of permitted reserves of clay may be of general interest to the reader, we highlight as set out elsewhere in the text, that the 'combined' reserve of clay across a County is of no relevance in determining the necessary permitted reserve per individual brickworks. We suggest that for clarity the words 'Clay requirement for individual brick works based on National Planning Policy is set out in this section' are added to 6.5.3.

Para 6.5.4 – Linked to comments above on 6.5.3 we would highlight a degree of caution in links to Strategic Objective 1 because brick supply and demand does not have 'regard to the market

demand and constraints on supply in the Plan area.' It is well known bricks can travel outside of the area unlike for example Aggregates which are generally to satisfy a more local market.

Para 6.5.5 – The paragraph provides a summary of brick clay and the 25 year Permitted Reserves as set out in the NPPF. Extract from the JMLP below;

National policy requires Minerals Planning Authorities to provide for a 25

year permitted reserve for the maintenance, and improvement of

existing plant, as well as for new plant, in the case of bricks, new kilns.

The Authorities are also required to take account of the need for

provision of brick clay from a number of different sources to enable

appropriate blends to be made.

In comparison with the extract provided here which is lifted directly from the NPPF the above extract seems to place too much emphasis on the 'new kiln' element of the NPPF which is actually associated with cement! For brick factories the basic premise is simply 'at least 25 years for brick clay';

Para 146

Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by:

• co-operating with neighbouring and more distant authorities to co-ordinate the planning of industrial minerals to ensure adequate provision is made to support their likely use in industrial and manufacturing processes;

• encouraging safeguarding or stockpiling so that important minerals remain available for use;

• providing a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant and the maintenance and improvement of existing plant and equipment, as follows:

– at least 10 years for individual silica sand sites;

– at least 15 years for cement primary (chalk and limestone) and secondary (clay and shale) materials to maintain an existing plant, and for silica sand sites where significant new capital is required; and

– at least 25 years for brick clay, and for cement primary and secondary materials to support a new kiln.

• taking account of the need for provision of brick clay from a number of different sources to enable appropriate blends to be made.'

Para 6.5.6 – We welcome the specific reference to West Hoathly however the paragraph might lead a reader to believe the subsequent allocation will achieve a 25 year Reserve at the site, which it does not. Whilst we welcome the allocation striving to increase the stock permitted reserve, we consider the paragraph should highlight this is a circa 3 year addition to the reserve to 2028 hence a 15 year Reserve to 2031 also falling 2 years short of the plan period. We consider the paragraph would benefit from this additional degree of clarity and highlighting that 'it is likely during the plan period that further reserve will be required for the site'.

Policy M5, Clay

On the whole the policy is positive and useful. If we may suggest a few modifications;

In part A (i) the word 'help' is included so to avoid a position whereby a 'proposal' would be sufficiently large to maintain the land bank were as in practice it may take an aggregate of sites to achieve this.

(a) Proposals will be permitted for the extraction of clay provided

that:

(i) they would help maintain a landbank of at least 25 years of

permitted clay reserves for individual brickworks; or

In part B (ii) we believe the addition of words 'at the originating site' would be beneficial, so to avoid ta position whereby because a clay could 'technically' be used at A N Other site elsewhere for 'brick making' it prevents the sale off site for alternative uses.

(b) Proposals for the small scale extraction of clay, for uses other

than brick making, will be permitted provided that:

(i) there is a need for the clay for engineering purposes; and

(ii) the clay cannot be used for brick-making at the originating site; or

In relation to part (iii) we would highlight that in some instances because of the long established locations of brickworks they may not be located in proximity to the Lorry Route Network, thus the requirement for links to the LRN again needs to be limited by a 'where practicable' test.

(iii) where transportation by rail or water is not practicable or

viable, the proposal is well-related to the Lorry Route

Network.

Policy M9 – Mineral Safeguarding

Should the policy make reference to the Mineral Resource Assessment explicitly??

In the Mineral Safeguarding Guidance document the following comments are also offered;

Para 1.2.3 – In relation to the dialogue for consultation with regards mineral the Developer, LPA and MPA are identified as consultees however it may be necessary to add into the consultation cycle the potential 'user' of the minerals who might be the best gauge as to the economic viability of the resource. In relation to cost recovery, this must fall to the developer of any particular site.

Para 1.2.4 – In response to the question, we believe that the MPA should be involved in the process as a statutory consultee to the LPA.

Para 1.2.5 – The Mineral Resource Assessment is a very comprehensive assessment of the resource on a particular site.

In figure 1 of the flow chart a typo error exists where the word 'Applicant to' should be changed to 'Applicant is'

Section 7.2 Strategic Mineral Site Allocation

Policy M11 – We welcome the specific consideration to the West Hoathly site.

Para 7.2.5 – The section is titled 'Extension to West Hoathly Brickworks' however the actual allocation is for the 'quarry' serving the West Hoathly Brickworks. Consideration to refer to the 'quarry' might be beneficial in the title.

Para 7.2.6 – Given the long standing activities of clay extraction associated with the West Hoathly Brickworks we consider that the paragraph would benefit from a brief description to inform the reader that the site is 'worked and progressively restored in phases working broadly from west to east, with the site being returned to agricultural and woodland after uses'. By highlighting the extension would be a progressive working of the existing established site, it serves to benefit the reader informing them that existing operations are occurring within the AONB and sympathetic to the local setting.

The remaining sections (i) to (xviii) serve to try and identify elements which must be included in any planning application for the site into the future. It is not appropriate for the policy document to try and identify such detail which will be dealt with appropriately through Scoping of the Planning application at the relevant time.

The section should also reiterate that the allocation will provide circa 3 years additional life through to 2031 which is neither a 25 year Reserve or ensuring adequate supply to the end of the plan period. The section should therefore highlight that additional reserves from off site may be required and that additional reserve will need to accord with the policies as set out in the plan, specifically Policy M5.

Thank you once again for the opportunity to comment on this submission and we hope the comments set out above are useful in the consultation.

* * *

01 - Organisation: Igas Energy (Response ID: 315 Respondent ID: 3972)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

IGas Energy has a long and successful history in West Sussex and the South Downs National Park, extracting hydrocarbons safely and environmentally responsibly from the Weald basin for decades. Accounting for around 50% of our current production the area has produced more than 21 million barrels of oil to date.

We welcome both Vision and Strategic Objectives, in particular their acknowledgement that mineral extraction in West Sussex has brought with it a range of economic and social benefits. We agree with that mineral production should be conducted in a way where traffic disruption is minimised - an aspiration reflected in our operational practices on our sites, such as Singleton where following designated traffic routes is key in minimising our impact on our neighbours. We also welcome the commitments to safeguard both historic and natural environments in West Sussex, and our track record demonstrates how we've done this in practice.

Like West Sussex County Council, the onshore oil and gas industry is also commitmented to minimising fugutive emissions of, for example, methane. To this end, the industry is seeking to control these emissions by using 'green completions', equipment that collects and separates the initial flow of water, sand and gas, and separates them so the gas can be handled. Doing this can reduce methane emissions by as much as 95% versus venting straight into the atmosphere.

Finally, and in reference to SO13, as a responsible operator we ensure our old sites are remediated to the highest standard. An example of this is the restoration carried out at the site of the Egmanton oilfield Central Gathering Station where we have removed all the plant equipment and machinery, including pipelines. In agreement with the landowner and Planning Officers, the land was restored to a mixture of woodland, grassland and wetland. The work is now complete and wildlife has already started to colonise the new habitats that have been created.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

01 - Organisation: Keep Kirford and Wisborough Green (Response ID: 163 Respondent ID: 3622)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Covering email)

Please find attached a contribution to the Consultation on the Draft MLP. The group KKWG (Keep Kirdford and Wisborough Green) has a particular interest and knowledge of Onshore Hydrocarbons following an application for Oil/Gas Exploration made on the borders of the Parishes of Kirdford and Wisborough Green and just outside the SDNP so we have focussed on that area in particular.

In summary,

- We object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.
- In particular, we object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.
- The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.
- We are concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

Our contribution is evidence-based. Thank you for your attention.

(Main report received with contents page)

DRAFT WEST SUSSEX

JOINT MINERALS LOCAL PLAN (MLP)

CONSULTATION April 14-June 17, 2016

KKWG Contribution to the Consultation

Dedicated to Jo Cox MP for Batley and Spen killed on the street June 16th 2016 in Birstall doing her job

Background:

This contribution to the WSCC Joint Minerals Plan consultation is being submitted by the Keep Kirdford and Wisborough Green (KKWG) group of local residents based in the two Parishes in West Sussex. It is being submitted by the group's Chair, *…(redaction)..* who has a doctorate and an MSc in Environmental Technology awarded by Imperial College, London where she specialised in radioactivity in the environment; and, health and environment issues with reference to energy. While working at English Nature/Natural England she led the work for the organisation in partnership with the Environment Agency (EA) on the impacts of radioactivity on wildlife leading to the creation of Working Group 5 at the International Commission on Radiological Protection (ICRP). She is currently a member of the MEDACT steering group on Health and Energy. This area of West Sussex was faced with an application by Celtique Energie for Oil/Gas exploration on land to the south of Boxal Bridge which they later withdrew after initiating a challenge which led to the setting up of a Public Inquiry and the group has specific interests in the particular issue of Hydrocarbons involving High Volume Hydraulic Fracturing (HVHF).

Context:

1.1 We welcome the opportunity to comment on this document and the evolving minerals policy for both the County Council (WSCC) and the South Downs National Park (SDNP) designed to replace that of the WSCC 2003.

1.2 Previous outputs: This version needs to refer to the earlier policy, the earlier draft and link to the responses and the contributions made in August 2014. We Recommend that an Annex stating how the recommendations made to the draft have been incorporated should be added.

1.3 We welcome the evidence-based approach taken for this plan and note that some aspects in the Paper 2 need to be updated eg with reference to the Kirdford/Wisborough Green application which was appealed by the applicant and then withdrawn; and the purchase this week by UKOG of the Celtique Energie

interests including Broadford Bridge site approved by WSCC in Feb 2013 where site clearance work began Sept 2014.

1.4 Evolving legislation and guidance on planning issues makes it difficult to keep the document up to date and aligned to legislation and policy as the context keeps changing!

1.5 Our main interest, but not exclusively, relates to hydrocarbon exploration in the county, and in particular, to what is referred to as “unconventional” hydrocarbon appraisal and extraction.

Current situation

2. West Sussex Minerals Local Plan 2003

West Sussex Minerals and Waste Development Scheme 2014-2017 (2014)

2.1 The West Sussex Minerals Local Plan (MLP), which was adopted in May 2003, ensured the supply of minerals to at least 2006 although the policy framework has had a longer timeframe. It set out the County Council's vision, objectives and strategy for mineral land-use planning in West Sussex, and provides the detailed policy framework for determining mineral planning applications. It also set out the existing sites and commitments and new site allocations for minerals development. The MLP is a material consideration in the determination of planning applications and part of the statutory development plan for West Sussex.

2.2 The MLP in its entirety was saved until 27 September 2007. The County Council submitted to the Government a list of the policies that it considered should be saved and why. The outcome of this request was that the majority of the policies in the MLP have been saved until and when they are replaced by the new Minerals Local Plan. The following policies in the MLP Plan have not been saved and no longer form part of the statutory development plan:

• 23-24: New Minerals Workings;

• 25: Reclamation;

• 28: Oil and Gas;

• 43-46: Planning Applications; and

• 50: Surveys.

2.3 The MLP is to be replaced by the new Minerals Local Plan when it is adopted by West Sussex County Council for which this is the draft out to consultation.

3. West Sussex Minerals Local Plan

3.1 A new county-wide West Sussex Minerals Local Plan (MLP) is being prepared to replace the adopted Minerals Local Plan (2003) thus will enabling the policies and proposals in the MLP to be formally reviewed. The Minerals Local Plan is being prepared jointly with the South Downs National Park Authority, which became responsible for minerals planning in the park area of the county of West Sussex (and other authorities) from 1 April 2011.

3.2 The MLP is to cover the period to 2031, and needs to be prepared to be consistent with the National Planning Policy Framework (NPPF, 2012 and further planning guidance). It must take account of the need to contribute appropriately to national, regional and local requirements at acceptable social, environmental and economic costs.

3.3 Accordingly, MLP will clearly set out:

• a county-wide vision, strategic objectives, a spatial strategy for mineral planning, and a monitoring and implementation framework. A key diagram will illustrate the strategy in diagrammatic form;

• strategic mineral site allocations that are central to achieving the strategy;

• mineral safeguarding areas and safeguarded mineral infrastructure, such as wharves and railheads; and

• criteria-based policies that deal with specific types of mineral development; and

• generic development management policies.

3.4 The background to the strategy and policies had been set out in supporting text and, where appropriate, in a separate Background Document and other papers.

3.5 Following approval (originally scheduled for autumn 2015), the Proposed Submission Draft will then replace the adopted West Sussex Minerals Local Plan (2003) as the most up-to–date statement of the County Council's land-use planning policy for minerals. At that time, it will also be approved for development management purposes and it will be one of many material considerations that will be used for decision-making.

3.6 The Plan will not form part of the statutory 'development plan' for West Sussex until it is adopted (scheduled for 2017).

MINERALS POLICY and SDNP

4. Context

The National Park has a wealth of mineral resources that are important to the economy. The minerals are used for a wide range of applications related to construction, manufacturing, agriculture and energy supply. The Partnership Management Plan for the South Downs National Park, (December 2013) advises that the energy hierarchy is used to guide decisions and this indicates the priorities to be adopted and makes exploitation of fossil fuels the last resort given the commitments to the need to protect the climate as evinced within the Climate Change Act, the Paris Convention, December 2015 et al.

4.1 This approach is missing from the DRAFT Joint Minerals Plan and needs to be included. It is recommended that the energy hierarchy as expressed is reintroduced into this document.

4.2 General description of mineral resources

- Soft sand mainly used as an aggregate, is currently being extracted from four sites which lie in the Folkestone Formation which runs between Petersfield and Ditchling.

- Along the southern boundary gravel and some sharp sand is found. Whilst there is only one active gravel site within the Park there are several former gravel workings within and close to the boundary. The restoration of these sites has potential to deliver priority habitats to meet BAP targets in the National Park.

- Chalk has been worked in the South Downs for centuries, but demand is now limited. There are only two sites currently operating along with a number of dormant and inactive sites.

- Sandstone is quarried from Hythe beds of the Lower Greensand at two sites within the Park. One produces aggregate, hardcore and constructional fill whilst the other continues to supply local building stone.

- There are five (Recommend: Need to add word conventional) oil and gas wells within the Park some already in production others at the exploration and appraisal stage.

- And, in the Partnership Management Plan, 2014-2019, the SDNP comments:

The National Park has good conditions for a range of renewable energy schemes that are compatible with its special qualities. There is scope for developing resources such as woodfuel in ways that also improve landscape quality and biodiversity

4.3 Minerals sector context The National Park has a range of mineral resources that are important to the economy including soft sand, chalk, sandstone, oil and gas and brick clay: more detail can be found in the State of the South Downs National Park Report 2012.

4.3.1 These minerals contribute to a wide range of uses including construction, manufacturing, agriculture and energy supply. Historic chalk workings have left important landscape features, many of which have high biodiversity and cultural heritage and access value. Existing brickworks and sandstone quarries produce traditional products which contribute to local distinctiveness.

4.3.2 Although some minerals are required to serve a national need, opportunities exist to enhance the landscape through high-quality restoration of former mineral workings.

4.3.3 Planning applications for minerals development in the National Park will be considered in accordance with National Park purposes and duty, the NPPF, planning policies contained in the development plans and other material considerations. More information about the adopted and emerging joint minerals and waste plans can be found on the National Park website: www.southdowns.gov.uk/planning.

4.3.4 Mineral sites both within the National Park and its setting, [emphasis added] can have negative impacts while they are being worked, and it is vitally important that they are restored pro-gressively (i.e. as extraction takes place) and to a high standard to provide long-term enhancement to the landscape and biodiversity. A restoration led approach to mineral workings also provides the opportunity to restore and create new habitats.

4.3.5 Many quarries are designated as Sites of Special Scientific Interest for their biodiversity or geological importance, such as Southerham Grey Pit (Lewes) which exposes a unique record of Cretaceous rocks. Heritage sites may be found in the course of quarrying operations (for example, West Heath Barrow Cemetery near Petworth) and the physical remains of quarrying can become important heritage assets in their own right (for example, the railway system at Offham Chalk Pit or the de-Witt lime kiln at Amberley Chalk Pit Museum). The geo-conservation interest of these sites or features of interest will be an important consideration in planning terms. Restored quarries can also provide recreational opportunities, for example, through the creation of permissive footpaths. The extent, type and method of restoration will depend upon the individual characteristics of each minerals site.

2.11 Minerals policy

Policy 27: Protect and Enhance the National Park's special qualities through the management and restoration of minerals sites. Seek opportunities for the enhancement of landscape character, biodiversity, cultural heritage, geodiversity interest and increased local access through the restoration or natural regeneration of mineral sites.

Fluid situation:

5.1 A key concern is that the oft cited "strong regulatory framework" for Onshore Oil and Gas development ie oft cited, that is, by government departments, officials and MPs on a regular basis, is an assertion rather than a fact does NOT yet exist as evidenced by the recent consultation by the Environment Agency (EA) on Technical Guidance (closed December 2015).

5.2 On April 20th, 2016, Prof Richard Davies, head of the fracking research programme REFINE based at the University of Newcastle, said at the All Party Parliamentary Group meeting in the House of Commons that there are still gaps in the UK's shale gas regulations. "I don't think we're totally there, to be absolutely frank - "There are still gaps to be filled".

5.3 This is one of the major concerns for those thinking about the development of an Onshore Oil and Gas industry. It feels back to front along the lines of the UK will go ahead and do this and then catch up later and not take time to assess the evidence which exists.

5.4 This is not good enough nor is it sufficient when considering and evaluating the evidence which does exist in those places which have developed such an industry ie US, Canada and Australia. Such evidence needs to be collated and assessed as other home countries are doing – Ireland, Northern Ireland, Scotland and Wales as well as many others, for example, the State of New York where there are moratoria in place until the evidence has been evaluated.

5.5 A health warning needs to be given: ie that evidence accumulated elsewhere may not be reliably applied in the UK. However, there are now over 650 peer reviewed scientific studies available which all point to detrimental impacts on local communities, on health and the environment.

5.6 For example, the USA does not have a complicated geology unlike the UK where much of the ground under our feet is badly faulted… and geologists recommend that no fracking should be undertaken near such faults ie West and East Sussex and Kent (Smythe, Diggens, Alderson and Warren, CPRE). At Preese Hall in Lancashire, the only example of a drilling site which has been fracked in the UK, this is what gave rise to the seismic events which took place in and around Blackpool and led to the first moratorium in the UK.

5.6.1 The re-definition of fracking (Infrastructure Bill, 2015) has been changed to only refer to the amount of water used so that now Preese Hall would be regarded as not having been fracked although a letter from DECC states the opposite having been written before the new definition emerged.

5.7 Current regulatory guidance on Onshore Oil and Gas (Footnote 1 - EA consultation Onshore Oil and Gas Sector Guidance, Consultation Draft, November 2015) applies so far only to the Exploration phase and would need to be modified for any possible production phase to reflect the more intensive conditions associated with it. The latest consultation by the Environment Agency (EA) refers to the regulatory framework

"evolving". What was developed for the Offshore Oil and Gas industry followed the Piper Alpha disaster in 1988 when 167 people died but this regulation is inadequate for onshore developments which take place near communities of people as opposed to the North Sea and the marine environment.

5.8 This makes it difficult for anyone seeking to draw up policy in this area.

5.9 The British Geological Society report on the Weald established that there is NO gas and any oil will be difficult to extract.

"This study has identified the potential for a significant volume of oil-mature shale to be present at several horizons in the centre of the Jurassic , but shales further west and on the northern and southern flanks are not considered mature for oil generation….

"This study concludes that there is no significant Jurassic shale gas potential in the Weald Basin. Even the deepest Lias shales are unlikely to have attached sufficient maturity to allow for significant gas generation.

"….Some of the most prospective plays are in environmentally sensitive areas, in National Parks Areas of Outstanding National Beauty or under towns and villages…. ."

The Jurassic Shales of the Weald Basin – Geology, Shale Oil and Shale Gas Estimation

British Geological Society, May 23, 2014

5.10 The evidence base demonstrates that it would be an inappropriate use of land to permit any Shale Gas/Oil operations in the Weald.

6. National Planning Policy Framework

6.1 The current National Planning Policy Framework (NPPF) states that: 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and AONBs which have the highest level of protection in relation to landscape and scenic beauty'

(Paragraph 115)

6.2 "Planning policies and decisions should aim to identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason'

(NPPF, Paragraph 123)

6.3 National Planning Practice Guidance supports Paragraph 122 of the NPPF stating that there "exist a number of issues which are covered by other regulatory regimes and mineral planning authorities should assume that these regimes will operate effectively. Whilst these issues may be put before mineral planning authorities, they should not need to carry out their own assessment as they can rely on the assessment of other regulatory bodies. However, before granting planning permission they will need to be satisfied that these issues can or will be adequately addressed by taking the advice from the relevant regulatory body" (Paragraph 112 of the NPPG refers).

6.4 Paragraph 122 of the NPPF makes clear the role of local planning authorities directing they "should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. Local planning authorities should assume that these regimes will operate effectively".

6.5 The purposes of designation for National Parks are to:

- Conserve and enhance their natural beauty, wildlife and cultural heritage and
- Promote public understanding and enjoyment of their special qualities.

In case of an irreconcilable conflict priority is given to the first purpose of conservation.

6.6 Nationally important landscapes have protection under the law. These special areas have been designated by drawing a carefully chosen line on a map, although the system is different in the various countries of the UK. Presumably the highest designations for landscape such as National Park and Areas of Outstanding Natural Beauty (AONB) as designated under the National Parks and Access to the Countryside Act 1949 (Footnote 2 - There are currently 13 National Parks in England and Wales covering about 10% of the land area) explain why the Draft Joint Minerals Local Plan seems lop sided within the County, ie has not taken on

board the wider important environments of West Sussex. In particular, much of the wider countryside provides crucial buffer zones for the designated areas. This omission needs to be rectified.

6.7 According to the NPPF, the planning system has core planning principles (emphasis added throughout):

"support the transition to a low carbon future in a changing climate …and encourage the use of renewable resources (for example, by the development of renewable energy)."

Para 17, pt 6 p5.

6.8 "has a key role to play in helping to shape places to secure radical reduction in greenhouse gas emissions (GHG)" Para 93 and Baroness Hanham stated "We [the Govt] want to ensure that new development is future-proofed against climate change as decisions are made…local authorities would have to take account of climate change where it is relevant under their planning guidance."

6.9 Clearly oil and gas – the resources sought by CE - are not renewable energies but are fossil fuels which directly and indirectly contribute to climate change and thus this application does not comply with Government commitments and international agreements. The Stern Review's main conclusion was that the benefits of strong, early action on climate change far outweigh the costs of not acting (Stern, 2006; UK Govt Climate Act, 2008).

6.10 To use current carbon-based fuels in order to explore for and, possibly at some future date dependent on the assessment of what is found, to extract more carbon-based fuels is not in line with the UK commitments on climate change. Indeed it is a waste of time and a diversion of resources.

6.11 First, we must take steps to ensure that the planning system delivers the sustainable development promised in the NPPF. We should ensure that the same weight is given to the environmental and social as to the economic dimension; that permission is only given to development if accompanied by the infrastructure necessary to support it; and that the planning system places due emphasis on the natural environment.

6.12 In a first review the NPPF was viewed as failing as it was not delivering sustainable development; (House of Commons, DCLG Consultation on NPPF, Third Report of Session, 2015-16)

6.13 "The concept of sustainable development is at the heart of the NPPF, which included as its "golden thread" a new concept of a presumption in favour of sustainable development, which includes provision that development proposals in accordance with the local plan should be approved. We have been told, however, that, far from delivering development that is sustainable, the NPPF is, in fact, leading to unsustainable development. People variously said that sustainable development was ill-defined in the NPPF, that decision makers were giving greater weight to economic over environmental or social considerations, and that sustainable development was not being delivered in respect of infrastructure, renewable energy and the natural environment.

6.14 As the UN's high commissioner for human rights said recently, the great challenge is to keep the carbon in the ground.

The Guardian Oct 1st, 2013

6.15 "In our view, development can only be sustainable if it is accompanied by the infrastructure necessary to support it. Many of the parish councils, community groups and local residents submitting evidence told us that permissions were being given to housing development without adequate consideration being given to its impact on local infrastructure such as schools, health care, transport and sewerage."

6.16 Such infrastructure considerations need to be taken into account to support energy proposals and any successful applications. We welcome the inclusion in the plan of the port of Littlehampton and Shoreham and the rail heads at Crawley, Chichester and Ardingly.

6.17 Consideration also needs to be given to ensuring that there is adequate access to the important roads network which can carry HGVs and other large lorries and not use the extensive system of lanes and small roads which characterise West Sussex.

6.18 Where phrases are cited from key documents such as the NPPF these should be referenced.

Omissions

7.1 The precautionary principle needs to be included in the document

7.2 The Precautionary Principle is defined as follows:

When human activities may lead to morally unacceptable harm that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. Morally unacceptable harm refers to harm to humans or the environment that is

- threatening to human life or health, or
- serious and effectively irreversible, or
- inequitable to present or future generations, or
- imposed without adequate consideration of the human rights of those affected.

7.3 650 peer reviewed scientific papers on health impacts arising in connection with fracking have now been published and the overall assessment is that:

"The arguments against fracking on public health and ecological grounds are overwhelming. There are clear grounds for adopting the precautionary principle and prohibiting fracking."

http://www.medact.org/wp-content/uploads/2015/04/medact_fracking-report_WEB4.pdf

7.4 This means that the section on hydrocarbons needs to be changed and fundamentally amended. It is Recommended that the emphasis needs to be on the development of renewable sources and encouraging a transition to less harmful forms of energy use.

7.5 Specific points:

Strategic Objectives

Executive summary: Last line of Chapter 3 – need to distinguish between Conventional Oil exploitation as happens at Singleton as opposed to Unconventional oil.

Chapter 6: MARINET (Marine Information Network) has been gathering evidence on damage of marine dredging.

The Vision: Para 1: Delete the word "outdoors" – minerals involve underground workings which can be damaging. Suggest replace by word "environs".

Para 3: Society needs to be weaned off Oil and Gas and reference needs to be made to transition to renewable energy. In the SDNP Partnership Plan reference is made to the need to move away from Oil and Gas. This new plan is to be in place beyond 2030

Para 6: The need to development a low carbon, circular economy is important and supported

Suggest that while National Parks and Areas of Outstanding Natural Beauty (AONB) are important designations, the emphasis is rather lop sided and SO8 should be placed higher up eg after SO4. The wider parts of Sussex should have joint billing as these also include the buffer zones around highly important areas which make up the whole.

SO 10 should include reference to the Water Protection Zones, to the aquifer and, if water resources are to be protected from contamination, there should be references to the Water Framework Directive.

SO12 needs to include reference to climate change. According to a number of academics (for example Prof Kevin Anderson, University of Manchester) in order to deal with climate change there should be no fracking ie unconventional exploitation of oil and gas.

According to other disciplines, namely geology and hydrogeology, there should be no development of Oil/Gas in the Weald specifically on account of the number and range of faults which exist. The geology of the Weald is considered to be unsuitable given the large number of faults present (outline in objections to the Oil and Gas Exploration application made by Celtique Energie for land to the south of Boxal Bridge on the borders of the Parishes of Kirdford and Wisborough Green submitted by Warren, former EA hydrogeologist cited in KKWG objection, geologists Smythe, 2013+14; Diggens 2014 and Alderton, 2014).

Para 9: Reference to connected green infrastructure is supported but the last line needs to refer to more than the purposes of the SDNP. The South Downs is not West Sussex. The Plan also needs to refer to WSCC importrant areas including EU sites and areas referred to in the Natural England landscape areas such as the Manhood Peninsula and briefly referred to in Para 2.3.7. Clearly the Plan needs to focus on the key areas where minerals occur but adjoining areas are likely to be impacted by for eg the associated transport, use of roads/lanes, etc.

Para 2.3.5: Minerals can only be worked where they naturally occur (cite NPPF para)

Para 2.3.13: Oil and Gas – need to distinguish between Conventional and Unconventional exploitation. With regard to the latter reference to Fracking (Footnote 3 - The modern form of fracking involving high pressure and the use of slick water was invented by Nick Steinsberger in the UK in 1998,) needs to cover the whole process.

Section 4.3: Geology

This section contains only a broad description of the types of rocks extant under Sussex. It needs to include the nature of those rocks which are extremely faulted. This matters with regard to unconventional Oil/Gas potential development because it is those cracks which could potentially carry contamination to water sources and because any vertical drilling intersecting these faults could trigger seismic reactions as happened at Preese Hall in Lancashire.

Recommendation: It is recommended that a set of criteria be drawn up for assessing potential future applications for unconventional Oil/Gas

Applications in the county/SDNP. An example is shown in the next section.

8. Proposed Criteria (based on the New Brunswick, Canada Shale Gas Report)

The National Planning Practice Guidance sets out that Local Plans should include:

• Petroleum Licence Areas and existing hydrocarbon extraction sites on policies map;

• Criteria-based policies for each of the exploration, appraisal and production phases of hydrocarbon extraction. These policies should set clear guidance and criteria for the location and assessment of hydrocarbon extraction within the Petroleum Licence Areas.

8.1 It is Recommended that six conditions be met before any shale gas/oil development should be considered. These include ensuring:

- A social licence is in place;
- Clear and credible information is available about the impacts of hydraulic fracturing on public health, the environment and water, thus enabling the government to develop a country-leading regulatory regime with sufficient enforcement capabilities;
- Climate change impacts are recognised, taken into account, and, appropriate actions to minimise these are implemented at the local level.
- A plan is in place to mitigate the impacts on public infrastructure and to address issues such as waste water disposal;
- The wishes of the local community are respected given that two government reports illustrate that the greatest
- A mechanism is in place to ensure that benefits are maximized for the local community including the development of a proper royalty structure and a bond to cover any possible accidents/leaks/damage to water supplies et al.

8.2 The global market for natural gas has seen a precipitous drop in prices, which makes it further unlikely that industry will invest the necessary efforts to address the conditions in the short or medium term."

8.3 Currently in the UK there is no clear energy policy – the National Policy Energy statements are out of date and no plan to deal with critical issues such as the disposal of wastewater from hydraulic fracturing. Originally industry proposals to dispose of wastewater from hydraulic fracturing into municipal systems were

found to be wanting; the Environment Agency (EA) has banned re-injection into wells (shown to be causing earthquakes in the US) BUT have approved reinjection of fracking waste water….which can only intensify the problems of any leaks.

8.4 Before any part of government – national or local - can consider whether a hydraulic fracturing project meets the six conditions, it must implement a number of findings from the Royal Society report and others that are essential to a robust regulatory and permitting regime, including:

- An independent regulator should be created with a mandate to strengthen monitoring and evaluation of shale gas development in terms of understanding cumulative effects, including impact on human health and the environment. (UK Shale Gas Team headed by Lord Smith).
- Adequate resources must be assigned to properly plan for potential public infrastructure impacts.
- Short-term and long-term solutions to hydraulically fractured wastewater should be determined before commercial production begins (US-UK NERC Workshop report, November 2015).

Climate Change:

Fracking is incompatible with the need to address climate change

Prof. Kevin Anderson, University of Manchester

9.1 In addition, the December agreement on climate change made in Paris means that action in the UK needs to change its practice and legislation. The Government plan to issue a new climate strategy by the end of 2016.

9.2 Local plans will not be found sound unless they tackle climate change proactively:

"To be found sound, Local Plans will need to reflect this principle [addressing climate change] and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with: the provisions and objectives of the Climate change Act 2008 and co-operate to deliver strategic priorities which include climate change."

9.3 Tackling climate change not only means protecting the country from storms, and floods, it would protect human health by cleaner air, all aspects arising as a result of planning decisions and affecting Sussex.

9.4 Fossil fuel use is now considered to be inimical with the need to limit climate change. The United Nations has stated that at least 80% of the world's proven reserves now need to stay in the ground.

9.5 Fossil fuel extraction needs to stop and certainly that which is aimed at extracting any of the identified reserve/resource which is the most difficult to access, namely made possible only by directional drilling and by using High Volume High pressure Fracturing (HVHF) first invented by Nick Steinsberger in 1998.

Sensitive areas

10.1 This County has an exceptionally high percentage of outstanding designated sites with regard to landscape, water protection zones, wildlife and, now, Dark Skies Reserve status which need outright protection.

10.2 The Infrastructure Bill, 2015, states that drilling horizontally at depths greater than 300m from outside the "Protected Areas" will be per-mitted. No evidence was presented that this could be done without harm.

10.3 What is the evidence that drilling horizontally under these sites at depth would have no impact on the surface? The decision that applications for unconventional oil/gas should not take place on the surface in National Parks but could employ horizontal intrusions at depth from outside the designated areas was passed by MPs earlier this year. This is of concern. No evidence was produced to support this decision. In Groningen, in the Netherlands, which form part of the North Sea Oil and gas developments, the land sank 2 metres after the oil had been removed from underground while using conventional methods.

Drinking water

11.1 70% of the water drunk in West Sussex emerges from the chalk aquifer.

11.2 The use of a great deal of clean water by unconventional oil/gas (can be 5million gallons per fracking operation) and making it unusable is not a sustainable form of use.

11.3 That brings us on to the issue of what to do with the flowback water. "This specific process for obtaining fossil fuels (HVHF) turns the earth inside out. It buries a surface resource – fresh water, which is vital for life – and brings toxic materials to the surface which were originally safely locked away underground…."

Sandra Steingraber, US biologist

11.4 Such contamination cannot be removed from such water which now contains salts, NORMs and as well as the chemicals added to the water

11.5 Whether it returns immediately – Flowback – or over time – Recovered Water – these need careful dealing with. Currently in the UK suitable sites for dealing with such massive amounts of contaminated water are in short supply. A DECC representative pointed to there being only one such site which is "nearing capacity" Colin Mackie, DECC, June 2014 at NuLeAF seminar

11.6 The EA pronounced that it won't be sent back down the wells which, in the US, has led to a marked increase in earthquakes in states such as Ohio, Oklahoma et al.

11.7 Excerpt from NERC joint US-UK workshop on fracking, 2015:

"Deep well disposal is currently not permissible under most scenarios in the UK [emphasis added] and that puts additional pressure on research for treatment and reuse of the flowback and produced water. Research is currently being undertaken into how and when deep well disposal or direct reuse as a hydraulic fracturing fluid can be implemented in the UK. A huge uncertainty, given the immaturity of unconventional oil and gas development in the UK, is how much waste water will be produced and regulatory and technical mechanisms for cleaning it or directly reusing it. Without deep well disposal, it is likely that treatment of the dissolved solids will be required and so research into cost-effective means of doing this is important to the implementation of unconventional oil and gas production in the UK. The costs related to waste water production may be significant and could make shale exploitation uneconomic. Research into potential uses of the flowback and produced water that might require less treatment should be pursued as well as treatment schemes taking advantage of cheap power (e.g. off peak power generation). In the UK deep disposal is not a currently available option and there is unlikely to be sufficient industrial wastewater treatment capacity [emphasis added] to service the needs of a mature operational industry and so there is a pressing need to address this through research and technology development"

NERC US-UK workshop, Nov 2015

11.8 Marcia Bjornerud, a structural geologist at Lawrence University in Appleton, Wisconsin, US told Live Science. "Flowback water can be treated, but there are large volumes of it and so dealing with it is expensive, and beyond what many small-town water treatment plants can handle." - See more at: http://www.livescience.com/34464-what-is-fracking.html#sthash.62QCBw5s.dpuf

Planning Guidance

12 Planning practice guidance for onshore oil and gas (DCLG, July 2013); and Planning Practice Guidance statement (DCLG March 6, 2014)

12.1 The document opens with the justification for why minerals planning is subjected to a separate planning process. Among the five points made it includes:

"minerals can only be extracted where they occur" and "working is a temporary use of the land although it often takes place over a long period of time" (p2). The first line is cited in the Joint Minerals Local Plan and needs attribution.

12.2 Such a similar justification should have been drawn up and applied with regard to specially designated landscapes, water protection zones, wildlife and heritage considerations. These aspects can only exist where they occur, they cannot be created but they can readily and quickly be destroyed which is why the document also refers to "Strong protection" for such areas.

12.3 The NPPF states that: "Planning policies and decisions should aim to identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason". (Para 123)

12.4 The current SDNP Management Plan and Landscape Character Assessment both identify tranquillity and dark night skies as important special qualifies of the area which would be protected and enhanced. Any unconventional drilling with its 24 hours drilling noise and lights would not comply with these commitments.

13. Legislation:

13.1 As part of Neighbourhood planning any plan drawn up needs to "fit", to fit in with international, national, regional and local policies like a Russian doll. With respect to this guidance this would involve and should state how and where it does fit:

- Climate Change Act 2008
- COP21, Paris agreement 2015
- Sustainable Development, Securing the Future: delivering the UK sustainable development strategy, (March 2011); 2010-2015 government policy, Sustainable development, Policy paper, (May 8th, 2015)
- National Planning Policy Framework, NPPF DCLG 2012
- DECC Overarching National Policy Statement for Energy (EN-1) July 2011

13.2 In addition to that already mentioned:

- EU Water Framework Directive, Council Directive 2000/60/EC establishing a framework for Community action in the field of water policy (Water Framework Directive); EU Habitats Directive
- LPA Minerals Planning – local policy
- Radioactive Waste - Basic principles of radioactive waste management related to nuclear sites, 2015;
- NORM strategy, Strategy for the management of Naturally Occurring Radioactive Material (NORM) waste in the United Kingdom 2014 plus consultation and contributing documentation

SPECIFIC COMMENTS on POLICY

Onshore Hydrocarbons

14 POLICY M7a Hydrocarbon development not involving hydraulic fracturing.

A) Should be amended to reflect the need NOT to pursue fossil fuel extraction ie

a. Will not be permitted if the UK country allowance for Oil/Gas has reached its target

b. The site needs to be located outside the SDNP, AONBs, European sites, those supporting EU Protected Species, Ramsar sites, LNRs, SNCIs, Water Protection Zones 1, 2 and 3 nor within sight of such a highly valued area and landscape including adequate buffer zones

c. The site has been selected on a full and adequate assessment

d. Any potential impacts need to be identified and Minimised/Mitigated

e. Restoration and aftercare – requires continual monitoring including the well itself. At Singleton a leak occurred for 5 years before it was recognised and dealt with

f. The document needs to be updated to reflect the new Dark Skies designation.

Singleton conventional oil extraction

1989: Discovered

1991: 2 wells drilled to depth of 4,100'

2015: 6 wells produced 600 barrels (21,000 gallons) per day

Pollution: Well integrity: the failure of a cement bond at Singleton took nearly 5 years to fix

14.2 POLICY M7b Hydrocarbons development involving hydraulic fracturing

This policy stipulates that fracking will not be allowed in NPs or AONBs. This approach has been jeopardised by recent government legislation which states that access could be made horizontally from just outside such

designated areas BUT no evidence was provided to underpin this legislative change showing that this approach would not harm such areas.

14.2.1

There are particular risks associated with the process of High Volume Hydraulic Fracturing, HVHF:

-Risk of chemicals and drilling mud polluting to the aquifer which in Sussex is fed by artesian and spring sources arising from the chalk downs of the South Downs National Park.

- Methane escaping after the fracturing of the shale via the cracks in the rock strata below the aquifer and thus polluting the drinking water. This can occur when the well is not properly sealed

- Methane getting into buildings and then building up to dangerous levels. A mixture of 5-15% methane with air can result in explosions if ignited. It is a volatile and dangerous gas.

- A lack of appropriate facilities to deal with flowback waste water. According to Sinding et al, 2015(Footnote 4 - Chapter 9, The Human and Environmental Impact of Fracking ed Madelon L Finkel (2015) p 140 citing Hammer R et al http://www.nrdc.org/energy/files/fracking-wastewaater-fullreport.pdf), "Disposal of wastewater from shale gas development is difficult and dangerous. Research has shown that currently available disposal methods may be inade-quate and the improper handling, treatment, and disposal of wastewater can expose people and wildlife to toxic, radioactive…. This difficulty is compounded by the volumes involved.

14.2.2 Flowback water provides a challenge in that facilities are generally unable to remove radioactivity and other materials such as sodium, chloride and bromide.

- "The quality of the initial cement job [in a well] is a critical factor in the prevention of fluid movement from deeper zones into groundwater resources."

- Onshore drilling rigs – industry evidence shows

8% fail within 6 months

50% fail within 15 years

All fail within 30 years

14.2.3 The Royal Society/RAE (2012) report recommended an Environ-mental Risk Assessment (ERA) be carried out which was done by Cuadrilla in their applications in Lancashire; and, an HIA should be undertaken as was the case drawn up by the Director of Public Health in Lancashire.

14.2.4 The accompanying evidence for this Minerals Plan needs to be up to date.

- Health – New York Compendium; MEDACT report(s)

- Engineering – Ian Crane, Michael Hill

- Water – Water management CIWEM. Shale Gas and Water

- Methane – Anthony Ingraffea

-Wastes and their disposal – Stuart Haszledine et al, Edinburgh University

- Chemicals – Fracking report, Chems Trust

- Climate change – Prof Kevin Anderson, University of Manchester

- Geology – Prof David Smythe; BGS report on Weald

14.2.5 Fossil Fuel considerations

UNITED NATIONS GLOBAL ENVIRONMENTAL ALERT

"While offering economic and energy security benefits, UG (unconventional gas) production presents considerable environmental risks. These range from potential water and soil contamination from surface leaks or from improperly designed well-casing, to spills of improperly treated water, increased competition for

water usage, and fugitive emissions of gas with implications for the global climate… air pollution from volatile contaminants, noise pollution,

negative impacts on ecosystems, biodiversity losses and landscape disruption."

Issued Nov 2012

14.2.6

Issues that need to be considered

Authorities need to be satisfied that the issues they cover can or will be adequately addressed. This is stated in the Planning Guidance but what about when Evidence demonstrates otherwise in some cases? The EA argued at the Lancashire PI into application on 2 sites (Preston New Road and Roseacre) to frack 4 drill sites on each area by Cuadrilla Bowland Shale that the issue of capacity of the local area to dispose of toxic waste waters produced in huge quantities belongs to the Minerals Planning Authority….so such facilities need to be documented and included within the policy.

15. Material Conditions

Note that Planning Guidance refers to an extant well being a material condition.

16. Predetermination

The issue of Predetermination has meant that many involved in the Decision making process including Parish, District and County Council would not meet or talk with objectors' groups, would not consider hearing the counter - evidence…..but did make themselves very available to the Exploration company. Many constituents felt that their views and concerns were not being heard or recognised. Has this changed under the Localism Act? See Appendix 3.

17. Changing legislation landscape (Ward, 2015)

Infrastructure Action 2015: Onshore hydraulic fracturing: safeguards (selected)

- No hydraulic fracturing at depths <1000m (no evidence produced regarding lack of harm)
- Independent inspection of well integrity – no timetable, no reference to numbers of staff needed nor the equipment required to do this
- Baseline monitoring for CH4 in the 12 months before drilling (requirement in the I Bill)
- No hydraulic fracturing on GW protection zones (Footnote 5 - These were to be elaborated in the Draft Regulations… these have been seriously weakened with only SPZ1 and >1200 m depth proposed and agreed to in Parliament in Feb 2016. Consultation on Protected areas launched Nov 4, 2015) or other protected areas but these have again been re-defined rather than using the current rigorous definitions
- Cumulative effects to be considered
- Fracking chemical(s) must be approved
- Water companies to be statutory consultees

18. Recommendations

Research

The Natural Environment Research Council (NERC) helped to sponsor a joint UK-US Workshop on Fracking in November 2015 . The outcomes included over 140 research priorities:

18.1 Key research questions (Ward, BGS, 2015)

- There needs to be better Characterisation of the deep sub-surface (>400 m) to understand

o Pathway characteristics – hydrogeological properties

o System response to anthropogenic influences

o Behaviour and interactions of fluids (physical, chemical, biological)

- Risk Evaluation – natural and anthropogenic exposure pathways, long term behaviour

- Detailed characterisation of baseline – spatial/temporal variation

18.2 Research required:

- Wastewater: What is happening to wastewater from oil and gas (conventional/unconventional); needs tracking from cradle to grave for waste water, including content and quantity.

- Longer term: air emissions; health effects, Regulatory, Decision making, Perceptions

- Water reuse: Since in some places, disposal wells are the cheapest method of managing produced water, how can we encourage operators to recycle their produced water? Is there any need for further regulation? NB this is permitted in the US but not in the UK.

- Water treatment management technologies

These are but a few of the 142 research recommendations……

18.3 Definitions need to be included in the MLP:

• The use of phrase "high volume" HF which is used in the

explanatory text, but in the actual policy M7b, it only refers to HF. This needs clear definition and explanation.

• Policies also only refer to the transport of oil/gas and water. There is no mention of other fluids/supplies/wastes/wastewater etc. At Horse Hill, Surrey, the vast majority of HGVs were either deliver-ing fuel, etc. to the site or removing waste rather than transporting oil/gas/water.

• There should also be some sort of definition or reference to what is considered to be an HGV, in order to avoid a repeat of K/WG or Fernhurst where white van equivalents were included by Celtique Energie.

18.4 An Annexe should be added stating how the recommendations made to the draft have been incorporated or why they have been omitted.

Need to distinguish in the document between conventional and unconventional Gas and Oil developments. There are five (Recommend: Need to add word conventional) oil and gas wells within the Park some already in production others at the exploration and appraisal stage

Need to stress the setting of the SDNP in line with the evolving ecosystem services basis of the local plan

Appendix 1: West Sussex Minerals Local Plan

West Sussex Minerals Local Plan

Document details

Role and Subject: The Minerals Local Plan will contain an overall vision setting out the role that minerals development will play in shaping the future of West Sussex (including the parts of the South Downs National Park that lie within the County). The new Plan is being prepared jointly with the South Downs National Park Authority.

It will set out strategic objectives which will contain more detail on the key issues for minerals for the area and how these will be addressed. These objectives will be in alignment with the priorities identified in the Sustainable Communities Strategy. The Minerals Local Plan will set out a spatial strategy and core policies which will achieve the objectives and deliver the vision.

The document will allocate strategic mineral sites that are central to achieving the strategy. Strategic mineral sites will include key sites serving a county-wide need. Strategic mineral sites will include sites for sand and gravel extraction. Measures will also be included to safeguard suitable mineral resources, wharves and railheads, and existing waste management sites.

The Minerals Plan will include a limited suite of use-specific and generic development management policies. It will also contain clear guidance on implementation and monitoring to ensure delivery of the strategy.

The Policies Map (held by the Local Planning Authorities) will be updated to illustrate the spatial extent of policies.

Time period covered: 2014-2031.

Geographic coverage: West Sussex (including the area covered by the South Downs National Park).

Status: To be prepared. Part of the statutory 'development plan' upon adoption.

Conformity/Consistency: Consistent with National Planning Policy Framework and other national policy and guidance

Timetable (indicative and subject to agreement with the SDNPA)

Survey and evidence gathering October - December 2013

Preparation for informal community and stakeholder engagement January 2014 – April 2014

Informal community and stakeholder engagement on issues, options and 'long list' of potential site allocations April – June 2014

Preparation of Draft Plan and draft Sustainability Appraisal Report June - September 2014

Informal public and stakeholder consultation (Reg. 18 stage) on Draft Minerals Local Plan and draft Sustainability Appraisal October - November 2014

Summarising representations/preparation of Proposed Submission Draft and Final Sustainability Appraisal Report December 2014 – August 2015

Representations period (Reg. 19) on Proposed Submission Draft and Final Sustainability Appraisal Report September- October 2015

Summarising representations/preparation of Submission Plan and Final Sustainability Appraisal Report November - December 2015

Submission of final document and Sustainability Appraisal Report to Secretary of State January 2016

Preparation for Public Examination Hearing January - March 2016

Pre-Meeting (as required) March 2016

Public Examination Hearing April 2016

Modifications Representations period June- July 2016

Reconvened hearings (as required) August 2016

Receive Inspector's Report September 2016

Adoption October 2016

Publication November 2016

Monitoring and Review

Monitoring: The Annual Monitoring Report will assess whether targets and indicators have been achieved; what impact the policies are having on national, and local targets; whether the adopted policies need adjusting or replacing; and, if policies need to be amended, suggested actions for achieving this.

Date of Review: From 2019 - To be replaced, when necessary, by a revision of the adopted plan.

Arrangements for production

Organisational Lead: Team Manager (Planning and Transport Policy).

Management Arrangements: Consultation with Strategic Planning Manager and Director Communities and Infrastructure. Discussions with Minerals and Waste Lead and Director of Planning at the South Downs National Park Authority.

Political Management: Consultation with Cabinet Member and decision at informal (Reg. 18) stage. Decision at formal (Reg. 19) stages by County Council following recommendation by Cabinet Member. Scrutiny by Environmental and Community Services Select Committee (ECSSC) and Planning Committee.

The South Downs National Park Authority will have separate governance arrangements.

Internal Resources: Senior Planner x 1.2, Planner and Assistant Planner (together with officer support from the SDNPA).

External Resources: Stakeholders - time and personnel for input into consultation. External consultants to audit SEA/SA and technical work as required.

Stakeholders/Community Involvement: Informal and targeted ongoing engagement with stakeholders on Background Papers and informal consultation on draft document and SA Scoping Report. Informal engagement with stakeholders re. changes following consultation on draft document and SA Scoping Report. Period for representations (Reg 19) on Proposed Submission Document and draft SA Report.

APPENDIX 2: WASTE WATER DISPOSAL (Report included with main email submission)

APPENDIX 3: LEGAL BRIEFING ON PREDETERMINATION

Localism Act 2011 – section 25, predetermination

Jonathan Swift QC

(Report included with main email submission)

* * *

01 - Organisation: Kent County Council (Response ID: 194 Respondent ID: 3782)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(main response)

Draft West Sussex Joint Minerals Local Plan (DWSJMLP)- Reg 18 Consultation

Thank you for giving Kent county Council the opportunity to comment on the above draft Plan at the Regulation 18 Consultation stage.

The County Council is aware that it wrote to West Sussex County Council (WSCC) on mineral supply matters of potential joint importance on the 2rd December 2015 (copied below for reference). The comments related to a number of minerals and mineral supply related matters, the contests of this letter remain pertinent to WSCC's deliberations on their Plan at this time.

Of all the mineral types that there is concern for in terms of future supply to the market in the south east of England area soft sand remains as a 'stubborn to reconcile' issue in that much of the remaining supply areas in both county's is within areas of designation that makes sustainable supply problematic. WSCC states in the emerging Plan at para 6.2.13:

"Land won soft sand is of a particular quality that cannot be substituted by other minerals.

The soft sand resource is heavily constrained due its location within or adjacent to the South Downs National Park."

Kent stated in December 2015;

"Kent has currently permitted reserves of 8.04 million tonnes (as of end of 2014) and a potential replenishment supply of 16.42 million tonnes overall (to 2030). Predicted requirements over the life of the Kent Minerals and Waste Local Plan (until 2030) are 17 times 0.601 tonnes averaged yearly production, thus totalling 10.20 million tonnes. Total surplus could (if all the replenishment reserves were to come forward) result in a surplus of 14.24 million tonnes. Thus there does appear to be a margin of flexibility available to Kent for its anticipated Plan period 2013-2030.

It is the case that a maintained landbank of at least 7 years of annual averaged (10 years) production (an NPPF compliant landbank) to be made available, year on year, amounts to 4.20 million tonnes. This will be achieved in Kent only if all the identified replenishment sites do indeed come forward. This is by no means a certainty. If West Sussex's requirements for soft sand do indeed increasingly have to be met via imports from Kent (thus not incurring new extraction or extensions to existing sites in the relevant National Park) Kent's position of anticipated surplus may well alter. It is reasonable to conclude that exhaustion may not occur in Kent if West Sussex's 3.724 million tonne supply shortfall has to be addressed by Kent's potential surplus of 14.24 million tonnes. Though this is indeed predicated by all the replenishment sites come forward over the life of the Kent Plan. This is not, as stated, a certainty."

Kent County Council's most recent Local Aggregate Assessment (LAA) SEEAWAP approved states that current landbank for soft sands is 8.04 million tonnes, the NPPF requirement for a 7 year landbank to be maintained in any one year is 4.207mt. Based on the average 10 years sales figure this would enable a 6 year NPPF compliant soft sand to exist in Kent with the current reserves base. This essentially underpins what KCC stated in December 2015 above. In that WSCC's Plan cannot entirely rely on KCC 'realising' the potential supply of new reserves in the scale of 16.42 million tonnes with any certainty.

The strategy of the DWSJMLP is to not incur into the South Downs ANOB National Park in terms of site allocations for further soft sand reserves and rely on a mix of importation from other areas and 0.85 million tonnes of supply from a site called Ham Farm. The DWSJMLP also sates at para. 6.2.14 that:

"The current 10 year average sales value is much higher than for sharp sand and gravel, at 365,000 tonnes per annum (2005-2014), and other

relevant local information suggests average demand may be as high as 423,000 tonnes per annum. The total permitted reserve of land-won

sand and gravel is 3,009,400 tonnes which currently provides a landbank of 7.1 years. Based on the 10 year average sales, taking account of

other relevant local information, current reserves are not sufficient to meet demand over the Plan period (up to 2033)."

The reserves base of 3.01 million tonnes plus Ham Farm would yield some 3.86 million tonnes that would give a simple landbank of 9 years, an NPPF compliant landbank would require there to be, at least, 2.961 million tonnes to be available in any one year over each year of the Plan. Therefore it is clear that the DWSJMLP's strategy is to move to an increasing reliance on soft sand importation given that it is assuming the exceptional circumstances required to identify further reserves within the South Downs ANOB National Park will not be possible (this is the essential effect of Policy M2) . This may well be the case, and KCC is not in a position to comment on other Mineral Planning Authority reserve life estimations for soft sand, and their ability to support supply in their respective areas and contribute effectively to the needs of WSCC, though the Kent position as set out in December 2015 remains essentially unaltered. Soft sands within the county may in terms of replenishments are not certain and WSCC , or other authorities, cannot rely on them coming forward to meet Kent's needs and make sufficient contributions to WSCC identified requirements.

I hope that the above is useful for your council's further Plan making deliberations.

(2nd December communication)

West Sussex Joint Minerals Local Plan-Duty to Cooperate

Thank you for your letter of the 16th of September 2015 (appended to this reply), in which you requested a reply by 25th September 2015. I apologise for the delay in my reply, though I understand from our discussions that your authority would still value this late response. In response to your specific questions I can respond as follows:

Q1. The make-up of future aggregate supply in West Sussex to meet identified needs

Until the full AM2014 import export movements are known it may be considered pre-mature to say that Kent will not take an increasing amount of minerals from West Sussex, as this data may show an increasing trend since the last relevant survey of AM2009. That said, it is considered unlikely that a marked change in trend of limited supply from Kent to West Sussex to that of a significant supplier (of sharp sand and gravel) will arise. It is considered that transportation costs and the existence of closer alternatives to Kent's landwon material would negate this change in the pattern of supply.

Q2. West Sussex Mineral future Supply Options

Table 1: Important Minerals in West Sussex shows that where indigenous supply is limited such that a degree of importation is occurring. However, the matter is more acute in Kent, to meet requirements over the next few years it will be unable to supply its own needs of sharp sands and gravels. This is a matter that West Sussex will increasingly experience (though there is an expected surplus in 2032) and marine dredged materials will be increasingly important. Thus, there remains the question of how far the marine resource can be relied upon into the future in Kent, West Sussex and other mineral planning authorities experiencing relative depletion of their landwon reserves and replenishing resources. It is a question greater than a West Sussex and Kent supply relationship analysis. It is inevitable that the marine dredged resources will exhaust at some point, as they are finite in nature.

Crushed rock in Kent is in relative abundance, given its part of the crustal massive geology of Kent. Permitted reserves are extensive (48-49 million tonnes) thus it is not anticipated that any increased need in West Sussex will necessarily mean that Kent's requirements (in the order of 0.78 million tonnes per annum) will be significantly constrained. It is of note the Kentish Ragstone is unable to meet all specifications of crushed rock aggregate use.

Q3. West Sussex Mineral future Supply Options

Supply should usually be indigenous to be sustainable. The geology dictates if the available array of mineral resource is limited or abundant. If the predicted demands outstrip supply scenarios then importation and substitution is the only other option.

Q4. West Sussex Mineral future supply options-Plan Only for indigenous Needs

Kent has currently permitted reserves of 8.04 million tonnes (as of end of 2014) and a potential replenishment supply of 16.42 million tonnes overall (to 2030). Predicted requirements over the life of the Kent Minerals and

Waste Local Plan (until 2030) are 17 times 0.601 tonnes averaged yearly production, thus totalling 10.20 million tonnes. Total surplus could (if all the replenishment reserves were to come forward) result in a surplus of 14.24 million tonnes. Thus there does appear to be a margin of flexibility available to Kent for its anticipated Plan period 2013-2030.

It is the case that a maintained landbank of at least 7 years of annual averaged (10 years) production (an NPPF compliant landbank) to be made available, year on year, amounts to 4.20 million tonnes. This will be achieved in Kent only if all the identified replenishment sites do indeed come forward. This is by no means a certainty. If West Sussex's requirements for soft sand do indeed increasingly have to be met via imports from Kent (thus not incurring new extraction or extensions to existing sites in the relevant National Park) Kent's position of anticipated surplus may well alter. It is reasonable to conclude that exhaustion may not occur in Kent if West Sussex's 3.724 million tonne supply shortfall has to be addressed by Kent's potential surplus of 14.24 million tonnes. Though this is indeed predicated by all the replenishment sites come forward over the life of the Kent Plan. This is not, as stated, a certainty.

Q5. West Sussex Mineral future Supply Options-Effect of decline of Exports of Soft Sand from West Sussex

Provided that the economics of demand were such that it would be commercially attractive to import significant volumes of soft sand from Kent, then the issue would be whether or not the unconstrained potential resources to supplement those currently permitted would be sufficient to meet Kent's projected needs (in terms of a simple landbank) and that of West Sussex. It appears that there would be sufficient material to achieve this, provided the identified sites (in the Kent Minerals Sites Plan Preferred Options Consultation, May 2012) were to come forward in a manner that gives assurance that sufficient supply will be available (see Section 10 Future Aggregate Supply Options in Kent to Maintain a Steady Supply of Aggregates to Meet Market Needs in Kent, of The Third Local Aggregate Assessment for Kent November 2015). This is not a certainty, and there is a degree of fragility in this potential supply chain model in that a significant amount of potentially replenishing material is tied up in one site (Shrine Farm, Postling, Site 97, 8.0 million tonnes).

Should the expected supply chain not come forward, then this would have a detrimental impact on ensuring supply is maintained in both in Kent and the modelled West Sussex areas simultaneously. It is also true that discussing these two area's soft sand requirements in isolation is essentially unrealistic; for example East Sussex has limited landwon reserves and potential available resources and thus this area's requirements may be, in part, from Kent.

Q6. West Sussex Mineral future supply options- Future security of Kent Export Supply

Kent has not experienced any significant changes to its import/export infrastructure that would limit future patterns or quantities of exported soft sands. It should be borne in mind that local needs may change over time in an unpredictable manner and this may have an impact on materials available for export. Given the assumption that local needs would be met first as, in practice, there is greater competitive commercial advantage to serve local markets primarily.

Q7. West Sussex Mineral future supply options- Market areas for Kent Soft Sand Sites

At this time a definitive answer as regards the markets served by Kent's soft sand extraction cannot be given. When the SEEAWP AM2014 report is available this will be clearer given that the import export balance with destinations will be detailed in the British Geological Survey report. The earlier SEEWAP AM2009 data is now rather old and should not be little weight in my view.

Q8. West Sussex Mineral future Supply Options- Continuity of Soft Sand Supply

Kent has currently permitted reserves of 8.04 million tonnes (as of end of 2014) and a potential replenishment supply of 16.42 million tonnes. Predicted requirements over the life of the plan (until 2030) are 17 times 0.601 tonnes averaged per annum production, thus 10.2 million tonnes are required overall.

Total surplus could (if all the replenishment reserves were to come forward in a timely fashion over the life of the Plan) result in a surplus of 14.2 million tonnes. Thus there does appear to be a margin of flexibility available to Kent for the anticipated Plan period 2013-2030, and for Kent to have a wider role in supplying markets outside the County, subject to market demand. However, as indicated in response to Q5, a significant amount of the potential replenishment reserves are within one site (Shrine Farm, 8.0 million tonnes). This site is has been identified as a Preferred Options site, though it remains within the setting of the Kent North Downs AONB, a highly sensitive site in landscape terms. Before and further progress on the Mineral Sites Plan can re-

commence an additional 'Call for Sites' consultation exercise will be undertaken, which will trigger a further assessment process.

If the County Council does not rely on the Shrine Farm reserve, then potential replenishment resources could, reduce from 16.42 million tonnes to 8.42 million tonnes, yielding a total potential reserve of 16.46 million tonnes. The Plan requirement of 10.2 million tonnes remains and thus the potential available surplus of 6.26 million tonnes may exist, rather than a surplus of 14.2 million tonnes. Kent's future role in the wider context of a net soft sand exporter may therefore not be as secure as it would at first appear. It would appear correct for West Sussex County Council to recognise the need to identify additional sites (Options SS1, SS2 and SS3) and not rely on a Kent import supply future scenario.

Options for Sharp Sand and Gravel-West Sussex Continuity of Supply

With regard to the options available to West Sussex County Council for the adequacy of future sharp sand and gravel aggregate supply, it is considered that if the NPPF places a priority in assessing and (if possible) securing a steady and adequate supply from landwon sources, therefore this should be pursued. If this is not possible, a sustainable approach is to increase substitution from secondary and recycled sources and then imports of such materials as marine dredged aggregates should be explored, thus affecting a steady and sustainable based supply of materials to the market.

Options for Secondary and Recycled Options

The NPPF caveats the requirement to take into account the contribution from this sector in overall aggregate supply "so far as practicable". Therefore, Options SRA1 and SRA2 do indeed appear practicable, in that they relate to planning policy. Options SRA 3 and SRA 4 relate more to how the private sector responds to policy, both locally and at the national scale, including the effect of primary aggregate taxation. Therefore, the objectives of Options SRA 3 and SRA 4 may be less appropriate to planning policy formulation.

Crushed Rock- Continuity of Supply in West Sussex

The lack of supply in West Sussex is understood. Therefore, crushed rock supply will have to be imported into the county's area. Kent has abundant reserves of limestone (Kentish Ragstone in the order of some 48 million tonnes) and it is not anticipated that an increase in demand from West Sussex will be likely to have a significant impact on the ability for Kent to meet its own needs.

Marine Dredged Aggregates- Continuity of Supply in West Sussex

Kent County Council understands the imperative to safeguard all existing, planned and potential wharves in an area to ensure that the NPPF's requirement for marine dredged (and other materials) aggregates can be imported into an area to contribute to overall supply needs. Therefore, of the options West Sussex County Council are considering only Option W6 which seeks to safeguard wharves in Eastern Harbour Arm at Shoreham (ARC Wharf, Hall Wharf, Tuberville & Penneys), Railway Wharf (Littlehampton); safeguarding of Brittania Wharf (and extension); and rely on 96ktpa general terminus capacity (2.29 mt capacity) addresses the need for Plans to safeguard existing wharves, and those that there are planned and are potential wharves within the area.

The recent Examination Hearings into the Kent County Council's Minerals and Waste Local Plan 2013-30 (as modified) exposed the need to ensure that non-operational but potential wharfage is required to be safeguarded to in accordance with the NPPF. It is advocated that West Sussex County Council adopt the same approach.

I hope that clarifies the position, if you have any need of further information please do not hesitate to contact me again.

* * *

01 - Organisation: Kirdford Parish Council (Response ID: 245 Respondent ID: 3664)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Kirdford is still vulnerable to oil exploration.

We spent months analysing the data and we spent taxpayers money defending our environment, yet we still feel that our concerns over transport, infrastructure, pollution, noise, light levels have not really been listened to.

We are worried that the proposals are still active.

The Strategic Objectives seem to gloss over the reality of what we continue to face.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Ideally, we would like think that the Strategic Objectives really do apply to us and will safeguard us, but somehow, knowing how hard we fought to prove that the proposed location was/is not suitable, we still feel that we are vulnerable.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Having read the full report with regard to Policies M7a and M7b we have the following comments: section 6.7.2 speaks about protecting the environment; section 6.7.3 talks about fracking not in SDNP, AONB or other protected areas.....we feel that these are still live and concerning issues for us.

6.7.4 speaks about "in the public interest", well this is rather subjective and woolly. Protected areas.

Policy M7A ii/HGC movements (p58) a) speaks about adverse impacts, we proved that HGV movements would have a terrible impact: noise, dust, visual intrusion, transport, lighting as mentioned in your above-captioned policy.

Policy M7B (P60-62) fracking, same as above.

Ch 8 p 79: "no unacceptable harm to the amenity, character and the environment or any other material consideration as a result of minerals development" we are not sure WSCC would protect our area.

8.1.5 (p79) Planning Performance Agreements: you write of "unacceptable impact" and protecting key characteristics of the landscape and retention of important features. We still feel vulnerable..."out of sight out of mind".

We are rural, isolated and really special. We'd like to think that WSCC feels the same way about us and will protect us and our irreplaceable environs.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

In an ideal world it would be really helpful to see that Kirdford and Wisborough Green have been granted a permanent exemption from the threat of Hydrocarbon development of any sort. To see this in writing somewhere would prove that the time and money we have all spent has been well worth it.

It's ok to keep some spaces special just because you can.....

Additional Comments

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* * *

01 - Organisation: Littlehampton Town Councillor & resident (Response ID: 40 Respondent ID: 3967)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I have two main concerns. The first is that there is not enough emphasis on the importance of using recycled materials for development wherever possible. The second that this plan contains a new policy for 'hydraulic fracturing', fracking, which does not have nearly enough safeguards in terms of issues like contamination, water supply, carbon emissions, earth tremors etc and it is important that these safeguards are put in place now as this is the policy for which future applications will be judged against. It allows fracking to take place underneath special areas like national parks. This could have been an opportunity for West Sussex to say that fracking is not welcome in this county.

I welcome the protection afforded to the railway wharves in Littlehampton for the river transport of minerals although some indication of how much it is used in the document would be welcome. Since the regular dredging of the Arun stopped what has been the impact on the use of this site? Are the size of boats necessary still able to access it?

These are the only comments I have to make on the document. Many thanks.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

01 - Organisation: Owner, Wappingthorn Manor (represented by Boodle Hatfield)
(Response ID: 268 Respondent ID: 4057)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The title to Ham Farm (title number WSX171768) contains a restrictive covenant that would prevent it being used as a mineral quarry.

The charges register of title number WSX171768 contains a number of covenants that affect Ham Farm. Entry number one on the charges register provides as follows:-

"A conveyance of the land edged blue on the filed plan and other land dated 1 June 1961 made between (1) *…(redaction)..* (the Grantor) and (2) *…(redaction)..* (Donees) contains the following covenants:-

The Donees to the intent and so as to bind (so far as practicable) the land and premises hereby assured into whosoever hands the same may come and to benefit and protect Wappingthorn hereby jointly and severally covenant with the Grantor to observe and perform the stipulations specified in the schedule hereto PROVIDED THAT neither of the Donees shall be liable in damages for breach of any stipulation which is restrictive of user of the premises hereby assured after he shall have ceased to have any interest in the premises in respect of which such breach shall occur.

The schedule above referred to

Covenants imposed in respect of the property hereby assured

3. Not to use the land hereby assured or any part thereof for any offensive noisy or dangerous trade business pursuit or occupation or for any purpose which shall or may be or grow to be in any way a nuisance damage grievance or annoyance to the Grantor, his successors in title or their tenants or which may tend to depreciate or lessen the value of Wappingthorn or any part thereof as a residential property".

Use of the land as a proposed mineral quarry would breach this restrictive covenant.

A series of studies have been prepared which consider the potential impact that might arise from the mineral quarry on the local environment, including transport, landscape, flooding and habitat but you have not considered whether the mineral quarry will breach the terms of the restrictive covenant.

It is clear that the proposed mineral quarry will produce noise and dust. You accept in the frequently asked questions document you produced on 1 June 2016 that the process of quarrying minerals involves heavy machinery, which inevitably produces some noise and dust. You go on to note that due to the distance of the site from the main built up area of Steyning, noise and dust is not expected to have a noticeable impact on the village. However, it will have an impact on Wappingthorn Manor. Use of the land as a mineral quarry will clearly constitute a noisy trade, business pursuit or occupation, as born out by your studies. It has the potential to also be an offensive or dangerous trade, business pursuit or occupation. It seems inevitable that such use will be a nuisance, grievance or annoyance to the owner of Wappingthorn Manor. There is a substantial risk that damage may be caused.

In addition, particularly as the mineral quarry would likely be operational for ten years, it is inevitable that the existence of a quarry at Ham Farm will lessen the value of Wappingthorn Manor as a residential property, which is a breach of the restrictive covenant.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Given the nature of the restrictive covenant on the title to Harm Farm, Ham Farm should be removed from the Plan. It is not a suitable site. It is open to the owner of Wappingthorn Manor to issue proceedings to enforce the covenants and protect her position.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(separate communication text which included additional land registry information)

We act for *…(redaction)..*, of Wappingthorn Manor, Horsham Road, Steyning, BN44 3AA.

We note that Ham Farm has been allocated as a strategic minerals site in the Draft Local Plan. We are surprised by this. The title to Ham Farm includes a restrictive covenant that would prevent it being used as a mineral quarry.

We enclose an official copy of the register of title of Ham Farm (title number WSX171768). As you will see, the charges register contains a number of covenants that affect Ham Farm. Entry number one on the charges register provides as follows :-

"A conveyance of the land edged blue on the filed plan and other land dated 1 June 1961 made between (1) *…(redaction)..* (the Grantor) and (2) *…(redaction)..* (Donees) contains the following covenants:-

The Donees to the intent and so as to bind (so far as practicable) the land and premises hereby assured into whosoever hands the same may come and to benefit and protect Wappingthorn hereby jointly and severally covenant with the Grantor to observe and perform the stipulations specified in the schedule hereto PROVIDED THAT neither of the Donees shall be liable in damages for breach of any stipulation which is restrictive of user of the premises hereby assured after he shall have ceased to have any interest in the premises in respect of which such breach shall occur.

The schedule above referred to

Covenants imposed in respect of the property hereby assured

3. Not to use the land hereby assured or any part thereof for any offensive noisy or dangerous trade business pursuit or occupation or for any purpose which shall or may be or grow to be in any way a nuisance damage grievance or annoyance to the Grantor, his successors in title or their tenants or which may tend to depreciate or lessen the value of Wappingthorn or any part thereof as a residential property".

It is our considered view that use of the land as a proposed mineral quarry would breach this restrictive covenant.

We note that a series of studies have been prepared which consider the potential impact that might arise from the mineral quarry on the local environment, including transport, landscape, flooding and habitat. We have seen nothing to suggest you have considered whether the mineral quarry will breach the terms of the restrictive covenant.

We note from the frequently asked questions document you produced on 1 June 2016 that you accept that the process of quarrying minerals involves heavy machinery, which inevitably produces some noise and dust. You go on to note that due to the distance of the site from the main built up area of Steyning, noise and dust is not expected to have a noticeable impact on the village. However, it will have an impact on Wappingthorn Manor. Use of the land as a mineral quarry will clearly constitute a noisy trade, business pursuit or occupation, as born out by your studies. It has the potential to also be an offensive or dangerous trade, business pursuit or occupation. It seems inevitable to us that such use will be a nuisance, grievance or annoyance to the owner of Wappingthorn Manor. There is a substantial risk that damage may be caused.

In addition, particularly as we understand that the mineral quarry would be operational for ten years, it is inevitable that the existence of a quarry at Ham Farm will lessen the value of Wappingthorn Manor as a residential property. Our client has been marketing the property for sale but has now taken Wappingthorn Manor off the market due to the proposed inclusion of Ham Farm in the Draft Local Plan. Our client has been advised by her agent that the existence of a quarry at Ham Farm could reduce the value of Wappingthorn Manor by as much as 50%.

We note that Dunford Rough was one of the original sites considered suitable for further consideration but was not taken forward to the next stage because of deliverability issues, including restrictive covenants and access difficulties.

We would urge you to remove this site from the Draft Local Plan because of the restrictive covenants. Our client will not hesitate to issue proceedings to enforce the covenants and to protect her position. If Ham Farm forms part of the final joint minerals local plan our client reserves the right to seek an injunction preventing Ham Farm from being used for that purpose.

Please confirm receipt of this letter by return. * * *

01 - Organisation: Michelmersh Brick Holdings PLC (Response ID: 22 Respondent ID: 3042)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

The following comments are made in the context of the Freshfield Lane Brickworks site:

Policy M5 for clay extraction looks fine. Read together with Policy M13 the Draft Plan provides a degree of flexibility for further working in the AONB. I think there is a typo in para 6.5.6 that refers to Policy M6 in relation to non-allocated sites, but Policy M6 is for stone extraction.

Policy M8 deals with minerals processing, but does not include Brickworks. It would be helpful to have a policy that allows extensions to existing brickworks.

Policy M9 Minerals Safeguarding looks fine. The safeguarding areas in the Draft Plan are small scale but appear to cover the area around Freshfield Lane Brickworks. We note that detailed plans are to be published

separately and request that the Industry should be consulted at this stage The achilles heel of Safeguarding is making sure the consultation arrangements between the Districts and County work effectively, and involve consultation with the industry on potential sites.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

01 - Organisation: Mid Sussex District Council (Response ID: 95 Respondent ID: 3110)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Consultation on West Sussex Joint Minerals Local Plan

Thank you for the opportunity to comment on the draft West Sussex Joint Minerals Local Plan.

Mid Sussex District Council wishes to support the representations made by West Hoathly Parish Council in respect of the proposed allocation at West Hoathly Brickworks under Policy M11: Strategic Minerals Site Allocations.

The extension of the clay workings into adjacent fields will have an adverse impact on the landscape which is wholly within the High Weald Area of Outstanding Natural Beauty. Great care will need to be taken to avoid damaging key characteristics of the AONB such as historic field boundaries (especially that between the new and old workings) and adjacent ancient woodland.

The Parish Council's concerns about increased traffic movements are also supported. The road infrastructure surrounding the site is predominantly historic routeways that are ill-suited to heavy goods vehicle traffic. The extension of the life of the clay workings will also extend the amount of time these roads are subjected to this traffic which has a significant impact on the quality of life in the communities of West Hoathly and Sharpthorne.

The restoration scheme proposed for the existing and proposed working is critical to mitigate the impact of the proposal in the longer term. The type of restoration scheme will also impact on traffic generation as a full restoration to original levels is likely to require the importation of material to fill the void created by the clay extraction. The District Council would request full involvement, alongside the Parish Council, in discussions about the appropriate form of

restoration for this site.

Yours Sincerely

Councillor *…(redaction)..*

Cabinet Member for Planning

* * *

01 - Organisation: Midhurst Town Council (Response ID: 78 Respondent ID: 4081)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Sound

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

2.3.12 Road transport should not only be minimised but strictly controlled and payments should be levied for the Highways Authority to mitigate the cost of highways damage.

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

n/a

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

None

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

There should be an enlarged Section 8.7.1 and 8.14.1 on the community stress that such workings may have. There should be recognition (Fiscal) for parishes affected by noise, inconvenience and vehicle movements which are not necessarily the parish where the works are.

1 - WSCC and SDNP must take greater account of the long term effect of vehicle movements - noise, safety, deteriorating road.

2 - The Authorities must be much more vigorous in applying planning conditions and more effective in enforcement action.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

01 - Organisation: Midhurst Town Councillor & resident (Response ID: 6 Respondent ID: 4064)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The extraction of minerals within the SDNP should be explicitly excluded from the plan and extraction should be reduced and then stopped over a defined period of time. Movement of materials across the park must be limited and enforcement of conditions be rigorously enforced to preserve the continuing enjoyment of the environment of the park but residents and visitors alike.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

01 - Organisation: Mineral Products Association (Response ID: 155 Respondent ID: 3125)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Vision

The Vision should set the right tone for the Plan as a whole and be focused more on provision for the sustainable supply of minerals. This could easily be achieved through re-ordering of the paragraphs, placing the current first and second paragraphs at the end of the Vision statement. This would also reflect the emphasis in the Strategic Objectives, which start (SO1-SO3) with the production and use of minerals.

Strategic Objectives

SO1: Refer to prudent and efficient 'supply' as well as 'production' to cover actual supply to the market from different sources.

SO3: The proposal for only making provision for a 'declining amount' of soft sand from within the SDNP is not justified and pre-judges whether exceptional circumstances and the public interest can be demonstrated, in line with the NPPF (116) and Policies M2 and M13.

Mineral Specific Policies

Policy M1 Sharp sand and gravel

Paragraph 6.2.9 identifies that, applying the very low 10-year average of past sales, there are sufficient reserves of sharp sand and gravel to last for the Plan period (2033) and beyond. Clause (a) relating to the maintenance of the landbank, and the absence of an 'and' or 'or' between clause (a) and (b), therefore implies that, in effect, proposals will not be permitted during the Plan period as they are unlikely to be required to ensure that a landbank equivalent to at least 7 years' supply is maintained (based on existing reserves). Of course, the landbank does not equate to production, and it may be that current reserves will not be extracted or be viable in the long term.

The principle of using the size of the landbank as a criterion against which to determine applications for new reserves does not comply with NPPF. The NPPF requires maintenance of landbanks of at least 7 years for sand and gravel but does not require new reserves to be restricted or limited where there is an adequate or even large landbank.

Planning Practice Guidance makes it clear that:

There is no maximum landbank level and each application for minerals extraction must be considered on its own merits regardless of the length of the landbank.

PPG also identifies some reasons why an application for aggregate minerals development may be brought forward (by an applicant) in an area where there exists an adequate landbank.

While the Plan identifies that there are sufficient supplies for the Plan period, the LAA (2.1.39) identifies that neighbouring Surrey has identified concerns over long-term supply of sharp sand and gravel, but has an apparent surplus of soft sand (which West Sussex may increasingly rely on). The issue of supply of soft sand and sharp sand and gravel between mineral planning authorities in the South East was discussed by the Aggregates Working Party (October 2014 and February 2015 meetings), and Surrey signalled that future demand for land-won sand and gravel may be met through imports into Surrey from the rest of the south east.

Therefore, it would be prudent for the Plan to be more enabling of additional sand and gravel reserves and new sites or extensions to come forward, recognising the potential to enable supply to areas outside of the County, including Surrey, and also to diversify West Sussex supply which is dominated by marine dredged sand and gravel. This could be achieved through removal of the clause (a) or insertion of 'or' between clause (a) and (b) in the policy.

Policy M2 Soft Sand

The principle of 'managed retreat' from working soft sand in the SDNP is of concern.

Maintenance of a landbank of at least 7 years' supply requires provision for at least a further 6.1mt (based on the 10 year average) or 7.6mt (based on the higher figure reflecting other relevant information). This includes provision for 18 years to 2033 plus a landbank of at least 7 years' supply at the end of the Plan period and takes account of existing reserves.

The allocation of Ham Farm will only provide an additional 2.3 years' worth of supplies, and so the Plan is failing to meet the requirement of the NPPF to maintain a sufficient landbank of soft sand.

The Mineral Sites Selection Report considers 'exceptional circumstances' in considering potential sites for future supply within the National Park. It considers that each of the bullet points in paragraph 116 of NPPF are 'tests' and where sites that do not 'pass' each of these the exceptional circumstances are not demonstrated. Whether exceptional circumstances are met is more a matter of judgement, and the assessments need to inform this. Not all of the 'tests' or bulleted considerations in NPPF para 116 necessarily have to be met. Policy M13 and supporting text appears to acknowledge this and more accurately refer to consideration of exceptional circumstances and public interest being informed by these assessments.

The assessment starts from the position that sites outside of the National Park are considered first (paragraph 2.1). This reflects paragraph 144, although importantly this includes the qualification that maintenance of landbanks outside of designated landscape areas should be achieved 'where practical'. The report demonstrates that maintenance of the landbank from sites solely outside the National Park is not practical.

The 'need' assessment then identifies that the local and regional economy could be negatively affected if provision is not made and alternative supplies are not secured.

The 'alternatives' assessment identifies some potential for supply from other authority areas, but concludes that it will become increasingly difficult for markets in West Sussex (and supplied by West Sussex) to be served by imports from other areas. It identifies that 'more sites may be allocated and developed' in other areas, but equally they may not be. Reliance on imports from other mineral planning authority areas is risky and it has not been demonstrated that this is likely to occur. Indeed, the Mineral Site Selection Report includes a Duty to Cooperate response from Surrey County Council regarding soft sand supplies that clearly identifies its concerns over the long-term supply of soft sand in Surrey and that Surrey may have to rely on imports from the early 2030 (paragraphs 2.22-2.25).

The 'environmental effect' assessment identifies that several sites could be developed for soft sand without resulting in significant adverse effects on the environment.'

Thus, the conclusion in the report that 'on balance, the exceptional circumstances test has not been passed' does not appear to be supported by the report. This indicates that additional sites need to be allocated, particularly a number of those that are identified as being 'acceptable in principle'.

For Policy M2 to positively plan for the objectively assessed needs of the Plan area, clause (a) should be deleted as it is clear that additional reserves will be required in addition to the potential yield from the one allocated site.

Policy M3 Silica Sand

We support the incorporation of a criteria-based policy. However, the statement in 6.3.3 about the adequacy of provision and supply elsewhere tends to underplays the wider conclusion of the Study which states that: 'Although alternative sources of supply do exist in other areas, they are gradually being depleted and there will inevitably be increasing pressure on the National Park for the release of new reserves. For the time being, it will at least be necessary to safeguard those resources, in anticipation of a likely future demand for their exploitation within suitable locations.'

Paragraph 6.3.4 also incorrectly implies that there may be a quantified amount below which NPPF requirements do not apply.

Key producing silica sand Counties particularly for the glass industry such as Norfolk, Surrey and Cheshire would appear to have a shortfall in allocated sites to meet the current NPPF requirements and the Mineral Planning Authorities should look favourably on sites brought forward to meet any shortfall in the national supply of silica sand.

Under the Table at 6.8.8, the text should be amended to read "Target = maintain landbanks of at least 10 years at individual silica sand sites and at least 15 years for sites where significant new capital is required…"

Policy M8 Plant, Processing and Secondary Activities

The policy appears to be primarily aimed at processing and ancillary activities. The specific inclusion of concrete batching implies that this policy will be used in determining proposals for such facilities. These are often located away from other minerals operations including extraction sites. Industrial and employment land, including at railheads and wharves, is generally suitable for such facilities. Therefore, it would be helpful to remove this specific reference to avoid potential confusion and mis-interpretation.

Policy M9 Safeguarding Minerals

We support the policy. However, in clause (b) insertion of 'only' before 'be' and 'permitted' would strengthen and provide the correct tone for a safeguarding policy. We do not believe this would affect the policy being considered as 'positive' (NPPF) as it would help to positively protect mineral resources in the long term and reflect the safeguarding required by the NPPF, particularly the presumption against development in MSAs (NPPF para 144, bullet #7).

Policy M10 Safeguarding Minerals Infrastructure

While we support the aims of the policy, it also needs to better reflect the requirement in NPPF for safeguarding of existing, planned and potential sites and facilities.

The policy, supporting text, and the associated Guidance, also needs to more clearly provide for safeguarding of infrastructure from encroachment by inappropriate development which can affect and constrain existing and future operations.

It needs to include clearer reference to mitigation measures that non-mineral development in proximity to safeguarded sites will need to incorporate, informed by assessments, to demonstrate compatibility with minerals infrastructure use and compliance with policy. This is a particular issue with regard to sensitivity of non-minerals uses, in particular residential development, to noise. Such mitigation may include scheme and building design and layout.

The policy also needs to reflect the fact that Shoreham is currently the only active landing point for marine aggregates in both East and West Sussex, and the continuing reliance on marine dredged aggregate to enable a steady and adequate supply to West Sussex and East Sussex.

In this context, the removal of safeguarding from Kingston Wharf appears unsound. The justification provided in the Background Document, referring to the Shoreham Joint Area Action Plan (JAAP), does not reflect the long-term nature of the regeneration plans for the Harbour, and the need for maintenance of aggregate wharf capacity in the short to medium term. It also does not reflect potential practical difficulties associated with re-location of wharf capacity. Given these issues, Kingston Wharf should continue to be safeguarded with the tests set out in clause (a) of the Policy applied when non-mineral development proposals materialise.

Policy M11 Strategic Minerals Site Allocations

Our preceding comments (Policy M2) concerning the need for additional site allocations to be made in order to enable maintenance of landbanks for soft sand apply.

* * *

01 - Organisation: Natural England (Response ID: 195 Respondent ID: 3783)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Thank you for giving Natural England the opportunity to comment on the new Joint Minerals Local Plan

Generally the methodology and selection of sites appears reasonable. We support the aspiration to mitigate harmful effects on designated sites and important habitats including ancient woodland. Some examples of possible approaches may be useful.

We welcome the recognition of the need to consider cumulative impacts for the Ham Farm site. This should also be included for land adjacent to West Hoathly Brickworks, particularly in respect of the Ashdown Forest SPA/SAC. Note that the West Hoathly site may also impact on Wakehurst & Chiddingly Woods SSSI and Weir Wood Reservoir SSSI (only one SSSI is considered in the risk zone in the Plan and it is not named). The Ham Farm site may impact on Chanctonbury Hill SSSI. Appropriate mitigation for these sites will be required if potential for negative impacts is detected at the planning stage.

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing this document and have focussed on the preferred sites. Nevertheless, I hope you have found our comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please contact me.

If you wish to comment on the service provided by Natural England please use the appended form.

* * *

01 - Organisation: Norfolk County Council (Response ID: 129 Respondent ID: 2996)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Re: West Sussex Joint Minerals Local Plan: Regulation 18 consultation

This is a delegated response and is made without prejudice.

Introduction

Please find below the response to the West Sussex Joint Minerals Local Plan (Regulation 18 consultation) by Norfolk County Council in its capacity as the Mineral Planning Authority for Norfolk.

Background

There is currently a shortfall in silica sand sites allocated in Norfolk's adopted Minerals Site Specific Allocations DPD. The permitted reserves and the one allocated site in Norfolk will provide silica sand supplies until around 2024. The shortfall is as a result of sites submitted to the allocation process being found unsuitable due to uncertain effects on European designated environmental sites.

While Paragraph 144 of the NPPF states that where practicable landbanks for non-energy minerals should be outside areas such as AONBs and National Parks, minerals can only be extracted where they occur. Many scarce mineral resources occur near such areas, and the extraction of minerals is a temporary use of land.

In Norfolk the silica sand resource also occurs close to and/or underlies SPAs, SACs, AONBs, SSSIs, Scheduled Monuments and Conservation Areas.

Norfolk County Council is currently conducting a Single Issue Silica Sand Review of the adopted Minerals Site Specific Allocations DPD to address the shortfall in specific site allocations. However, a call for sites did not result in sufficient specific sites being submitted by landowners or mineral operators to meet the shortfall. Therefore ten draft Areas of Search were defined by Planning Officers and consulted on in the Preferred Options Consultation during November and December 2015.

Publication of the Pre-submission version of the Single Issue Silica Sand Review will take place during May and June 2016. The Pre-Submission document contains one specific site and six Areas of Search for future silica sand extraction. Whilst it is considered that the Areas of Search will allow for sufficient suitable planning applications to be determined and granted to meet the shortfall; there is less certainty than if there were sufficient specific sites allocated to meet the shortfall. Therefore, 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.

Norfolk County Council would like to make the following comments about the West Sussex Joint Minerals Local Plan:

Silica Sand

Silica sand is a scarce national resource, and glass sand is a limited sub-set of this resource. The "Soft sand and silica sand study" carried out by Cuesta consulting, as part of the evidence base for the West Sussex Joint Minerals Local Plan, indicated in paragraph 2.59 that resources within the Joint Plan Area could potentially supply this nationally important industrial mineral.

The economic importance of silica sand extends well beyond the local area in which it is extracted; as highlighted in the Cuesta report (paragraph 2.60) the resources in the Joint Plan Area have national significance. This should be given great weight in encouraging future supply from within the Joint Plan Area.

The draft Plan at paragraph 6.3.3 states that adequate provision for silica sand is being made nationally and there is no requirement for West Sussex to meet any identified shortfall elsewhere. Landbanks for silica sand sites shown in the "Soft sand and silica sand study" highlight a different trend; a significant number of sites in table 6.1 have landbanks below 10 years, the recommended minimum in national policy for industrial mineral sites. Landbanks for silica sand sites producing glass sand are lower than for other silica sand sites, and even lower still when considering sites with resources suitable for clear glass manufacture. Therefore, a risk has been identified that nationally a steady and adequate supply of silica sand for clear glass manufacture could be compromised in the future. The "Soft sand and silica sand study" identifies (paragraph 7.1) that the soft sand resource is capable of definition as 'silica sand' in the majority of cases, although suitable end uses would vary. The "Soft sand and silica sand study" also identifies in table 5.1 that processing of the silica sand resources has a high potential to achieve suitability for uses such as glass manufacture.

Paragraph 146 of the NPPF states that "MPAs should plan for a steady and adequate supply of industrial minerals by co-operating with neighbouring and more distant authorities to co-ordinate the planning of industrial minerals to ensure adequate provision is made to support their likely use in industrial and

manufacturing processes." It is noted that currently the Joint Minerals Plan does not identify any need for silica sand extraction for industrial and manufacturing processes within the Joint Plan Area. However, the Joint Minerals Local Plan should re-consider whether there is a need for silica sand extraction within the Joint Plan Area, for industrial and manufacturing processes, in accordance with paragraph 146 of the NPPF, and paragraphs 7.3 & 7.4 of the "Soft sand and silica sand study". The "Soft sand and silica Sand study" should be used when identifying need.

The Soft sand and silica sand study' identifies that the resources within the Plan area could be transported to glassworks in England economically, as noted in paragraphs 6.12-6.14. A number of specific sites with the potential to contain silica sand have been proposed, including those proposed for soft sand. However, it is noted that only one site for soft sand is allocated in the draft Plan. It is considered that the specific sites within the National Park area should not be automatically discounted and that the assessment of sites should take into account: the low landbanks for existing permitted glass sand sites nationally, the low number of allocated sites nationally, and the importance of silica sand to the national economy including downstream effects for construction. These issues would seem to be consistent with the exceptional circumstances and public benefit tests.

The 'Soft sand and silica sand study' states in paragraph 1.11 that some potential silica sand resources occur outside the National Park and Norfolk County Council considers that more proactive policies on silica sand should form part of the Plan for these areas. As National Park Authorities are not required to consider Preferred Areas and Areas of Search, the Joint Plan authorities should only consider proposed specific site allocations within the National Park boundary. However, for those areas outside the National Park, Areas of Search for silica sand could be defined and therefore aid in the steady and adequate provision of industrial minerals.

Norfolk County Council has an adopted policy encouraging the extensions to existing mineral workings because necessary infrastructure is already in place in these locations, and this may be an approach the Authorities wish to consider. It is recognised that large parts of the Authorities' administrative area are covered by designated areas (AONB and National Park). The PPG states that in exceptional circumstance it may be appropriate to rely on criteria-based policies within such designated areas. The national importance of silica sand and the scarcity of resources should form part of the criteria based policy.

Safeguarding Mineral Resources

Norfolk County Council as the Mineral Planning Authority agrees with the approach taken by the West Sussex Joint Plan Authorities regarding the safeguarding of potential silica sand resources within its area. As this is a nationally important mineral all resources should be safeguarded for potential future use.

* * *

01 - Organisation: Northamptonshire County Council (Response ID: 138 Respondent ID: 3050)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Thank you for consulting Northamptonshire Countyl Council in relation to the West Sussex Joint Minerals Local Plan – Draft. The Council has the following comments in relation to Policy M1.

Northamptonshire County Council is concerned by the lack of a provision figure in Policy M1. It considers that the Minerals Local Plan process should lead to a policy that contains the quantity of sharp sand and gravel provision to be made over the plan period. Monitoring could then include triggers for review where appropriate.

The matter of making numerical provision in policy formed part of the examination into both the Kent Minerals and Waste Local Plan and the Oxfordshire Minerals and Waste Core Strategy as both the submitted plans were proposing not to include a figure within policy.

The Inspector stated in correspondence to Kent County Council that the Plan should clearly indicate the quantity of mineral for which provision is to be made, either annually or over the Plan period. He continued that without this information, there would be no basis in the Plan on which to assess the need for mineral or the size of the landbanks and only once an annual or total figure is arrived at will it be possible to assess the need to make additional provision; the quantity of that provision; the size of the landbanks; and the sites to meet the requirement. The Inspector was of the view the policy did not fulfil the requirements of the NPPF. KCC proposed, in advance of the hearing sessions, main modifications that included a provision figure in the relevant policy.

The Inspector also raised his concerns about this matter in correspondence with Oxfordshire County Council. Information about the Inspectors concerns can be found at paragraph 40 of the document http://www.hwa.uk.com/site/wp-content/uploads/2015/12/Inspector-letter-22-1-20161.pdf where he raised the fact that a lack of figures in policy is “not in accordance with national policy”. For information Oxfordshires response to the Inspector can be found at paragraph 30 of the following document http://www.hwa.uk.com/site/wp-content/uploads/2015/12/LetterToInspector_PHD_20160203_Redacted.pdf

Please do not hesitate to contact me if you require any further information.

* * *

01 - Organisation: Portsmouth Water (Response ID: 215 Respondent ID: 3936)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The Vision

The Plan's Vision should specifically reference ecosystem services, including water resources – an additional 'provisioning service' to mineral supply.

The provision of groundwater resources from the chalk is vital for public water supply and extremely significant in scale across the plan area; however, there is a potential conflict between the utilisation and safeguarding of chalk and sharp sand & gravel resources (those minerals relevant to Portsmouth Water's area of supply), and the securing of groundwater quality.

Therefore, the need to manage this potential conflict needs to be captured in the Vision as it is of high strategic importance.

Strategic Objectives

Strategic Objective 10 should be split into two, thereby separating flood risk from water resources. Respective Strategic Objectives should be set as flood risk and water resources are very significant, distinct issues that can conflict with each other – for example SUDS infiltration drainage, whilst beneficial for surface water flooding and potentially surface water quality, can have an adverse impact on groundwater quality.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Portsmouth Water request the following changes to Section 2:

Additional paragraph for inclusion in the Vision:

"Will have made a contribution to the sustainable utilisation of ecosystem services. Will have ensured minerals have been produced in manner that protects and enhances other ecosystem services such as the provision of water resources."

Revised Strategic Objective 10:

"To minimise the risk to people and property from flooding and to ensure the quantity and quality of the water environment is conserved and enhanced."

New Strategic Objective 11:

"To safeguard water resources, including aquifers and surface waters, from contamination, including turbidity, and to ensure the quantity and quality of the water environment is conserved and enhanced. "

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Policy M1 – Sharp sand & gravel and Policy M4 – Chalk

A 'policy hierarchy/tier' exists in the plan comprising the high level/strategic vision, cascading down to the strategic objectives, the 'mineral specific polices', and ultimately to the detailed development management policies. With regards to Portsmouth Water's area of supply, there is reference to the safeguarding of water resources at each 'policy tier' apart from the 'Mineral specific policies' M1 – Sharp sand & gravel, and Policy M4 – Chalk. This needs to be addressed for the following reasons:

1. Policies M1 and M4 state that proposals for mineral extraction will be permitted provided the proposal is located outside the AONB or South Downs National Park (SDNP). However, this will not deliver protection for Portsmouth Water's groundwater abstractions and associated catchments that fall outside these areas.

2. Policies M1 and M4 both refer to Policy M13 – Protected Landscape. However, Policy M13 does not state anywhere the need to safeguard the quality and quantity of water resources, including aquifers. Reference is made to the 'objectives' of the SDNP designation but there is no explanation of what these are (this needs to be addressed in the final document). If 'objectives' is an alternative term for 'special qualities', the special qualities of the SDNP make no reference to aquifers, groundwater, water resources, water quality etc; therefore, again, not delivering protection for Portsmouth Water's groundwater abstractions and associated catchments.

Portsmouth Water therefore requests the following amendments to Policy M1 (b) and Policy M4 (c):

Policy M1 (b) – "the proposal is located outside the AONB/South Downs National Park and is in accordance with Policy M16, unless there are exceptional circumstances and that it is in the public interest, in accordance with Policy M13, to locate within those areas."

Policy M4 (c) – "they are located outside the South Downs National Park and are in accordance with Policy M16, unless there are exceptional circumstances and that it is in the public interest, in accordance with Policy M13, to locate within those areas."

Policy M7a: Hydrocarbon development not involving hydraulic fracturing and Policy M7b: Hydrocarbon development involving hydraulic fracturing

These policies are ambiguous with regards to safeguarding groundwater resources. Concerning 'activity beneath or proximate to designated areas', both policies state:

"Proposals for exploration, appraisal and production of oil and gas…will be permitted underneath or in close proximity to the South Downs National Park, AONBs, Source Protection Zone 1 and Sites of Special Scientific Interest, which demonstrate that special care will be taken to avoid harming the setting and/or special qualities and/or value of these designated areas."

Therefore, the implication is that oil and gas activities will only be permitted in SPZ 1 and not in SPZ 2 and SPZ 3. This is obviously counter intuitive with SPZ 2 and SPZ 3 being of lower risk.

To address this, and to make the policies more robust with regards to groundwater protection (for the same reasons concerning Policies M1 and M4), Portsmouth Water requests that's an additional 'sub policy' is included under Policy M7a and Policy M7b for 'Groundwater public water supplies':

Groundwater public water supplies (Policy M7a)

(d) There will be a presumption against hydrocarbon development not involving hydraulic fracturing in groundwater Source Protection Zones 1-3 unless the developer can demonstrate that the risks can be addressed."

Groundwater public water supplies (Policy M7b)

(d) There will be a presumption against hydrocarbon development involving hydraulic fracturing in groundwater Source Protection Zones 1-3 unless the developer can demonstrate that the risks can be addressed."

The reference to SPZs should then be removed from the respective sub policies 'Activity beneath or proximate to designated areas'.

Policy M13: Protected Landscape

Reference is made to the "objectives of the designation" for the associated protected landscapes. These objectives are not identified in the document. It is crucial that this is rectified to ensure the policy is implemented as intended/correctly for each protected landscape.

Policy M16: Water Resources

Section C needs to make specific reference to groundwater/aquifers. Portsmouth Water therefore requests the following amendment is made to Policy M16:

" (c) protect and where possible enhance, the quality of rivers, aquifers and other water bodies (including within built-up areas)."

Supporting text, Section 8.5.2, needs to make reference to the relevant water supply company. Portsmouth Water therefore requests the following amendment is made:

"However, the planning authority can consider, in consultation with the Environment Agency and relevant statutory drinking water undertaker, whether the nature and location of any development would affect air, soil or water resources, and if so what mitigation is necessary to avoid any unacceptable impact, and where possible as part of a development, what action could be taken to improve air, soil and/or water resources."

Supporting text, Section 8.5.4, states that:

"…where water quality has the potential to be a significant planning concern an applicant should be able to explain how the proposed development would affect a relevant water body in a river basin management plan and how they propose to mitigate the impacts. Where it is likely a proposal would have a significant adverse impact on water quality then a more detailed assessment will be required."

Little detail is given regarding the content of the assessment required to support a proposal. Portsmouth Water therefore requests the following amendment is made:

"…where water quality has the potential to be a significant planning concern an applicant should be able to explain how the proposed development would affect a relevant water body in a river basin management plan and how they propose to mitigate the impacts. With regards to groundwater, planning applications will need to be supported by an appropriate hydrogeological assessment. This may need to include: conceptual analysis and model development, field survey and site investigation, groundwater monitoring and appropriate management systems, hydrogeological impact assessment, hydrochemical analysis, groundwater flow and quality modelling, and hydrogeological risk assessment. Where it is likely a proposal would have an adverse impact on water quality then a more detailed assessment will be required."

Supporting text, Section 8.5.6, states that:

“Working beneath the water-table will not be permitted unless a comprehensive groundwater management scheme, covering the construction, operation and restoration phases has been previously agreed;”

however, it is not clear by whom. Portsmouth Water therefore requests that the supporting text lists the organisations that need to agree the comprehensive management plan - and that the relevant statutory drinking water undertaker is one of these organisations.

The ‘Implementation and Monitoring’ table for Policy M16 needs to include the relevant water supply company as a ‘key organisation’ associated with the ‘development management process’.

Policy M19: Flood risk management

Portsmouth Water requests the following amendment is made to Policy M19 sub-clause (iii):

“…appropriate measures are used to manage surface water run-off including, where appropriate, the use of sustainable drainage systems (SUDS). However, there will be a presumption against infiltration SUDS in groundwater Source Protection Zones 1 and 2 unless the developer can demonstrate that the risks can be addressed.”

This is because the use of infiltration SUDS can pose a significant risk to groundwater quality.

In addition to this, we request the following section is added to the supporting text:

“Infiltration SUDS that allow surface water to infiltrate to the ground, such as soakaways, infiltration basins, infiltration trenches and permeable pavements, can pose a significant risk to groundwater quality and public drinking water supplies To address this risk, the relevant statutory drinking water undertaker will be consulted by WSCC/SDNPA on all proposals that include SUDS.”

Therefore, the ‘Implementation and Monitoring’ table for Policy M19 also needs to include the relevant water supply company as a ‘key organisation’ associated with the ‘development management process’.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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01 - Organisation: Pulborough Parish Council (Response ID: 1 Respondent ID: 3976)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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01 - Organisation: Rudgwick Parish Councillor (Response ID: 359 Respondent ID: 3911)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I am very disappointed our representative *…(redaction)..* who attends our PC meetings didn't call this to our attention to meet so all Parish councillors must now respond as individuals !

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

01 - Organisation: Sandgate Conservation Society (Response ID: 235 Respondent ID: 3978)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Chantry Lane Extension (SDNPA) (M/HO/2)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Draft West Sussex Joint Minerals Local Plan

Chantry Lane Extension

(SNNPA,M/HO/2)

Submission by John Dugnolle on behalf of Sandgate Conservation Society

The Society

Sandgate Conservation Society was formed 40 years ago with the objective of conserving the rural nature of the countryside of West Sussex, in particular, the area known as Sandgate Park, formerly the grounds of Sandgate House, Sullington, West Sussex. The founding members of the Society had recognised the damage being caused by the sand extraction along the Lower Greensand outcrop and the loss of open space due to potential house building. The Society's principle objective is to prevent inappropriate development in Sandgate and the surrounding area.

The proposal to extend Chantry Pit

The Society opposes any proposal to extend the existing sandpit in Chantry Lane. This extension has been mooted many times in the past and is regarded by the Society as wholly inappropriate. We have made the point that it is too close to the village and will completely alter the landscape of the approach to Storrington on the A283, one of the major road arteries.

Access

The owner has always recognised that the existing access via Chantry Lane is not capable of accepting the increase in vehicle movements created by the extension of the quarry. The proposal of 2008 (738/Mlp) recognises this fact and proposes a separate and new access across the adjacent field to the east of the quarry.

It is our opinion that any such access road would destroy the nature of this field which was referred to at the hearing in Worthing on the proposed National Park Boundary as typical downland scenery enhancing the entrance to Storrington.

Whilst the pit itself is outside the South Downs National Park, an access road as referred to above would be inside the park. It is particularly noted that the Plan on page 246 of the Draft does not include any form of access road. The Society considers that the Plan should clearly indicate the proposals of the operator for the routing of any access road.

Visual Intrusion.

The existing pit is clearly visible from the top of the Downs from the South Downs Way, any eastward extension will be more intrusive. The road across the adjacent field will add to the intrusiveness and this is unacceptable.

Connection to A283

The A283 is an extremely busy road and any further access points will make it more dangerous. The drawing shows a simple Tee junction, but in reality the slope of the field will require significant earthworks, adding to the visual impact.

Site Specific Information

It is noted that the Plan indicates that "A draft redevelopment plan has been drawn up for Chantry Lane Industrial Estate and the Sand Quarry. This includes housing and employment or an educational campus. Consultation on the detailed proposals is planned with local and neighbouring parish councils, Horsham District Council, West Sussex County Council and The Highways Agency. The existing site is also being considered through the Neighbourhood Plan process." However it is important to note that as a result of further possible revisions to the Neighbourhood Plan it will not include references to a redevelopment plan for Chantry Lane Industrial Estate and the Sand Quarry.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

For reasons given the Society considers the inclusion of this pit within the Plan as inappropriate.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

01 - Organisation: South Downs Society (Response ID: 139 Respondent ID: 2951)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

West Sussex County Council/South Downs National Park Authority Joint Minerals Local Plan

These are the comments of the South Downs Society in response to the current consultation on the above. The Society has nearly 2,000 members and is the national park society for the South Downs National Park. The Society's objective is the conservation and enhancement of the special qualities of the national park and its quiet enjoyment. Our comments will reflect this focus.

The Society welcomes the overall approach to the preparation of the draft plan, its vision and strategic objectives. We also welcome the protection afforded to the national park in site selection: it is particularly welcome that no new mineral extraction sites are proposed within the park. If, arising from the current consultation, there should be any change to this situation, the Society will wish to comment further.

The selection of a site at Ham Farm near Steyning for the extraction of soft sand gives rise to concern as it lies adjacent to the national park boundary and therefore forms an important part of the setting of the national park. There is of course a statutory duty on all public bodies under Section 62 of the Environment Act 1995 to have regard in their policy and decision making to the designation of the park: it will be essential, if this site is to remain in the plan, that all possible measures are taken to ensure the highest possible standards of site preparation, screening, operation, mitigation and restoration.

The development principles proposed for the Ham Farm site at para 7.2.4 of the plan are welcome, including but not confined to, those relating to the impact on the national park and the absolute importance attached to protecting the area of ancient woodland which may, following operation, serve as the core for an increase in woodland cover and habitat.

It is essential that the perimeter of the proposed allocation is firmly constrained and no extensions permitted.

Though outside the proposed allocation itself, the high wildlife value of nearby highway verges needs to be recognised, particularly on the southern side of the A283 both west and east of the site between the junctions with the A24 and B 2135. Protection measures should be devised to prevent impatient drivers running over these verges in case of obstruction by heavy lorries and/or slow moving traffic when the site is in operation.

The Society welcomes the proposed development management policies listed as M 12 to M 26.

We would welcome being kept informed and engaged as the plan progresses.

* * *

01 - Organisation: Southern Water (Response ID: 301 Respondent ID: 4061)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

n/a

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

n/a

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

Southern Water supports the inclusion of part (xiv) of paragraph 7.2.4 which sets out the principles for development at Ham Farm, acknowledging the presence of water infrastructure in proximity to the site.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

n/a

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B3.3

Representation 1 - Policy M7a: Hydrocarbon development not involving hydraulic fracturing, and

Policy M7b: Hydrocarbon development involving hydraulic fracturing

Background

Southern Water provides water and wastewater services to much of West Sussex. We recognise that there are potential opportunities for oil and gas development in this area and would not wish to hinder economic

development in the region. However, we acknowledge that there are potential risks inherent with activities of this nature which must be assessed, regulated and mitigated before such operations are allowed to commence. Therefore, we welcome the above policies in principle as they provide further guidance on the consideration of planning applications for this type of development.

The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument No. 595) that came into effect on 15th April 2015 makes Southern Water a statutory consultee for 'Development involving the boring for or getting of oil and natural gas from shale'. As such, we would make the following suggestions in relation to policies M7a and M7b:

Issue

Our main concern is to ensure that any activity would not compromise the quality of groundwater in the chalk aquifer across our area, which we treat and supply to our customers.

The protection of water resources is addressed within Policy M16 however Southern Water considers that Policy M16 could be undermined by the wording of paragraph 6.7.15 which supports policies M7a and M7b.

In our role as statutory consultee, we would expect to see a hydro-geological assessment as part of any application for this type of development. This should include enough information to inform well construction, monitoring, site construction and surface water drainage and pollution risks to both the groundwater and surface water environments. Any assessment of environmental impacts should include representative baseline groundwater sampling and analysis for groundwater from shallow 'drinking water' aquifers before, during and after construction, and after decommissioning.

Suggested change

In order for the impacts of development to be adequately considered at the appropriate time, we request the removal of 'and in some cases' from paragraph 6.7.15. This would also ensure this part of the Plan is consistent with paragraphs 8.5.5 and 8.5.6 that form part of the supporting text for Policy M16 Water Resources.

(We would also request that the issue of 'flowback' is adequately considered and have made a further representation on this issue in relation to Policy M16 Water Resources).

Representation 2 - M16: Water Resources

Background

Southern Water offers support for Policy M16 Water Resources. We welcome the wording of paragraphs 8.5.5 and 8.5.6 relating to risk assessments and working beneath the water table. We suggest this wording could have more weight if included within the policy text.

As noted in our response to Policies M7a and M7b, we are keen to ensure that flowback water from hydrocarbon development is safely and effectively disposed of, as with wastewater from any development.

Issue

Flowback water is likely to contain fluids used initially to aid fracturing, high concentrations of salinity (TDS) and potentially low amounts of naturally occurring radioactive materials (NORM). The feasibility of disposal will depend on the volume and concentration (including NORM present) of this effluent in relation to the capacity of the sewerage network and the size of the wastewater treatment works. A trade effluent permit would be required from Southern Water if connection is proposed to our sewerage network. If granted, it is likely that additional investment in local and strategic infrastructure will be required to accommodate such effluent.

Therefore, we suggest information about the expected volumes and chemical and biological composition of any wastewater should be included with planning applications so that the preferred disposal route can be identified and planned for at an early stage. Although the Site Waste Management Plan (SWMP) Regulations 2008 were repealed in 2013, a SWMP can provide the ideal framework to consider wastewater disposal.

Suggested change

To facilitate this we suggest the following wording should be included within the Plan, preferably within Section 8, either in the supporting text to Policy M16 or within the text of the policy itself (as noted above):

"Planning applications should be supported by information about the preferred method of wastewater disposal".

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

n/a

Additional Comments

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01 - Organisation: Stedham with Iping Parish Council (Response ID: 203 Respondent ID: 3420)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

It seems that both the Vision and the Strategic Objectives are focusing on new developments.

However, there are significant issues with existing sites which should also be addressed.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

2.2 VISION: "....Be a place where mineral sites are restored to the highest standards...." We would like to see steps proposed to ensure the restoration of the many old sites that exist across West Sussex and which are particularly visible from the air, and from the top of the South Downs and within the SDNP. In addition, we would like to see the industry generally contributing significantly to the costs of all the restoration that is needed for the past neglect.

2.3.11 FLOOD RISK AND WATER RESOURCES: The plan needs to include a scheme for monitoring water risks of the existing sites as well as for new developments. There should be regular publication on the assessments of flood risk and water quality for all old and new sites.

2.3.12 TRANSPORT: In the first instance, the existing Lorry Route Network needs to be reviewed. For example, many rural sections of the A272 are not appropriate for heavy traffic, nor are many of its routes through the towns and villages. Sections of the A272 and A286 through Midhurst are in a dangerous state of wear caused by the significant number of "minerals miles" originating from sites within the Park. A plan for improvements needs to be implemented before these roads are formally recognised as Lorry Routes for the purposes of minerals planning.

2.3.6 HEALTH AND AMENITY: The already existing noise, traffic and pollution issues arising from the present minerals activities need to be made to meet present day standards rather than being allowed to continue operating on the criteria of the past.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

6. MINERAL SPECIFIC.

We question the methodology employed for forecasting demand for soft sand, and the resulting conclusion that the current landbank is insufficient.

The NPPF states that a rolling average function should be used to predict future requirements, which the Draft Plan acknowledges:

6.2.3. "Current national planning policy requires local authorities to maintain landbanks (how long reserves at existing permitted sites will last), for sand and gravel, of at least seven years. With predicted annual requirements based on a rolling average of 10 years of historic sales data and factoring in

'relevant local information' about supply and demand, including future house building and infrastructure plans".

The Mineral Specific policy, however, has chosen to use a simple average to predict future requirements, which sounds similar but has a quite different function:

6.2.14. "The current 10 year average sales value is much higher than for sharp sand and gravel, at 365,000 tonnes per annum (2005-2014), and other relevant local information suggests average demand may be as high as 423,000 tonnes per annum. The total permitted reserve of land-won sand and gravel is 3,009,400 tonnes which currently provides a landbank of 7.1 years. Based on the 10 year average sales, taking account of other relevant local information, current reserves are not sufficient to meet demand over the Plan period (up to 2033)".

A rolling average and a simple average are not interchangeable and serve different purposes. The former is used for forecasting because it identifies trends while the latter produces a single figure which carries no significance for the future. Notwithstanding, the curious assumption has been made that the simple average of the West Sussex figures for 2005-2014 (365,000 tonnes p.a.) can be taken as the annual forecast for the

succeeding 18 years of sales from 2015 to 2033. In addition, unspecified "other relevant local information" is alluded to which purportedly could uplift this 'forecast' annual demand by some 16% to 423,000 tonnes.

In this context, the use of a simple average of ten year's sales from 2005 to 2014 for prediction purposes is wrong; it does not reflect the NPPF guidelines, and it considerably overstates the landbank requirement that will be needed.

If the NPPF guideline had been followed, namely to use a rolling average of 10 years of historic sales data to predict future sales, then a marked downward trend for soft sand sales would have become clear. Annual sales for all South East of England, including West Sussex, fell virtually continuously for the 20 years from 1992 to 2012 by nearly 60% from 13.4 mn tonnes to 5.5 mn tonnes. West Sussex variously accounts for about 5% to 8.5% of the South East production, and the relevant available figures broadly follow this same downward trend.

Interpolation of the trend of the 10 year rolling average for all South East England actually indicates zero soft sand sales by around 2020. Albeit unlikely, this should be compared to the Plan's alternative scenario based on a 10 year simple average sales figure which predicts a continuing level of sales of 423,000 tonnes, last seen in 2007/8, for 18 years.

The essential point here is that the future average demand figure, in this case of up to 423,000 tonnes per annum, is absolutely critical in establishing whether the existing soft sand sites can meet the forecast demand or whether new sites will have to be developed to meet any shortfall. For this reason the forecast for soft sand sales is perhaps one of the most important calculations as this part of the Plan is predicated on its quantum which ultimately translates into actual environmental issues that people will be experiencing.

To make a believable case therefore, how the future demand figure is arrived at deserves a much greater level of in-depth explanation than has so far been demonstrated and needs to include all the projected developments that will require locally-sourced aggregates from within the SDNP, with particular reference to housing development and infrastructure.

In summary, the methodology for determining future soft sand demands needs to be more coherent and disciplined, and should set out a full analysis of the both the wider and local economic contexts as well as using the correct mathematics.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

In respect of Restoration and Aftercare of new and existing sites, the policy must include monitoring and

rigorous enforcement during the life of the facility and not just at the end.

Additional Comments

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01 - Organisation: Steyning & District Business Chamber (Response ID: 258 Respondent ID: 4094)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The Steyning & District Business Chamber represents the interests of over 60 business members. Our principle objective is to promote, protect and develop the interests of the business community of Steyning and District area. The prosperity of our businesses, employees, their families and the outstanding area of natural beauty in which we both work & live is paramount to their success and the community as a whole.

Steyning is a thriving market town, a destination shopping and eating hub, with a far reaching reputation for it's outstanding events i.e. Steyning Festival, Xmas Late Night Shopping, May Fair, Food & Drink Festival, Big Church Day Out, to name but a few. Key to the continued success of our local businesses and events is access. Access by visitors, employees, families (not only to the town, but via school buses to the OFSTED 'Outstanding' Grammar School), diplomats & associates (to Wiston House), the list is endless. It is this point that is challenged in both the Vision and Strategic Objectives and are themselves contradicted within the plan as per the S.O. and corresponding points detailed below illustrate:

Strategic Objective 11: To maximise the use of rail and water transport for the movement of minerals and to minimise lorry movements and the use of local roads for minerals.

4.8.6. There are no rail-linked quarries in West Sussex and, given the high cost of infrastructure, this situation is unlikely to change and minerals extracted from quarries within West Sussex will continue to be transported by road.

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

4.9.2. Whilst mineral extraction is necessary for the economy and the built environment, it is capable of introducing adverse impacts, such as noise and dust pollution, increased traffic etc, to areas used for other purposes including housing, public rights of ways and employment.

Strategic Objective 8: To conserve and enhance the landscape and townscape character of West Sussex and the special qualities and local distinctiveness of the South Downs National Park,....

4.4.9. Minerals can only be worked where they occur and their extraction can potentially cause conflict through loss or changes to valued landscapes.

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

No apparent adoption of this policy, proven through the Upper Beeding Cement Works and the quarry located at the Hollow at Washington.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The Steyning & District Business Chamber object to the inclusion of this site in the Plan for the following reasons:

Extensive use of the A283 by heavy, industrial traffic that has a speed limit of 60mph. An already, dangerous and overcrowded road with serious bottlenecks experienced at rush hour times. Multiple accidents have occurred on this road with fatalities recorded. Congestion and right turn access into the site offers up the potential for increased accidents, extensive tailbacks and degradation of a single lane route that is currently below standard. Increased heavy traffic will not only accelerate the condition of the road, but will increase environmental pollution through excessive diesel ommissions.

Noise pollution from the grading plant will only seek to discourage visitors, impact our natural habitats for our wildlife and will not thereby enhance our environment.

Whilst the site is not within the SDNP, Ham Farm, as we all know, will be visible and an eyesore to those many visitors previously attracted to the area. This will negatively impact our tourism and business members alike.

The felling of mature trees and the potential negative impact to the water supply at Alderwood Fisheries (who provide many activities for disabled people), is a further concern with regards to the unique environment in which the proposed site is planned.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Further investigation into other sites that would prove to be less sensitive and more appropriate for a heavy industrial plant.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

01 - Organisation: Steyning and District Community Partnership - Visitor and Tourism Group (Response ID: 220 Respondent ID: 3794)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Production of minerals needs to be carried out in a way that protects and enhances the tourism economy.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Bullet Point 2 of the Vision refers to special places to live and visit, but we feel that should be expanded and be more specific, since tourism is such an important part of the WSCC economy.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The Visitor and Tourism Group of the Steyning and District Community Partnership is engaged in promoting the area as a tourist attraction together with making sure residents enjoy their surroundings.

The FAQs on the Ham Farm Site set out specific comments about the impacts on tourism. It acknowledges that Steyning is a beautiful historic village, it is in fact a market town but the comment concludes that development will not discourage visitors to the area; that the assessment would not have an unacceptable assessment on the landscape.

We challenge that view based on highway, landscape, visual, air quality and public rights of way.

Highway & Air Quality

Under Transport and Access this is rated Green. This appears to ignore the fact that this is a very busy and often congested road. Traffic turning against the flow will need a central waiting point. This implies that the highway will need major improvements and lighting. The traffic will be congested still further particularly at rush-hour times, together with queuing trucks throughout the day, leading to a detraction in air quality. This will be particularly disruptive when major events take place at Wiston Park. This will be a departure from the current rural outlook at a point immediately before you enter Steyning.

As to the detailed estimates these vary from 46 HGV per day to 92 in the summary. The basis of this is further confused with the reckoning that it translates to 4 HGVs per hour. These figures are puzzling but even at 4 movements per hour considerable changes to the highway will be required.

Landscape & Visual

The comments recognise that the site is visually sensitive in views from the top of the scarp and accepts that there will be some negative impacts at Wiston Park. The fact that the SDNP boundary is to the south of the road indicates the value of the landscape in this area. It will be highly visible to all users of the South Downs Way and Chanctonbury Hill and its surrounding downland. These are well -known and accessible tourist destinations in the SDNP. Views at these locations are considered to be of the highest sensitivity owing to the location being within a National Park, on a National Trail and at a viewpoint destination, as opposed to the medium rating in the report on the sensitivity of extraction for this site (page 86 of the West Sussex Minerals Landscape Sensitivity & Capacity Study for Potential Mineral and Waste Sites - Minerals Addendum May 2015). The recommendations for mitigation are, in our view, unlikely to be effective for many years leaving the site visually unattractive for visitors during the lifetime of this project. There are an estimated 39 million day visits to the National Park.

Most of the photographs in the document are taken when the trees are in leaf and during the winter months much of the screening referred to in the report will not exist. Development will include structures, movement, noise, lighting etc and cumulatively these will have a serious impact on those seeking tranquillity, peace and stunning views; the very reasons why visitors come to this area. In our opinion you have underscored the impact. (Attached are photographs from various spots along the National Park & National Trail, which show that even now, in summertime, the site in question is highly viewable)

Within the immediate area of the site are Alderwood Pond, Wiston House with Wiston Park and the Cow Shed Studio, all are visitor attractions. Alderwood Pond has 45 fishing points including 4 for disabled use. This is the only fishing pond in the area with disabled access and provides facilities for several major charities. The Cow Shed Studio and Jeweller Workshop, immediately adjacent at Hammes Farm offer courses, exhibitions which attract visitors from a wide area. Wiston House has an internal reputation as a Conference Centre. The current tranquil setting is used for Weddings, Dining, Social Events and the park hosts events such as the Steam Rally, Big Church, Concerts and other gatherings. The setting of all these popular attractions will be adversely affected.

The economic wellbeing of Steyning relies on attracting people to visit and initial impressions driving by matter. The approach by road to the Steyning area from the south is already adversely impacted by the disused cement works. The proposed development of the quarry will adversely impact the approach from the west.

Public Rights of Way

The existing footpath adjacent to the site will become very unattractive.

Sustainability Appraisal Conclusions

The site analysis document states that the site would have a minor positive effect on the local economy because of employment opportunities. In our view this will be more than countered due to the negative impact arising from the reduction in the number of visitors attracted to Steyning.

Conclusions

The impacts have been undervalued and the impacts on tourism misunderstood. Steyning is one of the gateway towns to the SDNP and its main attractions include easy access to the SDNP. In this crowded part of the UK many visitors relish easy access to the South Downs which offer openness, naturalness, lack of noise and distant views. The proposal will result in visibility of disturbance to the natural landscape, noise and light pollution, all detractors to peace and tranquillity. Visitors are also attracted by the views of the Downs and the surrounding countryside as they approach from the A283. This highly visible and busy site with structures will have a serious impact on the setting of this picturesque market town. For these reasons we take the view that there will be an adverse impact on tourism which is essential for the local economy.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Removal of this site and reconsideration of the wider list of potential sites.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Separate submitted photo attachment 1 - view of proposed site from Chanctonbury Ring; photo attachment 2 - Rock Quarry from Chanctonbury Ring)

* * *

01 - Organisation: Steyning Parish Council (Response ID: 156 Respondent ID: 3761)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

STEYNING PARISH COUNCIL RESPONSE

WEST SUSSEX COUNTY COUNCIL JOINT MINERAL LOCAL PLAN

Introduction:

Steyning Parish Council believe that WSCC's Local Minerals Plan proposing Ham Farm for 850,000 tonnes of soft sand extraction has failed to take account of key planning conditions nor has it been properly communicated to the public in general, specifically people who are immediately adjacent to the proposed site. It should be noted that the field known as Ham Farm is part of Wappingthorn Farm and owned by the same person; using the site name of Ham Farm has been misleading.

Steyning Parish Council object to this mineral proposal and request that the Ham Farm site is withdrawn from the Draft Mineral Plan on the following grounds:

1: Failure by WSCC to uncover an existing restrictive covenant, which is enforceable by an adjoining owner. Steyning Parish Council submits that this will prevent extraction of sand from the Ham Farm (Wappingthorn Farm) site. The landowner was fully aware of this fact in 2013/14.

2. Failure by WSCC in their statutory duty with regard to the National Planning Policy Framework (NPPF) and the Horsham District Planning Policy Framework (HDPPF)

WSCC have failed in their statutory duty as they have not correctly addressed the principles of the National Planning Policy Framework Policy 4 Conserving and Promoting Sustainable Transport paragraphs 29 – 41(PST); Policy 11 Enhancing the Natural Environment Paragraphs 109– 125 (ENE) and policy 13 Facilitating the Sustainable Use of Minerals (FSUM) Paragraphs 142 – 149.

3. Unacceptable impact on the Landscape

The site for the proposed sandpit is immediately adjacent to the boundary of the South Downs National Park run by the South Downs National Park Authority (SDNPA). The statutory requirement set out in the Countryside and Rights of Way Act 2000 states:

"Local Authorities have a duty to have regard to the purposes of National Park designation in the consideration of development proposals that are situated outside National Park boundaries but which might have an impact on the setting of and implementation of the statutory purposes of these protected areas, i.e. conservation of the landscape and scenic beauty of the National Park."

Extraction of sand at Ham Farm would have an adverse effect upon the principles of National park designation and therefore contravene the purposes of National Park designation, in particular the landscape and scenic beauty of the park (see paragraph 115 of the framework)

Steyning Parish Council also feels the proposal is contrary to the SDNPA Local Plan, as it contravenes its core purposes and core planning policies.

The following extracts from the Mineral Site Selection Report demonstrate a complete failure of compliance with the further SDNPA principles set out in this report:

The SDNPA Local Plan Preferred Options documents approved in July 2015 states:

"Core Policy SD1: Sustainable Development in the South Downs National park:

1. When considering development proposals the Authority will take a positive approach that reflects presumption in favour of sustainable development provided that they are:

a) Consistent with National Park purposes;

b) Pay due regard to the duty in pursuit of the purposes;

c) Conserve and enhance the special qualities of the National Park; and

d) Comply with all the relevant policies within this Local Plan.

Fig 1.1 The Purposes and Duty

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area

2. To promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.

The SDNPA also has a duty when carrying out its purposes to: "Seek to foster the economic and social well-being of the local communities within the National Park." In addition Section 62 of the Environment Act 1995 also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes. "Where there is an irreconcilable conflict between the statutory purposes, statute requires the Sandford Principle to be applied and the first purpose of the National Park will be given priority."

Supporting Text:

4.5 The SDNPA will work in partnership with other local authorities to ensure that development outside of the National Park does not have a detrimental impact on its setting or otherwise prejudice the achievement of the National Park purposes (Figure 1.1)."

The SDNPA website page on Minerals and Waste states:

"Major minerals and waste development could impact on the qualities which make the National Park special – its landscapes and local distinctiveness – and will therefore be refused unless they can be demonstrated that exceptional circumstances exist and the development is in the public interest."

Steyning Parish Council believes that WSCC have failed to demonstrate the exceptional circumstances existing at Ham Farm against the 25 sites that were considered and strongly feels that development is against the public interest in this location.

This site is highly visible from Chanctonbury Hill and other important view- points along the South Downs. (See photographic evidence Appendix 1), which would significantly reduce enjoyment of visitors to this area.

No consideration of the inevitable light pollution from the site has been addressed by WSCC. The following extract from the HSE Quarries regulations 1999, demonstrates the potential for unacceptable light pollution (2):

"Regulation 23 Lighting - The operator shall ensure that every part of a quarry in which a person is likely to be exposed to risks in the event of the failure of artificial lighting is provided with emergency lighting of adequate intensity and where that is impractical persons at work in that place shall be provided with a personal lamp. 177 General lighting matters and emergency lighting inside buildings are covered by regulation 8 of the Workplace Regulations. Relevant advice is contained in the Approved Code of Practice to that regulation. Lighting a quarry is much more difficult than lighting a flat area because of the uneven surfaces and the consequential deceptive effects of shadows. 178 Emergency lighting is required where work continues after dark and safe evacuation is not possible without artificial lighting. Where lighting is provided by independently powered lighting towers and failure of any one tower would still leave enough light to enable people to leave the area safely, no further emergency lighting need be provided. 179 Lights provided on vehicles ought to be sufficient to enable them to be driven safely, but additional lighting may be required for manoeuvring operations such as reversing or tipping. 180 The safety of security staff and others who have to move around the quarry at night must be ensured by an appropriate combination of torches and floodlights."

Excavation of the Ham Farm site would have an unacceptable and cumulative impact on the landscape, as it would create a simultaneous view to include the Storrington and Washington quarries, which are highly visible from the South Downs and have not been restored. (See Photographic evidence, Appendix 2).

Buncton Manor Farm, a site adjacent to the SDNP (and close by the Ham Farm site) was rejected by the SDNP Landscape Officer on the following grounds:

SDNPA Landscape Officer: This site has the potential for significant impacts on views from the SDNP from Chanctonbury Hill and the Open Access land along the Scarp slope of the chalk ridge to the north of Chanctonbury Hill. In some locations these impacts are screened by the topography and slope profile combined with woodland along the scarp slope. However there are areas where there is clear visibility over the site, albeit at distance within a wide panorama. The site, a series of agricultural fields, is poorly screened

with denuded and gappy hedgerows, particularly along its southern boundary. It is well screened from the Underhill Road due mainly to roadside vegetation, topography and the set back from the road. The landscape, a section of the Scarp foot slopes character area, is undulating and quite variable in scale from enclosed and intimate where wooded areas and hedgerows are frequent, through to more open sections of arable land where the topography and scale of the landscape is more consistent and less enclosed. Woodland and hedgerow screening could be effective at reducing this impact to some degree locally, although this approach is less likely to effectively mitigate the impact on views from the higher ground to the south of the site. There are open and panoramic views from the chalk ridge, which overlook the existing Rock Common and Chantry Lane sandpits. These pits are sequentially and simultaneously visible from the PROW and access land on the chalk ridge to the south. This site would also be visible sequentially in some locations. Opening a further quarry in this location prior to restoration of Chantry Lane and Rock Common would lead to unacceptable combined cumulative impacts on the panoramic views from the chalk ridge. Chanctonbury Hill, and its surrounding downland are a well -known and accessible tourist destination in the SDNP. Views at this location would be considered to be of the highest sensitivity owing to the location being within a National Park, on a National Trail and at a viewpoint destination. Access to the area is from the car parks at the foot of Chanctonbury Hill and south of Washington. There are also a significant number of users on the National Trail"

Steyning Parish Council believe that the Ham Farm site should be rejected for the same reasons.

The following extracts from the Mineral Site Selection Report demonstrate a complete failure of compliance with the further SDNPA principles set out in this report:

"LUC Landscape and Capacity Study 2015:

The updated study did not revise the 2011 sensitivity or capacity scores.

SDNPA Addendum to WSCC Minerals Local Plan Site assessment:

The site is visually sensitive in views from the top of the scarp in sections where woodland does not block wider views. The ZTV shows visibility from Wiston Park and it is likely that there would be some negative experiential impacts (tranquility, remoteness) on visitors to the parkscape should this site come forward. Views to the south of the parkscape would not be affected.

Design of the site operations should be undertaken sensitively and with appropriate levels of screening. Existing trees around the perimeter of the site should be retained.

The entrance to the site should be carefully designed to minimise urbanising impacts on the SDNPA.

Transport and access:

The results of the traffic impact assessment show that the traffic related to the development would not have any adverse impact on the Lorry Route Network and would not therefore, have a severe impact if the site were to come forward on its own.

The location of the existing gated access to the agricultural land is considered to be in the optimum position".

Additionally the WSCC report says:

"but the tree belt along the boundary with the A283 will need to be completely removed for safety reasons."

Thus making the site even more visible from the Downs.

Steyning Parish Council reiterate that extraction and infilling at Ham Farm should not be allowed as it would create an unacceptable impact on landscape character.

3. Water and Flooding:

Wiston Pond and Alderwood Pond are highly sensitive to water levels. The proposed site has watercourses to the west, north and south, which also feed to Alderwood Pond.

50% of the site is susceptible to surface water flooding. As advised by WSCC planning, no hydrological survey has been carried out. One of the reasons that the Rock Common site was rejected was on the basis of a hydrology report. Alderwood Pond is dependent on ditch line water and connecting streams for their fishing business, which would be damaged by pollution. Loss of this business would be a considerable loss of amenity for the community and other users. A representative from Southern Water has stated that water would need to be removed from the site to enable quarrying.

(See appendix 3: Alderwood pond information as provided by Pam Holmes, owner).

4. Deliverability:

The Ham Farm site, as part of Wappingthorn Farm, was designated in a previous application (DC/13/1958) for the internal production of maize and distribution of digestate for the Wappingthorn Farm Anaerobic Digester. The landowner is aware that these are usages of the same land and contravenes the plan as approved.

Steyning Parish Council contends that planning permission granted in July 2014 for the Anaerobic Digester at Wappingthorn Farm was based on the evidence (attached as Appendix 4) submitted by Farm Renewables Ltd and was relied upon by Planning Officers in granting permission. This is all publicly available on the HDC Planning Portal. This evidence clearly shows that permission was granted on the understanding that maize grown on the Farm (including the Ham Farm site) would feed the Digester and that digestate produced would then be spread on the Farm as fertilizer thus creating a sterile area, which may not be used for other purposes. If the fields that are now used for growing maize are instead used for sand extraction then the whole basis for planning permission for the Anaerobic Digester was incorrect, and traffic movements of HGVs on both the B2135 and the A283, which leads to it will increase. This would be an additional increase to that proposed for vehicles servicing the sandpit operation, which is already unacceptable.

The application also says that the key planning and land management guidelines for the area include the need to 'Conserve the rural and remote character of the area by maintaining its generally undeveloped nature' and that Mr F De Boer and Partners desire to develop a low carbon business model that is both environmental and economically sustainable producing green energy that can be used in the local area thereby reducing the carbon footprint of Horsham District. A sandpit, later to be refilled with inert waste brought from out of the County, will deliver the opposite of this. See appendix 4.

Steyning Parish Council submit that the borehole tests done by Dudman and the landowner are brought into question as this borehole test is inconsistent with the test done on the same land in 1948 (see appendix 6) and Steyning Parish Council question the reliability of this test and submit that WSCC have failed to research the site sufficiently as this earlier testing would have come to light. If the 1948 bore test is to be believed then there are significant deposits of far more valuable blue clay.

Furthermore Dudman has submitted a forecast for extraction of 850000 tonnes of soft sand. WSCC have failed to validate this, as this is inconsistent with the landowner's verbal estimate of 500,000 tonnes. (See statement in appendix 7)

Steyning Parish Council believes that the Ham Farm site will not be restored within the time frame, nor is there enough inert local landfill to restore satisfactorily the site within the assured timescale of 10 years. WSCC have confirmed that adjacent sites at Storrington and Washington have not been satisfactorily restored by Dudman Ltd and have far exceeded an acceptable timescale. On that evidence, there can be no assurance that this site will be restored either, despite advice from WSCC planners that the Ham Farm site would be excavated and restored within 10 years.

According to the West Sussex Minerals and Waste Development Framework (May 2011) and the reasoning upon which WSCC rejected a potential site:

“most inert waste in the County is now recycled or re-used, for example, within engineering projects, and the requirement for inert landfill capacity is therefore vastly reduced. Overprovision of inert landfill would not encourage waste up the waste hierarchy, away from disposal to land, and would therefore not fit with the preferred strategy. There is not enough inert landfill available within this County, subsequently out of county landfill will be imported in order to meet the assured time frame of 10 years.”

5. Highways and Traffic

The 2015 Highways assessment did not take into consideration the following factors:

Since the Shoreham aircraft crash in Aug 2015, when the A283 became the official diversion route from the A27, traffic volumes on the A283 have increased by an estimated 30% and have not fallen back to their original volume even though the A27 reopened many months ago.

The A283 and the B2135 are well used cycle routes and often used for races in the evenings and at weekends; this causes slow moving traffic on both roads especially when lorries cannot overtake because of the bends, on-coming traffic and blind summits.

Functions at Wiston House also cause considerable jams on the road.

Road accident statistics show that from April 2011 to March 2016 inclusive on the A283 between and including the Washington Roundabout and the Clays Hill Roundabout, there have been 34 accidents involving injury reported to the Police, categorised as one fatal, ten serious and 23 slight collisions. (Source: Sussex Safer Roads Partnership)

In the 2014 Road Safety Foundation Report 'How Safe are you on Britain's Roads' the A283 is shown as a Medium-High Risk road.

The 2015 consultants’ report is considerably different to the 2011 consultants’ report. The entrance is to be at the point of the existing farm gate, but sight lines are needed to the north. The existing belt of trees will need to be removed in its entirety to allow drivers turning right to see the bend in the road. This is in conflict with the Draft Minerals plan’s stated intention and SDNPA requirement to retain all trees around the perimeter of the site.

Turning right across the A283 (i.e. going from the east towards the west) will need a right hand turn lane if it is not to halt traffic going west. A right hand turn lane was stated to be necessary in the 2011 WSCC Traffic Assessment report as follows:

“Access Works and other Mitigation Works

Given the nature of the A283, a right turn lane would be required in order to protect the free flow of traffic and ensure no safety detriment through vehicles waiting to turn. In principle, it would seem that an access with right turn lane could be formed without requiring 3rd party land.

However the road is narrow at this point so land must be taken from the Wiston Estate, which is within the South Downs Park. (See Appendix 5)

“Suggested Routing

The location of the site would mean that a routing agreement would not be necessary.”

The 2011 WSCC Traffic Assessment Report says no routing agreement is necessary, so that more pressure is put on air quality in Storrington. This is not sufficiently addressed in the 2015 report.

There is gross inconsistency between the 2015 assessment of 46 two way lorry movements per day with 11.5 hour operating hours and the 2011 report that states 34 daily two way movements with a 6 hourly operating day.

The number of lorry movements has been severely underestimated, as WSCC’s assumption that the same lorry will remove sand and bring infill, would appear to be incorrect. This is substantiated by the West Sussex Minerals and Waste Development Framework, May 2011 that states: “There is not enough inert landfill available within this county, subsequently out of county landfill will be imported in order to meet the assured time frame of 10 years.” Furthermore no allowance has made for additional vehicles such as staff/equipment/maintenance vehicles and Lorries to remove surface water. Should the Ham Farm site be lost

to maize production, additional Lorries would also be required to feed the anaerobic digester, which is currently operating at Wappingthorn Farm.

The 2015 Highways report statistics show that there will be a 26% forecast increase in traffic through natural growth on the A283 from 2015 to 2033. This will exacerbate the existing problems already experienced on the A283.

Furthermore, the speed limit of 60mph is incorrectly stated as being 50mph in the report and calculations based on this are therefore invalid.

Loaded sand lorries are required to travel at a reduced speed. This has not been accounted for in the plan. The following information confirms the serious highway issues, which are presented by the transport of aggregate by lorries:

"According to the Mineral Industry Research Organisation (MIRO), sustainable aggregates study (1), "Although considerable improvements have been made over recent years, there are still a number of potential off-site effects of this traffic. It can add to the number and size of vehicles on the road, which may cause congestion, accidents or difficulties for pedestrians. It may damage roads, which can give rise to damage to other vehicles or cause accidents. It may damage road verges, which can affect the wildlife often found along roadsides. Lorries may spill or drop material onto roads and spread dust, which can be another source of accidents. Increased traffic can also create visual intrusion, air pollution, dust, noise and possibly vibration in areas adjacent to the roads."

The ARCDY report states that the roundabout is over theoretical capacity on the A283 Storrington arm in the morning. Therefore traffic issues already exist and will be made worse by the development as proposed. By 2031 this assessment suggests the A24 and A283 Storrington Road will be over capacity. Storrington Road is expected to see an increase of 162 queuing vehicles compared to 2015.

No allowance has been made for the cumulative effect of importing inert landfill from out of West Sussex to restore Ham Farm and the existing adjacent Washington and Storrington quarries sites, simultaneously.

The traffic survey which was undertaken, was over 24 hours but did not reflect the very busy times i.e from 7am – 9.30am with commuters, school coaches and parents taking children to school or nursery. Nor the school coaches and school runs from before 3pm- 4.30pm, followed by the "rush hour" traffic from 4.30pm – 7.30pm. All of which cause long tailbacks and reckless driving.

6. Health, well being and loss of amenity:

There will be a detrimental impact on the Health and Well being of residents, which has been fully accepted by WSCC in the report and yet irresponsibly dismissed.

The effects of light pollution from this site has not been addressed, both with regard to the immediate homes adjacent to the proposed site, nor the visitors to the South Downs (view from SDNP) and Steyning village.

The effect of air pollution on the surrounding community has been unacceptably dismissed. One in eleven children have asthma in the UK. According to asthma.org association "Pollutants, such as the chemicals in traffic fumes, can quickly irritate the airways and trigger asthma symptoms. The tiny particles found in dust, soot, and diesel fumes are small enough to get right into the lungs, causing inflammation and making asthma systems worse". On the Horsham Road in close proximity to this site, is a large and active pre-school crèche who are concerned about the effects of noise, light and particulate pollution on their young children. The playing fields of Steyning Grammar School (2000 pupils) are nearby.

Alderwood pond provides recreational fishing facilities and a nature reserve for enjoyment by disabled young people, rehabilitating soldiers and the local community, which will suffer from the affects of air, water and noise pollution.

7. Local economy

The Steyning and District community partnership, which has responsibilities for local economy and tourism, have stated that there would be a severe detrimental effect to the interests of the community by this plan. WSCC have stated that there will be no effect and this statement was made without any known consultation to any local body.

8. Bio Diversity

There are obvious biodiversity issues, which include ancient woodlands, bats, newts and the toad crossing under the A283. Alderwood Pond was designated a nature reserve and bird sanctuary in 1984. (See Appendix 8) This document provides evidence of many land, water and plant species in existence, which should be protected and have not been considered by WSCC.

9. Historic environment Listed buildings

Wappingthorn Manor is a listed building, (which WSCC have not considered) and has the benefit of the restrictive covenant mentioned elsewhere. Horsebrook Cottage is also listed and is immediately adjacent to the site on its western boundary. Also adjacent to the site on the east is the house called Hammes Farm (the original Ham Farm) and associated buildings. Wappingthorn Farm itself contains several listed buildings.

Full cognisance of historical issues has not been fully addressed, such as Roman occupation and the abandoned medieval village of Wappingthorn.

Conclusion:

Steyning Parish Council therefore considers that the process of including the site known as “Ham Farm” in the draft Minerals Plan was fundamentally flawed.

That assessment failed to take into account sufficiently the following:

1. The relevant advice in the NPPF;

2. The damage to the South Downs National Park (“SDNP”);

3. An inaccurate 2015 Highways Report which was at complete variance to the 2011 Highways Report and, in particular, the destruction of a mature belt of trees for a considerable length fronting the A283 to the Wiston bends;

4. The cumulative adverse nature of the other two sandpits further up the A283;

5. The recommendations of the SDNP Landscape Officer;

6. The damage to the amenity of adjoining residents, acknowledged as severe in the WSCC Report;

7. The extent of flooding and damage/pollution to the water courses;

8. The effect of air, noise and light pollution on the health of the community;

9. The harm caused to the local economy;

10. The lack of clean inert material to backfill the sandpit over the alleged ten year period of extraction, without bringing this in from “out of County”;

11. The impact on nearby Grade II Listed Buildings;

12. The designation of the Ham Farm site, as part of Wappingthorn Farm, in a previous application (DC/13/1958) for the internal production of maize and distribution of digestate for the Wappingthorn Farm Anaerobic Digester.

These planning obstacles that directly contravene the strategic objectives set out in the WSCC Minerals Plan are insurmountable, making this site undeliverable.

The Parish Council therefore seeks the removal of the Ham Farm site from the next version of the draft mineral plan.

Steyning Parish Council

June 2016

Appendices:

Appendix 1

Photographic evidence of view from Chanctonbury Hill and other view points from the South Downs.

(Photos included in email and hard copy version of response received:

- From Chanctonbury Ring (A) - 2 pictures

- Rock Quarry (A) From Chanctonbury Ring

- From connecting path from South Downs Way to High Horse Shoe (B)

- From High Horse Shoe near bench (C)

- From permissive footpath above tennis courts on high horse shore (D)

- Google overview map showing sites A, B, C & D)

Appendix 2:

Existing quarries at Washington and Storrington demonstrating potential for cumulative visual impact if Ham Farm is excavated.

(Photo included in email and hard copy version of response received)

Appendix 3:

Alderwood Pond information notes 31/5/16:

- Alderwood Pond is registered with DEFRA EW033-X-017F
- Risk to migrating trout exist
- Risk to bat species- awaiting survey
- Risk to Crested Newts - awaiting survey
- Ancient Lime tree is present, which is an ancient woodland species.
- Alderwood Pond was put forward as a nature reserve and bird sanctuary in 1984 due to its bio diversity.

Users:

- There are 45 fishing points also known as Swims, including four for disabled use. This is the only fishing pond in the area with disabled access.
- 500 + people use the site each year
- St Dunstans Charity for the blind, 5-6 at a time
- Chailey Heritage for disabled, 5-6 at a time
- Simon York Johnstone - People with learning difficulties
- St Johns
- Rehabilitation for soldiers.

Water levels are a huge concern. Fed from stream and Ditch-line water.

They have a licence to extract water from the South Stream.

There is a Covenant attached to the site, which is being investigated.

Appendix 4

Extracts taken from Farm Renewables Planning, Design and Access Statement

Related to a proposed anaerobic digester plant at Wappingthorn Farm dated 11th October 2013

Submitted to HDC as part of application DC/13/1958

Introduction

1.2 This application reflects a desire by F.de Boer & Partners to develop a low carbon business model that is both environmental and economically sustainable producing green energy that can be used in the local area thereby reducing the carbon footprint of Horsham District.

1.7 The farm yard does contain 3 listed buildings all related to the operation of a dairy farm at the site

1.8 The plant will be fuelled by 8760 tonnes of maize silage produced at Wappingthom Farm and land and on additional land farmed by F.de Boer & Partners.

1.11 The digestate left over from the digestion process will be used as natural organic fertiliser by F.de Boer & Partners. The majority of land farmed by F.de Boer & Partners is not in a Nitrate Vulnerable Zone (NVZ), but where it is, this will be done in full accordance and compliance with NVZ restrictions on the timing of spreading of digestate to land

2.1.8 The key planning and land management guidelines for the area include:

- Conserve the rural and remote character of the area by maintaining its generally undeveloped nature
- Respect traditional settlement pattern
- Avoid the creation of new farm access tracks
- Conserve and enhance the existing hedgerow and show network

9.1.11 All 8760 tonnes of maize silage will be grown on land farmed by F.de Boer & Partners. Of this 4500 tonnes will be grown on land accessible from the farm track network of Wappingthom Farm.

9.3.10 Current agricultural practice sees Mushroom compost delivered to the farm for spreading on the land on an annual basis, whilst Sewage Cake and Cattle Slurry have both been spread in recent years. This will be replaced with digestate.

9.4.11 Arable land, currently farmed by F.de Boer & Partners, is fertilised with a mixture of 1000 tonnes of spent mushroom compost tonnes and chemical fertilisers. In recent years cattle slurry and Sewage Cake has also been spread on the land. This proposed development will see that replaced with digestate produced by the process.

10.1 The impact of the proposed development will be minimal on traffic movements, when compared to existing patterns of traffic movement related to the farming activities of F.de Boer & Partners, related to the current operation of a crimped grain production business.

10.2 The farm currently produces seasonal agricultural vehicular movements related to the production and harvest of crops. In the land around Wappingthorn Farm normal arable production might include the production of 7000 tonnes of crimped grain and 700 tonnes of wheat. These are brought back from the fields to Wappingthorn Farm. Of these 1000 tonnes of crimped grain are produced on land accessible internally through farm tracks.

10.3 Of the 7000 tonnes of crimped grain produced,5000 tonnes is almost immediately sold on to local cattle farmers for use as animal feed. Depending on the location this is mainly transported by lorry with some taken by tractor and trailer. The remaining 2000 tonnes is stored over winter and sold on to farmers in the early summer months between May and August.

10.4 Once harvested, wheat is currently brought back to the site by 12 tonne trailer where it is dried, before being transported to a grain store on a separate site. The grain is then brought back to Wappingthom Farm for processing, in order that it can be sold on to local farmers, again as an animal feed in the first two or three months of the year.

10.5 For the production of both the wheat and maize crops 1000 tonnes of spent mushroom compost and 112 tonnes of artificial fertiliser are brought onto the farm and then spread onto the fields. The fertiliser for all of F. de Boer & Partners agricultural activities are delivered to Wappingthom Farm as there is the space to

store the material on a dry concrete base in the yard. In both cases 33% of the material is used on Wapplngthorn Farm itself. The remaining 77% is spread on the additional arable land farmed by the company.

10.6 This proposal sees a move away from the production of animal feeds at Wappingthom Farm and the wider land farmed by F. de Boer & Partners.

10.7 The plant will be fed by 8740 tonnes per annum of maize silage.

10.8 As maize silage uses the whole crop, rather than just the grain, this significantly increases the tonnage that can be produced on site at Wappingthorn Farm. 4500 tonnes of the maize silage feedstock can be produced on land accessible through the farm track network.

10.9 The further 4260 tonnes of maize silage will be sourced from land outside the farm track network, that is currently used for crimped grain production. This will result in a significant reduction in the land rented by F. de Boer & Partners for the production of maize and a resultant reduction in the traffic required to prepare and maintain that agricultural land.

10.10 Once material has been fed through the digester, it comes out as digestate. This will be produced at a ratio 71% of the material fed into the process. This means there will be 6390 tonnes of digestate produced, per annum. The digestate will be separated into a solid and liquid fraction.

This means there will be 5490 tonnes of liquid digestate and 900 tonnes of solid digestate. These are both odour free when spread. They will be spread at a maximum rate of 29 tonnes per acre comprising an application of solid digestate either in autumn or spring, and several applications of liquid digestate throughout the year. This will result in 275 vehicle movements to spread liquid digestate on land external to Wappingthorn Farm and 45 for the solid fraction.

10.12 The table above shows that this development will lead to a significant decrease in traffic movements caused by the agricultural activity at Wappingthorn Farm. This is largely caused by the simplification of the processing required for the maize that is grown and the fact that it will no longer be sold off-site to livestock farmers.

10.13 This reduction in lawful movements will reduce pressure on the junction formed by the driveway with Wappingthom Farm track onto Horsham Road. This comes in the centre of a double bend in a 60mph limit stretch of road. A reduction in its use will improve local conditions.

Later letter from Farm Renewables re traffic movements: (image of planning code included - DC/13/1958)

7th November 2013

The move to a business model focused around Anaerobic Digestion will mean Wheat and Maize grain is no longer processed and exported off-site from this location. The farm's existing crop storage infra-structure will all be used for silage storage which will then be fed into the digester.

It should also be noted that feed stock for the digester will be brought in by tractor and trailer, where coming from the additional local land farmed by F. De Boer & Partners. This will be instead of the articulated Lorries which bring grain maize and wheat onto site and then some time later once processing is complete, distribute it to end markets.

This will in turn significantly reduce pressure on the entrance to the farm from Horsham Road. It will result in a reduction in the lawful use of the farm entrance by the farm's owner. It will under no circumstances lead to an operational situation where vehicles are making constant deliveries to site 24 hours a day, seven days a week through-out the year.

Extract from Planning Officers report to Planning Committee on consideration of DC/13/1958

1. To show that that planning permission was given on the understanding that the maize to feed the digester was produced on-site:

There is an intrinsic link between this form of renewable energy technology and the subsisting agricultural use of Wappingthorn Farm - the form of renewable technology being proposed here, relies on the consumption of arable feedstock, such as the maize already grown at Wappingthorn.

Consequently, the sustainable location of the proposed anaerobic digestion plant is considered to be wholly satisfactory in this regard.

2. To show that that planning permission was given on the understanding that traffic movements on the B2135 would reduce as maize and digestate would both be moved within the farm:

The access to the site from the Horsham Road has also been raised as a concern by many local residents, and understandably this is on the basis of the existing inadequate road junction. West Sussex County Highway Engineers have been on-site, assessed the application details, and have not raised an objection on the overall reduction in vehicle movements.

The applicant has submitted a traffic report that considers the existing farm activities against the proposed farm activities associated with the running of this plant.

A road traffic audit has been produced by the applicant to verify the initial report, and both have been carefully assessed by the County highway engineers.

The result of this assessment is that there is agreement between officers, the highway engineers, and the applicant, that vehicle movement will decrease by the sum of approximately 300 movements per year.

On the basis that the junction will be used less as a result of the proposed development, despite its inadequate geometry and visibility splays there is no evidential basis for a refusal on this ground.

Appendix 5:

(Image included in email and hard copy version of response showing Ham Farm proposed access visibility splay and swept path (from West Sussex Minerals Local Plan Transport Assessment - December 2015))

Appendix 6:

Duke and Ockenden Bore

Bore Hole Test March 1948

(Scanned image included in email and hard copy version of response of bore hole test March 1948)

Appendix 7:

As per the Steyning Parish Council notes, recorded at the meeting with WSCC planners and members of the Steyning Quarry Action Group 1.6.16, a local resident stated " I met with Frans DeBoer last week and he has stated that there is a capacity of 500000 tonnes, not 850000". Mr F Deboer is the landowner.

Appendix 8:

Nature Reserve and Bird Sanctuary Document:

(9 pages of scanned extracts included in email and hard copy version of response - J.G. Stewart, Conservation Officer, Sussex Trust for Nature Conservation, 9th September 1982)

Website Bibliography:

1. Mineral Industry Research Organisation (MIRO), sustainable aggregates study:

http://www.sustainableaggregates.com/sourcesofaggregates/landbased/traffic/traffic_opsstage.htm

2. West Sussex Minerals and Waste Development Framework - May 2011 statement:

file:///Users/michellesyred/Downloads/wch3a_boxgrove.pdf

3. Asthma UK. Asthma facts and FAQs. http://www.asthma.org.uk/asthma-facts-and-statistics Website accessed 3 January 2014.

(Addendum submitted to response)

STEYNING PARISH COUNCIL ADDENDUM TO

WEST SUSSEX COUNTY COUNCIL JOINT MINERAL LOCAL PLAN

Introduction

Since the original submission of our response to the WSCC Joint Mineral Proposal, more information has been received, which we believe further supports our request that WSCC withdraws the Ham Farm Site from the Minerals Plan. We realise that the deadline has passed, however we were given assurance by the planning officer, Daryl Hemmings that late submissions would be allowed and therefore we would ask that this information be considered fully.

3. Water and Flooding

The Ham Farm site is susceptible to a high risk of ground water flooding. The consideration for removal of the ground water has not been taken into account in this study. Following a meeting with a member from Southern Water, the following concerns were raised, which potentially further impacts on the environment, road safety and deliverability of the site:

- Leachate, the by-product of this excavation process, must be handled properly.
- Water waste cannot be discharged into the watercourse.
- Discharging water waste into river or streams would not be acceptable.
- Current Steyning waste treatment will not cope with the additional commercial discharge quantities that excavation of this site would create, as it is already almost full.
- Currently 7-9 tankers per day need to be handled in the Steyning facility. This unit is close to capacity so an alternative solution is needed.
- An additional 2-3 tankers per day in each direction would be required. This would have a substantial impact on the A283 and has not been considered in the WSCC traffic assessment
- The nearest processing points for water discharge are Budds Farm in Hampshire or Aylesford in Kent, further adding to the environmental costs of this proposal.
- The potential additional cost could be in excess of £1-2 million.

Steyning Parish Council has received the following report from Peter Chase, a senior member of the Ouse and Adur River Trust. It outlines the adverse risks to the water environment, the potential flooding on local roads, and the adjacent business at Alderwood pond, which provides recreational fishing facilities and a nature reserve for enjoyment by disabled young people, rehabilitating soldiers and the local community.

"The local rivers trust and Environmental Agency have invested a lot of time and money improving and restoring nearby streams over the last six years, as part of the European Water Frame Work Directive. The water quality is monitored on a monthly basis and regular surveys have been carried out over the last ten years. Gravel beds have been created, which are regularly used by trout, both resident and migrating. One stream, in particular, has been identified by the Water Frame Work Directive, as having improved in line with the Directive. Therefore any development that jeopardises this will be in contravention of the Directive.

Streams, which flow down from the Ham Farm area, feed into the streams mentioned above and will have the potential to silt up the gravel beds and impact the water quality, which will destroy the spawning grounds.

When the pit has been filled it will be covered with plastic sheeting. This will cause massive run-off, as the rain will not be able to penetrate the plastic sheeting and will potentially causing flooding on the A283 just West of the turn-off to Partridge Green.

The runoff will again flow down into the restored streams and silt etc. will destroy the spawning beds. We have seen the result of this in the stream opposite Washington Post Office where sand and silt has clogged the stream and destroyed spawning beds. Photographic evidence can be provided."

Conclusion

You will be aware that the owner of Wappingthorn Manor has instructed lawyers to enforce the existing covenant on Ham Farm to prevent sand excavation. We understand that the operator has taken several weeks to respond to a request to meet with the planning officer, Daryl Hemmings. In view of the time constraints imposed on the Steyning Community, and WSCC's refusal to extend the submission time, Steyning Parish Council consider this delay grossly unfair. WSCC should be aware that the owner of *…(redaction)..* has been forced to withdraw their house from sale, due to this Mineral Proposal and also the prospective purchaser of *…(redaction)..* will not proceed until a decision by WSCC is made, causing huge financial stress for the owner,

…(redaction)... In view of this, we believe that WSCC have a duty of care to ensure that this process is completed as swiftly as possible.

* * *

01 - Organisation: Steyning Parish Councillor, local business (unspecified) and resident (Response ID: 327 Respondent ID: 4039)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I do not support the strategic objectives.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like to see the Ham Farm Site withdrawn from the plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I do not agree with the development principles, which I believe will cause harm to the community, the residents, the wildlife, the environment, the landscape and the watercourses.

The site is easily visible from the South Downs and will negatively impact on the enjoyment of visitors to the South Downs. The site is adjacent to residents, an art studio, jewellery business, yoga studio and very near to a nursery school, secondary school, Alderwood Pond fishing business, Wiston House. It is also extremely close to Steyning. All will suffer to various degrees from air and noise pollution. Air pollution will arise from the quarrying of the site, subsequent landfill and traffic fumes from lorries, causing harm to residents health.

Local ponds and in particular Alderwood pond is connected to the site by springs, streams and watercourses which the owner of Alderwood pond has advised would put her business at risk. Furthermore it could pollute the waters there and destroy the migrating trout which exist, bats, crested newts and other wildlife that exist.

The traffic along the A283 has become increasingly busy, with early morning traffic building up as early as 7.30 am. School buses use the road twice daily. The entrance to the site is along a section of the road that is hidden. Turning out of the site will cause risk to other drivers approaching the entrance and lorries turning into the site will have to stop and turn right across the path of oncoming traffic. This puts an unacceptable risk to road users.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see the Ham Farm site removed from the plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I do not agree with the development principles, which I believe will cause harm to the community, the residents, the wildlife, the environment, the landscape and the watercourses.

The site is easily visible from the South Downs and will negatively impact on the enjoyment of visitors to the South Downs M12, M13. The site is adjacent to residents, an art studio, jewellery business, yoga studio and very near to a nursery school, secondary school, Alderwood Pond fishing business, Wiston House. It is also extremely close to Steyning. All will suffer to various degrees from air and noise pollution. Air pollution will arise from the quarrying of the site, subsequent landfill and traffic fumes from lorries, causing harm to residents health M18.

Local ponds and in particular Alderwood pond is connected to the site by springs, streams and watercourses which the owner of Alderwood pond has advised would put her business at risk. Furthermore it could pollute the waters there and destroy the migrating trout which exist, bats, crested newts and other wildlife that exist M18, M17.

The traffic along the A283 has become increasingly busy, with early morning traffic building up as early as 7.30 am. School buses use the road twice daily. The entrance to the site is along a section of the road that is hidden. Turning out of the site will cause risk to other drivers approaching the entrance and lorries turning into the site will have to stop and turn right across the path of oncoming traffic. This puts an unacceptable risk to road users M20.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

01 - Organisation: Steyning Quarry Action Group (Response ID: 166 Respondent ID: 3773)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Please see full statement in B2.3 and B2.4.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

THE STEYNING QUARRY ACTION GROUP RESPONSE TO THE JOINT LOCAL MINERAL PLAN

Introduction

This objection to the inclusion of the Ham Farm Site in the Draft Joint Mineral Plan has been prepared by the Steyning Action Quarry Group (SQAG) and is supported by a petition of more than 2000 signatures to date. Given the gross lack of public consultation and failure by WSCC to carry out appropriate investigations into vital issues such as hydrology, biodiversity and traffic, we are awaiting independent commissioned reports from professional bodies on these matters, which we intend to submit in due course.

Furthermore, the owner of Wappingthorn Manor has advised that they are in possession of a restrictive covenant (Official copy of Register Ham Farm Title Number WSX171768), which lawyers have confirmed is enforceable and which would prevent use of the site for the extraction of minerals. The landowner is fully aware of this covenant and we would therefore suggest that WSCC has acted irresponsibly and without due care for the community and taxpayer, by not having carried out land registry investigations at an early stage. We would submit, in light of this advice, that the Ham Farm site should be immediately withdrawn from the Joint Minerals Local Plan, to avoid further unnecessary costs already incurred by taxpayers.

The following report sets out our response to the strategic objectives and associated 'Development management' policies (section 8) as follows:

STRATEGIC OBJECTIVES 3 and 4:

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.

To protect the South Downs National Park by only providing for silica sand in exceptional circumstances and when in the public interest.

Unacceptable impact on landscape:

Ham Farm is a pristine green field site that immediately adjoins the South Downs National Park (SDNP) from which it is highly visible (see photographic evidence). It is next to an area of Ancient Woodland (Alder Wood), a number of Grade II Listed Buildings and is opposite the historic parkscape of Wiston. Any mining operations on the site would be visible from the internationally known and much used Wiston House.

Allocation of Ham Farm would be contrary to national policy in the Framework (Footnote 1 - The National Planning Policy Framework.) having regard to its location abutting the SDNP and the statutory requirement set out in the Countryside and Rights of Way Act 2000 that states (see photographic evidence appendix 4):

"Local Authorities have a duty to have regard to the purposes of National Park designation in the consideration of development proposals that are situated outside National Park boundaries but which might have an impact on the setting of and implementation of the statutory purposes of these protected areas, i.e. conservation of the landscape and scenic beauty of the National Park."

The extraction of soft sand proposed (variously suggested as between 500,000 and 850,000 tonnes) would have an adverse impact upon the principal purposes of National Park designation – namely, the conservation of the landscape and scenic beauty of the Park (see paragraph 115 of the Framework). The proposed mineral extraction represents a major development, for which paragraph 116 requires that permission be refused. The extraction would also fail the objectives set out in the main bulk of the Draft Joint Minerals Local Plan (Policies M12 [Character] and M13 [Protected Landscape]).

Excavation of the Ham Farm site would have an unacceptable and cumulative impact on the landscape, as it would create a simultaneous view to include the Storrington and Washington quarries, which are highly visible from the South Downs and have not been restored. (See Photographic evidence, Appendix 1). We believe that the report made below by the SDNPA Landscape Officer in relation to Buncton Manor Farm, a site not far from Ham Farm and rejected on the recommendation of the SDNPA report, should be excluded for the same reasons:

SDNPA Landscape Officer: "This site has the potential for significant impacts on views from the SDNP from Chanctonbury Hill and the Open Access land along the Scarp slope of the chalk ridge to the north of Chanctonbury Hill….The site, a series of agricultural fields, is poorly screened with denuded and gappy hedgerows, particularly along its southern boundary. …There are open and panoramic views from the chalk ridge, which overlook the existing Rock Common and Chantry Lane sandpits. These pits are sequentially and simultaneously visible from the PROW and access land on the chalk ridge to the south. This site would also be visible sequentially in some locations. Opening a further quarry in this location prior to restoration of Chantry Lane and Rock Common would lead to unacceptable combined cumulative impacts on the panoramic views from the chalk ridge. Chanctonbury Hill, and its surrounding downland are a well -known and accessible tourist destination in the SDNP. Views at this location would be considered to be of the highest sensitivity owing to the location being within a National Park, on a National Trail and at a viewpoint destination. Access to the area is from the car parks at the foot of Chanctonbury Hill and south of Washington. There are also a significant number of users on the National Trail"

STRATEGIC OBJECTIVE 6:

To safeguard potential economical viable mineral resources from sterilisation.

Loss of the highest quality agricultural land:

The Ham Farm site is shown upon the Agricultural Land Classification Map as within Grade 3A (amongst the most versatile and productive land in the country). It will be difficult to ensure that any restoration following quarrying will retain that classification (see paragraph 112 of the Framework).

Unreliability of Bore Hole Testing:

WSCC has failed to carry out an independent borehole testing to ascertain the validity of the landowner and operator's test.

The borehole tests done by Dudman LTD and the landowner are brought into question, as this borehole test is inconsistent with the test done on the same land in 1948. (see appendix 2) This throws doubt upon the reliability of the test carried out by the landowner and operator and we therefore submit that

WSCC have failed to research the site sufficiently, as this earlier testing would have come to light.

Furthermore Dudman LTD has submitted a forecast for extraction of 850000 tonnes of soft sand. WSCC have failed to validate this, as this is inconsistent with the landowner's verbal estimate, confirmed to a local resident of 500,000 tonnes.

STRATEGIC OBJECTIVE 7:

To protect, and where possible, enhance the health and amenity of residents, businesses and visitors

Health and Amenity

A detailed technical assessment did not include amenity at stage 5 of the site identification process. There is no supporting evidence provided in the report to measure the impact on amenity, despite a Red/Amber warning on the West Sussex RAG scoring as to the suitability of Ham Farm M/HO/4A.

The Mineral Site Study (MSS), Stage 4 desk-based assessment RAG scoring for Ham Farm highlights:

'Amenity: RED/AMBER Scoring due to 'A number of residential properties in close proximity to the site and these residents who may be affected by high levels of harm from noise, dust and light'.

Extraction of sand and subsequent landfill at Ham Farm will have a significant negative impact on the natural environment (aquifers, ancient woodland, wildlife, landscape) causing inevitable visual, air, noise and light pollution over many years and unacceptable harm to residents and the local community over many years (contrary to Policy M18). The close proximity of Ham farm to the community and residential homes is shown in appendix 3.

Visual Impact:

There will be a visual impact affecting the public amenity of users of the SDNP, as the proposed site is clearly visible from Chanctonbury Ring (see appendix 4). Runners and cyclists using the A283 in order to access to the South Downs Way and walkers on the Wiston public footpath FP2599 will be adversely affected by noise and dust, with a reduced level of visual enjoyment of the rural countryside when walking the path which lies within 150 m to the west and north of the site.

The West Sussex Landscape Sensitivity and Capacity Study October 2011, notes that key features of sand extraction include 'noise and visual intrusion of on-site processing' and 'Dust apparent within the vicinity of sand pits', effectively an admission of the impact on public amenity where minerals are extracted.

The Air Quality Expert Group Report on Fine Particulate Matter (PM 2.5) in the UK (prepared for the Department for Environment, Food and Rural Affairs DEFRA and published in 2012 states in the executive summary:

' A growing body of research has pointed towards the smaller particles, in Particular PM less than 2.5um in diameter as a metric more closely associated with adverse health effects' and that 'Black carbon is a major component of the PM 2.5 um associated with road traffic emissions' with 'main traffic sources of PM 2.5 are exhaust emissions from diesel vehicles'.

With regards to the health effects of PM2.5 the report states (section 1.3.1.10) 'There is clear evidence that particulate matter has a significant contributory role in human all-cause mortality and in particular in cardiopulmonary mortality' and that long term exposure to these particles 'is associated with increased levels of fatal cardiovascular and respiratory disease'.

Steyning Grammar school attended by some 2,000 pupils, lies within close proximity of the proposed site, as do many other residential dwellings and community facilities. The potential health impact on the local community from dust particulates should be subject to close scrutiny with evidence provided by an independent Air Quality Assessment to be reviewed in conjunction with any local authority/land owner appointed assessment report.

One of the new residents of …(redaction).., adjoining Ham Farm is an asthmatic 12-year old and his parents are concerned about dust and in particular silica dust, which has been known to cause non-occupational silicosis: (http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3683189/)

Visual Amenity

The West Sussex Landscape Sensitivity and Capacity Study October 2011 Key Sensitivities, Forces for Change and Guidelines with reference to Ham Farm, state:

‘West Sussex Land management guidelines (sheet WG7) recommend conserving the largely secluded, tranquil character, maintaining the historic character of the area...and conserving and enhancing rights of way network’.

The study mentions ‘Grade 3 agricultural land’ at this site and that the site has ‘a rural character’. The rural character of this land will be severely impacted should this proposal go ahead. (See Sensitivity Analysis appendix 5).

WSCC have failed to consider the inevitable impact of light pollution, which will create an unacceptable impact on adjacent residents, visitors to the area and will further negatively impact on views from the South Downs as confirmed by an extract from the HSE Quarries regulations 1999, (See appendix 6).

Aural Amenity

There will be a long-term increase in noise disturbance from the increased traffic on the A283 and the activity of HGV vehicles accessing and mining the site. This is forecast to continue potentially until 2033. It appears that WSCC is yet to assess any potential increase in noise disturbance. The repetitive noise from HGVs’ sensors whilst reversing and tipping will be loud and continuous throughout the hours of operation at the site and such a long-term increase of noise from this activity will severely adversely impact the aural amenity of residents living within close proximity. Local wildlife will be disturbed by the noise and activity and will be potentially displaced from this area.

Mineral extraction considered within ‘National Planning Practice Guidance: Minerals’ documentation advises that a noise impact assessment should be conducted. The appointment of an independent officer to produce evidence for an aural assessment of the increase in noise disturbance to public amenity would provide a technical study and analysis and this could be analysed in conjunction with any noise disturbance assessments undertaken by an officer from WSCC, or officer appointed by the landowner.

Loss of amenity caused by Odour

A landfill site is proposed following mineral extraction, which will result in landfill gas emissions.

The visual and aural amenity of the direct neighbours living at Hammes Farm, namely Horsebrook Cottage and Cow shed studio, which has operated a jewellery business for over 30 years, as well as art and yoga classes for local residents, will be severely impacted by this development should it go ahead. No amount of mitigation will be able to protect these residents from the effects of the proposed quarry and landfill on their health and wellbeing.

Local visitors to the area, walkers along the footpath, cyclists on the road, fishing clubs as well as the some 2,000 pupils at SGS and users of their playing fields will all have their enjoyment of the countryside and public amenity detrimentally affected should permission to excavate mineral sand and land fill be granted at Ham Farm.

Amenity Impact from loss of Ham Farm Site to feed anaerobic digester

Of note is the omission under the section of planning history for Ham Farm within the assessment of the Joint Minerals Local Plan that the landowner was granted planning permission by HDC for the installation of an anaerobic digester within close proximity to this land. The Ham Farm land (grade 3 agricultural) within the proposed mineral extraction site has already been identified within the planning documentation to be used for crops (maize) to feed the digester (See appendix 7). Planning history reference Horsham District Council DC/13/1958. The impact of increased vehicular movement was mitigated by the inclusion of crops from this same land to feed the digester preventing the requirement to outsource all of the ‘feed’ for the digester. Should this land be reallocated for sand excavation, not only will there be a loss in good agricultural soil, but there would also be the need to outsource more slurry, waste food and crops to ‘feed’ the digester. This will result in a significant cumulative impact on the visual and aural amenity of local residents in close proximity. If permission is granted for mineral extraction, not only will there be an increase in traffic movements on the A283 and continuous noise from HGV’s during the long-term period of excavation there will most likely be an increase in HGV vehicles accessing Wappingthorn Farm via the Horsham Road with slurry, crops and waste food to ‘feed’ the digestor’ and travelling directly past the residents of ‘The Red House’. Such activity will have a cumulative detrimental impact on air quality, noise disturbance and aural and visual amenity for these residents living not only in close proximity to the digester but potentially additionally within close proximity of a quarry and landfill.

Furthermore, the visual amenity of residents living within close proximity to the digester (Garden Cottage, Downsview Cottage, the Water Tower, Wappingthorn Court and the Red House) has already been severely impacted. Bad odours coming from the digester have already been noticed. The cumulative impact of odours from the digester alongside odours from the potential landfill site will be significant.

Damage to the local economy:

The Visitor & Tourism Group of the Steyning and District Community Partnership is engaged in promoting the area as a tourist attraction in order to boost the local economy, together with making sure residents also enjoy their surroundings. They challenge the WSCC view set out in the FAQs on the Ham Farm Site which states that the development will not discourage visitors to the area and will not have an unacceptable impact on the landscape. The Group's views are contained within the Consultation Response Form sent directly to WSCC, which highlight the reasons why they feel the proposal will have an adverse impact on tourism, which is essential for the local economy (Contrary to policy M16).

The Steyning & District Business Chamber is also extremely anxious that the impact of this proposal will have an adverse effect on the economy of the High Street. They have entered an objection directly to the WSCC highlighting their concerns (Contrary to policy M16).

STRATEGIC OBJECTIVE 9:

To protect and where possible enhance the natural and historic environment and resources of West Sussex

Historic Environment, biodiversity:

The site is adjacent to several Grade II Listed Buildings, whose setting would be compromised, contrary to Policy M14 of the Draft Joint Minerals Local Plan and Chapter 12 of the Framework.

No detailed ecology work has apparently been undertaken, but it is known that there are protected amphibians including toads, which cross the A283 from Wiston Pond on the opposite side of the road and for whose benefit toad crossing tunnels were constructed some years ago. Bats are also regularly seen in nearby Alder Wood. These concerns would also render the proposal contrary to Policy M17 of the Draft Joint Minerals Local Plan and Chapter 11 of the Framework.

The site is close to an Ancient Woodland. There is a statutory requirement to consult with Natural England in such cases. We have seen no evidence to date that such consultation has taken place.

Alderwood Pond was designated a nature reserve and bird sanctuary in 1984.

Information from the curator of the Steyning Museum shows archaeological references to Wappingthorn and Wiston (see appendix 8) and links this site to the Domesday record, confirming the necessity for a thorough archaeological site investigation.

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

Unacceptable risk to watercourses:

The site is crossed by important surface and underground streams, which factor is highlighted at paragraph 5.136 of the County Council's Sustainability Appraisal dated April 2016. It states that: "The site has the potential for significant negative effects on water quality." Accordingly, development would run counter to Policies M15 and M16 of the Draft Joint Minerals Local Plan and to national guidance in the Framework.

Impact on these watercourses and pollution as a result of quarrying and landfill at Ham Farm would cause unacceptable harm to the Alderwood Pond Fishing site. Alderwood Pond is registered with DEFRA EW033-X-017F. The existing ponds are fed from stream and Ditch-line watercourses. Pollution or interference to these watercourses would severely impact on the migrating trout, bat species and crested newts that exist. Furthermore Alderwood Pond has a licence to extract water from the South Stream that is vital to refill the ponds when water levels are low. Alderwood Pond is surrounded by ancient woodland, including an ancient Lime tree. Furthermore Alderwood Pond was put forward as a nature reserve and bird sanctuary in 1984 due to its bio diversity. (see appendix 8) There is a Covenant attached to the site, which is currently being investigated and which WSCC has failed to identify.

Southern Water advises that there is no additional capacity for groundwater during the quarry period, and that this water will need to be removed from the site by lorry. This will worsen the site's financial viability and the traffic movement studies, which WSCC has failed to consider.

During landfill stage leachate will also need to be drained, captured, pumped and removed by lorry with care not to contaminate the land and water.

Alderwood Pond is a local fishing business, which provides an excellent recreational facility for the local community and other visitors. In particular, this is the only fishing pond in the area with disabled access and provides a valuable service for:

- St Dunstans Charity for the blind use this site

- Chailey Heritage for disabled

- Simon York Johnstone members, people with learning difficulties

- St Johns

- Soldiers for rehabilitation

Impact on the watercourses and pollution as a result of quarrying at Ham Farm proposal would cause unacceptable harm to the Alderwood Pond Fishing site and a loss of amenity for users of this facility (contrary to Policy M18, M18). (see photos appendix 9)

STRATEGIC OBJECTIVE 11:

To maximise the use of rail and water transport for the movement of minerals and to minimise lorry movements and the use of local roads for minerals

Transport :

Access to the site is proposed from the busy A283 at a point where the road is subject only to the national speed limit of 60mph. If, as suggested by the County, no right-turn facility is provided to serve the development, vehicles travelling from Steyning towards Storrington would be faced by stationary heavy goods vehicles in the left hand lane. This would create a substantial highway hazard.

If, as any self-respecting Highway Engineer will tell you, it is imperative to provide a right-turn facility to serve such a quarrying operation, that would require land which may not be within the control of the owners of Ham Farm. It would also be an expensive undertaking.

In order to meet the requirements of Design Bulletin 32 the access would require sight lines of 9m x 215m and would need a hard surfaced area to accommodate HGVs entering and leaving the site. These works would entail the removal of considerable frontage planting, which would further damage the visual quality of the SDNP. (see appendix 10)

SQAG has appointed a highly qualified Highway Engineer to assess the County Council's highway report. This will be made available as soon as possible. In the meantime, however, it should be noted that this stretch of the A283 has been described by the County Highway Engineers as one of the most dangerous sections of the County network.

The meeting with WSCC planners on the 1st June revealed that the adjacent quarries at Storrington and Washington have not been restored satisfactorily, or in a reasonable timescale. An extract from the West Sussex Minerals and Waste Development Framework (May 2011) demonstrates the lack of inert landfill available and the consequence that the Ham Farm site will not be restored in a reasonable timescale of 10 years as assured by Daryl Hemming, WSCC:

"most inert waste in the County is now recycled or re-used, for example, within engineering projects, and the requirement for inert landfill capacity is therefore vastly reduced. Overprovision of inert landfill would not encourage waste up the waste hierarchy, away from disposal to land, and would therefore not fit with the preferred strategy. There is not enough inert landfill available within this County, subsequently out of county landfill will be imported in order to meet the assured time frame of 10 years."

The cumulative impact of having to simultaneously restore the Rock Common and Chantry sites from landfill out of county has not been considered by WSCC (contrary to policy M20).

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

CONCLUSION

The site immediately abuts the SDNP, from which it is highly visible. Development as proposed would be contrary to national guidance at Chapter 11 of the Framework given that quarrying would fail to conserve the landscape and scenic beauty of the SDNP.

The Plan fails to provide evidence to support the need for such an allocation.

Most of the housing development within West Sussex is scheduled to take place in the north of the county adjacent to the Surrey boundary at Horsham and Crawley. There are known reserves of soft sand within Surrey, which would be more sustainably located to address the needs of development in West Sussex.

For these reasons, and given the substantial objections to the proposal set out above, the allocation of Ham Farm does not meet the exceptions test set out at paragraph 116 of the Framework, which specifically deals with the allocation of major development within or adjacent to National Parks.

Accordingly, the allocation at Ham Farm should be deleted from the Draft Joint Minerals Local Plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Additional appendices supplied with email and hard copy response)

STRATEGIC OBJECTIVE 11:

To maximise the use of rail and water transport for the movement of minerals and to minimise lorry movements and the use of local roads for minerals

Transport :

Access to the site is proposed from the busy A283 at a point where the road is subject only to the national speed limit of 60mph. If, as suggested by the County, no right-turn facility is provided to serve the development, vehicles travelling from Steyning towards Storrington would be faced by stationary heavy goods vehicles in the left hand lane. This would create a substantial highway hazard.

If, as any self-respecting Highway Engineer will tell you, it is imperative to provide a right-turn facility to serve such a quarrying operation, that would require land which may not be within the control of the owners of Ham Farm. It would also be an expensive undertaking.

In order to meet the requirements of Design Bulletin 32 the access would require sight lines of 9m x 215m and would need a hard surfaced area to accommodate HGVs entering and leaving the site. These works would entail the removal of considerable frontage planting, which would further damage the visual quality of the SDNP. (see appendix 10)

Appendix 1

Existing quarries at Washington and Storrington demonstrating potential for cumulative visual impact if Ham Farm is excavated. (Photo included within email and hard copy versions of response submitted)

Appendix 2

(Scanned 1948 Borehole record included with email and hard copy versions of response submitted)

Appendix 3:

Facilites and businesses within the community of note:

Location Distance (Google Map by road) Potential Amenity Impact

Steyning Grammar School 1.4 m. Aural, Air quality

SGS playing fields 1.2 m. Aural, Air quality

Steyning Leisure Centre 1.2 m. Aural

Wiston pond (SDNP) 0.2 m. Aural, Visual, Air Quality

Alderwood Ponds 0.8 m. Aural, Air Quality, Visual

Chanctonfold Business park &

Elan Day Nursery 0.8 m. Aural, Air Quality,Visual

Wiston House Grade I (SDNP)1.5 m. Visual, Aural

Cow Shed studio (art classes) lies adjacent to the field proposed for mineral extraction.

Residential Properties adjacent to the proposed site:

Hammes Farm Aural, Air Quality, Visual

Horsebrook Cottage Grade II listed Aural, Air Quality, Visual

Loss of amenity to residential Properties within 'close proximity' of the proposed site:

Wappingthorn Manor Grade II listed Aural, Air Quality, Visual

(Land backs onto the proposed site)

Wappingthorn Court Aural, Air Quality

Wappingthorn Lodge Aural, Air Quality, Visual

Foxes, Wappingthorn Farm Lane Aural, Air Quality, Visual

Garden Cottage, Wappingthorn Farm Lane Aural, Air Quality

Downsview Cottage, Wappingthorn Farm Lane Aural, Air Quality

Water Tower at Wappingthorn Grade II listed Aural

Appendix 4

Photographic evidence of view from Chanctonbury Hill and other view points from the South Downs.

(Photos included in email and hard copy version of response received:

- From Chanctonbury Ring (A) - 2 pictures
- Rock Quarry (A) From Chanctonbury Ring
- From connecting path from South Downs Way to High Horse Shoe (B)
- From High Horse Shoe near bench ©
- From permissive footpath above tennis courts on high horse shore (D)
- Google overview map showing sites A, B, C & D

- View of adjacent residential homes from the proposed Ham Farm Site

Appendix 5: Visual Sensitivity Analysis:

Landscape Character Criteria – land cover and scale High sensitivity

Visual Criteria – Intervisibility 'views to the South Downs are especially noticeable, and the site would be seen from the upper north-facing slopes of the downs between Steyning Round Hill and Chanctonbury Ring' High sensitivity

Visual Receptors (walkers, residents, users A283) High sensitivity

Landscape Designations High sensitivity

In summary the study rates the Landscape Character Sensitivity as Medium, the Visual Sensitivity as Medium – High, and the Landscape Value as Medium.

Appendix 6:

HSE Quarries regulations 1999

"Regulation 23 Lighting - The operator shall ensure that every part of a quarry in which a person is likely to be exposed to risks in the event of the failure of artificial lighting is provided with emergency lighting of adequate intensity and where that is impractical persons at work in that place shall be provided with a personal lamp. 177 General lighting matters and emergency lighting inside buildings are covered by regulation 8 of the Workplace Regulations. Relevant advice is contained in the Approved Code of Practice to that regulation. Lighting a quarry is much more difficult than lighting a flat area because of the uneven surfaces and the consequential deceptive effects of shadows. 178 Emergency lighting is required where work continues after dark and safe evacuation is not possible without artificial lighting. Where lighting is provided by independently powered lighting towers and failure of any one tower would still leave enough light to enable people to leave the area safely, no further emergency lighting need be provided. 179 Lights provided on vehicles ought to be sufficient to enable them to be driven safely, but additional lighting may be required for manoeuvring operations such as reversing or tipping. 180 The safety of security staff and others who have to move around the quarry at night must be ensured by an appropriate combination of torches and floodlights."

Appendix 7:

Extracts taken from Farm Renewables Planning, Design and Access Statement

Related to a proposed anaerobic digester plant at Wappingthorn Farm dated 11th October 2013

Submitted to HDC as part of application DC/13/1958

Introduction

1.2 This application reflects a desire by F.de Boer & Partners to develop a low carbon business model that is both environmental and economically sustainable producing green energy that can be used in the local area thereby reducing the carbon footprint of Horsham District.

1.7 The farm yard does contain 3 listed buildings all related to the operation of a dairy farm at the site

1.8 The plant will be fuelled by 8760 tonnes of maize silage produced at Wappingthom Farm and land and on additional land farmed by F.de Boer & Partners.

1.11 The digestate left over from the digestion process will be used as natural organic fertiliser by F.de Boer & Partners. The majority of land farmed by F.de Boer & Partners is not in a Nitrate Vulnerable Zone (NVZ), but where it is, this will be done in full accordance and compliance with NVZ restrictions on the timing of spreading of digestate to land

2.1.8 The key planning and land management guidelines for the area include:

- Conserve the rural and remote character of the area by maintaining its generally undeveloped nature
- Respect traditional settlement pattern
- Avoid the creation of new farm access tracks
- Conserve and enhance the existing hedgerow and show network

9.1.11 All 8760 tonnes of maize silage will be grown on land farmed by F.de Boer & Partners. Of this 4500 tonnes will be grown on land accessible from the farm track network of Wappingthom Farm.

9.3.10 Current agricultural practice sees Mushroom compost delivered to the farm for spreading on the land on an annual basis, whilst Sewage Cake and Cattle Slurry have both been spread in recent years. This will be replaced with digestate.

9.4.11 Arable land, currently farmed by F.de Boer & Partners, is fertilised with a mixture of 1000 tonnes of spent mushroom compost tonnes and chemical fertilisers. In recent years cattle slurry and Sewage Cake has also been spread on the land. This proposed development will see that replaced with digestate produced by the process.

10.1 The impact of the proposed development will be minimal on traffic movements, when compared to existing patterns of traffic movement related to the farming activities of F.de Boer & Partners, related to the current operation of a crimped grain production business.

10.2 The farm currently produces seasonal agricultural vehicular movements related to the production and harvest of crops. In the land around Wappingthorn Farm normal arable production might include the production of 7000 tonnes of crimped grain and 700 tonnes of wheat. These are brought back from the fields to Wappingthorn Farm. Of these 1000 tonnes of crimped grain are produced on land accessible internally through farm tracks.

10.3 Of the 7000 tonnes of crimped grain produced,5000 tonnes is almost immediately sold on to local cattle farmers for use as animal feed. Depending on the location this is mainly transported by lorry with some taken by tractor and trailer. The remaining 2000 tonnes is stored over winter and sold on to farmers in the early summer months between May and August.

10.4 Once harvested, wheat is currently brought back to the site by 12 tonne trailer where it is dried, before being transported to a grain store on a separate site. The grain is then brought back to Wappingthom Farm for processing, in order that it can be sold on to local farmers, again as an animal feed in the first two or three months of the year.

10.5 For the production of both the wheat and maize crops 1000 tonnes of spent mushroom compost and 112 tonnes of artificial fertiliser are brought onto the farm and then spread onto the fields. The fertiliser for all of F. de Boer & Partners agricultural activities are delivered to Wappingthom Farm as there is the space to store the material on a dry concrete base in the yard. In both cases 33% of the material is used on Wapplngthorn Farm itself. The remaining 77% is spread on the additional arable land farmed by the company.

10.6 This proposal sees a move away from the production of animal feeds at Wappingthom Farm and the wider land farmed by F. de Boer & Partners.

10.7 The plant will be fed by 8740 tonnes per annum of maize silage.

10.8 As maize silage uses the whole crop, rather than just the grain, this significantly increases the tonnage that can be produced on site at Wappingthorn Farm. 4500 tonnes of the maize silage feedstock can be produced on land accessible through the farm track network.

10.9 The further 4260 tonnes of maize silage will be sourced from land outside the farm track network, that is currently used for crimped grain production. This will result in a significant reduction in the land rented by F. de Boer & Partners for the production of maize and a resultant reduction in the traffic required to prepare and maintain that agricultural land.

10.10 Once material has been fed through the digester, it comes out as digestate. This will be produced at a ratio 71% of the material fed into the process. This means there will be 6390 tonnes of digestate produced, per annum. The digestate will be separated into a solid and liquid fraction.

This means there will be 5490 tonnes of liquid digestate and 900 tonnes of solid digestate. These are both odour free when spread. They will be spread at a maximum rate of 29 tonnes per acre comprising an application of solid digestate either in autumn or spring, and several applications of liquid digestate throughout the year. This will result in 275 vehicle movements to spread liquid digestate on land external to Wappingthorn Farm and 45 for the solid fraction.

10.12 The table above shows that this development will lead to a significant decrease in traffic movements caused by the agricultural activity at Wappingthorn Farm. This is largely caused by the simplification of the

processing required for the maize that is grown and the fact that it will no longer be sold off-site to livestock farmers.

10.13 This reduction in lawful movements will reduce pressure on the junction formed by the driveway with Wappingthom Farm track onto Horsham Road. This comes in the centre of a double bend in a 60mph limit stretch of road. A reduction in its use will improve local conditions.

Later letter from Farm Renewables re traffic movements: (image of planning code included - DC/13/1958)

7th November 2013

The move to a business model focused around Anaerobic Digestion will mean Wheat and Maize grain is no longer processed and exported off-site from this location. The farm's existing crop storage infra-structure will all be used for silage storage which will then be fed into the digester.

It should also be noted that feed stock for the digester will be brought in by tractor and trailer, where coming from the additional local land farmed by F. De Boer & Partners. This will be instead of the articulated Lorries which bring grain maize and wheat onto site and then some time later once processing is complete, distribute it to end markets.

This will in turn significantly reduce pressure on the entrance to the farm from Horsham Road. It will result in a reduction in the lawful use of the farm entrance by the farm's owner. It will under no circumstances lead to an operational situation where vehicles are making constant deliveries to site 24 hours a day, seven days a week through-out the year.

Extract from Planning Officers report to Planning Committee on consideration of DC/13/1958

1. To show that that planning permission was given on the understanding that the maize to feed the digester was produced on-site:

There is an intrinsic link between this form of renewable energy technology and the subsisting agricultural use of Wappingthorn Farm - the form of renewable technology being proposed here, relies on the consumption of arable feedstock, such as the maize already grown at Wappingthorn.

Consequently, the sustainable location of the proposed anaerobic digestion plant is considered to be wholly satisfactory in this regard.

2. To show that that planning permission was given on the understanding that traffic movements on the B2135 would reduce as maize and digestate would both be moved within the farm:

The access to the site from the Horsham Road has also been raised as a concern by many local residents, and understandably this is on the basis of the existing inadequate road junction. West Sussex County Highway Engineers have been on-site, assessed the application details, and have not raised an objection on the overall reduction in vehicle movements.

The applicant has submitted a traffic report that considers the existing farm activities against the proposed farm activities associated with the running of this plant.

A road traffic audit has been produced by the applicant to verify the initial report, and both have been carefully assessed by the County highway engineers.

The result of this assessment is that there is agreement between officers, the highway engineers, and the applicant, that vehicle movement will decrease by the sum of approximately 300 movements per year.

On the basis that the junction will be used less as a result of the proposed development, despite its inadequate geometry and visibility splays there is no evidential basis for a refusal on this ground.

Appendix 8: Archaeology information *…(redaction)..*, Steyning Musuem:

a. HER (Historic Environment Record) records are held at W.S.C.C.

The only HER (up to 2011) we have a note of for the 'sandpit' area is the finding of an Acheulian flint Hand Axe (Paleolithic) found at map ref. 163 134 to the South of Little Alder Wood (HER ref. 3494 – WS446). By my reckoning this is within the proposed sandpit area – although the County Archaeologists report (see below)

suggests that it is outside the area. [I have challenged this conclusion and they have agreed that the find spot is within the sandpit site as now delineated.]

b. County Archaeologist's advice for the WSCC plan document

(vi) an historic building setting impact assessment of nearby listed building (Horsebrook Cottage) should be carried out and mitigation provided, if required;

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

Mark noted in consultation that the site lay near the listed building and that its north west corner lay close to one of the putative alignments of the Sussex Greensand Way Roman road (possibioity of related Roman remains within the site at this point). Also that deposits of ancient river terrace gravels have been mapped by the British Geological Survey on the site (possibility that these may contain Palaeolithic flint tools; the previous find of a Palaeolithic handaxe just to the north of the site [see note above] is on our HER database, within a mapped area of river terrace gravels. Also that on a large site such as this, the possibility that other remains of ancient occupation might exist.

C. Field Walking. We are not aware of any planned field walking having taken place in the past

d. Metal detecting. I do not know whether any landowner-approved detecting has taken place within the area. The Small Finds Officer – based in Lewes – may know though they are not generally free to make the location of finds publicly available.

Natural History

I understand that some idea of the age of a field boundary can be gleaned from counting the number of species in a hedgerow. We hold no records of that sort but you may want to pursue this.

Domesday Book – 1086

We have a copy of the Domesday Book entry in both the Latin and English. But these entries are notoriously difficult to interpret. They were compiled

for tax purposes. They don't tell us what area was involved (even a hide had an imprecise acreage because it was principally a measure of tax due – though it was generally reckoned to be in the order of 120 acres) and it would be very rash to assume that the boundaries then were anything like those we now know. The Wappingthorne entry, for instance, mentions 20 pence worth of salt. The only location for making salt, so far as we are aware, was the river valley so the manor must have incorporated some land there. There is also no indication of where the villeins and villagers actually lived within the manor. I attach a summary document of the statistics derived from Domesday for several of the local parishes/manors which demonstrates that the whole landscape was divided up into parcels of land with known owners etc. etc.

Victoria County History Vol VI part I. This is an excellent and detailed description of the history of Steyning and includes detailed footnotes of the source document for every assertion.

E. p.224 "Wappingthorne, long part of Wyckham tithing"

f. p.225 Reference to the Roman road

g. p.229 History of the manor of Wappingthorne. (copy available)

h. p.231-2 Farming at Wappingthorne (and other farms incl. reference to acreage at Ham Farm) (copy taken)

i. p.233 Possible windmill at Wappingthorne in 1332. There was a "Windmill Field" in 1840 (ref. tithe map) to the E. of the old farm

j. p.242 Money "was paid to the vicar in lieu of the demesne tithes of Wappingthorne from an early date."

Journals

k. Sussex Archaeological Collections, 1848-2015

Vol.12 Proof of age of William Bovet (of Wappingthorne) 1358 (i.e. sufficient age to inherit)

Vol.30 13th century coat of arms of Bonet family

Vol.54 Article on “Leedes of Wappingthorne”

Vol.76 Article on “A Roman road from Barcombe Mills to the west, through Streat & Hassocks”

Sussex Notes & Queries No significant references

Sussex Record Society

Vol.14 1912 “Sussex Inquisitions” p.140 shows lands of John Leedes at his death in 1607

Vol.20 1915 “Sussex Feet of Fines” (pp.463-464) issued at conclusion of a deal to sell or lease land. Nine 17th century deals of this sort are referred to. In two of them it records “Wappingthorne alias Hoppingthorne”

Vol.31 1925 Description of the Bishop of Chichester’s claimed right of way through the manor of Wappingthorne, including the pasture of Hursebrok (p.123)

l. Sussex County Magazine, 1927-1956

Only one Wappingthorne mention – a reference to Viscountess Wolesley’s suggestion of tunnels from Wappingthorne to Wiston and Steyning. My view is that this is a particularly daft suggestion.

M. Sussex History No references

n. West Sussex History No references

Manor of Steyning Account Roll – 1337-1338

In August 1338 the Manor of Steyning paid “Thomas de Hyen, Tithing man at Wappingthorne”, at the rate of 1½d a day for 5 weeks “before the month and after” (a total of 4s 4½d) plus 2 shillings for “the month” itself. The “month” was the way they referred to the harvest period when the tithing man would need to be particularly vigilant to ensure that a tenth of all the produce of the fields went to “the Lord”. At this particular time, because “alien priories” had been banished when Edward III declared war on France, the revenues from the manor went eventually to the king.

The same Thomas de Hyen paid the manor 9s for “timber for a new house”.

Court Baron of the Manor of Steyning – 1461-1484

These detailed court records are unfortunately for the Borough of Steyning and not the Parish so they don’t cover Wappingthorne or Ham Farm.

Deeds held by Museum

1646 – passing 40 acres of land “commonly called Wappingthorne Hill” from Sir John Leedes to his recently widowed daughter in law Anne Leedes.

1654 – lease of “the half part” of Wappingthorne House and its “barns, stables, outhouses, courts, gardens, orchards and backsides” from the estate of Sir John Leedes to Anne Leedes.

Inventories

An inventory (of 1618) on the death of John Swift, a blacksmith, shows (among many other debts owing to him) that Sir Thomas Leedes of Wappingthorne owed John Swift £16 10s 2d

Wiston Archive catalogue

p.174 (item 2559) Ham Farm sold in 1810 “tenement, barns, stables, hovels, outhouses, gardens, orchards, closes, yards, gates, backsides & arable, meadow, pasture & woodland” 40 acres

p.413 (item 5302) Henry Goringe of Wappingthorne was High Sherif of Sussex in 1680

p.453 (item 5718) 1810 – “relating to the trustees of the Storrington and Steyning Turnpike Road and the valuation and acquisition of a sandpit . .” [thought it worthwhile to include this although the location of the sandpit is not clear.]

p.466 (item 5951) 1683 – “agreement between Richard Haynes of Sullington and Henry Goring of Wappingthorne in Steyning “concerning Mr. Haynes secrett touching Cyder’”

Maps:

o. Bigg (Wiston Estate) – 1639 (held at WSRO)

Wappingthorne is not shown but Ham Farm is, just within the northern edge of the Wiston estate. Our photograph of the map is old and very indistinct but it may read “Hames” farm. Two ‘blobs’ immediately north of the farm may be ponds. There is no sign of any settlement other than the farm. Field outlines are unreliable and, if they imply anything at all, it is that the land was being farmed.

P. Yeakell & Gardner – 1795 (held at WSRO)

This is a small scale but it shows the location of Wappingthorne accurately. Ham Farm is not mentioned but it shows Alder Wood approximately (though not named) and field boundaries which may or may not be accurate. It appears to distinguish between meadowland and arable. If it is correct in this regard Ham Farm followed mixed farming at that time.

Q. Edwards – 1795

Too small a scale to be of any use.

R. Uncertain – 1810 (held at WSRO)

Wappingthorne is mentioned but not Ham Farm. The mapmaker has divided the landscape into a host of small fields – quite possibly based on his imagination. The fact that Great Alder Wood does not feature in any way amongst all these fields suggests that it is not to be relied on.

S. Charlton Court Estate maps – c.1810 (held at WSRO)

The estate stops at the main road so neither of the properties we are interested in show up.

T. Ordnance Survey – 1813

This first edition of the O.S. is very vague. No field boundaries & no useful names are shown.

U. Tithe Map & Apportionment – 1840. (held at Steyning Museum)

The Museum holds one of these maps (of the whole parish) and have photographed the relevant part of it (available)

The following fields (which were all allocated numbers) in the 1840 Tithe apportionment would be within the sandpit area. This detail was entered into so that each plot of land could be assessed in monetary terms for its share of the tithe payment.

35 called then ‘Further Horse Brook’ 3 acres – meadow. Farmed by Penfold

39 called then ‘Hither Horse Brook’ 3 ½ acres – meadow. Farmed by Penfold

40 called then ‘The House Horse Brook’ 5 ½ acres – meadow. Farmed by Penfold

41 called then ‘Breaches Horse Brook’ 7 ¾ acres – meadow. Farmed by Penfold

42 (part of) called then ‘The Ham Horse Brook’ 12 ½ acres – pasture. Part of this field is now incorporated into Great Alder Wood; indicating that the wood has been extended since 1840. Farmed by Penfold

44 (part of) called then ’The Home Horse Brook’ 8 ½ acres – pasture. Farmed by Penfold

71 called then ‘Pond Field’ 4 acres – arable. Farmed by George Gates

72 called then ‘Eight Acres by Horse Brook’ 8 ½ acres – arable. Farmed by George Gates

73 called then ‘Turnpike Field’ 3 ½ acres – pasture. Farmed by George Gates

74 called then ‘Two Acre Field’ 2 ½ acres – pasture. Farmed by George Gates

N.B. Meadowland has been cultivated. Pasture is uncultivated grassland

v. Ordnance Survey (25”:1 mile) – 1875 (held at Steyning Museum)

Wappingthorne and Ham Farm are on two different sheets. It is very high quality mapping and we can be certain that anything shown was there and anything not shown was not there. If the track from the main road to Ham Farm has not changed its alignment then the existing arrangement of buildings is confusing. The existing house looks as if it was a farm building in 1875 with no sign of the converted Hammes Barn and the

actual farm building slightly to the NE – with a pond but no other outbuildings. It needs the Lawries to look at it. Horsebrook Cottage looks, from this map, to be two tiny semi-detached cottages which shared a well.

W. Ordnance Survey (25":1 mile) – 1932

Unfortunately we don't have the 25":1 mile map sheets for the sandpit area in this edition but we have various smaller scale maps from about this time which are available if needed.

Sales Particulars from Estate Agents

x. Estate agent's brochure for the sale of "Wappingthorne Estate" in 1976 – 432 acres. It includes a brief (and useful) resume of the history of the property and its owners. The associated map provides field numbers which have their land use type included in the sale document.

Y. Estate agent's brochure for the sale of "Wappingthorne Farm" in 1977 – 182 acres.

…(redaction).. archive –

Farms Some pencilled notes about the Duke family (parents of Frank Duke) who lived at

Wappingthorne between 1884 and c.1900. Very little about Ham farm.

People There are substantial family particulars on the Leedes family who lived at Wappingthorne in the 16th/17th centuries and the Duke family who lived there at the end of the 19th century. There is also substantial information about the Gates family who farmed at Ham Farm during the 19th century

Cox – Parish Magazine articles (often with fascinating stuff – but never any references to sources)

Nov.1922 In 1580 Sir John Leedes was applied to by the Church to use his influence to get the chancel repaired

Apl. 1923 In the Parish of Steyning there were the manors of Steyning, of Charlton, Wappingthorne and Wickham

Nov.1923 In 1086 De Braose held Wappingthorne and Wiston but Fecamp held Steyning

May 1924 Peter Wilcombe lived at Wappingthorne in 1411 when it was rated as worth £15 a year.

Apr. 1929 Late 19th C brick making in field at junction of the A283 & the Ashurst Road

Aug. 1930 On a list of donors for the repair of the Church in 1593 Sir Thomas Leedes gave 25s 8d

Nov. 1932 The 17th C Hearth tax showed that Wappingthorne had 16 hearths (cf. Charlton Ct. 8)

Dec 1932 "Magna Britannia" of 1730 says that Wappingthorne and Nash "have been ancient seats but have now gone into decay"

Jul. 1933 Commentary on Domesday. Extra information is that the 7 villeins would have had c.30 acres each and the 15 bordars c.5 acres each. Cox estimates an average family size of 7 but up-to-date estimates are a max. of 5 per household – so maybe 90-110 people in total.

Aug 1933 The Bonet family held their lands at Wappingthorne in the 13th C conditional on giving military service when needed. One of them was killed in war with Scotland in 1297.

Sep. 1933 The impact of the Black Death on the Bonet family and the management of the manor of Wappingthorne in 1350. There is specific mention of fields called 'Severals' [i.e. enclosed fields] but I think that they are outside the Sandpit area.

Oct. 1933 Further info. On how the Wylcombe family inherited the Bonet estates at Wappingthorne

Jun. 1934 William Bonet (Wappingthorne) entertains 2 men returning from taking a prisoner to gaol.

Sep. 1934 The Bishop of Chichester's journey in 1374 from Streatham westward is described in some detail. Leaving Huddlestone and going through Wappingthorne he went "through the midst of the pasture called Hursebrok". Cox suggests that this follows the line of the footpath (shown, for instance, on the 1875 map) which runs from Wappingthorne to Horsebrook Cottage and was probably a more substantial track in the Middle Ages. The Bishop then turns south towards Buddington/Round Robin, following the line of the parish boundary and the edge of the proposed sandpit. The Bishop claimed his route was a right of way "as he was wont to have".

Mar. 1940 There are further comments about the old road (mentioned above – Sep 1934) which the Bishop travelled along.

Books on the History of Steyning

z. Anna Butler – "Steyning" 1913 No references to Wappingthorne etc.

Aa. Duke & Cox – "In and Around Steyning" 1951

pp. 104-5 Wappingthorne (p/c made). Origin of the name; comments on Domesday; brief resume of what is known of the ownership of the estate from c.1200 onwards. Nothing on Ham Farm.

Bb. C.A.Grigg – "Steyning" No references

Appendix 9: Alderwood Pond – two of four existing ponds

(3 photos included within email and hardcopy version of response)

Appendix 10:

(2 photos of access to proposed site included within email and hardcopy version of response)

* * *

01 - Organisation: Storrington & Sullington Parish Council (Response ID: 83 Respondent ID: 3251)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Page 76 Chapter 7 - Strategic Minerals Site Allocations 7.2.4 (x) states "if the traffic from the site could have a negative impact on the Air Quality Management Area is Storrington High Street, then an Air Quality Assessment is required." Members request that measures are put in place to ensure traffic is routed down the A24 to avoid traffic travelling through the AQMA and the centre of the village.

Additional Comments

N/A

* * *

01 - Organisation: Storrington & Sullington Parish Councillor, local business (unspecified) & resident (Response ID: 86 Respondent ID: 3977)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

i do not support the extraction of sand from Ham Farm adjacent to Hammes Farm, Steyning. This is an agricultural site and development for extraction of sand cannot be considered to 'protect the environment',nor to 'conserve and enhance the landscape of West Sussex', nor to protect and enhance the natural environment' which are all stated Strategic Objectives.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like to see development of a sand pit at Ham Farm removed from the plan.

B2. Mineral Site Allocations

B2.1 Name of site

Chantry Lane Extension (SDNPA) (M/HO/2)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

this site has been considered to be exhausted and unsafe for some years. I do not think further sand should be extracted. This site is of prime strategic importance to Storrington as a gateway to the South Downs providing the only unaltered view of the Downs in the area and being of historic importance therefore I do not believe that the sand pit should be extended.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I believe that priority should be given to policy M26 ' use of Secondary and recycled aggregates', also policies M13 and M14 to protect the landscape and historic environment. The landscape and historic environment of

Sussex form the core of the county's attraction for UK and overseas tourists and as such are a very important basic tools in stimulating the county's economy. The landscape and historic environment of the county are ignored or undermined at the county's economic peril.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

DRAFT WEST SUSSEX JOINT MINERALS LOCAL PLAN: APRIL 2016

With reference to the abovementioned plan, Chapter 7. Strategic Minerals Site Allocations 7.2.4(x) states ''if the traffic from the site could have a negative impact on the Air Quality Management Ar

* * *

01 - Organisation: Surrey County Council (Response ID: 162 Respondent ID: 3004)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Thank you for your consultation on your emerging Joint Minerals Local Plan. Our comments are as follows:

Land-Won Sharp Sand and Gravel

In relation to land-won sharp sand and gravel, we note that there is no need to plan for additional land-won supplies over the plan period. This is given the ability of the county to import approximately 1 mtpa of marine sand & gravel directly into wharves in West Sussex to satisfy the steady increase in demand over the last 10 years. This conclusion is based on a remaining permitted land-won reserve of 0.9 mt and average land-won sales over the last 10 years of just below 0.02 mtpa.

Surrey is likely to run out of exploitable land-won sharp sand and gravel resources by around 2030 and will become increasingly reliant on alternative sources of supply. Kent is facing a similar issue but is able to rely on marine landings brought directly into the county's wharves. As Surrey is landlocked and has no wharves located within the county, alternative sources of supply will include imports of marine dredged sand and gravel. Marine sand and gravel imports into Surrey are primarily imported from wharves on the Thames Estuary / North Kent Coast. However, as demand gradually increases, there may be a need to import some marine aggregates from wharves on the south coast in future, such as Shoreham Harbour for example.

It would therefore be helpful if the strategy was amended to acknowledge the increase in demand for imported sharp sand and gravel anticipated in Surrey during the plan-period, and that any implications for land-won supply in West Sussex will be kept under review through regular monitoring.

Land-Won Soft Sand

In para 6.2.16, we would suggest that it would be helpful to improve clarity by: (i) inserting the words "land-won" before 'sharp sand and gravel' in the first sentence to avoid potential confusion with total sharp sand and gravel, as this figure would include marine landings and be much higher than the average 10 years sales figure for soft sand; and (ii) substituting the words "soft sand" for 'sand and gravel in the second sentence to reflect the information contained in bullet 6 under the sub heading of 'Land Won Sand and Gravel' on page 2 of the latest LAA (April 2016).

Page 2 of your LAA (April 2016) explains that an additional 3.56 to 4.61 mt of soft sand is required over the plan period if supplies are maintained at the level of current 10 year average sales. Para 6.2.14 of the draft Plan confirms that current reserves of soft sand are not sufficient to meet demand over the plan period to 2033. It is noted that para 6.2.16 of the draft Plan explains the strategy for the provision of soft sand. This sets out the intention to rely on existing reserves (around 3 mt), an additional site allocation outside the SDNP at Ham Farm (0.85 mt); and an increasing level of imports from other areas, in order to facilitate a managed retreat from working soft sand within the SDNP. At worst, this would appear to amount to a shortfall of 760,000 tonnes over the plan period based on the methodology used.

Hence we are supportive of the flexibility built into the Plan through Policy M2. It is essential that supply and demand is monitored carefully through the LAA such that soft sand provision to meet future demand in the south east can be provided in the most sustainable way.

Recycled and Secondary Aggregate Use

Note discrepancy between estimate of existing capacity of 587,000 tpa stated in para 8.15.1 of the draft Plan, and 596,940 tpa stated in both para 2.5.6 and the summary below Table 20 of the LAA both published in April 2016.

* * *

01 - Organisation: Sussex Wildlife Trust (Response ID: 175 Respondent ID: 3109)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Vision

The Sussex Wildlife Trust objects to paragraph 3 of the Vision and the assumption that by contributing to the supply of oil and growth the plan will 'support growth in West Sussex'. This aim clearly contradicts paragraph 6 of the vision that 'West Sussex will ensure minerals have been produced in a manner that…

contributes to a low carbon, circular economy'.

Climate change is the biggest threat to biodiversity and the National Planning Policy Framework (NPPF) is clear that the planning system should seek positive improvements to the natural environment by moving from a net loss of biodiversity to achieving net gains (paragraph 9). The use of finite energy resources such as fossil fuels cannot meet the energy needs of a growing population without contributing to the unacceptable impacts of climate change. We therefore support the UK Government's legally binding commitments to reduce carbon emissions enshrined in the Climate Change Act 2008 and cannot see how

this vision contributes to this aim.

The Sussex Wildlife Trust strongly supports paragraph 9 of the vision.

Strategic Objectives (SO)

We strongly support the inclusion of SO9. However as this is an aspirational objective we do not believe there is a need for the proviso of 'where possible'. Additionally the word 'resources' is ambiguous.

We support the aim in SO12 to protect the environment. However we do not support the lone reference to the national commitment to energy security, when there are other relevant national commitments, such as the legally binding commitments to reduce carbon emissions.

The Trust supports the inclusion of SO13 however it should be strengthened to include a reference to the timescale for restoration. Paragraph 143 of the NPPF states that 'Local Planning Authorities should put in place policies to ensure worked land is reclaimed at the earliest opportunity'. This requirement should be

reflected in the strategic objectives as it is in draft policy M24.

We strongly support SO14 and the commitment to minimise carbon emissions. However, although SO14 does not restrict the application of this commitment, the preceding paragraph focuses on ensuring energy efficiency in design and minimising the transportation of minerals, neglecting the carbon emissions

associated with oil and gas extraction.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Paragraph 2.3.9 – The words 'where possible' should be removed, there is no need for this qualification. NPPF Paragraph 109 clearly states that 'The planning system should contribute to and enhance the natural and local environment'.

We also question the need to particularly highlight international and national sites (2nd sentence). This objective should apply to all biodiversity not just that found on internationally and nationally designated sites. This is acknowledged later in the draft plan in Policy M17 and should be reflected here. We recommend that the 2nd sentence of 2.3.9 is removed. The paragraph should now read:

'Where new development is required, the biodiversity and geodiversity of the County will be protected and enhanced as will the other natural resources of the County such as air, soil and water'.

Strategic Objective 9 – The words 'where possible' should be removed, there is no need for this qualification. NPPF Paragraph 109 clearly states that 'The planning system should contribute to and enhance the natural and local environment'.

We also recommend that SO9 is amended to add reference to the need to protect and enhance the county's natural capital. This would be in line with the sentiments of paragraph 4.2.6 and would add clarity to the term 'resources'.

Strategic Objective 12 – An addition should be made to the effect of:

'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 and significantly reduce carbon emissions'.

Strategic Objective 13 – An addition should be made to the effect of:

'To ensure high quality mitigation and restoration to appropriate after uses as soon as possible after working has ceased'.

Paragraph 2.3.15 – This paragraph is too focused on the carbon emissions associated with the design of mineral works and transportation of minerals. This is contrary to the wording of SO14 which does not specify where the commitment to minimise carbon emissions should be applied. We recommend that an

addition is made to the effect of:

'…This will be done by ensuring energy efficiency in design, minimising the transportation of minerals and considering the overall carbon emissions associated with the extraction and use of minerals'.

This would be in line with the NPPF core planning principle to 'support the transition to a low carbon future in a changing climate' (para 17) and the requirement for local planning authorities to 'plan for new development in locations and ways which reduce greenhouse gas emissions' (para 95).

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Whilst we support the sentiment of development principle (xv), it does not accurately reflect the requirement in the NPPF for net gains to biodiversity (para 109).

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Development principle (xv) - An addition should be made to the effect of:

'…and line of trees. Long term restoration should create net gains to biodiversity and should aim to maximise the habitat value…'

This would be in line with the first guiding principle used to identify the allocated sites (7.1.6).

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Whilst we support the sentiment of development principle (xviii), it does not accurately reflect the requirement in the NPPF for net gains to biodiversity (para 109).

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Development principle (xviii) a - An addition should be made to the effect of:

'…hedgerow trees. It should create net gains to biodiversity and should aim to maximise the farmland habitat value…'

Development principle (xviii) b - An addition should be made to the effect of:

'…following extraction. Long term restoration should create net gains to biodiversity and should aim to maximise the habitat value…'

This would be in line with the first guiding principle used to identify the allocated sites (7.1.6).

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

(Q3.1 comment)

We strongly object to policies M7a & M7b

(Please see response to B3.3 for details)

(Q3.2 comment)

We would like to see changes to policies M16, M17, M23 & M24

(Please see response to B3.3 for details)

(Q3.3. comments)

Mineral Specific Policies

Paragraph 6.7.3 – The strategy should be strengthened to acknowledge the local planning authorities' commitment to protect designated sites and landscapes from any unacceptable impacts of oil and gas development as per Strategic Objective 12. As such, we recommend additional wording in this paragraph to

the effect of:

'…but to ensure that the use of high volume hydraulic fracturing does not take place within, or has an unacceptable impact on, the South Downs National Park, Areas of Outstanding Natural Beauty…'

We are also concerned about the specificity of the strategy in singling out both hydraulic fracturing and the South Downs National Park and Areas of Outstanding Natural Beauty. Given the long lifetime of the plan and the rapidity with which planning policy has changed in recent years, we would recommend more general language to ensure the inclusion of all protected areas into the future. Additionally give the rapid changes in the methods used to extract oil and gas we would like all unconventional extraction methods to be included. We recommend wording to the effect of:

‘Oil and gas development not involving unconventional methods of extraction, including high volume hydraulic fracturing should only take place within protected areas and landscapes, including the South Downs National Park or Areas of Outstanding Natural Beauty in exceptional circumstances and when it is

in the public interest’.

Policy M7a

The Sussex Wildlife Trust strongly objects to this policy for the following reasons:

- We believe that the UK Government should retain its focus on sustainable energy production and energy conservation, and ensure that funding is prioritised for the development and implementation of renewable energy technologies

- The policy fails to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels. This is contrary to Strategic Objective 14 and NPPF paragraphs 7, 17 and 95.

- The policy fails to fully protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest contrary to chapter 11 of the NPPF.

- The policy should acknowledge the hierarchy of sites as per NPPF paragraph 113.

- The policy fails to take account of potential indirect impacts on protected areas.

As in the supporting text, we are concerned about the specific identification of hydraulic fracturing and would like to see the policy widened out to include any methods of unconventional extraction that may be developed in the future. Therefore we recommend that (a), (b) and (c) are amended to include:

‘…, not involving unconventional methods of extraction, including hydraulic fracturing, including extensions…’

Criterion (c) is not comprehensive enough and does not sufficiently differentiate between the different designations. As there are different legal and policy requirements for the designations listed, we feel that (c) should be separated into subsections as (a) and (b) are. This will allow reference to the exceptional circumstances/public interest test in NPPF 116 for the National Park and AONBs and will allow proper consideration of sites designated for their biodiversity value. Any reference to designated sites must conform to NPPF paragraphs 113 and 118.

Policy M7b

The Sussex Wildlife Trust objects to this policy for the reasons listed in our objection to policy M7a and for the following additional reasons:

- The policy fails to recognise the precautionary approach.

- The policy will not result in sustainable development.

- Adverse impacts on the environment are to be mitigated to an ‘acceptable level’ without any definition of what that level might be.

The NPPF is clear that there are three dimensions to sustainable development: economic, social and environmental and that these roles are mutually dependent with no one dimension taking precedent over the other two (paragraphs 7 and 8). We do not believe that this policy achieves this balance.

The uncertainties around the potential risks and impacts of this technology mean that it is unlikely that proposals will achieve sustainable development. This is clearly reflected in the assessment of this policy in the associated Sustainability Appraisal where question marks have been listed against almost all of the SA

objectives indicating uncertain effects.

Again we are concerned about the specific identification of hydraulic fracturing and would like to see the policy widened out to include any methods of unconventional extraction that may be developed in the future. Therefore we recommend that (a), (b) and (c) are amended to include:

‘…, involving unconventional methods of extraction, including hydraulic fracturing, including extensions…’

Given the untested nature of unconventional methods of extraction in the UK we would like to see additional requirements to criterion (a) to the effect of:

‘(v) No significant adverse impacts would arise from the on-site storage or treatment of hazardous chemicals and contaminated fluids above or below ground or their transportation from (or in the case of hazardous chemicals to) the site’

Criterion (c) is not comprehensive enough and does not sufficiently differentiate between the different designations. As there are different legal and policy requirements for the designations listed, we feel that (c) should be separated into subsections as (a) and (b) are. This will allow reference to the exceptional circumstances/public interest test in NPPF 116 for the National Park and AONBs and will allow proper consideration of sites designated for their biodiversity value. Any reference to designated sites must conform to NPPF paragraphs 113 and 118.

Implementing and Monitoring – we are deeply concerned that the measure/indicator of the success of these policies is the volume of hydrocarbon produced, with a target for increasing volumes. This clearly goes against the Government’s commitment to reduce carbon emissions and is contrary to Strategic Objective 14 and NPPF paragraphs 7, 17 and 95.

Development Management Policies

Policy M16

The Trust strongly supports the inclusion of this policy and would object to the weakening of any of the policy’s criteria. We would also recommend that ‘wetlands’ are added to the list of features in criterion (c).

Policy M17

The Sussex Wildlife Trust strongly supports the inclusion of this policy and the commitment to protect and enhance biodiversity. However there are some omissions to this policy that need to be addressed in order for it to comply with the NPPF. As it stands, it does not give sufficient protection to biodiversity.

(a)ii – It is not appropriate for the policy to suggest that partial avoidance of significant harm is acceptable. If significant harm is only partially avoided the remaining harm will still need to be mitigated, or as a last resort compensated for as per NPPF paragraph 118. Therefore the qualification of ‘or partially’ should be removed from the policy.

This criterion should also be strengthened to include a requirement for the mitigation/compensation to create net gains to biodiversity as per NPPF paragraphs 9 and 109. This would be in line with the Government’s commitments to Biodiversity 2020 and Strategic Objective 9.

(b) We recommend that this paragraph is split to differentiate between the requirements for internationally and nationally designated sites. As it stands the policy is not comprehensive enough and does not accurately differentiate between the different requirements for the different levels of protection. This is contrary to NPPF paragraph 113.

Internationally designated sites are afforded the highest level of protection under the Habitat Regulations. It is not acceptable to say that adverse impacts on sites of international biodiversity conservation importance will be acceptable if ‘the benefits of development clearly outweigh the impact on the objectives of the designation’. This is contrary to the Habitat Regulations as any potential impacts must be dealt with in line with the appropriate regulations. We recommend the use of language to the effect of:

‘Any development with the potential to impact on an internationally designated site will be subject to a Habitat Regulation Assessment to determine the need for an Appropriate Assessment’.

We also recommend an acknowledgement of the requirement of NPPF paragraph 118 that:

‘The following wildlife sites should be given the same protection as European sites:

- potential Special Protection Areas and possible Special Areas of Conservation;

- listed or proposed Ramsar sites; and

- sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites’.

For nationally designated sites, the Trust is also concerned about the terminology ‘impact on the objectives of the designation’. This wording is not taken from planning policy and therefore there is an ambiguity in its meaning. We recommend that ‘features of interest’ is used in its place. We would also like to see the wider

ecological network considered as per NPPF paragraphs 113, 114 and 117. We recommend language to the effect of:

'there are no adverse impacts on areas or sites of national biodiversity or geological conservation importance unless the benefits of the development clearly outweigh both the impact on the features of interest for the designation, and on the wider ecological network of sites'.

(c) We strongly support the specific recognition given to locally designated sites.

(d) We strongly support the recognition given to Biodiversity Opportunity Areas.

The Sussex Wildlife Trust is concerned to see that there is no recognition of the importance of ensuring that development conserves and enhances priority and irreplaceable habitats. We recommend an additional criterion to cover the requirements of NPPF paragraphs 117 and 118:

'To minimise impacts on biodiversity and geodiversity, planning policies should:… promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators

for monitoring biodiversity in the plan'

'Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh

the loss'

Protection of ancient woodland is particularly important given the wooded nature of West Sussex.

We would also like to see the inclusion of a sentence highlighting that planning permission will be granted only where up to date environmental surveys are submitted as part of the application as per NPPF paragraph 165. We would also expect that up to date environmental information is a requirement for applications to extend sites or operations.

Policy M23

The Trust recommends an addition to criterion (c) with word to the effect of:

(v) incorporate biodiversity within the development.

This would be in line with NPPF paragraph 118 and would make the policy more consistent with the supporting text, particularly paragraph 8.12.6.

Policy M24

The Sussex Wildlife Trust supports the inclusion of this policy. We would like to see criterion (b) strengthened to ensure that financing is put in place for the long term management of the restored site and that there is a requirement for monitoring to ensure that any newly created habitat is properly established

and flourishes.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The Sussex Wildlife Trust strongly supports the recognition that high quality restoration and aftercare of mineral sites has a role to play in the growth in natural capital, which underpins the economic and social well-being of Sussex (Paragraph 4.2.6). However we are disappointed that this concept has not been embedded in the plan, especially given the South Downs National Park Authority's commitment to an ecosystems approach to strategic planning. This needs to be addressed.

Additional Comments

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01 - Organisation: The Chichester Society (Response ID: 176 Respondent ID: 2346)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

In section SO8, add '… and the setting of the cathedral city of chichester'

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Safeguarding mineral infrastructure

Policy MIO (c) (vi) Chichester railway sidings

(INSET MAP 5)

Whilst we recognise the need to safeguard a railhead for supply of minerals not available locally, the chichester railhead on the A259 via ravenna gives rise to noise and pollution, and HGV movements to and from the railhead adversely affect the environment of the city's ring and radial roads. Lorry routing should specify that HGV's should access the railhead from the A27/A259 Fishbourne roundabout and cathedral way / via ravenna and not through the city.

In the longer term, the chichester railhead might be relocated to drayton where aggregate sidings were formaly operated and which would be easily accessible from the county's advisory lorry routes without the need for HGV's to enter the city

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

01 - Organisation: The Cuckfield Society (Response ID: 141 Respondent ID: 3122)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Please see attached letter dated 11 June 2016

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Please see attached letter dated 11 June 2016

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Please see attached letter dated 11 June 2016

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Please see attached letter dated 11 June 2016

Additional Comments

(letter attachment)

Consultation response on draft West Sussex Minerals Plan ("JWSLMP")

Thank you for the opportunity to comment at this stage on the draft Joint Minerals Local Plan.

The draft plan takes a number of the concerns we originally raised in our consultation response dated 24 July 2014 into account. However, we still have residual concerns in the following areas:

1. Prioritisation of South Downs National Park ("SDNP") over other protected landscapes

The legal and policy framework in section 5.3 of the JWSLMP should be amended for the matters listed below, which also affect the vision, strategy and policy sections of the draft plan.

The draft JWSLMP appears to prioritise protection of the SDNP's landscape over the High Weald and the Chichester Harbour AONB's. However, the AONB's landscapes have an equal level of statutory protection as the SDNP, as set out in statute and national planning policy.

The Countryside Rights of Way Act 2000 ("CROW 2000") replaced the provisions of the National Parks and Access to the Countryside Act 1949, as they related to AONB's. §85 of CROW 2000 includes a responsibility of public bodies, such as the MPA, to 'conserve and enhance' the natural beauty of AONB's.

The duty to equally protect the landscapes of National Parks, the Broads and AONB's is confirmed in section 115 of the NPPF. There should be no differentiation between the level of protection afforded to one or the other.

We consequently do not see why policy M2 (soft sand), M3 (silica sand) and M4 (chalk) should exclude development in the SDNP, but not in the AONB's. This is regardless of whether there are currently no identified reserves for these respective types of minerals in the AONB's.

The above policies consequently appear to be contrary to §144 of the NPPF, which states that MPA's should "provide for maintenance of landbanks of non-energy materials from outside National Parks, the Broads, AONB's and World Heritage Sites, Scheduled Monuments and Conservation Areas".

2. Minerals development is 'major development'

We have previously expressed our view that hydrocarbon development should be considered as 'major development' within the meaning of paragraph 116 of the NPPF.

Since our original consultation response on the background papers to the JWSLMP, the Town and Country Planning (Development Management Procedure) (England) Order 2015 came into force on 15 April 2015. It defines 'major development' as development involving…"(a) the winning and working of minerals or the use of land for mineral-working deposits…". This definition is notably not qualified by size criteria. Part 3, §7(5) of the Development Management Procedure Order further clarifies that the winning and working of minerals includes 'exploratory drilling'.

Paragraph 6.7.12 of the draft JWSLMP seems to accept that all hydrocarbon development is 'major development', but should in our view be more explicit for the avoidance of doubt. We also note that policy M13 of the draft JWSLMP attempts to distinguish between major and minor minerals development. However, there can be no such distinction as all minerals development is by definition 'major development'. Consequently M13(a)(ii) should be deleted in its entirety and references to "major" should be deleted in M13(a)(iii) and M13©.

3. Definition of 'extension' in policy M7

The asterisk at the foot of the policy clarifies the meaning of 'extension'. It should in our view be clarified to show that it applies to an extension of an existing time limited activity or use. We therefore propose: "…including physical extensions, extensions to operations within the existing boundary or the continuation or resumption of a previously authorised use…"

4. Restoration and aftercare

Implementation and monitoring procedures for restoration and aftercare, as set out in section 8.13 should include an assessment of enforcement procedures and their effectiveness.

This consultation response is submitted on behalf of the Cuckfield Society. We are a charitable organisation (No. 249110), based in Cuckfield, a village in West Sussex. Our membership accounts for approximately a half to one third of the population. Our key charitable object is to preserve and enhance the essential atmosphere

of the parish of Cuckfield and its surrounding countryside and to improve in every way possible its appearance and amenities.

We hope that you will find the above helpful feedback and look forward to being consulted on the next stage of the process.

* * *

01 - Organisation: The Movement for Universal Democracy & Justice (Response ID: 164 Respondent ID: 3771)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

With regard to your Fracking proposition.

It is difficult to know where to start.

Fracking is well documented as as failed method of energy extraction in the USA & Australia.

The reasons for fracking oil have been well documented as a bad investment & financially nonviable in the current financial climate.

The damage to the English countryside is undeniable & will include permanent damage to the water supply & basin in Sussex.

I am sure you are aware of the river pollution problems.

The only reason to justify Fracking is another financial fraud by The City of London on Taxpayers who will probably, in their ignorance, have to pay for this.

While I can understand that as a Public Servant you have been corrupted by The Criminal Bankers & wish to keep your job,

There comes a point in integrity where you have to decide whether you are willing to die for your country or submit to criminal entities.

I therefore have to tell you that the UK Government is a Criminal Government.

And that we, the people, hope to be able to live through this phase of corruption with you.

You are therefore reminded of your fiduciary responsibilities

And that you are employed by the Taxpayers of the United Kingdom.

You have a choice to either do the right thing or go to jail.

The Reset Event is imminent.

* * *

01 - Organisation: The Wiggonholt Association (Response ID: 37 Respondent ID: 246)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

VISION:

The vision needs to be very simple, clear and accurate as it is an explanatory text.

Sub-paras 3 and 5 are interactive. Silica sand has been omitted from 3 but will be safeguarded in 5. The Vision needs to explain convincingly that:

(a) unlike soft and sharp sand, gravel and hard rock (aggregates) silica is a national rather than a local resource and is not dependent on the findings of the LAA 2016, as this focuses on aggregates and devolves from the historic apportionment (ie what has to be met by each Minerals Plan) handed down by Government to Minerals Planning Authorities. Silica, although a variety of soft sand, is (confusingly) not an aggregate as it is not used (or is not intended to be used) for construction

(b) silica can still come forward for extraction through a planning application whether or not it is in the future deemed to part of the "supply" delivery by the Plan in the event of silica working coming on stream.

(c) silica therefore does not have a 'landbank' in West Sussex (unlike other forms of sand and gravel) as it has never before been considered in a Local Plan by the WSMPA. The Inspector at the recent Hampshire Minerals Local Plan examination had to consider a new and extended definition of silica (by the BGS) where no reserves of silica had been thought to exist previously (They are now recognised, allocated and permitted at Kingsley Quarry.) A similar situation may arise in West Sussex both with regard to unidentified high-grade material, and material which (although although of a lower grade) still comes within the definition of "industrial sand". The Hampshire experience was that where the end market was industrial, the material was deemed to be silica, a potential determining factor in planning applications for unallocated sites in West Sussex.

The Vision therefore needs to answer why there is a need to safeguard silica although it is not part of the supply. This should be on the face of the Plan not just in a background paper. We note that whereas there is a great deal of detail in the Plan about unconventional hydrocarbon development involving hydraulic fracturing (where there has been extreme public interest) there is nothing commensurate about silica which although not allocated in the Plan may well emerge at the development control stage. Unless the distinct character and likely presence of silica is clearly explained, the public will not be properly informed and the Plan will be deficient. It will help to enlarge the reference in paragraph 5.3.4 "NPPF ... expects minerals plans to be prepared that include policies of extraction of minerals of national and local importance" from oil and gas to silica.

Sub-para 4: This should contain a gloss on Littlehampton as a port as the landing of marine-dredged aggregate, as this rests on an assumption that the Littlehampton wharf can easily be brought into use again, whereas the background documents suggest otherwise. This situation should be clearly explained in the Plan, otherwise the Vision is misleading (and see our comments on Safeguarding Infrastructure below at Section 6.

OBJECTIVES:

2.3.3 Please also identify the very large resource at Sandgate Park outside the National Park.

2.3.4 Line 4 should begin "or" not "of"

Strategic objective 4: Add "This would include national need" to the text, for reasons already identified above. It is really important to distinguish between the apportionment and national need when drafting this Plan.

Strategic Objective 5: Please see comments above on sub-para 4 of the Vision.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Please see B1.3 above

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

There appear to be a very large number of constraints to working this site (including proximity to the South Downs National Park). The site will produce only 850,000 tonnes of material. It is also a virgin site and there may be issues of cumulative effect involving the Rock Common and Sandgate Park sites.. Both the Plan and its background papers draw attention both to exports and imports of sand to and from West Sussex and to the availability of a large excess of recycled aggregate within the Plan period, so this unique soft sand site very close to the area of "managed retreat" ought to be reconsidered.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

SECTION 6: STRATEGIC MINERALS SUPPLY

1. LAND WON AGGREGATES

Section 6.2 is weak as it fails to include the tonnages on which the policies and text are based on the face of the Plan. There will need to be agreement within the Plan about what those numbers are (expected outputs, reserves in different sites, annual rates of supply over the last 10 years, landbanks, rates of marine landings and railhead throughput etc.) Such figures can be controversial. Omission will only encourage subsequent speculative planning applications which might otherwise be avoided.

2. SHARP SAND AND GRAVEL:

(a) Implementation and Monitoring:

The table on p45 proposes under Intervention Levels that if there are breaches of the landbank indicator over two successive years the action to be taken is to review policy. This is unwise. The position oat present is that there are 900,000 tonnes of sharp sand and gravel available against an annual expected output of about 26,000 tonnes. However most of the demand is met by landings of marine-dredged aggregate. This means that pressure on land-won supplies is controlled by the rate of marine landings. If that source were to reduce its supply for any reason, for example a dredger takes material to another port, or is taken out of service, OR A WHARF IS CLOSED whether temporarily or not - see Littlehampton above - a sudden demand could be placed

on the available landbank. That landbank could run down quickly and the annual output rise rapidly from the minimal output of 20,000 tonnes annually. In other words the circumstances in which an Intervention Level would be reached could occur quite easily, or even be engineered by the industry. In these circumstances, the appropriate response is not to review the policy, which (as drafted) does not need changing, but to press for the reinstatement of marine-dredged supplies. This would avoid sudden pressure for the release of additional land in the National Park (or AONB) for sharp sand or gravel. Policy M1 although sound as far as it goes, should be accompanied by a policy to favour the use of marine-dredged sharp sand and gravel rather than land-won sources in designated areas. This is implied in Strategic Objective 2 (para 6.2.8) but should be converted into meaningful text and policy. This would be an appropriate response to limited availability of remaining land-won resources in South East England, and especially so as to the pressure off protected landscapes. This approach is taken elsewhere. For example the emerging approach of the Kent Minerals and Waste Local Plan states at para 5.2.20:

"Diminishing land-won sharp sand and gravel supplies will increasingly be substituted over the plan period by supplies from production of alternative materials including secondary and recycled aggregates, supplies gained from blending of materials to generate material suitable to supply the construction aggregate market, landings of Marine Dredged Aggregates and imports of land-won aggregates from elsewhere. Indeed there is adequate existing capacity at wharves, railheads and recycling facilities for supplies from these sources to meet the predicted shortfall in supply of land-won sharp sand and gravel aggregate as resources are exhausted. The Plan provides for this flexibility in supply of aggregates as follows: Policy CSM 5 seeks to safeguard sharp sand and gravel resources that may become economic and to maximise the opportunities for the development of 'windfall' reserves which may come forward under Policy CSM 4. In addition policies CSM 8 and CSM 7 make provision for maintaining and developing further secondary and recycled aggregates supplies during the plan period and policies CSM 6, CSM 7 and CSM 12 seek to ensure that the necessary minerals importation and processing infrastructure is in place." [ENDS]

(b) The approach in paragraph 6.2.9 should therefore be amended so that it does NOT state that the Plan will "make provision for additional reserves only if needs cannot be met from other sources in West Sussex including landings of marine won aggregates landed at ports in West Sussex". Instead it should state that the Plan will:

"ensure that there are adequate recycling facilities to supply the construction aggregate market, wharves for the landing of Marine Dredged Aggregate and railheads for importing land-won aggregates from elsewhere in order to avoid the need to identify further land-won sources within the National Park."

(c) Policy M1 should also clarify that items (a), (b) and (c) must ALL be complied with (inserting "and" between them twice. The reference to "in accordance with Policy M14" should be changed to "Policy M13".

3. SOFT SAND

(a) The approach to soft sand is superior to that for sharp sand and gravel so far as the National Park is concerned. It offers a specific policy of 'managed retreat' which is absent from sharp sand and gravel, clarifies that there are now insufficient suitable remaining land-won reserves to maintain historic production levels and that, if necessary, reliance must be placed on additional imports into West Sussex.

(b) Again, the Implementation and Monitoring Table on page 48 should be amended. The Intervention Levels and appropriate Actions in response are difficult to understand. The Intervention Level is expressed not as a threshold for a problem but as an outcome (a new permitted reserve) - an outcome highly unlikely in the context of the proper implementation of the stated policy. It is therefore unclear what the risk really is that needs to be guarded against. Furthermore to 'review the policy' as the action in response is likely to be wholly inappropriate, given the clear direction of travel of the policy and the stated lack of soft sand sites available in the area of the two MPAs. Far more appropriate will be reiteration of the policy and the putting into effect of the Plan's own stated objective of encouraging additional imports into the area. It is difficult to understand the presence of this odd and limp approach in the Table.

(c) Policy M2 should again clarify that the four subsections must all be complied with, using "and" between them to avoid any possibility that there is an assumption of "or".

4. SILICA SAND

(a) There is merit in Policy M3 in that it requires exceptional circumstances to be demonstrated before silica sand working will be allowed in the National Park, and that it properly restricts the provision of reserves to individual sites. However this Policy is open to interpretation and misuse, and it still needs improvement. The overall position with silica sand working in the National Park is more complex than this section appears to recognise.

(b) Item (b) of M3: the proposed policy has lost sight of why 10 or 15 years' worth of permissions should be granted, just stating what will be done. The reason (NPPF paragraph 146) is "to support the level of actual and proposed investment required for new or existing plant and the maintenance and improvement of existing plant and equipment". It is quite possible that in the scattered deposits of West Sussex there will be no proposals to work small silica sand sites with limited rates of working and little or no processing on-site. In these circumstances there should be no commitment to provide permissions for 10 years, particularly if the applicant has not even proposed 10 years' working.

(c) Policy M3 should be much clearer about obliging applicants to define the full extent of the geological resource of silica sand that might be worked from a single plant site. The policy commitment "to maintaining a stock of permitted reserves of at least 10 years for individual sites" is effectively a commitment to giving the developer a personalised landbank. This means that, once a developer gets a 'foot in the door' the company will be able to argue that this policy should provide it with extension after extension so long as the resource is accessible and worth working, potentially taking operations into increasingly challenging locations. Only if the FULL EXTENT of the deposit has been established at the outset will this risk be contained and the MPA be truly aware of what they are letting the countryside in for in the longer term. The text reference in paragraph 6.3.8 to the potential inability to replenish reserves at some sites due to "overriding reasons" is a partial recognition of the need for a response to this problem, but more could be done to avoid it.

(d) Policy M3 fails to get to grips with proposal where only a proportion of the output of a soft sand site is silica sand. The need here is for applicants for permission to establish AT THE OUTSET the proportions of output expected to be sent to different uses, and to present convincing borehole evidence to demonstrate this in advance. That evidence should be used by the developer to establish the specifications likely to be met. The temptation will be for the applicant to describe deposits as silica even if the uses could be satisfied by other less specialised sand (eg. golf bunker sand - see Cuesta report "Soft and Silica Sand Study" (June 2015) paragraph 3.60). Consequently Policy M3 is not as robust as it looks because it is open to interpretation about what 'silica sand' actually is. There needs to be a clear statement about providing the MPA with information on the specification of materials within the site and the uses to which they will be put. The text reference in paragraph 6.3.5 - to applicants demonstrating through borehole data and geological analysis that the sand meets the specifications for the proposed end uses - is a valuable first step in this.

(d) Further, there should be a stated requirement for a commercial analysis to demonstrate that silica sands of specific grades will actually find markets which justify their permission in the first place. There is a real risk that high grade materials will otherwise be used for lower grade purposes for which other lower grade soft sands would have been quite sufficient. The Cuesta report correctly notes (at paragraph 3.7) that sales of lower-purity silica sands for a diverse range of uses from individual quarries varies over time "depending on the success or otherwise of individual operators in marketing their products for specific end uses". Policy M3 should be EXTENDED to allow mineral planning authorities to insist on MINIMUM FIXED PERCENTAGES of the output of a site to be sold for silica sand end-uses, in accordance with the purposes of allowing the permission in the first place, and MONITORED by the compulsory provision of monthly weighbridge records of sales. A site which COULD supply an end-use does not mean that it WILL. Evidence is therefore needed from potential customers as an indication that a proposed silica sand site can supply this more cheaply than other sources and that there will enough markets for the volumes proposed to be extracted. Another consideration is whether sites in West Sussex are closer to the market than alternative suppliers.

(e) Footnote 17 to paragraph 6.3.3 cites a 'Duty to Co-operate Summary' but we have learnt from the MPA that no such document is in fact available. This is cited as proving that "there is no requirement for West Sussex to meet any identified shortfall elsewhere". There is an extract from the summary in the Local Aggregates Assessment 2016 at paragraph 2.1.39, but this has no bearing on the above statement.

(f) What is clear is that there is a difference of information presented on the availability of silica sand in alternative locations elsewhere in England. In contradistinction to Paragraph 6.3.3, the Cuesta 2015 report (Summary) states that for higher purity silica sands "three or four known resource areas have 'landbanks' [ie reserves] below the minimum levels required by NPPF". Cuesta is much less sanguine than Paragraph 6.3.3

about the continued availability of silica sand from resources outside the South Downs. The JMLP may well have been selective in its characterisation of alternative silica sand sources, and the statement is brief, but it clearly does not follow the spirit of the advice provided by the study it commissioned from Cuesta. This matter will be the subject of debate as the Plan progresses. The SDNPA has simply not allocated any site in the National Park for silica sand working. There will be pressure from the industry to change that, with Horncroft the prime candidate.

(g) Implementation and Monitoring: The table on page 50 needs improvement. the sequence of events in the left column makes the clear implication that if silica sand is not available in authorities with whom WSCC is exercising a Duty to Co-operate (essentially MPAs close by) then additional silica sand will be released locally. As almost all the Lower Greensand in which silica sand is likely to be found is within the South Downs National Park, with the remainder adjacent to it, this suggests that land in the SDNP or its setting would be released. This is not acceptable. The proper test to apply before releasing land in the SDNP (recognised elsewhere by WSCC and the SDNPA) is paragraph 116 of the NPPF (reflected in Policy M13). To illustrate how unrealistic this assumption is, the Cuesta report found in its Summary that:

"there are alternatives to the Folkestone Beds resources elsewhere in the country, at least with regard to the relatively low purity specialist applications relating to agricultural, horticultural, sports and leisure end-uses. Thee alternative resources are limited in extent but many of them fall outside nationally designated landscapes and are capable of supplying many of the geographical areas which could potentially be served from the South Downs."

In short, for lesser uses of silica sand, there is unlikely to be a pressing case in the short term for mineral working within the SDNP.

(h) Interpretation and Monitoring:

As with aggregates, the suggested Actions if problems arose would be to "review policy". This is quite unnecessary. The aspects of policy presented in Policy M3 are not wrong: the effect of implementation and monitoring would - appropriately - be to enable more sites to meet the criteria contained within Policy M3, so there is no need to change that policy. Further, the Intervention Level stated is opaque as it is not clear what benchmark would have been breached for two successive years. It is not clear either that if there is a site landbank below an appropriate number of years (and this is not in any event the policy objective) that the MPA would be in a position to do anything about it. Only a planning application would enable a site-level landbank to be increased, that that might be a prospect which could fall foul of other aspects of this, or other, minerals policies (and see also paragraph 6.3.8).

(i) The supporting text for Policy M3 shows an awareness of some of the complexities which are likely to arise with silica sand-working in West Sussex. This includes the advice in paragraph 6.3.6 on comparing like with like when considering alternative sources to those in the SDNPA. However the policy approach needs to be thought through more carefully and Policy M3 itself strengthened to refer to the issues arising.

(j) UNALLOCATED SILICA SAND SITES:

The Cuesta report offers insight into the scope for silica sand working at Horncroft and Wickford Bridge (both sites are near Wiggonholt, our home base).

A. HORNCROFT: Horncroft clearly contains silica sand deposits of very high quality (chemically, physically and in terms of consistency) with potential markets for colourless glass and sodium silicate. Paragraph 5.7 of the report indicates that the specifications may well be met with only basic washing and grading of the sand ie without the need for sophisticated processing. This makes it an exceptionally valuable source of silica, and one which should therefore be able to compete with other sources in supplying markets far and wide. It would have a financial advantage to serve markets in the South West (given the requirement) and the West Midlands. National need grounds would thus loom large. Competing considerations would be the direct impacts of working the site and the wider effects. Horncroft would probably be large enough to interest a specialist supplier of silica sand in view of limited processing costs and the likelihood of its being sold to specialist markets. Cuesta hints also (paragraph 6.23) that other sites in the SDNP such as the dormant Coates

Quarry may be able to meet these high specifications. However (according to Cuesta) Kingsley Quarry in Hampshire has a similar resource profile to Horncroft. Yet Kingsley is only selling to the lower quality horticulture and leisure markets. It will be particularly important to ensure that silica permissions are not a back-door way of enabling the mineral to be sold for less than its full potential - or even as an aggregate. (See also our sub-paragraph (d) above.)

B. WICKFORD BRIDGE: the quality of the materials at this site is unclear, partly due to sampling difficulties. But, even if high quality material were to be found here, it is a very small site where the cost of justifying development would be high in relation to the benefits obtainable. The site would also be difficult to operate due to flood risk and access and possibly other environmental features (though no landscape assessment has yet been made of this site). Its size would discourage specialist suppliers (see Cuesta 4.11). The unintended consequence may be to open the door to small-scale, inexperienced minerals companies who try to keep costs to a minimum and have the potential to cause trouble through operational inefficiency and restoration difficulties if they obtain permission. It is imperative for the SDNPA as mineral planning authority to insist on the highest standards of evidence to justify working the site and on impeccable operation and restoration if the site is either allocated or permitted. (See comments on Policies M23 and M24.)

5. SAFEGUARDING MINERAL RESOURCES AND SUPPLY INFRASTRUCTURE

(a) Section 6.9 although basically sound could be strengthened by amending point (b) (iii) in Policy M9. LPAs are far more inclined to accept that surface development is more important than safeguarding minerals, and may even take the view as a means of preventing future minerals working. Therefore add the words "Where the Mineral Planning Authority agree .." at the beginning of point (b) (iii).

(b) Section 6.10 (strategic objective 5 and Policy M10): Any failure to ensure that minerals can be supplied through recycling facilities, wharfs or rail depots will increase the likelihood of land-won mineral working, including the National Park. Policy M10 should be emphatically worded to resist inappropriate development challenging to minerals supply. In particular there is huge pressure upon aggregate wharves for conversion into housing, marinas and other high-value developments. This has already begun to happen on the south coast. Yet retaining the wharves is critical to the aggregates strategy of the Plan. District Councils in West Sussex are under great pressure to fulfil their five-year housing targets. These local authorities could readily decide that "redevelopment of the site... has wider social and/or economic benefits that clearly outweigh the retention of the site..." (Littlehampton is already in the balance.) Nor can it be assumed that even the mineral companies will want to retain all their wharves, and some may be able to profit from the high sale values with impunity to their existing business, even if this is regarded as bad practice within the industry. This policy could promote the loss of aggregates infrastructure and threaten the implementation of marine landings and rail imports on which the Plan depends. The consequence would be renewed pressure for the release of land-won aggregates in West Sussex, and even the SDNP.

(c) Policy M10 also raises the possibility of alternative replacement sites being found as a means of allowing existing facilities to be redeveloped for non-mineral uses. More detail could be given in the Policy and in paragraph 6.10.13 which supports it. Kent County Council, as already noted, has an incipient Mineral and Waste Local Plan. This is to state: "In the case of mineral wharves the factors to be considered include the depths of water at the berth, accessibility of the wharf at various states of the tide, length of the berth, the size and suitability of adjacent land for processing plant, weighbridges and stockpiles, and conflicting development in close proximity that may jeopardise operations at the replacement site." Kent's Policy DM7 will likewise state that "Replacement capacity must be equivalent or better in terms of tonnage, accessibility, location in relation to the market, suitability and size of the berth for dredgers, barges or ships, suitability or size of adjacent available land for processing and stockpiling of minerals. There must also be no incompatible developments in close proximity that could jeopardise the operation of the replacement site." Kent's emphasis is on "equivalent or better" in every regard. Policy M10 could be strengthened by following this approach.

(d) The supporting text to Policy M10 should clarify which of the safeguarded wharves and rail depots have permanent permission and which are time-limited to the life of an associated minerals operation. This would help identify the circumstances in which Policy M10(b) would apply.

(e) The specification of 150m for buffer zones in paragraphs 6.10.10 and 6.10.15 could be advantageously increased to 250m so that there is a decreased risk of adverse impacts on new development and (conversely)

vehicle access to and from wharf or rail depots would not be jeopardised by the development proposed (viz. Kent MWPL Policy DM7).

(f) Policies M9 and M10 should be strengthened by requiring Mineral Consultation Areas to be explained in the Local Plans of lower-tier authorities, and shown on their Policies Maps.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Chapter 8: DEVELOPMENT MANAGEMENT POLICIES

Policy M23 Small sites are not adequately protected by this Policy (see comments at Section 6, 4(j) Wickford Bridge)

"Proposals for minerals development will be permitted provided that [OMIT 'WHERE APPROPRIATE'] the scale, form, and layout (including landscaping) DEMONSTRATE THAT CLOSE ATTENTION HAS BEEN PAID to the need to etc.

Policy M24 Small rural sites, particularly in designated areas, are not adequately protected by this Policy (see comments at Section 6, 4(j) as above). Leaving a site is often as a result of financial difficulties and can be a dangerous time for environmental restoration unless there is a bonding provision in place. Clause M24 (e) needs to be contracted, or alternatively paragraph 8.13.2 need to be expanded to indicate what is actually in mind. This is because of the difficulty which arises when rural land-use buildings are either abandoned or unofficially converted to other uses.

"(e) provide for the removal of all buildings, machinery and plant when no longer required in connection with the principal use." OMIT THE REST OF THE SUB-CLAUSE.

Planning permission can always be sought for a temporary use but this is outside the remit of the Plan.

Paragraph 8.13.2 should be omitted or else expanded to indicate exactly what the MPA has in mind and for which it is not appropriate to seek temporary permission under the planning regime. The overriding objective of Policy M24 should be to prevent rural dereliction in the wake of a temporary land use like minerals extraction.

Additional Comments

N/A

* * *

01 - Organisation: UKOG (represented by Barton Willmore) (Response ID: 193 Respondent ID: 3780)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Please see attached document

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Please see attached document

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Please see attached document

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Draft West Sussex Joint Mineral Local Plan

April 2016

Representations on behalf of UK Oil and Gas Investments

June 2016

CONTENTS

1.0 Introduction

2.0 Response

3.0 Conclusion

1.0 INTRODUCTION

1.1 The following representations are made on behalf of UK Oil & Gas Investments PLC (UKOG) in response to the draft West Sussex Joint Minerals Local Plan. UKOG is a dynamic and innovative British oil and gas company that strives to support the drive for increased energy security within the UK. The company prides itself on its ability to minimise impacts on local communities whilst maintaining and often enhancing the surrounding environment. UKOG demonstrates that it is possible to provide energy while preserving the way of life and rural beauty of licenced areas.

1.2 UKOG holds a 100% interest in UK onshore licence PEDL126, which expires on 30 June 2016. An extension is being sought by UKOG to extend the licence until 30 June 2017. The full area of PEDL126 lies within the South Downs National Park.

1.3 Prior to offering the oil and gas exploration licences to successful applicants under the 14th Onshore Licensing Round in December 2015, the Oil and Gas Authority assessed the environmental impact of drilling within all protected areas. There is no requirement in offering the licences for operators to fully consider non-designated areas before bringing forward proposals in designated areas.

1.4 UKOG wishes to comment on some relevant aspects of the draft West Sussex Joint Minerals Local Plan, and these are expressed below.

2.0 RESPONSE

Strategic Objective 12

2.1 UKOG has concerns regarding the wording of Strategic Objective 12. This is worded within the Draft West Sussex Joint Minerals Local Plan as:

“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 One of the key strengths of the National Planning Policy Framework (NPPF) is to promote positive planning. This is echoed throughout the document and is linked to the presumption in favour of sustainable development, the golden thread of planning running through both plan-making and decision-taking.

2.3 Paragraph 14 of the NPPF, in relation to plan-making, notes “local planning authorities should positively seek opportunities to meet the development needs of their area”. The theme of positive planning continues within the 12 core planning principles described in paragraph 17 of the NPPF. Paragraph 182 notes that local plans should be positively prepared, and this forms an important part of assessing the soundness of such plans.

2.4 The wording to Strategic Objective 12 is negatively worded when referencing oil and gas development. This is contrary to the advice given within the NPPF as discussed above, and particularly paragraph 182. At present, the Objective is not considered by UKOG to be sound as it is not consistent with national policy.

2.5 The scope of Strategic Objective 12 should therefore effectively be reversed. It should be reworded to promote such oil and gas development, recognising the national commitment whilst being fully aware of potential environmental and social impacts. A more positively-worded Objective would ensure compliance with national policy and meet the test of soundness, enabling the delivery of sustainable development. . A suggestion for potential rewording is noted below:

“To promote oil and gas development, recognising the national commitment to maintain and enhance energy security in the UK, whilst ensuring the environment and local communities are adequately protected”.

Policy M7a: Hydrocarbon Development not Involving Hydraulic Fracturing.

2.6 The policy in relation to oil and gas development in M7a: Hydrocarbon Development not Involving Hydraulic Fracturing. The wording is noted below:

Exploration and Appraisal

(a) Proposals for exploration and appraisal for oil and gas, not involving hydraulic fracturing, including extensions* to existing sites will be permitted provided that:

(i) the site is located outside the South Downs National Park, High Weald AONB or Chichester Harbour AONB unless it has been demonstrated that there are exceptional circumstances and that it is in the public interest, and in accordance with Policy M13;

(ii) the site selected is the least sensitive, deliverable location from which the target reservoir can be accessed, taking into account impacts from on-site activities and off-site activities including HGV movements;

(iii) any adverse impacts including (but not limited to) noise, dust, visual intrusion, transport, and lighting, on both the environment and local community, including air quality and the water environment, can be minimised, and/or mitigated, to an acceptable level;

(iv) restoration and aftercare of the site to a high quality standard would take place in accordance with Policy M24 whether or not oil or gas is found.

Production

(b) Proposals for oil and gas production, not involving hydraulic fracturing, including extensions* to existing sites, will be permitted provided that:

(i) they accord with (a)(i-iv) above;

(ii) no significant adverse impacts would arise from the transport of oil/gas and water from the site;

(iii) the restoration and aftercare of the site to a high quality standard would take place in accordance with Policy M24.

Activity beneath or proximate to designated areas

(c) Proposals for exploration, appraisal and production of oil and gas, not involving hydraulic fracturing, will be permitted underneath or in close proximity to the South Downs National Park, AONBs, Source Protection Zone 1 and Sites of Special Scientific Interest, which demonstrate that special care will be taken to avoid harming the setting and/or special qualities and/or value of these designated areas.

*including physical extensions or extensions to operations within the existing site boundary. N.B. The suitability of proposals for alterations to permitted operations will be considered against the Development Management policies.

2.7 Paragraph 116 of the NPPF relates to major developments within designated areas. The policy above does follow the requirements of this policy to some degree. However, the policy does not make reference to the cost implication within the NPPF, and viability is an important consideration for developers. A more balanced approach is therefore required within point a) ii).

2.8 Policy M7a a) ii) requires that “the site selected is the least sensitive, deliverable location from which the target reservoir can be accessed”. Whilst the Minerals Planning Authority (MPA) can expect operators to assess the environmental impacts of hydrocarbon development, and propose suitable mitigation, in practice, it may prove difficult to identify a site which is the least sensitive. Sites are dependent on a willing landowner agreeing to hydrocarbon development on their land and securing an agreement with the landowner can be problematic. Furthermore, suitable access to a development site is essential for hydrocarbon development and typically a site is selected for its accessibility. As stated in paragraph 114 one of the core principles of the NPPF is positive planning and for that reason, it would be more sensible if operators were to demonstrate that the chosen site was acceptable subject to appropriate mitigation. A suggestion for potential rewording is noted below:

ii. “the site selected is an appropriate, deliverable location from which the target reservoir can be accessed, taking into account impacts from on-site activities and off-site activities including HGV movements”;

Policy M7b: Hydrocarbon Development Involving Hydraulic Fracturing

2.9 The policy in relation to oil and gas development in M7b: Hydrocarbon Development Involving Hydraulic Fracturing. The wording is noted below:

Exploration and Appraisal

(a) Proposals for exploration and appraisal for oil and gas, involving hydraulic fracturing, including extensions* to existing sites will be permitted provided that:

(i) any surface development is located outside the following areas (as shown on the policies map):

i. South Downs National Park

ii. Chichester Harbour AONB

iii. High Weald AONB

iv. Source protection zone 1;

v. Sites of Special Scientific Interest (SSSI)

(ii) the site selected is the least sensitive, deliverable location from which the target reservoir can be accessed, taking into account impacts from on-site activities and off-site activities including HGV movements;

(iii) any adverse impacts including (but not limited to) noise, dust, visual intrusion, transport, and lighting, on both the environment and local community, including air quality and the water environment, can be minimised, and/or mitigated, to an acceptable level;

(iv) restoration and aftercare of the site to a high quality standard would take place in accordance with Policy M24 whether or not oil or gas is found.

Production

(b) Proposals for oil and gas production, involving hydraulic fracturing, including extensions* to existing sites, will be permitted provided that:

(i) they accord with (a)(i-iv) above;

(ii) no significant adverse impacts would arise from the transport of oil/gas and water from the site;

(iii) the restoration and aftercare of the site to a high quality standard would take place in accordance with Policy M24.

Activity beneath or proximate to designated areas

(c) Proposals for exploration, appraisal and production of oil and gas, involving hydraulic fracturing, will be permitted underneath or in close proximity to the South Downs National Park, AONBs, Source Protection Zone 1 and Sites of Special Scientific Interest, which demonstrate that special care will be taken to avoid harming the setting and/or special qualities and/or value of these designated areas.

* including physical extensions or extensions to operations within the existing site boundary. N.B. The suitability of proposals for alterations to permitted operations will be considered against the Development Management policies.

2.10 As with our response to Policy M7a when discussing proposals for exploration and appraisal the policy requires that “the site selected is the least sensitive, deliverable location from which the target reservoir can be accessed”. Whilst the MPA can expect operators to assess the environmental impacts of hydrocarbon development, and propose suitable mitigation, in practice, it may prove difficult for an operator to identify a site which is the least sensitive. Sites are dependent on a willing landowner agreeing to hydrocarbon development on their land and often securing an agreement with the landowner can be problematic. Furthermore, access to the development site is essential for hydrocarbon development and typically a site is selected for its accessibility. As stated in paragraph 114 one of the core principles of the NPPF is positive planning and for that reason, it would be more sensible if operators were to demonstrate that the chosen site was acceptable subject to appropriate mitigation. A suggestion for potential rewording is noted below:

iii. “the site selected is an appropriate, deliverable location from which the target reservoir can be accessed, taking into account impacts from on-site activities and off-site activities including HGV movements”;

M10: Safeguarding Minerals Infrastructure

2.11 The policy in relation to oil and gas development in M10: Safeguarding Minerals Infrastructure. The wording is noted below:

Policy M10: Safeguarding Minerals Infrastructure

(a) Development on, or near to, sites hosting existing minerals infrastructure that would prevent or prejudice the use of existing minerals infrastructure will not be permitted unless:

(i) the site or infrastructure is no longer suitable for continued minerals use; or

(ii) redevelopment of the site or loss of the infrastructure would form part of a strategy or scheme that has wider social and/or economic benefits that clearly outweigh the retention of the site or the infrastructure for minerals use; and,

(iii) a suitable replacement site or infrastructure has been identified and permitted;

(b) Where safeguarded infrastructure is situated within a host quarry, wharf or rail depot facility, it is safeguarded for the life of the host site.

(c) The following wharves and railheads are safeguarded for their minerals transportation purposes:

(i) ARC Wharf, Shoreham (inset map 3)

(ii) Turberville and Penneys Wharf, Shoreham (inset map 3)

(iii) Halls Wharf, Shoreham (inset map 3)

(iv) Rombus Wharf, Shoreham (inset map 3)

(v) Railway Wharf, Littlehampton (inset map 4)

(vi) Chichester Railway Sidings (inset map 5)

(vii) Ardingly Rail Depot (inset map 6)

(viii) Tinsley Goods Yard, Crawley (inset map 7)

(ix) Crawley Goods Yard (inset map 7)

(x) Crawley Goods Yard (inset map 7)

2.12 Policy M10 ‘Safeguarding Minerals Infrastructure’ seeks to safeguard existing minerals infrastructure and prevent incompatible development near to it. UKOG is supportive of this policy, particularly the safeguarding of hydrocarbon exploration, appraisal and production facilities. The very nature of hydrocarbon minerals development can sometimes result in short term adverse environmental and amenity impacts and, therefore, restricting inappropriate neighbouring developments that may prejudice the continuing efficient operation is welcomed.

3.0 CONCLUSION

3.1 West Sussex County Council and the South Downs National Park Authority have worked in partnership on the preparation of the West Sussex Joint Minerals Local Plan. The draft Plan covers the period to 2033. On behalf of UKOG, comprehensive responses have been made concerning hydrocarbon development, cross-referencing to national planning policy.

3.2 In summary, UKOG is of the opinion that in its present state the plan is considered unsound based on the following reasons:

• Positively Prepared – It is considered that the plan currently adopts a negative approach. The wording to Strategic Objective 12 is negatively worded when referencing development and oil and gas. It should be reworded to promote such oil and gas development whilst fully recognising the potential impacts and national commitment as noted.

• Consistent with National Policy – Policy M7a does not make reference to the cost implication within the NPPF paragraph 116, and viability is an important consideration for developers. A more balanced approach is therefore required. Policies M7a and M7b in respect of hydrocarbon development require that the site selected is the least sensitive, deliverable location from which the target reservoir can be accessed. As stated in paragraph 114 one of the core principles of the NPPF is positive planning and for that reason, it would be more sensible if operators were to demonstrate that the chosen site was acceptable subject to appropriate mitigation.

* * *

01 - Organisation: Washington Parish Council (Response ID: 334 Respondent ID: 3436)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Washington Parish Councillors discussed the proposed site at Ham Farm, off the A283, siting various traffic concerns as the reason they were strongly against the proposed development of the site.

Consequently, they AGREED to register the following, in response to the draft consultation:

1.The A283 to Steyning was a proven dangerous road, where serious accidents had been reported, and that it was also another access for multiple vehicles onto the road.

2. Pressure of traffic on the A283 and the Washington Roundabout which is at capacity.

3.The impossiblity of stopping HGVs travelling through Storrington without a blanket ban;

4.The impossiblity of the standing down of lorries should the traffic count be too high, and the prospect of many lorries being bunched together on such a dangerous road

I would be grateful if you would submit this response for the survey.

* * *

01 - Organisation: Waverley Borough Council (Response ID: 207 Respondent ID: 3791)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Thank you for consulting Waverley Borough Council on the above draft local plan. I know that the consultation closed on Friday but I hope you can accept this late response.

Having reviewed the document I do not consider that there would be any particular implications for this authority. Therefore, Waverley BC does not wish to make any comments at this stage.

I would be grateful if you could please inform us of future consultations on the plan.

* * *

01 - Organisation: West Hoathly Parish Council (Response ID: 94 Respondent ID: 2206)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

At their meeting on 25th April West Hoathly Parish Council considered the Draft Local Minerals Plan 2016, in particular the allocation of an extension to the clay pits at the West Hoathly Brickworks.

The Parish Council is concerned about the allocation in the Joint Minerals Plan of an extension of the clay pits at the West Hoathly Brickworks due to:

- The impact on the landscape especially as the site is wholly within the High Weald Area of Outstanding Natural Beauty.
- The impact on the community, in particular the potential increase in traffic movements that might be generated.
- Since the site is within the High Weald AONB how the site will be restored afterwards.

The current 1998 permission for the brickworks includes a restoration plan for the current clay pits and the Parish Council would be interested to know what progress has been made towards the planned restoration outlined in this plan.

* * *

01 - Organisation: West Sussex County Councillor (Response ID: 197 Respondent ID: 3785)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Please consider this email my formal response to the draft Consultation.

You have heard me speak about this on many occasions now and you will know that I am fundamentally opposed to the location. I have worked with the Parish Council and the Residents on their objections and I fully support the contents of the written documents which you have received and which I will not repeat here.

There are, however, two points I specifically want to make in addition:-

1. I do not believe that the site is deliverable and although that would not be a factor in a planning application, in a draft Minerals Plan that is most certainly a factor. It is not deliverable because there is a live an enforceable restrictive covenant on the site, vested in the adjoining owner of Wappingthorne Manor. It was made quite clear through his solicitors that they will enforce that covenant and I believe that this has been sent to you. You have made the point in your own written considerations that the amenity of local residents will be seriously impaired and therefore scores "red" and therefore this gives further credence to the wording of the restrictive covenant by your own admission.

2. I am seriously concerned about the Highways Report on which you have placed so much reliance as "green".

I received the attached drawing which I believe purports to show the site.

I do not believe that it does and I have serious concerns that your Highway Consultant has mistaken the entrance for somewhere else. I say this because the entrance is very close to a bend which is not shown nor is it opposite any sort of layby.

Even if I was wrong in that, you consultant clearly believes that the speed limit is 50mph which it is not but 60 mph and this report is completely different to the 2011 Highways Report (based on a lower number of vehicles) which required a right hand turning lane. I believe, therefore, that the Highways Report is seriously flawed.

Once again, as I did when I last spoke to you, I implore you to do the sensible thing and withdraw this site from the draft Minerals Plan. Please acknowledge receipt.

(Ham Farm proposed access visibility splay and swept path Transport Assessment diagram attached to email submission)

* * *

01 - Organisation: West Sussex Local Access Forum (Response ID: 202 Respondent ID: 1564)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

West Sussex Local Access Forum (WSLAF) is an independent advisory body, established under the Countryside and Rights of Way Act 2000, to give access advice to local authorities, statutory organisations and non-government organisations. In giving that advice, the Forum's main objective is to ensure the existing network of public rights of way (prows), as well as the wider access network, is protected and where possible enhanced. The Forum has a balanced membership of knowledgeable and experienced users (walkers, cyclists, horse riders and carriage drivers), landowners and other interests (including conservation, disabled access, landscape). For further information about the Forum please visit www.wslaf.org.

This letter constitutes formal advice from the West Sussex Local Access Forum. West Sussex County Council is required, in accordance with section 94(5) of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from this Local Access Forum in carrying out its functions.

West Sussex Joint Minerals Local Plan Consultation

General Comments

It is important that all possible effort is made to ensure roads used to access minerals sites are not those used by non-motorised users (NMU – walkers, cyclists and horse riders) to link off–road routes (primarily the rights of way network). If such a route has to be used by HGVs access the sites then alternative safe routes for NMUs should be provided. Safe crossing of routes used by HGVs by NMUs should also be considered.

At the end of the mineral extraction every effort should be made to improve and enhance public rights of way and maximise public benefits of the sites during restoration.

2.2 Vision

The Forum supports the vision that mineral sites are restored to the highest standards, leading to larger and better managed and connected green infrastructure, with increased opportunities for recreation. The provision of off-road, safe, access, and links to other off-roads access routes, that all can be enjoy by all is increasingly important as roads become busier.

2.3.12 Transport

The Forum supports the commitment to minimise road transport and in particular the use of local roads. The use of roads, including the use of NMUs, must be fully understood before developing a transport plan.

2.3.14 Mitigation and Restoration / Strategic Object 13

The aim to ensure high quality restoration and for this to be implemented at the earliest possible stage is supported. Engagement with stakeholders, including the West Sussex Local Access Forum (or South Downs LAF where appropriate), should take place to maximise benefits.

4.9.2 Health and Amenity

Control of adverse impacts is welcomed and should extend to all areas that the public access including all highways.

5.3.5 National Planning Policy

The links to the National Planning Policy Framework should include a reference to protecting and enhancing public rights of way and access (NPPF para 75).

5.5.4 West Sussex Transport Plan

The West Sussex Rights of Way Improvement Plan – A Strategic Framework 2007 – 2017 (www.westsussex.gov.uk/rowip) should be reference as it is linked to the current Transport Plan.

8.7 Public Amenity and Health; Policy M18

Both a) and particularly b) are welcomed. As mentioned above it is important to protect NMUs and so opportunities to provide off-road routes should be taken. These should cater for as many types of users as possible so bridleways are ideal.

8.9 Transport / Policy M20

The policy is supported. It is important all users are considered and efforts made to protect them, by alternate provision if necessary, if roads used by NMUs are used by HGVs.

8.13 Restoration and Aftercare / Policy M24

The Forum supports this policy.

8.14 Community Engagement / Policy M25

Early discussion with local communities is welcomed but should also include wider stakeholders to ensure all interests are represented. The two Local Access Forums (West Sussex and South Downs) should also be consulted as, with a balanced membership of users, landowners and other interests, they to provide objective advice.

WSLAF would very much appreciate being kept informed of progress on this matter.

* * *

01 - Organisation: Wisborough Green Parish Council (Response ID: 168 Respondent ID: 3775)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Re: Joint Minerals Local Plan for West Sussex

Wisborough Green Parish Council welcomes the opportunity to comment on the draft Joint Minerals Local Plan for West Sussex and the evolving minerals policy for WSCC/SDNP, designed to replace the existing Minerals Local Plan (2003).

Experience

In 2013, the Parish was faced with an application for Oil/Gas Exploration by the company Celtique Energie. On 22nd July 2014, WSCC turned down the application on the grounds of:

- Highways

- Impact upon the character of the villages

- And, added reference site selection.

The Company challenged this ruling and appealed which precipitated the prospect of a Public Inquiry due to start on 8th September 2015, until the company withdrew their appeal on 11th March 2015. As a result of this application, the Parish Council had to learn a great deal about the processes of working such hard to reach fossil fuels, the lack of evidence produced and the poor nature of the application.

Comments

There is no apparent implication of quarrying within the Parish but the prospect of drilling for oil or shale gas could be relevant against the background of there being a PEDL agreement in place for the area. The Parish Council therefore submits the following comments for consideration:

1. About one third of the Parish is located within the SDNP and as such, the village settlement is situated within the setting of the SDNP. A rural location and community life needs to be protected from what would be an industrial process.

2. If full protection of the National Park and AONB is to be maintained then no drilling sites should be located within 5.5 miles of the protected areas ie there needs to be a buffer zone.

3. Recent legislation changes allows drilling companies access into National Parks horizontally below a depth of 300m and any materials to be left in the well could threaten our local environment.

4. Any Oil/Gas exploration would need to be accompanied by a rigorous and independent monitoring system including for health of villagers, air and water quality, for methane and provision is made within the Infrastructure Bill for a year's monitoring to be undertaken prior to starting any shale oil/gas development.

5. The geology of the Weald is very faulted and any materials put down the drill could find their way into wells and sources of water supply. Given that 70% of the local water supply derives from the chalk, the water supply could become vulnerable to contamination and once polluted such materials could not be removed.

6. At the time of the Oil/Gas Exploration application by Celtique Energie there was no information provided concerning the destination of the wastes – materials, water. We have since learned that the UK has very limited provision for dealing with the very large amounts of toxic flowback liquids.

7. The Neighbourhood Plan for Wisborough Green has recently been supported by a successful referendum. This document will now be adopted by both the SDNP and CDC as a key component of Planning Policy, setting out the local policies to inform the future development of this community. The Parish Council has included a policy to promote Renewable Energy Schemes (Policy IN4) and believes that there is a need to encourage and support the use of renewable energy.

* * *

01 - Organisation: Wiston Parish Councillor, Local Business (unspecified) & resident (Response ID: 73 Respondent ID: 4035)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Sand, gravel and clay are all needed to build the large number of houses urgently needed in the area.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Road improvements must be made to ensure the movement of minerals without causing traffic congestion.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

With the existing sand pits nearly exhausted, new sites must be investigated and secured for future use.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The A283 road must be improved to avoid traffic congestion.

The A283 to the west of Ham Farm is narrow and has awkward bends and hills just after the exit from the proposed site. This will cause traffic hold ups by the departing sand lorries.

If the A283 is improved by implementing one of the proposed schemes re-routeing the the road slightly to the south this will make available a large quantity of soft sand not currently available because it is in the South Downs National Park.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

If sand is not available locally it will have to be transported by road to the required destination causing further traffic congestion.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

01 - Organisation: Wiston Parish Councillor, local business (unspecified) and resident (Response ID: 216 Respondent ID: 4036)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The ability of the local authority and the extraction companies to make good after quarrying and surface mining in West Sussex is demonstrably non existent. The land fill after the end of extraction at the Windmill pit Washington demonstrates the promises of cellular containment cannot be kept. The Washington pit remains a dangerous liability. The Sandgate Park site became a housing estate against the wishes of the Parish and District Councils. To create another hole in the ground at the Ham Farm Site is not for the mineral extracted. It is for the use of the hole when extraction is ended. The value of the sand and the quantities involved are of little value to the building trade in West Sussex. The opportunity to use the site for land fill of inert waste is of great value to the interested parties. I strongly object to the inclusion of the Ham Farm site in the draft plan.

The A27 is, in practice neatly bypassed by the A283. What is needed in strategic planning is the improvement of the A27 through, around, or over Worthing to relieve the pressure on the A283. As Ham Farm is directly on this road, the additional load will be unbearable. The number of vehicle movements are under estimated in the draft outline.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

As mentioned above, the Ham Farm site should be removed from the list of proposed sites.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This is a small site with earlier proposal to limit it's area by excluding the northern section, some plans show the inclusion of the farm buildings, most recent drawing show the entire proposed site without the northern area removed. There is a watercourse to the west and the scope of the proposal is inappropriate. The soft sand requirement could not and will not be met by inclusion of this site in the Mineral Plan. It should be removed from the Draft Plan.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The removal Of the Ham Farm Site.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Policies M12 to M26 are sound and considered, given the past history of mining along the northern side of the south downs, the admirable objectives of the polices are not met. I fear they will not be met again.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The mineral plan in draft and final form should address the existing mines and quarries in West Sussex taking the local peoples views much more to heart. The requirement for sand is vastly outweighed by the objections of the populace.

Additional Comments

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* * *

01 - Organisation: Woolbeding with Redford Parish Council (Response ID: 130 Respondent ID: 3747)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

West Sussex Joint Minerals Local Plan

Thank you for the opportunity to respond to the West Sussex and South Downs National Park Authority Draft Joint Minerals Plan 2017 -2033.

We have studied both the strategy and implications of the proposal and wish to record that we approve and congratulate you on the work required to complete the plan. We think that you have incorporated the protection of the natural beauty of the National Park and successfully incorporated a sensible philosophy of resource sustainability.

We are especially pleased to note that the two suggested sites that fall within the jurisdiction of the Parish of Woolbeding with Redford, namely Severals East and Severals West, have been preserved without the risk of future licences being granted.

The draft proposal meet both the SDNP and our own Parish Plan and strategy to conserve and protect these important greensand heathland habitats as part of the wildlife corridors around the park. The surrounding community have enjoyed access to these sites for many years and we will be pleased to inform them that it is the intention of your joint plan to retain that enjoyment.

We are also pleased with your sensible and cautious approach to the search and extraction of gas and oil through both drilling and fracking processes. We understand the balance it is a fine balance between the commercial imperative for extraction and the preservation of landscape and enjoyment of living in an undisturbed National Park. We applaud your rationale and decision not to allow such extraction processes within the Park boundary. We would add that the risk to our parishioners from fracking particularly, is elevated, as a number of households are still on natural rising spring water and the threat of watercourse contamination, give a real fear of implications for both health and long term property value.

We commend the draft plan and wish you success in its full adoption.

On behalf of Woolbeding with Redford Parish Council

* * *

02: Ham Farm

02 - Ham Farm: Resident/Member of the Public (Response ID: 270 Respondent ID: 701)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The Strategic Objectives listed are partly agreed and partly not - so a "yes", or "don't know" are inapplicable.

The selection of the Ham Farm site fails to meet these SOs, particularly SO7 to SO11

The proposal of that site is indeed, directly in conflict with many of the Strategic Ojectives

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

DESELECT the Ham Farm Site

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

- The MWDP does not properly follow NPPF requirements

- Significant questions exist as to due process and whether these have been followed correctly by the County Council planners. It is believed not.

- Various assessments are weak, incomplete, inac

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

DESELECT the HAM FARM site from the Plan

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 85 Respondent ID: 1234)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I am concerned about SO3 and SO4 in that whilst I agree that the South Downs National Park should be protected, this protection should be extended to those areas immediately adjascent to the National Park. This would ensure that the views from the National Park would also be protected.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Whilst it is not in the South Downs National Park it borders the National Park along the A283, so it is clearly in view from users of the National Park and so should have the same protection extended to potential sites in the South Downs National Park as covered by SO3 & SO4.

The A283, which would be used to access this site is quite narrow in places with dangerouis bends (Wiston Bends) and road junctions (Horsham Road and Canons Way in Steyning). The increase in heavy lorries would increase the dangers for other road users especially at those bends and junctions. Unless there was a planning condition requiring the operation to be spread over the years used in estimating the number of lorries, any developer could speed up the process for maximum financial benefit with a consequent further increase in the number of heavy lorries using the A283.

There are local residents and business located right next to the Ham Farm site (Hammes Farm) which would be subject to huge increases in noise from having an operational soft sand extraction site next to those properties. This cannot be mitigated.

Whilst it is stated that the site would be restored by filling with clean waste, there would have to be appropraite planning conditions to ensure that this happened.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

With the change in SO3 & SO4 suggested this would exclude the Ham Farm site for the same reasons that other sites in the South Downs National Park have been excluded.

Since there is an identified shortage in saft sand supplies, all the sites previously identified in the National Park should be be reviewed equally along with the Ham Farm site so that Ham Farm would not be chosen just because it is just outside the National Park - all the criteria taken into account with the National Park sites would also apply to Ham Farm.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

There should be a requirement in the Plan that planning conditions must be applied where assumptions have been used in the Plan - especially relating to heavy lorry estimates, life of sites and futue uses, to ensure those assumptions are reasonably correct.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 154 Respondent ID: 1318)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

OBJECTION TO PROPOSED SAND QUARRY AT HAM FARM, WISTON, ON THE A283 NEAR STEYNING, WEST SUSSEX

I am very concerned that few local people are aware of this draft proposal. It has not been publicised and the deadline of 16th June does not give the residents of Steyning and the surrounding area the opportunity to respond. Consequently, I feel that the response you will receive will not reflect the true strength of feeling of people in the area.

I feel passionately that a sand quarry must not be allowed on the Ham Farm site. It is a precious rural area of outstanding natural beauty, an area of ancient farmland and woodland, rich in flora and fauna, with many listed buildings nearby. A quarry on this site will destroy all of this and the extreme beauty of the area for ever. It will have a detrimental affect on the lives of local residents and on nearby Steyning. The quarry will be situated on the A283, a notoriously treacherous and narrow road with dangerous bends.

Below are more detailed reasons for my extreme opposition to a quarry on this site:

The A283 is a very dangerous and treacherous road

I have attached a map (source: crashmap.co.uk) showing accidents on the A283 (from Steyning's Horsham Road to the Washington roundabout on the A27), (from 2005 – 2014).* It is horrifying viewing. With dozens of quarry lorries added to the traffic on this road, it doesn't take much imagination to see how dangerous this stretch of road will become.

Many school coaches from nearby Steyning Grammar School use this road twice a day, transporting pupils to and from school to Storrington. These pupils' lives will be put at risk if a quarry is sited here. There will be lorries turning into the site, pulling out of it, driving along this winding road with it's blind bends.

Our daughter was involved in a serious accident on the A283 several years ago. A lorry lost control and came around a bend near Washington village on the wrong side of the road. It hit an elderly couple's car and our daughter's car. They were very lucky to survive the accident, as their cars were total wrecks. I'm extremely worried that this could happen again, with the outcome being rather more tragic.

There are regular festivals at Wiston House (opposite proposed quarry site): Big Church Day Out and the Steam Rally where hundreds of people congregate for long weekends. It is also a wedding venue, sometimes attracting hundreds of guests. The Steyning Festival also attracts hundreds of visitors for several weeks. Add the quarry lorries to all this traffic, on this hazardous road – terrifying!

* There was no information for 2015.

Area of Outstanding Natural Beauty/Loss of Aesthetic Value to Local Landscape

This area is West Sussex at it's most beautiful. The view from the proposed quarry site, looking across Wiston pond and the Wiston estate towards Chanctonbury, is probably the loveliest in Sussex. This would be destroyed for decades if a quarry was allowed on this site. Visitors frequently mention this fabulous view and landscape when coming to Steyning.

Historic Environment/Damage to Biodiversity/Loss of a Natural Landscape and Habitat Destruction

This countryside has been farm land for centuries, with ancient hedge rows and trees. A landscape that is rich in flora and fauna. You cannot 'return' countryside like this to it's former glory after excavating. The whole balance of nature will take centuries to return to the way it is now. Several streams meander through this area and the balance of such freshwater ecosystems will also be destroyed forever.

There are many listed farmhouses and ancient cottages in this area, including the magnificent Wiston house and estate. Surely the council has a duty to protect this ancient landscape and it's equally irreplaceable and valuable listed properties. The nearby ancient town of Steyning is one of the most attractive towns in West Sussex and because of this, it's economy is reliant on tourism. A quarry situated so close to Steyning would have a huge impact on this.

The South Downs National Park

A national treasure is just across the road. The quarry would be visible and a scar on the landscape for visitors enjoying the park, particularly from Chantonbury Ring. A blight on the landscape for decades, again having an impact on local tourism.

Air Pollution / Air Quality

I'm extremely concerned about air pollution and air quality. School play grounds and sports grounds in Steyning are only 1 mile from the proposed site. A nursery school on the Ashurst road is even closer. Dust from the quarry site and dust from the moving heavy trucks will jeopardize local children's heath. Diesel pollution from these heavy lorries is even more concerning, with recent scientific evidence indicating how dangerous diesel pollution is to young people. From your own estimates of 46 vehicle movements per day this translates to: 1,012 vehicle movements per month, 12,144 per year. These trucks only manage approximately 8 miles per gallon (less when fully loaded). That is equivalent to approximately 9 diesel cars per lorry.

Noise Pollution

Noise will begin with the preparation of the sight to establish a link to the road. Exposing the sand using a scraper and hydraulic excavator will follow. Next will be huge dump lorries removing the top soil. Excavation of the sand using more noisy industrial machinery will commence. Add the noise of the huge lorries entering and leaving the site, the noise will be substantial and continuous. Nearby farms and houses (many of them listed) and Wistson Estate will be affected by all this 'industrial' noise. It will be heard on the South Downs Way and in Steyning.

Impact on Local Businesses

I have already mentioned the affect the quarry would have on tourism in Steyning. The nearby nursery school on the Ashurst Road would struggle to attract children. Alderwood Ponds Coarse Fishery business would be destroyed by a quarry here, as pollution and the destruction of the local freshwater ecosystems is inevitable.

Dereliction of Site after Excavation

Steyning has the remains of a quarry, known locally as the Cement Works, to the south. It has been left derelict and a huge scar on the landscape for decades. Nearby Rock Common at Washington (to the north), which was also excavated for sand, has been abandoned. Although local people were promised a lake and park-like setting after the quarrying at Rock Common, this failed to materialise. I have little confidence that this sand quarry will be any different when the excavation is finished.

The Cumulative Impact

The cumulative impact on this beautiful rural and historic landscape must be mentioned: the pollution, impact on wildlife, destruction of fauna, added pressure on an already treacherous road, destruction of people's lives and businesses.

Private Commercial Gain

This application for a quarry on this site is about private commercial gain. It is about the quarrying/excavation company and the landowner making money. It will impact on thousands of people's lives and destroy a beautiful and ancient landscape. There will be no advantages for local people. I oppose it strongly and will continue to fight it.

(Map from crashmap.co.uk submitted with email response)

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 150 Respondent ID: 2100)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I dont have a problem with either. It is however a total contradiction to pretend that Ham Farm Steyning meets either the Vision or the Strategic Objectives, of the Joint Minerals Local Plan.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Withdraw Ham Farm Steyning from the Draft Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The reaction from the local community is a clear indication that you have wrongly used "Guiding Principle" no 2 above in relation to this site, very close to a large settlement.

You absolutely must withdraw the Ham Farm site from the Draft Plan.

Some of the best quality Dark Sky directly abutts the site. International Dark Sky Reserve. 2016.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 281 Respondent ID: 2299)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I object to the inclusion of this site for the following reasons :-

1. The number of vehicle movements generated is said to be 46 per day. However this only refers to removal of the extracted sand not the delivery of material to site for restoration of the land to arable use. The actual average daily movements are therefore likely to be double this figure over the 10 year extraction period to 92 per day.

2. Vehicular access to the site is via one of the most dangerous roads in West Sussex and the risk can only be exacerbated with increased heavy vehicular traffic.

3. When accidents occur resulting in road closure, Spithandle Lane is frequently used as an official diversionary route or unofficial "rat run". This is a 3 mile country lane, running parallel to the A283, much of which is single track and is in constant use by walkers, dog walkers, cyclists and horse riders. The increased damage and danger, created by such diversionary activity, is significant.

4. The noise and dust will have an impact on residential properties in the locality.

5. The site will be clearly visible from Chanctonbury Ring and the South Downs Way

6. As a keen amateur visual and photographic astronomer (I have my own observatory), there will undoubtedly be additional light pollution as a result of security lighting etc at a time when "dark Sky" status is being sought for parts of the SDNP

7. In summary, whilst I agree with the Vision and Strategic Objectives identified in the plan, I see little opportunity for them to be applied to this site.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

1.The removal of the Ham Farm site as a source of excavation material.

2. I still feel that the case for the need for 423,000 tonnes/annum of soft sand, which after all is what is driving the proposal to use Ham Farm, is largely unproven, being based solely on speculative residential construction

forecasts. These show housing construction to climb and continue at a level only seen to be exceeded once in the past 10 years.

3. Unfortunately I couldn't locate the relevant document on your website, but a very large proportion of soft sand being imported through Shoreham Port apparently goes to meeting East Sussex needs rather than West Sussex. Perhaps there is an opportunity here to obviate the need to dig up more of our lovely county.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B3.1 I probably do not know enough to comment yes or no regarding Section 6 "mineral specific policies"

B3.2 I can support the Section 8 "development management policies" in principle, but once again cannot see where they fit with the proposed development of a site such as Ham Farm. It seems that you are saying one thing and doing the opposite.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Those responsible for producing the plan should be commended for the considerable amount of work done in gathering and presenting the information it contains.

That said, it is not easy to glean relevant information when it is often split between several documents and as previously stated I do not feel that the need for the quantities of soft sand identified in the plan have been adequately proven.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 278 Respondent ID: 2542)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I think that the

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The Vision must comply with the obligations of the UK to meet the Paris climate change agreements so we should eliminate the emissions of gases that contribute to climate change. Methane is a much more potent cause of global warming that CO2. No fossil fuels take place - fossil fuels must remain underground.

Part 4 states that we should be "aspiring to source more and more minerals from alternatives to extraction of indigenous resources but we can easily source alternatives to fossil fuels. This document should prioritise solar and wind over fossil fuels.

Energy security cannot depend upon oil and gas extraction. Security will be achieved through using renewable sources of energy. solar and wind.

"In the public interest' appears several times in this document. This means taking into account our health and well-being. It must consider pollution risks to water and air by considering independent studies. WSCC should function as part of a democracy and listen to and act upon the opinions of the public.

The South Downs National Park, Sites of Special Scientific Interest and water Source Protection Areas should be afforded the same protection from pollution by acidification and from fracking at any depth.

Additional Comments

(separate email communication)

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 225 Respondent ID: 2768)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I think the vision is correct but the Objectives need some enhancement.

The emphasis on the protection of the South Downs National Park(SDNP) should also include areas of outstanding natural beauty and likely to impact on the SDNP.

The objectives should also be supportive of finding alternatives for minerals supply and alternatives to energy supply that are not driven by oil and gas development.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

By number comments to consider:

SO1. but not to be solely driven by the industry.

SO2. also emphasis on the importance of making better use of dredged minerals ie sand.

SO3 & SO4 To ensure that sand allied /aligned to the SDNP is also a declining amoun

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site is not appropriate for development.

1. The environment will be significantly affected by a quarrying of sand at this site. The site is close to SDNP and will have a major impact on views from the park and other nearby beauty spots.

2. The impact on traffic with the scheduled number of lorry visits to the site will be more significant than anticipated. Firstly the turning in of lorries will present a hazard and also queuing at the junction. The road is already busy and dangerous(a traffic survey is required over a 7 day period to understand the current level of useage) it is 60mph speed limit. Local residents have campaigned to get the speed reduced on current traffic with this increased amount it will create a major hazard. Theer are some 5 junctions and pedestrian crossings along this stretch of road. Without major changes to the road network of the Steyning area this development will create a major problem and risk to local residents.

3. The evidence of sand available is based upon that given by the developer there is alternative evidence that the amount of sand available is not at the levels suggested.

4. There is a significant risk in quarrying the sand that water levels to streams and ponds nearby will be affected. The quarrying activity will also pose a significant risk of pollution to the delicate balance of fresh water that currently exists and will impact upon the freshwater fish such a Brown Trout.

5. There will be an increased level of noise from this site to an otherwise tranquil area.

6. There is a likelihood of air quality being impacted by this quarrying both from the added pollution of the lorries and the dust that will be put into the air by the quarrying.

7. The cultural heritage of the area will be damaged by this quarry. There will be direct impact on Wiston House and also an impact on the tourism of Steyning a town that's heritage is of national importance.

8. The quarrying at Ham Farm will have immeasurable impact on the wildlife . This particular area has bats, newts, toads, deer and a wide variety of other wildlife. Many of the species are protected and the destruction of their habitat would be an environmental disaster.

9. The woodland of this area would also be impacted upon. The woods are ancient and provide a the habitat for the wildlife mentioned above. To create the quarry would destroy the woodland and the wildlife.

10. The developer could make a significant contribution to the need for sand and not impacting upon environment by making greater strides to exploit the dredged sand. This would ensure better use is made of the rail and sea networks for transport,it would exploit a resource that is available. It does need to be cleansed but if the plan encouraged this then a developer could be promoted or supported to exploit this resource. Currently developers are not encouraged to use this sand and find that sand from a hole in the ground is cheaper for them without considering the longer term impact on the community that is nearby.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

That the Ham Farm site is reconsidered.

That a completely independent review of the environmental impact of the site is undertaken including a comprehensive traffic survey and analysis of the likely increase in traffic.

Or if it stays in the plan that the following caveats are inserted.

1. The developer must discuss with the community the numbers of lorry movements and the timing of those movements.

2. That WSCC make significant improvements to the roads by decreasing speed limits, more traffic lights, roundabouts and other calming measures to ensure safety of residents.

3. That a compensation scheme is established, funded by the developer and land owner for those people directly affected by the quarry.

4. That a fund is created at the start of any excavation for the restitution of the site once quarrying is finished. That plans for restitution are consulted with and agreed by the community.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

The mineral specific policies do not make sufficient emphasis on the pressure that is being put on West Sussex for sand particularly by national pressure/directives that are being brought by the building industry. There is no counter to this ie that alternatives to mortar based building could be promoted, that alternatives to digging sand out of areas of outstanding beauty should be sought.

The impact of creating the "hole" of the quarry will create added pressure to fill it from aggregate from outside of West Sussex.

The hydrocarbon development does not make sufficient emphasis on the need/desire to create alternative supplies of energy.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

I will emphasise the points made before:

More exploitation of dredged sand.

A careful independent analysis of the impact on traffic of this proposal.

More analysis of the impact on the environment, wildlife and fresh water of the proposals.

That compensation is made available to those impacted by the development.

That the developer sets a fund for restitution at the commencement of the project.

Additional Comments

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* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 77 Respondent ID: 3544)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Very pleased to see that the objectives of the National Park are being upheld.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 146 Respondent ID: 3658)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

In principle I agree with the vision and strategy although think we should use other sources than those from within West Sussex if it means that the negative impact will be reduced. I struggle to see, indeed, how the vision and objectives can be achieved if the Ham site proposed goes ahead.

Further I think that there is too much emphases on the National Park and not sufficient concern for the implementation of right and proper principles, such as those afforded to the National Park, to other areas, and in particular those which, it seems to me, could have readily be included in the park if different decisions had been made at the time it was planned. The different treatment of residents outside of the park compared with those in the park is discriminatory.

I think that the beautiful town of Steyning will be impacted negatively by this proposal. There will be dust and noise. The view will be impacted and given that this was a reason for excluding another site (text unclear Hill?) I cant see why this shouldn't be condoned important.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The Ham site will impact negatively on the Steyning community, most particularly because of the increased risk that the considerable additional numbers of lorries on the road will bring. I live on the A283. I often travel into Steyning. I ride my bicycle in the area and it is very dangerous. People who drive for work purposes drive too quickly, and this includes lorry drivers. They are a huge danger already.

They will become even more of a danger and I would not like to live to be a part of a body that makes the decision which will ultimately lead to someones death.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Cumulative impact – we already have 2 quarries nearby.

Transport - the road is already dangerous.

Historic environment - the woodland is precious

Character- Steyning is special if you don't know it come here and try it. There is nothing like it – it will be negatively impacted.

Air and Soil- noise travels near here.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 107 Respondent ID: 3665)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Road far too busy: Since the air disaster the the Road has become the by pass for Arundel and Worthing.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Another Steyning ByPass all the way to Washington.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 106 Respondent ID: 3666)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Do Not Place It Near A Very Busy Road Right On Top Of Buildings. If The Extraction & Restoration Is As Good As You Say Why Can It Not Be In Th South Downs National Park?

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 109 Respondent ID: 3687)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 108 Respondent ID: 3688)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

THE AREA IS AT MAX TRAFFIC MOVEMENT NOW?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 213 Respondent ID: 3697)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I strongly oppose the plan to develop the Ham Farm site as in my view this contravenes the strategic objectives set out in the plan.

My home is adjacent to the Steyning by-pass (A283) and the volume of traffic and resulting noise and pollution has increased significantly since moving here in 1998. Whilst aware that this is a general increase and beyond the control of WSCC, the plan to develop Ham Farm is not. The higher level of pollution and noise generated by heavy vehicles regularly using the A283 is not acceptable and I submit will endanger the health and well-being of me and my family.

Article 8 of the Human Rights Act sets out my right to enjoy my home peacefully and places a responsibility on public authorities to take positive steps so that I can peacefully enjoy my home e.g. by reducing noise or protecting me from pollution. My understanding is that WSCC has a legal responsibility to make sure this happens.

I understand notification of consultation letters were distributed within a one kilometre radius of the actual site. We were therefore unaware of these plans until picking up an opposition leaflet. This in itself is indicative of the lack of understanding planners have with regard to the impact on all Steyning residents and particularly those living close to the A283. I would like to know what impact surveys have been undertaken by WSCC. Additionally, if this plan is accepted what measures WSCC will put in place to ensure I am protected from unacceptable and avoidable levels of noise and pollution.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like to see the plan to develop Ham Farm scrapped

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 282 Respondent ID: 3702)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I support elements of the Vision and the Strategic Objectives but not all.

Questions B1.1 and B1.2. should have included the option - In Part

The Vision:-

References to the South Downs National Park should include 'and adjacent areas'. It is not an urban park and consideration should be given to the area around it.

The value of mineral resources should be judged by a range of factors including the environment, social and community interests etc.

The historic use of locally sourced bricks, stone etc should not be used to justify continued use if there are more significant concerns of the community. Times change and resources are finite.

The Strategic Objectives:-

Market demand and supply are commercial economic factors. Resources should not be deemed appropriate to exploit just because they exist.

Safeguarding resources from sterilisation should be balanced against the interests and the will of the community.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

There are many references to maintaining, conserving and protecting, but nothing that refers to the benefit to the community that will be affected

The cost should not be born by the community while the benefit goes to commercial interests.

Perceived mar

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site is adjacent to the South Downs National Park, less than a mile from a well establish market town and surrounded by local businesses.

This site is relatively small when compared to the projected demand for sand in this plan.

The plan does not successfully argue that its strategic importance is significant enough to justify the impact on the community.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

It should be removed.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B3.1 Mineral Specific Policies

(My comments relate to Soft Sand)

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.

As referenced previously, this should not be restricted to the boundary line around the South Downs National Park. It should also take into consideration the adjacent land.

B3.2

I have not had enough time to review these policies but in principle they appear to be constructive.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The Plan has been put together by West Sussex County Council and the South Downs National Park Authority and runs to 143 pages not including associated references.

The consultation period for this Plan was meant to cover a 9 week period (to June 17), however most of the local community only became aware of it at the end of May.

This was not nearly enough time time for the community to review and digest the contents of the report and associated documents, let alone mobilise a collective response

It was clear from the West Sussex CLC Meeting (6th June) that there was significant local opposition to the proposal for Ham farm to be included in the Plan.

The plan has been put together by paid Council staff and consultants. Resources should be given to support the community to prepare a collective response to these proposals

The Plan should have a frame of reference that puts far more emphasis on the potential impact of mining on the local community.

The South Downs National Park should not be referenced in isolation. The same weight should be given to protecting the areas adjacent to the park. (Nature does not respect a map boundary).

Any cost/benefit assessment must take into account the impact on the community. If mining proceeds, only the mining operators and associated interests benefit directly. There is no evidence of a benefit to the local population, and limited evidence that it will have a significant benefit to the county or the nation given the relative demand projections.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 127 Respondent ID: 3704)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Whilst I support overall vision & strategic objectives this is not applicable to soft sand as 99% of local bands fall within National Park.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

SO3. There have to be other sites within National Park which would less impact on local communities.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Too close to Steyning – schools etc. Too close to houses,- inc listed properties. A283 very dangerous road! WSCC policy of not trimming verges + trees does not help. Endangers surface + ground water sources particularly to Alder Wood fish ponds + wildlife. Questionable source of sand - see Borehole analysis.

(1948 Borehole analysis scan included with hard copy response)

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Look within National Park for site that would have less impact on local community!

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 126 Respondent ID: 3705)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site would have a huge impact on Steyning and the surrounding area. The A283 is already a very busy road and this would bring much more heavy traffic onto it. The site is too near to houses and would be a scar seen from Chanctonbury Ring and the South Downs National Park.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

This form is not user-friendly why does it have to be so complicated?

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

This form is not user-friendly

Why does it have to be so complicated?

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 120 Respondent ID: 3706)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

POINT 1.

Re policy M11.

Ham Farm is not in principle, acceptable as a site for sand extraction. Ham Farm is part of Wappingthorn Farm and is subject to covenants made from Wappingthorn Manor to surrounding properties when it was spit up in the 1960s. The covenants are in force. The land owner Frans de Boer appears not to have passed this crucial information onto the WSCC planners and they have said they did not make checks for covenants; rather relying on the land owner's statements. There are covenants which apply to all the properties subject to the Wappingthorn estate sale, Wappingthorn Farm, Downsview Cottage etc. etc. the one most applicable is:

Not to use land hereby assured or any part thereof for any offensive noisy or offensive trade business pursuit or occupation or for any purpose which shall or maybe grow to be in any away a nuisance damage grievance or annoyance to the Grantor his successors in title or their tenants or which may tend to depreciate or lessen the value of Wappingthorn or any part thereof as a residential property

This applies from Wappingthorn Manor to Ham Farm.

Other sites were rejected for the reason of relevant covenants quite early on in the process. Ham Farm should never have reached this stage without appropriate checks by the planners. Trusting the word of potential operators of a quarry seems naïve. The costs to the community in pursuing this undeliverable plan and the detrimental effects on the people living nearby let alone the financial issues resulting from this ill-conceived plan seems to be a lack of due diligence.

POINT 2.

M11 Ham Farm is sterile due to already being tied into HDC planning DC/13/1958 DC/15/1937

Ham farm is part of Wappingthorn farm and is owned by Frans de Boer. He also owns the anerobic digester. They are linked into the plans approved by HDC for the digester. Any change to this planned use would collapse the basis for the digester project DC/13/1958 into doubt.

The main issue with the Wappingthorn digester was convincing HDC that the dangerous entrance to the farm on the B2135 on a blind bend with tracks to Huddlestone farm and Wappingthorn could be mitigated. This was done by the applicant submitting spread sheets which seemed to reduce traffic on the road by virtue of the previous trade of exporting of kibbled corn to one of internal farm movements of maize feeding the digester. Previous plans by Frans de Boer for caravans etc have always been turned down on the grounds of this dangerous farm entrance. Taking out Ham Farm fields from the digester plans would result in substitute maize having to be imported through the Wappingthorn farm entrance (B2135) instead of being internal. Removal of digestate (waste produced from the anerobic processes) would also have to be spread elsewhere outside of the Wappingthorn network of internal lanes.

Ham Farm fields are tied up as follows from the HDC DC/13/1958 planning agreement of 15th Oct 2013 from farm renewables planning & access statement:

All 8760 tonnes of maize silage (calculated as the requirement for 500 KW digester) will be grown on land farmed by D de Boer and partners. Of this 4500 tonnes will be grown on land accessible from the farm tack network of Wappingthorn farm.

This includes the maize from Ham Farm.

POINT 3.

Environmental impact.

The site is very visible being so close to Steyning town and the Southdowns National Park SDNP. Because of the site's proximity to the A283 there would be a need to cut down most of the mature trees to the south of the site to enable HGVs to see along the road at the entrance. This would make the site more visible from the road (the purpose of tree cutting) and the SDNP. A shielding bank and screen planting would not take place for years, if at all, leaving the site visible from the A283 and SDNP. Neither the land owner or the prospective developer have a history of being able to execute tidiness in their work viz. previous sand quarries and farm developments which have been left in abysmal states of repair. Visit Wappingthorn from the residents' point of view for proof. Agreed screening for the digester has still to be executed.

Other proposed sites, even within the SDNP, are further away from communities and would be less visible.

There has been too much emphasis on the A283 being a designated lorry route.

POINT 4.

Traffic. The A283 has been ticked as a good point for the Ham farm site as being a designated lorry route.

The Ham farm field quarry site would add considerably to the already dangerous A283. The traffic on this road has increased lately. It is probably since the Shoreham air show plane crash when the A27 was closed for so long, drivers have 'learnt' to use the A283, through Buncton as an alternative route to the A24. As a regular user of the B2135 A283 "T" junction, I know that in the mornings it is safer to turn west on the A283 by first turning east and then turn on the Bramber roundabout to travel west. The point being the A283 has become dangerous to the extent that it should be reconsidered as a lorry route at all on the grounds of safety. Changing the road signage from a 'so many accidents in the next 6 miles' to one of a 'safety route' fools no one. Statements about lorry movements are unbelievable. It has been stated by WSCC planners that lorry movements have been based on the same lorry delivering waste landfill as taking out sand! Haulage business just is not that efficient. It would be different Lorries and maybe hauliers. This would double, at least increase, proposed lorry movement predictions. It is obvious to all locals that Lorries turning west out of Ham farm is a fatal accident waiting to happen. No doubt before or after this happens mitigation will say that all Lorries will have to turn out of Ham farm site due east and turn at the Bramber roundabout as required. This would double up on some lorry movements and further increase danger on the A283.

In this case the A283 being a lorry route is a point against the Ham farm site.

Please remeasure traffic movements on the A283 to realise what the locals say is true and do not try to mitigate this most dangerous plan.

I am led to believe (not enough time given to prove it yet) that traffic serveys were executed before the Shoreham air show accident and A27 closures.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Ham Farm site to be removed from the short list of soft sand sites. Planners should investigate possible sites a lot more thoroughly than this one and come up with a shortlist greater one!

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

M2 | Cross reference to M11 a list of one when this is illegal under covenance and is not a short list at all. Creates undue pressure on one site, devious plan!

M24 | "Make provision for high quality & practicable restoration management & aftercare."

This should include known histories of land owners & operators. If track record is bad as is the case here adequate funds must be obtained before work starts to ensure completion of work/site can/will occur. Viz past projects Wappingthorn Farm owner & Dudman sand quarries viz. Cement works in SDNP still a complete eyesore. Endeavours should be backed up with practical measures before site is agreed on.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Not enough time given for affected people to research and obtain information to use in comments. My request for traffic data could not be completed under freedom of information until June 16th one day before closing date.

This consultation response form requires a copy of the plan. I ordered 5 copies which were to be posted next day. One week later none were here. On investigation I was told I could only have one copy & a 10 day response expectation was in place! This is not a good enough service for such an important plan.

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 224 Respondent ID: 3708)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The views set out in this response flow from the information gleaned at the Chanctonbury CLC Meeting at Steyning on 6 June 2016. There was strong local opposition to the proposed site allocation at Hamm Farm on a wide range of grounds: it is hard to relate the serious problems raised during the meeting about the proposal to the tone and content of both the Vision and the Strategic Objectives. For example, it is apparent that the quarrying of minerals goes hand in hand with landfill activities and the depositing of inert material to fill up the quarry, yet the Vision and SO are silent about this very important aspect. Mineral production is not a stand alone activity and the Local Plan should reflect this - especially where minerals and waste raise out of county activities.

The Vision and SO are far too unspecific to be useful.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

See above.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

My concerns are as follows:

1. It appears that the Council has not undertaken any independent investigation of its own to verify that soft sand is to be found on the site (-the only investigation has been carried out by the landowner and operator). Surely this is a necessary first step.

2. It is not clear that a quarry here is actually needed.(FAQs refer to an "estimated need")

3. If the soft sand is to be used for development for the area around Gatwick, then why not look for closer sites in Surrey?

4.Many issues arose during the meeting:

- the direct effect on some residents' houses: huge financial loss and loss of amenity

- worries about the effect of so much additional heavy traffic (and the Council's failure to present the facts in a transparent manner - e.g. movements per hour figures) on an already dangerous road (commuter & school traffic; Wiston Park event traffic, numbers of cyclists etc). Plus more farm traffic on the B2135. We do not have clear and complete information about the transport of inert materials.

- as yet - no hydrological survey

- issues to do with the environment, the SDNP, tourism, tree clearance, leisure activities such as fishing, the loss of agricultural land etc

The Development Principles do not address these issues and are not fit for purpose. The Council should withdraw them.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The plan should be withdrawn - redrafted at the very least.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I don't have the information to hand at the moment

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Ditto

Additional Comments

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* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 118 Respondent ID: 3709)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I can understand the need and requirement for sand for building material but disagree on the Ham Farm site suggested.

More research should be made into marine sources.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

My objection to the use of Ham Farm site is:-

I have attended a number of meetings to hear the information on both sides but it has re-inforced my concerns over this requirement to scar this area of our landscape which has such a close locality to Steyning.

The site is highly visible from the National Park being directly adjacent to the border. This goes against the policy of the 'special qualities of the South Downs National Park' - being very evident from the historical and famous Chanctonbury ring. We already have the scar of the Chalk pit quarry and at the cement works and the deep orange googed out area at Washington. - The re-landscaping of this area seems to have No date for completion - so why would it be possible to believe that the Ham Farm site would be any different?

Trees would be need to be falled to provide access for lorries that I feel strongly opposed to as they improve and enhance the beauty of the area.

Apart from the direct environmental impact - destruction of habitat of natural rare species - bats, butterflies - Duke of Burgundy etc. there is also the economic impact to consider.

The impact to local businesses and property blight for all who live adjacent to the site doesn't seem to be addressed in any way. The time line for this quarry could impact on individuals whole lives.

The 'vision' mentions "will be a place where the production + transportation of minerals does not destract from its thriving communities and being a special place to live and visit."

- Aldwick Pond business - this is a wonderful resource for our community and many disabled groups from a wide area travel here including many children in the area. The whole livelihood of this would be at risk as the ponds are filled from natural springs from the quarry site.

The number one concern has to be with increase of traffic on the A283.

The particular section of the road between the Washington roundabout and Steyning has become much busier over recent years. Dudman & Penfold Verral lorries are already travelling these routes yet if the council plan to agree this mineral extraction they are welcoming more lorries travelling along this busy windy road for 11 hours a day 6 days a week.

Although in the statement it says there would be 46 heavy good vehicles travelling to & fro this would be impossible to legislate. At a later date when inert waste was being brought in this would have to be supplied from out of county - we do not it seems produce enough building waste from our region - yet more lorries - how is this policed - how do we really know what is being placed within the quarry - this is only decided by the Contractor!!

My main worry is that Steyning Grammer School has a large catchment area with children either being (text unclear)by bus or car to + from school using the A283

- are the council prepared to take responsibilty should an accident happen with the increase of traffic.

The little nursery on the road to Ashurst has a breakfast + tea club for working parents. Their business will be drastically affected by the increase of lorries causing congestion to the area. There is also a possibility of dust etc from the site

- if the quarry commences who assess's this?

Saturday morning the A283 is often busy with cycle races - along this route - bringing cyclists to Steyning and improves business for local high street food establishments.

Visitors come to Steyning for its beauty and historical charms.

-if the roads are congested will people bother to make the journey - this will affect business directly within the market town.

Certain times of the year the Wiston estate host large events.

The church day out, the steam fayre, wedding fayres - these weekends all produce large volumes of traffic - but this is only for a weekend - can the local community really wish to increase a large amount of congestion all the time.

Washington roundabout is already a highly congested area and has issues particularly at rush hours but the increase of Quarry traffic will pressure this further.

Our A283 is already busy - the contracter plans to work from early in the morning until late at night so there would be no peace in this area. Perhaps thought of noise pollution should also be addressed.

Surely the councils duty is to conserve the countryside not be driven by individuals greed.

So is the councils intention to quarry at 'ANY' cost.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 81 Respondent ID: 3715)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The development in Steyning for sand extraction will not enhance the landscape and townscape as suggested in 2.3.7. It abuts the National Park at Hammes farm - where the national park boundary runs along A283. Proposals for shielding with trees and berms will not avoid the blight on the landscape that will be seen from the Downs from miles around.

It is not consistent with point 2.3.8 aiming to preserve remote and tranquil areas.

2.2 is intended to enhance the historic and natural environment - and Steyning is recognised as a historic town with a high percentage of historic buildings and this will be jeopardised by the development. Nor will the development contribut dot low carbon as there is only road access - no water or rail transport possible (since Beeching).

2.3.12 aims to reduce road transport. This proposal will only increase road transport by large vehicles on an already congested single carriageway local road. This will be exacerbated by additional traffic generated by the workforce - as public transport is already poor and there is a commitment in the proposal to develop new parking.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Expansion of existing facilities and sites along the sand bar and where there are better infrastructure links already eg on A24

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

As outlined

- abuts national park and will be a very visible scar on the landscape

- Inadequate transport links - already a busy single carriageway road and the development will increase Larry and car transposed, impact air quality, create risk but lorises joining/leaving busy road (at the cement works at dare gardens there is risk as Lorraine's ignore traffic signs and turn illegally and this will be replicated at this site).

- impact on historic houses and landscape and detrimentally change the nature of the environment

- proposal for reclaim with landfill with perpetuate this and also by the acknowledgement in the document likely to create lakes etc as reclaim will be below existing level. This would create an alien landscape out of

keeping with the area, does not fit with the alleged principle of restoration to original and will lose gricultural land.

- Steyning is acknowledged as a historic town with historic buildings. It will suffer due to noise, air and traffic pollution

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Consideration of new sites where better transpotrt links and away from the national park. If this is allowed on ten border of the national park then why ever did we create a national park if we scar ten immediate environment around it? expand existing facilities - such as clay extraction in west Hoathley.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Supporting the vision and principle does not mean acceptance of detail - if poorly thought through

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 330 Respondent ID: 3719)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

We have spent some time attending meetings and reading documents related to the proposed site at Ham Farm. We found The Joint Minerals Local Plan - consultation response form quite difficult to respond to as many of the questions and issues covered related to the 143 page on line document: a document that was beyond our understanding. Nevertheless, we'd like our views considered.

We understand the main issue to be the acquisition of 'soft sand' which can only be obtained from a limited number of sites in the South East. The evidence, as far as we know from your reports, is accurate.

The A283 is a big issue here. The road is already a nightmare to travel at peak times and is also considered fairly dangerous. Traffic jams either side of the Washington roundabout are frequent/daily and already impact on commuters, schools, visitors and businesses.

Steyning is a unique and treasured historic 'jewel' set in the South Downs, a destination for tourists both here and overseas. The impact will be felt for many

years, until 2033 apparently; in some of the most beautiful and protected countryside in England.

The report states that 'where possible' environment, traffic, business and residential areas will be protected/considered etc. From the last meeting at the Steyning Centre it came up that the site will be visible from much of the South Downs National Park and impact greatly on the surrounding properties. It seems likely that tourism and businesses in particular cannot help but be adversely affected by both the A283 overload and the planned site activity. Although the predicted site traffic appears conservative it will no doubt be the tip of the iceberg as the need for maintenance, and extra works traffic rises. This seems to be the case for most such proposed sites.

Thank you for your time.

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 88 Respondent ID: 3721)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I think they are fine ideals and strategies, my concern is how they will pan out in reality.

I don't think any form of excavation - whether for minerals, gas or oil - is acceptable within the SDNP or what is the point of having safeguarded it? There is danger in the value of an area being related only to it's economic value. Many - including walkers, cyclists, hikers, horse riders (and this is not an exhaustive list) and residents - would argue that the value in the SDNP is that it remains managed but undeveloped to provide an area of countryside to be enjoyed and that that is it's true value.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

It should be undertaken that there is no drilling, digging, excavations, building for any commercial reasons within the SDNP unless there are the most compelling of arguments. Surely there are some aspects of our lives and country which aren't for sale t

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

My concerns relate to impact on traffic (when the application by Wappingthorn Farm for an anerobic digestion plant is taken into consideration as it is within 2 miles of this proposed development).

I commute along the A283 every day and have done so for the last 9 years. The road becomes narrow and twists from the Wiston Pond area up to the Washington Roundabout (known as the Pike) - the proposed route of the alleged 4 lorries an hour. From Spring to Autumn, less so during the Winter, this route is regularly brought practically to a standstill when lorries and buses are unable to pass cyclists. I was reminded of this on Wednesday 25th as I drove back to Steyning along the Pike (after I'd visited the Exhibition at the Steyning Centre, coincidentally) as I sat in a very slow moving traffic queue during peak traffic as the lorry at the head of the queue was unable to pass a cyclist (I don't know how far our tailback went). On the other side of the road, travelling towards Washington Roundabout I passed a similar traffic queue- a lorry caught behind a cyclist- and I can tell you that tailback went from the Water Lane turn off to Wiston Pond as I checked. Whilst slow moving traffic (we were 20 miles an hour and they must have been slower as the cyclist was going uphill) isn't a bad thing in itself but could contribute to reckless decisions by frustrated drivers. I draw your intention to the second bullet point of the vision and SO11 of the Strategic objectives. Potentially the impact on traffic would detract on the lives of everybody who uses that road regularly and its siting hardly allows for the minimising of the use of local roads as sand would be transported entirely on local roads.

nature, conservation and geodiversity - digging a large quarry close to the ancient, semi-natural woodland is not destined to "conserve and enhance the landscape" (SO8).

visual impact - unlike the sites of the other sand quarries at the Washington Roundabout and the Hollow, this quarry will be immediately visible not just from the Downs and the South Downs Way but from the road. This is difficult to match up with the first bullet point of the Vision which talks of minerals being produced in a way which enhances the beautiful outdoors of West Sussex (I draw to your attention the huge and ugly scar formed by the quarrying for chalk and the accompanying and now decaying buildings at the Cement works in Beeding as a precedent here). Neither does it square with SO8 as it's difficult to see how this will enhance the landscape. It may look wonderful in 2033 but that will be scant comfort to those of us who have to live through it now.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

This is not a good site for the proposed quarry.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

No comments at this time.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

No specific comments at this time.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 259 Respondent ID: 3725)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The strategic objectives set out in this plan, in particular (S03, S04, S07, S08, S09, S010, S011, S013) have not been considered correctly and will cause unacceptable impact on landscape, residents, wildlife, businesses, the health and wellbeing of residents. My reasons are explained later in this form.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like to see the Ham Farm Site removed completely from the Joint Mineral Local Plan

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The following information outlines my objection according to the Development Management Policies: The inclusion of Ham Farm site in this plan does not conserve the beautiful surroundings, quite the contrary as it is highly visible from the South Downs, surrounding countryside and the A283 (Policy M12). In view of the huge delay in restoring the other sites at Washington and Storrington and a lack of inert landfill to fill the site, according the West Sussex Minerals and Waste Development Framework (May 2011), restoration within an acceptable timescale will not be possible . The cumulative effect of restoration will further impact on traffic (Policy M24, M22). Pollution from dust, noise, landfill, traffic fumes and noise will cause unacceptable harm to the adjacent residents and residents in close proximity. As a nearby resident, my son who has severe asthma will be put at unacceptable risk of further asthma attacks (policy M18). The traffic assessment plan demonstrates inconsistent information i.e an increase of lorry movement to 46 2 way movements, as well as an incorrect speed limit (Policy M20).

The Ham Farm site, which is is part of the Wappingthorn Farm site has already been allocated for the production of maize for the anaerobic digester. The regulations upon which the digester was approved (Application no. DC/13/1958) , required that no offsite maize was imported as the land, including Ham Farm land, would be sufficient to supply the digester. The digestate, a by-product of the digester needs to be spread across the land. If this site is removed the landowner will have to import maize or worse still import chicken manure or food waste, causing unacceptable odour for Wappingthorn residents. This would create a dangerous situation as traffic would have to access the site from the B2135 on a dangerous and blind bend (Policy M16, M20)

Quarrying at this site would also contravene the purposes of National Park designation, in particular the landscape and scenic beauty of the park, contrary to the paragraph 115 of the planning framework.

This site is immediately adjacent to a group of residents who run businesses from their properties, which include art classes, yoga classes and a jewellery business; all would suffer from pollution, noise, traffic, and

light pollution which would cause these businesses great harm. There is a nursery school just around the corner who have expressed their concerns publicly. Reina Alston, from the Tourism and Trade community Partnership has publicly expressed that this would have a detriment to the economy of Steyning, contrary to the WSCC assessment (Policy M18).

The traffic on the A283 is increasingly congested. We regularly use this road and have noticed that even at 7.30am the road is busy. Having dropped my son off at school I often have to wait 5 minutes or more to be able to turn off the Horsham Rd at the Steyning junction onto the A283. We regularly observe accidents on this road and it is not unusual for this road to be closed by police due to accidents. Lorries driving at 60mph where cyclists. school buses, local residents taking their children to and from school is an unacceptable hazard to Steyning community (Policy M20).

Finally WSCC have failed to consider the bats, toads and other wildlife that will inevitably harmed or displaced by this site (Policy M17).

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see the Ham Farm site deleted from this plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Sand should be dredged from Shoreham harbour, which would create economic benefits for the Shoreham community, avoiding the negative impact on Steyning over several years. Certainly if Washington and Storrington sites are anything to go by, Steyning can expect unacceptable restoration and aftercare well beyond the acceptable timeframe.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

REINA ALSTON REFERENCE

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02 - Ham Farm: Resident/Member of the Public (Response ID: 105 Respondent ID: 3731)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

ASPECTS OF THE VISION + SO's SOUND VERY ACCEPTABLE – BUT MY CHIEF CONCERNS ARE ABOUT THE DELIVERY + EXECUTION OF THE PLAN.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I USED TO LIVE ON B2116, IN ALBOURNE; VIRIDOR WAS GRANTED A LICENSE TO MAKE A PRESCRIBED NO. OF MOVEMENTS TO A SITE ON B2116. IT WAS A NIGHTMARE! VIRIDOR EXCEEDED THE NO. OF MOVEMENTS – APPARENTLY WITHOUT ANY SANCTIONS. ASK ANYONE!

THESE LORRIES ARE HUGE, NOISY + GO VERY FAST! THE DRIVING OF HGV's IS APPALLING. VIRIDOR TRUCKS ARE A MENACING PRESENCE. HOW WILL YOU (MONITOR + CONTROL DELIVERIES?)

I USED TO LIVE + CYCLE ON B2116 – AND NOW HAVE TO USE A283. THERE ARE NO SAFE EAST / WEST ROUTES. THE A283 IS ALREADY A DANGEROUS ROUD: VERY FAST IN PLACES; VERY NARROW IN PLACES. AS PART OF YOUR PROPSAL, WHAT TRAFFIC MANAGEMENT MEASURES ARE YOU CONTEMPLATING?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

SEE EARLIER COMMENTS

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

RE-CONSIDER WHETHER THE A283 IS SUITABLE FOR 80 TRUCK MOVEMENTS PER DIEM (2) DEMONSTRATE HOW YOU WILL CONTROL TRAFFIC (3)THE LANDOWNER + CARRIERS CAN PAY FOR ANY SUITABLE MEASURES.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

HOW ON EARTH CAN I DIGEST THE PROPOSALS, THE PLAN ETC. IN A SHORT AMOUNT OF TIME?

Additional Comments

IT IS OBVIOUS THAT THIS FORM IS SO COMPLEX. (+YOUR STAFF FAILED TO PUT THEM ON DISPLAY) THAT THE COUNCIL IS NOT CONDUCTING A CONSULTATION, BUT CARRYING OUT AN EXERCISE TO LOOK LIKE A CONSULTATION! WHY WAS THIS MEETING NOT PROPERLY ADVERTISED? IN THE LOCAL MAGAZINES?

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 111 Respondent ID: 3732)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

1) The objectives would contravene the vision, by spoiling the AONB and the National Park, in particular Wiston pond directly opposite. (2) Lorrie movements will be too close to turning for steyning town centre and cause severe congestion to heavy traffic e.g. school coaches. (3) will seriously interfere with the wild life e.g the toads and Wiston deer.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I am objecting to any extraction or development on the proposed site of Ham Farm, Steyning. The proposal will seriously undermine the safety of residents, visitors and wild life. (Q's B1.1, B1.2, B1.3)

The beauty and peacefulness of the Area will be spoiled. The site will become a blot on the landscape.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

please see all above

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Removal of site from the plan

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The site is either in, or encroaching the National Park and is unacceptable so close to the historic town of Steyning. It will adversly affect tourism and walkers.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Removal of Ham farm, Steyning site from the Joint Minerals Local Plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

See all of my previous comments.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

No mineral extractions on the Ham Farm, Steyning site.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 110 Respondent ID: 3733)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Sand is required to build home's if only objection is traffic same employment / home's/ will have no effect on Steyning.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

You have to look water flows if into Wiston Pond and outer when heavy rain fall fooding to both Fish Farm and streams running close by.

Traffic will not make difrance Steyning/ only affect washington / wiston but be employment ((40 person))

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Be employment 4 40-50 persons if Dudman envolved how can a bancrupt (text unclear) be involved

If water table ok be good as turned down going under RD Pleasants Hill and Washington

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Little constraints polustion Fish Farm / Wiston Pond if this ok good go ahead.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Start soon as possible

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

None if following covered

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Duddman ran cemment works 28 year's as an eye sore.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Need home's young socal houseing no sand no house's rich or poor

Additional Comments

Lived area 64 year Wiston / Ashington seen road (text unclear) conservative government was to be sand Pleasants Hill could not afford to dig.

As railway removed by (text unclear) labour by-pass Steyning built on part line running Horsham D.C dumped rubbish on line, built b-pass now. Church day out traffic use's Wiston/Washington WHY big fuss Steyning people ??? Will only affect RD 283 Wiston/Washington And pollusion if no pumps to keep water level down heavy rain fall.

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 113 Respondent ID: 3734)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

only if Dudman he bankrupt so how can he run opration look cement works / chalk pit washingto

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Steyning not affected in this wiston/washington are if traffic road to be improved if re layed, signs (text unclear) lights, Wiston cross road's most important road to be swept on regular bacis owing accdents when Tip at the Hollows in washington not swepted owing mud, leave's ect and road chanton bury ring ie Wiston Estate road used vistor chanton bury ring walkers, bycles, caravan, tourst site most important light there

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Oweing water table and streams run Wiston Pond, fishing farm Partridge Green Ashurst Rd if heavy rainfall run back flooding can be a problem as land has been flooded possible pumps required or trout fish could be poluted Wiston Pond and flooding near field's and woodland as not cleared

Site will not affect Steyning at all as vehilce will use bypass. No rish be covered by (text unclear) by traffic so what the complaint from (text unclear)

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

This should be looked into Duddmand Owns cement works Uppoer Beeding should been recycling centre East/West Sussex been empty 40 year's an eye soar of county plus he bankrupted how can he be owner

Be employment possible 25 persons ie 5 on site plus drivers vehicle's so none. Just start as soon as you can A.S.P.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

then can use sand pit washington for re fill if hard core dirt, and use recycleables.

As only benefits washington new village hall cost raided by contracter who BIFFA VIRIDOR, (text unclear) court what for village wiston none just council now no tips extra transport costs and just flooding the room's 3 times in week as well moved place of rats when flooded have and smell as wind change. Long as this not case with your sand dig possible gravel thing a ok.

As if not lived here tell me where were tip's all now put back land gas use metane used (text unclear) corner Storrington Water Lane factory / home's built on land fill, other bottom Water Lane home's built on, sand pit hall AB's home's built flooded as lake home built flood plane this is why …*(redaction)..* wanted to go under 283 no given and pit to be filled clay, recycling, non rubbish.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

(Chapter 7: Site allocations annotated) You can change this as you pleased if past have

First off put light at wiston cross r's, cut grass as danger can't see points along rd replace dammaged signs repair (text unclear) relay road service (text unclear) / ashurst turning to Washington round a-bout put light where lorry's going to access entrance. Where washed before cornering on to road way where wash plus sweeping daily. To Ashurst turning/ Wiston cricket field danger IE mud on road as important to area.

(additional text unclear)

Additional Comments

Anything we say wont make a (text unclear) worth good as on other thing's it's money that count's. Shoreham cement works an eye sore for 28 years still owned by dudmans one side a dumping ground for carvans, (text unclear) vehicles, why, w.s.c.c. responsable on hill over looking Steyning / Beeding a lovely pig farm, some smell but county just lovely so why our area. Townie's (text unclear) Steyning complaining go back to towns where they came from London | Guilford | Crawley mostly 4000 to 5000 cost house where young going finance social home's, cheep, where's sand to build they took up (text unclear) Lime Shoreham - Horsham would saved built by pass million's (text unclear).

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 115 Respondent ID: 3740)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

*Vision para 4 insert "or immediately adjacent to the SDNP or AONB after "areas outside"

Strategic Objectives insert "or areas immediately adjacent" after "outside"

This has always been the practice of NP's

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Spoiling of views from South Downs Pollution - prevailing wind to nearby Steyning

Inert landfill waste - again prevailing wind to Steyning

Heavy lorry movements on single carriageway, A283 noted as a dangerous road.

Onspoilt countryside - Ham Farm was within the first National Park proposed area - although not finally included, it is still fine countryside.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Ham Farm deleted per 2.3

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 116 Respondent ID: 3741)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The A283 is already a 'cut-through' from A27 and is extremely busy.

The site is very near a road junction to both Ashurst and Steyning. It is also very near to Steyning in terms of noise and pollution. It is also bordering the National Park and would be a blot on the landscape.

Steyning neighbour plan has suggested housing on the edge of town which would be even nearer the site.

Like many I feel cheated that this plan is 2 years in the making before we have heard anything.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Consider not going ahead

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 117 Respondent ID: 3742)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The use of the A283 is unwise as it is narrow and winding and used by man cyclists and speeding motor bikes.

There was no information available on air pollution from the site. I assume there would continous dust pollution.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 119 Respondent ID: 3744)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Mining of minerals degrades local amenities and impacts the views from the South Downs National Park. Causes an increase in HGV lorry movements upon congested roads. Distroys arable and agricultural land for generations

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Consider use of minerals from the sea bed. Consider alternative building materials and technologies.

Remove Ham Farm from the plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

1) Ham Farm is now owned and is part of Wappingthorn Farm. Both Ham Farm and Wappingthorn Farm are bound by a covenant prohibiting development or use that may cause nuisance.

2) Ham Farm site "sterile" by its agreed use for the Anoerobic Gigester (Horsham District Council plan - DC/13/1958 and DC/15/1937)

3) Ham Farm is within 1 mile proximity to Steyning Town, schools nurseries whose health & wellbeing will be impacted.

4) The site is of historic, hydrological note and the risk of contaminating aquifers and fishery lakes is high.

5) High visual impact from South Downs National Park and Chanctonbury Ring.

6) Increase of HGV lorry movements along congested A283

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Note the covenant applied to Ham Farm.

Note the sterilization of the site by vertue of the aneorobic digester (see B2.3)

Note the loss of amenity, health and wellbeing to Steyning township and to the South Downs National Park.

Note the additional traffic, especially HGV lorry movements along the A283.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Re. B3/2

Geological surveys are not performed by Local Authorities, but take landowners word. The operations and the effect on community and business amenity and health and wellbeing are not monitered adiquately.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

DRAFT WEST SUSSEX JOINT MINERALS LOCAL PLAN: APRIL 2016

With reference to the abovementioned plan, Chapter 7. Strategic Minerals Site Allocations 7.2.4(x) states "if the traffic from the site could have a negative impact on the Air Quality Management Area in Storrington High Street, then an Air Quality Assessment is required."

With this in mind, members wish to request that specific measures be put in place to ensure traffic is routed down the A24, to avoid site traffic travelling through the AQMA and the centre of the village of Storrington.

It would be very much appreciated if you could inform the Parish Council of the outcome of this consultation in due course.

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02 - Ham Farm: Resident/Member of the Public (Response ID: 128 Respondent ID: 3745)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The Strategic Objectives (and indeed the “Vision”) are neither all agreed, nor all rejected. The simple “yes / no” option for 14 distinct and highly varying SO’s, is far too simplistic. "No" was more appropriate therefore, than "don't know"

With the (misleadingly named) "Ham Farm” site, Strategic Objectives are NOT met, in numerous areas, most specifically in respect of S07 to S011 inclusive.

The proposal of this site is clearly and in many ways, in direct conflict with these Objectives and the essence and spirit indicated as sought.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Deselect the Ham Farm site from the draft plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

- The MWDP does not properly follow NPPF requirements

- Significant questions exist as to due process and whether these have been followed correctly by the County Council planners. It is believed not.

- Various assessments are weak, incomplete, inaccurate or have not been carried out at all.

- There are existing clear restrictive Covenants in place, in respect of the land forming the site, which will be enforced by the owners of at least 2 directly affected Grade II Listed properties. These covenants will not allow any quarrying on the site.

- Both the amenity and financial values of these two Listed Grade II properties, other nearby Listed buildings, and numerous other nearby or adjacent properties, will be destroyed. Even the threat of a quarry has caused the termination of one sale completely and caused another to be taken off the market.

All nearby properties are now rendered un-saleable.

- Grade 1 Listed Wiston House is less than 1,000 m away and will look down on the site from it’s location. Wiston’s Parkland is just across the A283 from the proposed site.

- The area (and this includes the Ham Farm site) is mentioned in several places in the Domesday Book, and has strong historic aspects that need further investigation. Any quarrying would obviously destroy all historical value at a stroke.

- Various businesses exist nearby, some very many years established. All will be heavily negatively affected, and some may well be forced to cease to exist, particularly where relocation is not an option (eg the DEFRA registered fishing ponds, uniquely accessible by disabled).

- Entire screens of roadside trees will be removed over a considerable distance, to improve visibility on the extremely dangerous A283 road - but to the major detriment of the landscape amenity. Further, various adjacent or nearby trees are remnants from ancient woodlands and would not survive quarrying operations.

- The local landscape would obviously be destroyed by permitting a quarry and landfill at this site. It is one of the very few relatively unspoiled locations in the area, is close to an AONB (Area of Outstanding Natural Beauty), is adjacent to and highly visible from, the new South Downs National Park (SDNP), and particularly from the South Downs Way and Chanctonbury Ring - both extremely important tourist attractions - and currently an area of peaceful “escape" for the local population.

- Damage to extensive existing local wildlife, flora and fauna will obviously occur. This includes bats, toads, frogs, newts, fish, and the full range of British rural wildlife from hedgehogs, to grass snakes, to deer.

- Tourism in Steyning and district, as well as in the SDNP is extremely important to the local economy - and will be seriously damaged.

- The dust from quarrying activities (including significant danger to neighbours' health), noise from heavy quarry machinery and lorries (particularly including incessant reversing "bleeping” which is damaging to nervous and mental health), the polluting fumes from both quarry machinery and lorries, the smell of the activities and exhaust fumes, the light pollution from powerful illumination at the quarry in low light or darkness, etc - will all have the obvious major detrimental affect on all local residents, large volumes of passers by, the 2,000 plus pupil school, and the whole population of the village of Steyning.

- Health implications from dust (including silica dust) and pollution including of water, and additional vehicle pollution, are all obvious, particularly considering the 2,000 nearby children at the large school and on the close by open playing fields. The incessant noise, smell and flood lighting, will also be severely damaging to those anywhere near. Air quality in a wide area will be badly affected.

- Water. 50% of the site is liable to flooding. Southern Water advise that large amounts of water will have to be removed from site, as water promptly replaces quarried sand.

The large number of extra lorry movements required for this, have not been included by WSCC at all, so the overall traffic element is far worse than claimed in the Plan.

The neighbouring properties of Alderwood Ponds and Horsebrook Cottage both extract clean potable water from the water courses, which are numerous all around the site. These water courses will become contaminated.

There is a serious risk of regular and heavy flooding to the site, to neighbouring properties (which may also suffer subsidence), to the main road, etc.

“Inert Waste” does not have the good drainage characteristics of sand - and is therefore almost certain to prevent water draining through the ground and thus directly cause further flooding.

- The road (A283) is narrow, winding, poorly cambered and badly edged in places, notoriously dangerous and heavily congested, with frequent very long tailbacks, and routinely experiencing “suddenly concertina-ring” processions.

The writer has lived next to the A283 for 36 years, and has seen this natural growth take the road from a quiet country thoroughfare, to a hugely congested, fast or stationary, death trap. So I do have long, direct, first hand experience. It is a terrible road.

Frequent accidents (fatal, serious, or simply minor but still hugely inconvenient) occur that close the road for considerable periods, and cost the taxpayer large sums in emergency services attendance, and cost the public huge inconvenience and time.

Most of this traffic has come about by natural growth over the years, plus the road now being used by much more traffic than previously, to avoid the A27 congestion in Worthing.

That natural growth will continue unabated without a quarry and landfill added in to the already huge volume. Thus the congestion, accidents and closures will increase in any event.

To deliberately add large amounts of additional lorry movements, is absurd beyond belief

The highly mixed traffic - bicycles (including large groups of them often holding races), motorbikes, scooters, cars, vans, lorries - many very big indeed, caravans, farm tractors & trailers and larger farm machinery, and not least school traffic (buses, coaches, cars, bikes) crossing into the road to and from Steyning - all make a cocktail that is already too dangerous, to which to add very large numbers of daily lorries (and clearly far more than the Plan suggests)

- There is not enough inert waste available in West Sussex to refill after extraction of the sand. It will have to be brought in - yet more lorries, in addition to those removing water.

- The site was also supposed to be used for the growing of maize for the landowner's aerobic digesters - and that was the basis he (Frans de Boer, Wappingthorne Farm) obtained planning permission from Horsham DC, for the digester installation. But - at the same time apparently - he was putting the same site forward to WSCC for sand quarrying. Very questionable beaviour.

If the sand is quarried, there will be no maize. Thus the digesters will be fed with maize (or waste) from outside the site - thereby yet again increasing lorry movements, not just on the A283, but on the B2135 as well. Mr de Boer will also thus have further breached his digester planning permission.

- Adequate mitigation against all these negative affects is impossible to achieve - and will be extremely expensive in any event. An already dubious 850,000 tonnes of sand (or only 500,000 tonnes according to the landowner), probably mixed with blue clay and hard to extract economically, plus the greatly increased cost of 2 to 3 times the lorry movements claimed in the Plan, plus expensive mitigation works, compensation to householders and businesses, ruination of the local tourist industry, etc, all make profitability highly improbable - and the effect will be the operator (Dudman) abandoning the site once sand is removed. It is understood the same operator has had deliverability delays or failures before – particularly when restoration is due.

The "deliverability" of the site is thus extremely unlikely, and the economics look nonsensical.

- All in all, the cumulative effect of a quarry / landfill going ahead at Ham Farm, would be a disaster for the local environment, economy and all aspects of amenity, and cause devastating financial damage to several most affected house and business owners, as well as shops and tourist dependent businesses in Steyning.

The taxpayer would very probably end up (given the operator's record), footing a further large bill for restoration works.

The losses to many will hugely exceed the profit to one. The sole beneficiary would be the one individual who owns the land.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The "Ham Farm" site should be deselected immediately and withdrawn from the WSCC DMWP

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 131 Respondent ID: 3748)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I am writing to object strongly to the Draft Proposal for a Quarry to be created on the A283 near Steyning.

I am a resident of Steyning, and I attended the meeting at the Steyning Centre yesterday (6th June 2016), where the proposed plan was outlined, and I am extremely concerned about the whole concept, for the following reasons:

1) The A283 is already a very busy road, and the addition of numerous heavy lorries using it on a daily basis, over a period of 10 years, and turning into and out of the proposed site would be extremely dangerous.

School children are regularly bussed into Steyning along that road.

There is a children's nursery in the vicinity which is also used all week.

There are regular events taking place at Wiston House and it's land, which already cause congestion.

There is a lot of congestion already at the Washington roundabout, which would be exacerbated by the heavy lorry traffic.

2) The pollution resulting from the quarrying would be serious for those neighbours living close to the proposed site, not to mention the immediate reduction in the value of their properties.

The continuous noise from the quarrying and the lorries (over a suggested 11 hour day) would be intolerable for those living nearby.

The so-called 'inert waste' that is proposed to fill the empty quarry would also have to be brought in along the A283, and I don't believe that is going to do the land or natural water courses in the area any good.

3) The effect on the South Downs National Park would also be detrimental, as Steyning is a very popular destination for tourists, cyclists, and walkers.

The quarry would be clearly visible from miles around, from Chanctonbury Ring, the South Downs and from the Wiston Estate, particularly if the mature trees along the perimiter of the site are removed. Even if replanting is done when the quarrying is completed, (after 10 years) it will take many years to restore the site to it's present verdant appearance.

We already have one eyesore in the area - the Cement Works. We certainly don't need another.

4) The geological effects are of concern, particularly the effect on the water table in that area, where I understand there are streams and springs feeding the trout streams and pond on the B2135. This pond is regularly used by disabled people, visiting schoolchildren and fishermen, and is a tremendous local amenity.

5) There is also a digester situated on land adjacent to the B2135, which uses the land at Ham's Farm to grow maize which feeds the digester.

This was all permitted by West Sussex County Council, but if the quarrying goes ahead, there can be no more maize grown there.

Altogether, I feel this site is not the right place for a quarry. It will not benefit the community, just the developer and the land-owner.

This is a beautiful part of the country, enjoyed by many - visitors and those who live here.

We should preserve it at all costs.

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 133 Respondent ID: 3750)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

As a resident of Steyning…*(redaction)..* - I am writing to object to the proposal to create a quarry near Steyning on the A283. My reasons are:

1) The danger to road traffic and pedestrians from the large extra number of heavy lorries using an already very busy road. This would be particularly bad in the summer with the extra tourists and events at Wiston House.

2) The pollution arising from the diesel fumes emitted by these lorries and the additional noise from the lorries.

3) The waste which would be used to fill the quarry, supposedly inert, would still allow polluted water to drain into the land and the water courses.

4) The South Downs National Park is popular because it is visually attractive to local people and tourists. The creation of the quarry and the felling of the mature trees around it would be an eyesore, especially visible from Chanctonbury ring. It would take decades or possibly centuries to replace these trees.

5) I understand that maize is grown there to feed the nearby digestor. Without the local maize there would be additional traffic to bring it from elsewhere.

I therefore urge you to withdraw the proposal for the benefit of the local community and visitors to this beautiful part of Britain.

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 121 Respondent ID: 3752)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision & the strategic objectives are all very good – but for the Ham farm plan almost all are negated by the problems that would be created by work at the site. They are non-deliverable.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

2.2 Vision very laudable in a general sense. But not deliverable for this Ham Farm plan.

2.3 Strategic Objectives. (in brackets)

2.3.1 (1) Why in this field at Ham Farm which is meant to be farmland growing maize for Wappingthorn Farm's anaerobic digester?

2.3.3 (3) Ham Farm site has not been recently tested for how deep they have to dig to find sand – operator & land owners report only. Digging may upset artesian wells and cause pollution.

2.3.6 (7) This plan at Ham Farm will seriously impact on local businesses & visitors to Steyning - Traffic increase, view from Chanctonbury and the South Downs Way - transport on A283 much slower

2.3.7 & 2.2.8 (8) This plan will be to the detriment of the landscape & the special qualities of our South Downs.

2.3.9 (9) This plan will not protect or enhance the natural & historical environment – wildlife could suffer.

2.3.11 (10) Grave danger of water pollution, digging interfering with water table – Alderwood Ponds could suffer brown trout living and spawning.

2.3.12 (11) Very serious extra traffic on A283 – already v. dangerous road – lorries will cause more jams - only road transport is possible - local roads already congested.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

1. Land could not be restored "beneficially" – after landfill it would take decades to return it to prime agricultural condition - and re-growing trees takes decades too.

2. Ham Farm very close to Steyning. There are many houses within less than ½ mile.

3. Ham Farm site is only accessible by road – but A283 gets very congested and extra lorries would cause more – very dangerous for bicycles already & cars.

4. Trees near site would have to be cut down, opening views to work on site.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

To make it acceptable to the people int his area it is impossible to change this plan for the Ham Farm site – however one looks at it, there are too many objections which are valid - in direct contradiction to your "vision" and "strategic objectives".

Consider the poor owners of properties which are very close to the site.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

M2 | Although sand may be under this field at the Ham farm site, it may be at a depth which is bellow the water tabole and could cause interference and pollution to known artesian wells, streams springs & ponds.

M12, 13, 14 | Character – Protected Landscape Historic Environtment.

The character of the field and landscape would be changed for the worse with this plan - A beautiful piece of farmland destroyed and exploited for many years to come - trees cut down by A283 – view from path to Chanctonbury Ring will have large blot on a previously rural area.

M15, 16, 17 | Air & soil – Air could be polluted by dust for the houses near the site - & by smells/rats from later landfill.

Water sources – digging would upset known streams, artesian wells, springs & ponds – the sand is found very deep down (see report from 1948)

Biodiversity & geodiversity – the field and site of quarry woud be permanently damaged for agricultural use – wildlife & water also endangered.

M18 | Public Health & amenity - houses which are near quarry would suffer noise dust & disturbance.

M19 | Flood Risk – not much danger of flood risk – more danger of water table disturbance and pollution.

M20 | Transport – very serious danger & disruption on A283 with greatly increased lorry traffic - very busy road already - school runs morning and afternoon would be much delayed and at risk of accident – also bicycles would have increased risk.

On B2135 there would be extra traffic with lorries – this road would be used for bringing maize to Wappingthorn farm for the anaerobic digestor. If maize cannot be grown on Ham Farm site as was agreed when permission was granted for this digestor.

M22 | Cumulative impact – bad for everyone living nearby, for people using the A283/B2135 or visiting / working in Steyning or walking on South Downs Way.

M23 | Design & Operation of Mineral Developments – however the design and operating of diggning this quarry – it will impact badly on all the houses (land around it for many years.

M24 | Restoration & aftercare - a landfill in a deep quarry (M26) will need lorry loads of material – causing yet more traffic to the site – local houses would suffer dust, pollution, noise & disruption – even with inert waste there would be dangers from materials dumped there - builders waste, glass etc. old ovens fridges & rats would come if any compostable waste was dumped. The "restoration" would take many years and the quality of the soil on the filled in quarry would never be the same.

M25 | Community Engagement - for some strange reason our parish council was not engaged until April this year - so there has been very little time for proper information to be given to the community - this has been

rushed upon us - WSCC is steamrolling this Plan for the quarry - locally only the operator & landowner are in favour - and they are ignoring a covenant on land near Wappingthorn Manor.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Please see comments on Ham Farm Site. And in B3.3. A quarry for sand on this site should not be dug for all the reasons I have pointed out – and many more that others will put forward.

This plan is non deliverable and is not acceptable in any possible form.

Please study carefully the covenant on land near Wappingthorn Manor which affects all surrounding fields wood houses gardens farms etc. stating that no commercial activity, building, nuisance etc. etc. should be allowed.

To dig a quarry on this site would be to the longstanding great detriment of our beautiful area, and to the danger & inconvenience & economic difficulties for people in Steyning, as well as for the residents who live near Ham Farm.

Additional Comments

To have our say using this response form takes many hours as the Draft Plan is so complicated – for many people it would be hard to understand & to respond. We are not all versed in burecratic / legal language – but over 2000 people have petitioned for this planned site on Ham Farm to be turned down-

Locally the only ones in favour are the “operator” and the “landowner” – and the landowner promised to use this field for growing maize for the anaerobic digestor, which is why he got permission to build this despite objections.

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 122 Respondent ID: 3753)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

1) Sound could be obtained from dredging & refinement

2) SDNP will not be protected visually

3) Steyning economy will be severely affected - particularly tourism

4) Health of adjoining neighbours will be at risk

5) Water table issues particularly reference Alders fishing lakes.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

1) Unsuitable site on border of SDNP.

2) No tests undertaken for suitability of the sand. C1948 survey stated land unsuitable.

3) No hydrological tests or survey have been undertaken

4) Site already allocated to provide growing maize to feed anaerobic digester at Wappingthorn Farm under planning permission granted recently.

5) Unacceptable additional lorry traffic movements on A283 and B2185.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 123 Respondent ID: 3754)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

1) Views from Chanctonbury Ring and SDNP will be sadly marred yet again.

2) Will affect health of people in vicinity especially the young at the nursery school and Steyning primary upwards – all with breathing problems.

3) Hydrological studies not yet carried out. Our house badly affected after Alder Ponds were dry so we had to be underpinned.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Water table will inevitably be affected. As we are on clay any interference on this will have far reaching effects especially for those houses sited right on the edge of the quarry. Cost for whom?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

1) Sterile site already allocated to provide maize to feed digester already given planning permission to this all part of Wappingthorn Farm- very misleading

2) lorry movements are totally unacceptable on 283 and B2185. The latter due to even more lorry movements to feed digester.

3) On edge of Great Alder Wood registered in Doomsday Book. Existing footpaths that farmer de Boer already ploughs up each year making walking exceedingly difficult.

4) On edge of ancient village site at Wappingthorn.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 124 Respondent ID: 3755)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I do not believe you have seriously considered the impact of the quarrying for soft sand at Ham Farm on the residents of Steyning and the other road users of the A283.

To increase the use of the A283 any further, in particular heavy lorries thundering along, will further increase the air pollution in Steyning. Also it is an already dangerous road, quite narrow in places with sharp bends very near to where the entrance to the site will be. It can only increase the risks of road accidents on this dangerous stretch of road.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Although I agree with your aims to source this mineral as local as possible to where it is required I am fearful of the use of any of the roads in this area.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 125 Respondent ID: 3757)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision and objectives should include provision to ensure that local communities are not impacted by air, water and noise pollution resulting from extraction and that extraction shall not be undertaken either within or on the boundaries of such communities.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Question b1.2. See above - Strategic Objective 7 should be amended by adding “and to ensure health and safety in not impaired and that air, water and noise pollution arising from extraction will not impact in anyway on local communities. Strategic objective 11 to be amended by adding “and to ensure that road safety is not compromised by the additional vehicle movements arising from development, extraction and restoration.”

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site is less than one mile from Steyning and thus there would be adverse impact on the quality of life of residents and visitors. In particular, the site would pose substantial risks to the safety of road users along that section of the A283.

Ham Farm is located alongside a section of the A283 which is the subject of a “west sussex CC 8mile Road Safety Scheme.” The additional vehicle movements will not contribute towards that schemes objectives.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Question B2.1- Ham farm should be withdrawn from the plan. The reasons relating to road safety are as follows:

a) on the section of the 283 between the Bramber Roundabout and the A24/Washington roundabout there have been 71 accidents in the last 5 years including 16 serious and 1 fatal;

b) on the 2 mile section between Horsham road and the Wiston/ Chanctonbury crossroads there have been 19 accidents of which 9 were serious and one fatal;

c) it is questionable whether the road at Ham farm is sufficiently wide to allow safely for an HGV right hand turn lane;

d) the location is close to a blind bend. Vehicles travelling towards Washington would not have sufficient breaking time if traffic was stopped by HGV’s turning right;

e) the site is close to a dangerous double bend which the County Council had planned to widen and straighten, but have insufficient funds;

f) the site is opposite the east gate of Wiston Estate which is used for access to outdoor events eg. Concerts, steam rallies etc;

h) the main entrance to Wiston Estate is dangerous to exit. It is located less than a mile from Ham Farm;

i) from the double bend mentioned at e) above to near Washington, the A283 is a narrow road not suitable for additional HGV traffic.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B3.1 Support policies in general, but not the inclusion of Ham Farm at 6.2.16

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 159 Respondent ID: 3765)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I am writing this message to raise my objection to the West Sussex plan to locatea quarry in Ham Farm on the A283 close to Steying. This site is fa to close the the local amenities in Steyning, particularly the Schools and Leisure Centre. It is the role of councils to mitigate any risks that may occur as a result of future planning, and by your own selection documentation residents will face " High levels of harm from noise, dust and light"

It is totally unaceptable to locate such a large quarry so close to a major residential area. My wife and I formally object to this plan and wish for our views to be registered with the Council and a copy of this letter ot be forwarded to the chief executive.

I hope that the planning committee see sense and seek to reject this application.

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 210 Respondent ID: 3793)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Health, well-being and amenity of residents:

As one of the new residents of …(redaction)..., adjoining Ham Farm, I am concerned about my asthmatic 12-year old step-son in regards to airborne dust and in particular silica dust (which has been known to cause non-occupational silicosis, see the following link as an example of studies in this; http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3683189/).

As well as this all residents adjoining Ham Farm will suffer noise, light, air and almost certainly, water pollution. The well at Horsebrook Cottage is used for potable water extraction and requires protection. Alderwood Ponds also have a water extraction license from the Environment Agency.

Landscape:

The main (front) elevation of Horsebrook Cottage faces Ham Farm, a point which will not be lost on DCMS in assessing the impact of this grade II listed building of the DMP.

Soil:

The current allocation of Ham Farm for growing maize for the Wappingthorn Farm anaerobic digestion plant safely maintains the site's high quality agricultural soil.

Landfill:

Landfill materials will not allow water permeation / "reservoir affect" to anything like the same degree as soft sand, therefore significantly adding to the 50% flood risk already present on Ham Farm.

Southern Water is concerned about leachate from landfill polluting surrounding ground and water courses.

Landfill brings other issues such as vehicle movements (probably from beyond the County's borders), vermin (with the risk of disease), significant air pollution for adjoining residents and possibly further into Steyning and the surrounding area.

Water and flooding

Southern Water advises that there is no additional capacity for groundwater during the quarry period, and that it will all need to be removed from the site by lorry. This will worsen the site's financial viability and the traffic movement studies.

During landfill stage leachate will also need to be drained, captured, pumped and removed by lorry with care not to contaminate the land and water.

Deliverability:

1. No financial assessment offered as part of the public consultation. Examples of additional financial issues;

- Significant mitigation measures (Bunding/screening, planting/landscaping, air filtering, acoustic fencing, groundwater extraction, leachate management, site sealing/capping to prevent contamination, biodiversity mitigation measures)
- Additional transport costs not factored into running costs
- Reduction of size of site due to proximity of neighbouring residents
- Queries regarding quantity of sand therefore total net financial gain
- Historic insolvency of the proposed operator

2. Due Process;

- There are questions as to whether this has been followed. The key stakeholders were supposed to have been consulted in 2014, however WSCC seem to be struggling to demonstrate evidence of this.

3. Compensation;

- No consideration has been made for individuals suing WSCC for compensation for the quarry. There are cases where the Courts have found in favour of neighbouring owners successfully demonstrating loss of property value, for example. Issues relating to health problems shown to be caused by the quarry could also be significant.

4. Restrictive Covenant at Wappingthorn Manor covering the Ham Farm land;

- This appears to have not been mentioned in the Minerals Plan but would prevent the use of the site, and therefore the DMP, in its tracks.

Air quality:

The immediate residents will suffer air pollution during both the quarry stage and landfill stage. Initially there will be lorry fumes, dust (including silica dust).

Transport:

The above comments regarding groundwater and leachate will increase further the traffic movements.

Bio diversity:

Awaited.

Historic environment:

DCMS have not currently been engaged to consider the likely impact on surrounding listed buildings, but from my experience will take a dim view of the DMP and its impact on nearby historic buildings.

Local economy:

There are obvious impacts on Steyning / Wiston / SDNP tourism having a quarry at Ham Farm, however there are plans being discussed with the local authority planning department about a holiday lets business at Horsebrook Cottage which won't be able to go ahead if the quarry was to be located at Ham Farm.

Cumulative impact:

The costs associated with the DMP which have not been adequately considered or put into a proper cost/benefit assessment will lead to either the Ham Farm proving financially unviable, or to the operator becoming insolvent.

Lessons should be learnt from the recent case in Scotland, as the BBC link below;

http://www.bbc.co.uk/news/uk-scotland-scotland-politics-25352375

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 331 Respondent ID: 3795)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Proposed Sand Quarry Ham Farm in Steyning, A283 West Sussex

I do not support the proposed inclusion of this site within the draft of West Sussex Joint Minerals Local Plan. I am strongly against it for the following reasons. The Proposed development of Ham Farm in Steyning increases the dangers of a busy, dangerous and treacherous road. There have been many deaths and accidents along this road.

The A283 from Shoreham by Sea to Washington is a very busy rat run used to avoid the A27 which is also extremely busy. The A283 road already has large lorries, vans, cars cyclists, caravans, (caravans are stored on the A283 along the bypass) motorbikes and rescue vehicles. The noise level is unbearable in the garden and intolerable in a closed up house, it's relentless.

The A283/B2135 Horsham Road junction at the end of Steyning A283 by pass is dangerous. There is a pre school on the Horsham Road. On the junction is Steyning Grammar and Primary School, children are transported by many coaches to and from neighbouring villages. The main entrance to the school site is via Canons Way through Shooting Field, this at times with children, parents and teachers by foot and car is difficult or impossible to get through. It is also busy with other through traffic to get to and from the High Street and all cars from the homes that need to get in and out of the area. The school is a community school with a swimming pool, gym and many classes are held there.

STEYNING HEALTH CENTRE houses doctors, clinics and dentist in Tanyard Lane Steyning, it is used by Steyning and other village residents who through necessity drive in from all points, it's very busy. These facilities generate a lot of car movement from all points in Steyning and surrounding areas.

WISTON HOUSE CONFERENCE CENTRE is an important busy venue already on a dangerous bend on the A283 just pass Ham Farm site it is used by thousands of people using vehicles. Wiston cross roads to Ashington is a busy turn, it is well used to avoid the congestion and queues at Washington Roundabout.

CANONS WAY ENTRY AND EXIT via the A283 by pass is difficult and dangerous through the volume and speed of the 60mph or more traffic. This large housing area along with Shooting Field have no place to travel except via the by pass or through the very congested High Street and neighbouring roads to get in and out of Steyning. The A283 is a main artery.

The A283 is a windy narrow road with difficult bends and long double lines with no supposed overtaking and cannot sustain the amount of traffic the site would generate, it is already overburdened. The additional traffic from this site would result in an unacceptably capacity and safety issues would be further compromised leading to more deaths and accidents. This would also inhibit the rescue services especially when traffic is halted through accidents. Where does the dense traffic go?

Pollution, air, noise and dust.

There wiJl be lorries entering and exiting the site but what about other transport needed to bring workers and staff into the quarry along with essentials supplies needed to run the site. All the noise and dust of the machinery, light pollution, dies-al engines including their brakes, and the related stress are all harmful to health. The health of residents and visitors will be adversely affected especially patients with breathing problems.

Traffic

There is already a heavy increase in traffic over the last 3 years that I have lived in Canons Way for 25 yearson the Steyning by pass for 25 years the noise and dirt are already unbearably. Before I lived in Storrington, Storrington's pollution and traffic congestion along with Shoreham are both already choked. The entrance to the sand quarry is on the A283 but what about access to other roads what about congestions there? For example the Upper Deeding roundabout to Henfield, the Shoreham fly over, Washington Roundabout, Storrington, Arundel, Worthing and its major roundabouts, Buck Barn Crossroads, Horsham and others.

Years of sand quarrying, the subsequent landfill and replacement of the overburden will create, intolerable dust, fumes,dirt, noise and extra vehicles for many decades to come, The traffic will have a detrimental effect on the quality of lives, environment will be further eroded with the contamination such an industrial site would bring on the border of the National Park.

Tourism.

Tourism is an important part of the life and economy of Steyning, walkers, cyclists, short and long stay visitors base themselves in Steyning to explore other parts of Sussex.. They stay in beautiful hotels, pubs, B&B's,

Wiston House, very near the proposed sand quarry site, generates a lot of business for accommodation, eateries, shops etc with the events that are held there. It's a wonderful unique beautiful site. A sand quarry on the door step of our ancient town with all its charm and amenities will have only have a negative effect. The toll on the A283 and surrounding road networks cannot cope.

Biodiversity, Geodiversity.

Ancient woodland, habitat, water courses, the list goes on it will all be damaged by the proposed sand quarry. Wiston Pond, opposite the proposed site, which is part of a well know and loved landscape, will also be damaged by the proposed sand quarry. With the proposed quarry agricultural is lost. It would be a great shame to lose the character of this outstanding natural landscape and scar the beautiful country side for decades to come.

In conclusion there have been no major new roads to alleviate heavy road congestion in the south east, especially within the site area and beyond, traffic has and will continue to increase at an alarming rate future traffic needs have to be factored in. The proposed sand quarry in Steyning on the A283, with all the negative issues that surround such a development, it is the infrastructure of the roads and the ever increasing traffic burden that leads me to the conclusion that I do not support the sand quarry proposal on agricultural farm land at Ham Farm Steyning on the A283 for the quarrying of sand.

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 148 Respondent ID: 3796)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

1) I fail to see how a quarry & landfill can possibly "conserve & enhance" the beautiful outdoors of W.Sussex. On the contrary, it will be a blot on the landscape & spoil it for those of us who wish to preserve & enjoy it.

2) How can it possibly be a "special place to live and visit". Transport of minerals by road will be vastly increased in the area – not minimised.

3) I cannot see how the minerals are produced in a way that enhances the "historic & natural environment".

4) I fail to see how "the rich archaeological heritage" is protected with the scheme. The contrary is the case.

5) "Be a place where the mineral site is restored to the highest standards ." Nothing can improve on the site's current agricultural use & in any case, the site was designated to feed the Wappingthorn Farm anaerobic digester & any interference with this use, should make the digester planning approval, invalid.

In the case of the Ham Farm, Steyning, the vision statement is delusional!

SO4. The proposed scheme does not protect the South Downs National Park, & is not in the interest of the local Steyning populace.

SO7. I fail to see how the scheme can possibly enhance the "Health & Amenity" of local residents, businesses & visitors. The dust from the quarry will be blown in our direction, adversely affecting our health and wellbeing (my wife is asthmatic) & several local businesses, such as Fisheries, are badly affected.

SO8. Are you deluded! How on earth can the scheme "conserve & enhance the landscape & townscape character of West Sussex & qualities & distinctiveness of the South Downs National Park, where it will be and unsightly blot on the Landscape.

SO10. I am extremely concerned for the probability of contamination of water supplies, both in terms of the streams adjacent to the site & local fishery & many nearby residential lakes containing Carp koi etc.

SO13.See my comments earlier. The site is designated for agricultural use for the Wappingthorn Farm A.D industrial plant (the owner of which also owns the designated quarry site). It cant be used for two purposes & makes the A.D plant invalid if site used for quarry. The site is also protected by a restrictive covenant for agricultural use only.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Application should be withdrawn for reasons stated

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

We wish to see plan withdrawn

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Proposal for Ham Farm should be withdrawn.

The proposed site for mineral extraction should be withdrawn for many reasons, in particular: -

1) Potential contamination of local streams, & fishing lakes. There are many within a short range of the proposed site. I believe that excavation will cause water problems because of the low water table. If one digs a whole in several neighbouring gardens, they shortly fill with water!

2) Wind direction is mainly from the west, which would cause dust from the site to adversely affect our health and amenity. This would affect the town of Steyning as well as many residents close to the proposed site. My wife is asthmatic so would suffer badly.

3) The landscape would be badly affected & will appear as a blot on the landscape from the South Downs.

4) The traffic to & from the site will vastly increase, causing more accidents & traffic hold ups. Already on that dangerous stretch of road there are long lines of traffic behind vehicles with no opportunity to safely overtake.

5) Any assessments carried out to date have been done by the owner & user of the site. It would be vital to get independent reports, mutually chosen by WSCC & the Steyning Action Group.

6) It is very important to stress that the site owner, only got planning approval for an anaerobic digester at Wappingthorn Farm, on the basis that the adjoining land, including Ham Farm, be used for the growth of maize & on the basis that the very dangerous access to Wappingthorn Farm would have no additional traffic. Use of Ham Farm for sand extraction rather maize production would invalidate the planning approval for the A.D plant. To date several planning conditions have not been met: i.e

not protecting properly dangerous equipment

not fully screening the digestive silos

7) The proposed quarry has already had a detrimental affect in that one of the adjoining properties has lost their house sale recently when it became public, & another has been taken off the market because it would be sold at a loss in this environment because no one would pay a normal price with the possibility of a quarry next door.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 149 Respondent ID: 3797)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision would appear to be very flawed as a quarry / landfill at Ham Farm in a field designated for agricultural use (and a condition of planning for anaerobic digester) under covenant and with listed buildings does not enhance!

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Ham Farm site is a sensitive area, it is clearly visible from Chanctonbury ring, a local beauty spot. It is in an area with an abundance of wildlife, ancient woodland, lakes and streams and close to 2 listed buildings. There is also a footpath running close to the perimeter. Our *…(redaction)..* and our lake feeds Wappingthorne Manor Lake. It is fully stocked and home to wild fowl, birds, kingfishers waterfowl and a variety of fish. It is a peaceful environment suitable for breeding and the noise pollution and air pollution on the predominantly south westerly wind can only destroy this environment. Additional traffic is a major concern also.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

(1) How can this site be restored “beneficially”?? There is not enough inert matter in West Sussex.

(2) The environment is sensitive and natural, teeming with wildlife, history, close to listed buildings (2) and Wappingthorn community / Steyning (already blighted by an anaerobic digester, to the east, by the same landowner!). This land is under covenant for agricultural use and was designated as a condition of planning for maize for the aforesaid digester! Also the water table is very high leading to possible pollution / risk of flooding.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like W.S.C.C to look into alternative sites . I believe this area was originally included in the South Downs Natural Park so it must have been considered as an A.N.O.B What is the point of turning a beautiful landscape into an industrial wasteland and against the wishes of Steyning!

B3. ‘Mineral-specific’ and ‘Development Management’ Policies

B3.1 Do you support the ‘mineral-specific’ policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Policy M20 - I am amazed that WSCC appear to rely on a report commissioned by interested parties (i.e: the landowner) with regard to traffic movement instead of undertaking an objective and democratic assessment.

Policy M25 - With regard to "community engagement" I have yet to meet a single local resident who is in agreement with the Ham Farm site selection! I understand negotiations have been going on for about 2 years and yet we only heard about this a few weeks ago. This is not a democratic process. It can only damage the local environment and have a negative effect on the community, and local businesses. Especially Ham Farm itself and the local fisheries, tourism and especially walkers. Many local residents are elderly and have little access to the internet and do not understand this complicated form! It is difficult for them to make their feelings evident and to be involved in this "so called" democratic process. They should not have to rely on action groups! Effect on local health and amenity is negative, noise, air pollution, traffic.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The plan should contain objective assessments from parties that do not have a major financial interest in the development of these sites. Unlike those for Ham Farm, which I understand, rely on the landowners consultants and their assessments on volume of traffic and even soil analysis. Also checks should surely be made with regard to covenants on land (of which the landowner was fully aware). Our house is also under the covenant of 'Wappingthorn Manor' and legally we have to abide by its contents – this must apply to everyone including the applicant.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 147 Respondent ID: 3798)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I think the vision is good but do not see how this can be fulfilled by having a quarry in Steyning. I don't think a quarry here will protect and enhance the historic and natural environment. Steyning is a particularly beautiful town with great history + natural beauty which which be negatively impacted upon by a quarry. I also think the impact on the A283 will be huge - both for local residents and for the community's safety.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I do not think it is an appropriate site due to transport issues - use of lorries on the A24 + A283 will create safety and congestion issues. We live directly on the A283 and are concerned about road safety and noise. There are many cyclists that use these roads. I think that Steyning is a town of great natural beauty which will be negatively impacted by the quarry - Chichester was discounted due to 'the view' and if this a good enough reason for Chichester surely the same issue exists for Steyning.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Not to consider the Steyning site.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Additional comments on rear of response form)

- Pictures of “after” didn’t show a landfill?
- Only viable site not in National Park
- Will still get stuff from Kent
- 46 lorries a day
- its all on facts – not feelings
- no mention of landfill
- need to find a precedent re the road. De Boer
- Parish Council were told in 2014 that 50 sites were being considered

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02 - Ham Farm: Resident/Member of the Public (Response ID: 178 Respondent ID: 3800)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Unacceptable impact on the landscape - too close to the National Park!

Extra traffic on an already dangerous road - A road described as one of the roads in the S.E. that has most accidents

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 179 Respondent ID: 3801)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

SO2, SO4, SO7, SO8, SO9, SO14: In my opinion these objectives are not being met. The impact on local small businesses and residents is not being sufficiently considered by the vision.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

SO10, S1O2, SO7, SO8: Further research needs to be carried out into the potential effects on the local community and specifically on the natural history of the immediate area. A bat survey for example is essential.

SO3: The (text unclear) has agreed to supply sand to all UK counties.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The production and transportation of minerals will have a major impact on the local communities. The A283 is an extremely busy road and having lived in the area for 35 years have been aware of the high incidences of accidents including fatalities. Until recently there were clear warning signs along the length of road from Washington to Steyning and recording the number of fatalities each year.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The current plan will in no way conserve and enhance the beautiful attraction of West Sussex. The effects on the local community will be permanent affecting the residents of both this and future generations. Pollution from lorries and the invasion of the environment will be irreversible.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

It is impossible to carry out the plan for these points without permanently changing the environment with its flora and fauna. It is not at all clear how the production of minerals can contribute to a low carbon cicrular economy. Explanation is needed in some detail to explain how the historic and natural environment can be enhanced. These are already plans to remove mature ash trees which are currently healthy. The site of a roman village must be protected and also the stream which brings brown trout (this is a protected species) through the site.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

It should be possible to resource the sand from other places e.g imports from EU. or marine sand.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 180 Respondent ID: 3802)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

S02 SO7 SO8 SO9 SO14 In my opinion none of these strategies are being achieved

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Land base extraction should not be considered, look to SO2

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

As an artist I regularly exhibit at the Cow Shed Studioes, this would cease & my income.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Please remove from your plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B3.1 The countryside is too valuable & fast dissapearing, when marine can be used.

B3.2 It doesn't appear that any of the points in section 8 are being adheared to.

B3.3 I think it should be abandoned

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 181 Respondent ID: 3803)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

S07 S08 SO9 SO11 SO14 Not enough is being done concerning these strategic being met.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I enjoy art lessons at Ham Farm within the calm and tranquil surroundings. This will cease to exist if the above goes ahead. The road (A283) will be congested and lead to further disruption and pollution.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Please remove Ham Farm from your plan

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B3.1 As the countryside is precious for the environment and the wild life, the marine option should be used

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 182 Respondent ID: 3804)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

SO2, SO7, SO8, SO9, SO11, SO13, SO14. I wish these objectives were really being achieved but have no belief they will be. In fact in a lot of cases the objectives seem to be ignored.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

More sand extraction in the beautiful West Sussex countryside should not be allowed. The impact on communities, countryside, trees, hedgerows, wildlife, ancient sites + for what gain? So that we can build more houses and be left with a devastated area. An awful future for us all. More research needs to be carried out.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Comments as page 5.

Plus a big increase in traffic on the A283 causing more Co2 emissions. Storrington is already a polluted small town because of heavy traffic through the area. After many surveys with results way above the acceptable level – still nothing has been done, even after the intervention of MP's. This would also make the A283 a very dangerous road with lorries turning on the site. We lived on the A283 for five years with Dudman lorries rumbling past. The whole house shook + the noise was awful. They were worse empty than when full of sand.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Remove Ham from your planned site.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Could we use the marine option?

I am part of an art group run by …*(redaction)*.. at the cowshed studios. Her business and income would be seriously affected by the noise and vibration of the close proximity of this planned extraction. A sad day if this goes ahead – I should say – a sad + shameful day.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 183 Respondent ID: 3805)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

SO2/4/7/8/9/14 These objectives are being ignored. More consideration is needed for local residents and businesses.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

S10/12/7/81 Further work needed into effects caused - Also natural history ie. toads and bats and all.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

The road isn't adequate - it's a busry road with high incidents of accidents. This will blight the locality

Surely existing Dudman extractions need to be completed on this very road before yet another extraction is begun. Dudman seem not to be complying already.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

No extraction whatsover

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Marine sand - available nearby should be concentrated on generally. This land is designated for maize production for his anaerobic digester. This was a condition which is not now being met.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 184 Respondent ID: 3806)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

THERE IS A NEED TO REVISIT THE VISION GIVEN THE CONSTRAINTS TO THE PROVISION OF SOFT SAND AND TO CONSIDER ALTERNATIVE PROPOSALS WITHIN THE NATIONAL PARK, FROM MARINE SAND OR FROM OTHER LESS CONSTRAINED SITES IN SURREY .

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

REMOVAL OF HAM FARM FROM THE JOINT MINERALS LOCAL PLAN - SEE ATTACHED DETAILED RESPONSE .

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

SEE ATTACHED DETAILED RESPONSE.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

REMOVAL OF HAM FARM AS A PROPOSED ALLOCATION IN THE CONSULTATION DRAFT JOINT MINERALS LOCAL PLAN.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

SEE ATTACHED DETAILED RESPONSE.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Attached additional comments)

OBJECTION TO THE DRAFT WEST SUSSEX JOINT MINERALS LOCAL PLAN

[INCLUSION OF HAM FARM, STEYNING FOR QUARRYING]

Ham Farm is a pristine greenfield site that immediately adjoins the South Downs National Park (SDNP) from which it is highly visible (see photographic evidence). It is next to an area of Ancient Woodland (Alder Wood), a number of Grade II Listed Buildings and is opposite the historic parkscape of Wiston. Any mining operations on the site would be visible from the internationally known and much used Wiston House.

Allocation of Ham Farm would be contrary to national policy in the Framework (1 Footnote reference - The National Planning Policy Framework) having regard to its location abutting the SDNP and the statutory requirement set out in the Countryside and Rights of Way Act 2000 that states:

"Local Authorities have a duty to have regard to the purposes of National Park designation in the consideration of development proposals that are situated outside National Park boundaries but which might have an impact on the setting of and implementation of the statutory purposes of these protected areas, i.e. conservation of the landscape and scenic beauty of the National Park."

The extraction of soft sand proposed (variously suggested as between 500,000 and 850,000 tonnes) would have an adverse impact upon the principal purposes of National Park designation - namely, the conservation of the landscape and scenic beauty of the Park (see paragraph 115 of the Framework). The proposed mineral extraction represents a major development, for which paragraph 116 requires that permission be refused. The extraction would also fail the objectives set out in the main bulk of the Draft Joint Minerals Local Plan (Policies M12 [Character] and M13 [Protected Landscape]).

The site is crossed by important surface and underground streams, which factor is highlighted at paragraph 5.136 of the County Council's Sustainability

Appraisal dated April 2016. It states that: "The site has the potential for significant negative effects on water quality." Accordingly, development would run counter to Policies M15 and M16 of the Draft Joint Minerals Local Plan and to national guidance in the Framework.

Access to the site is proposed from the busy A283 at a point where the road is subject only to the national speed limit of 60mph. If, as suggested by the County, no right-turn facility is provided to serve the development, vehicles travelling from Steyning towards Storrington would be faced by stationary heavy goods vehicles in the left hand lane. This would create a substantial highway hazard.

If, as any self-respecting Highway Engineer will tell you, it is imperative to provide a right-turn facility to serve such a quarrying operation, that would require land which may not be within the control of the owners of Ham Farm. It would also be an expensive undertaking.

In order to meet the requirements of Design Bulletin 32 the access would require sight lines of 9m x 215m and would need a hard surfaced area to accommodate HGVs entering and leaving the site. These works would entail the removal of considerable frontage planting, which would further damage the visual quality of the SDNP.

The site is adjacent to several Grade II Listed Buildings, whose setting would be compromised, contrary to Policy M14 of the Draft Joint Minerals Local Plan and Chapter 12 of the Framework.

No detailed ecology work has apparently been undertaken, but it is known that there are protected amphibians including toads, which cross the A283 from Wiston Pond on the opposite side of the road and for whose benefit toad crossing tunnels were constructed some years ago. Bats are also regularly seen in nearby Alder Wood. These concerns would also render the proposal contrary to Policy M17 of the Draft Joint Minerals Local Plan and Chapter 11 of the Framework.

The site is close to an Ancient Woodland. There is a statutory requirement to consult with Natural England in such cases. I have seen no evidence to date that

such consultation has taken place.

The Ham Farm site is shown upon the Agricultural Land Classification Map as within Grade 3A (amongst the most versatile and productive land in the country). It will be difficult to ensure that any restoration following quarrying will retain that classification (see paragraph 112 of the Framework).

CONCLUSIONS

The site immediately abuts the SDNP, from which it is highly visible. Development as proposed would be contrary to national guidance at Chapter 11 of the Framework given that quarrying would fail to conserve the landscape and scenic beauty of the SDNP.

The Plan fails to provide evidence to support the need for such an allocation.

Most of the housing development within West Sussex is scheduled to take place in the north of the county adjacent to the Surrey boundary at Horsham and

Crawley. There are known reserves of soft sand within Surrey, which would be more sustainably located to address the needs of development in West Sussex.

For these reasons, and given the substantial objections to the proposal set out above, the allocation of Ham Farm does not meet the exceptions test set out at

paragraph 116 of the Framework, which specifically deals with the allocation of major development within or adjacent to National Parks.

Accordingly, the allocation at Ham Farm should be deleted from the Draft Joint Minerals Local Plan.

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 185 Respondent ID: 3807)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I see the recycling of aggregates consisting of the minerals mentioned should take place in an area away from natural beauty & South Downs National Park. The A283 is already congested & dangerous.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like to see the plan abandoned altogether.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I do not think this is a suitable site as it is on a very busy road A283 which is already deemed to be a very dangerous road. It is near the historic picturesque town of Steyning an residential areas.

I do not think the site is suitable and do not agree with the principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see the plan abandoned

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 186 Respondent ID: 3808)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

1) I am particularly pleased to learn for primary aggrregates, marine sources will continue to be developed/manufacturred. This must be with appropriate environmental safeguards.

2) I support the use of locally sourced materials for building works. This reduces carbon footprint, supports the local economy, maintains local skills and provides for a rich and diverse heritage. SO8, SO9, SO14

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I do not support fracking under any circumstances - SO12

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I do not agree that Ham Farm meets numbers 1, 2, 4 of the guiding principles. I am not convinced that it is also possible to transport materials by "sustainable modes of transport" (3) from this location either.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see the site at Ham Farm, Steyning removed from the Plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

M7b - Hydraulic fracturing (fracking) should not be permitted anywhere in West Sussex in my view. I am concerned about the long term (potential) effects to aquifers and groundwater

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 187 Respondent ID: 3809)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

('to some extent' added to response to Q1.1 & Q1.2)

The vision and the strategic objectives seem to be based on assumptions that seem somewhat out of date. We, as a country, should be thinking about ways of reducing the use of newly extracted minerals by less wasteful uses of finite reserves – this means we should be reusing already extracted materials, and finding renewable and sustainable means of construction.

If sand is needed, it can be extracted as a by-product of dredging Shoreham Harbour rather than digging further holes in the ground which ravage the view from the top of the Downs even though the site not actually in the SDNP.

It is always better not to despoil the countryside in the first place rather than have to carry out expensive investigation and restoration afterwards – I do not believe that grade 3 agricultural land can be restored after being dug up.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

See enclosed sheets

The site at Ham Farm is unsuitable for sand extraction on various grounds.

- Health well being and amenity of residents - People living near to the site cannot but be affected quite severely by noise/ light/ air pollution. This cannot be mitigated. It is unclear how wide an area will be affected; I suggest that those living in a large part of Steyning will be affected.

- Landscape – You may have seen photographs which show that the site is already visible from the area of the Downs around Chanctonbury Ring. If Buncton Manor Farm is rejected on criteria to do with views from Chanctonbury which apply equally here. Also, there would be a cumulative affect when combined with the Chantry Lane and Rock Common sites.

- Soil – As I understand it, the only minerals survey of the site was conducted by the operator and landowner only. About thirty years ago, I was told that the sand in Ham Farm field was so interlayered with clay as to be uneconomic to extract – what has changed?

I do not think in a time when farmers and agricultural planners are worried about the diminishing availability of good land for growing crops that we should be digging up prime farm land.

- Landfill – We are assured the landfill would be 'inert waste'. Where from? And who says? I have concerns about the effects on air quality and on the water courses in the area which feed the stream down to Alderwood Pond.

- Water and Flooding – the water table in this area is such that the local houses used water from boreholes until recently. WSCC say that 50% of the site is susceptible to flooding. What up to date surveys have been done to suggest that this will not be a problem, will not have an adverse effect when the ground is excavated?

- One field, two uses? – Ham Farm field is to be used for growing maize in order for Mr de Boer to comply with the planning regulations for his anaerobic digester. This doesn't seem possible in a quarry – And would add to traffic.

- Transport – A283 is already one of the most dangerous roads in West Sussex; it is especially since the Shoreham Air Show crash and subsequent diversions, already full to bursting, with dangerous queuing at the Washington roundabout and at the Steyning junctions for much of the time.

Access from the site onto the road will be dangerous – I know from living at Hammes Farm that it can take considerable time to get out with a car, let alone a lorry, when traffic moves at 60 miles an hour.

As SDNP require no vegetation to be removed, I don't see a safe way to give access and egress.

- Other concerns - Biodiversity. Bats – who's done a survey? I know there are pipistrelles roosting here, and other birds probably use the area to fly through.

- Alderwood is partly semi-ancient woodland, and there are large mature oak trees in the site.

- The line of a Roman Road crosses the site, and a 20th century map shows a Roman tile kiln.

- There are several scheduled buildings in the close vicinity.

- Tourism – Visitors don't walk the Downs to look at big holes.

Cumulative impact: This site would add to the visual and traffic impact of the other sites in the area. Enough is enough.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 188 Respondent ID: 3810)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

No other alternatives have been considered or detailed.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Has the use of marine sand been considered, this is also a soft sand and is already being used in the building industry.

Why cant the sand be extracted from quarry(s) that are already existing in West Sussex.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Please see the attached comments page 1 and 2.

(attached comments)

Comments on Draft Mineral Plan from WSCC (dated March 2016)

In reply to the statements made in the frequently asked questions on your website here are my thoughts, observations and views.

Some of the statements seem to be based on inaccurate and information which is out of date therefore raising several questions that make the inclusion of Ham Farm as a potential quarry site an ill- conceived proposal.

My issues regarding the following topics mentioned in the FAQs are as follows :-

Transport

The most recent assessment carried out by independent consultants is dated April-May 2015, since then 2 things have happened that directly affect the volume and nature of the traffic using A283.

1. Shoreham Air crash in August 2015 this introduced the need for the A283 to be used as a temporary diversion route, however, as residents we have seen a large increase in the traffic volumes which neutralise the value of the comments made in the assessment.

2. As part of the Worthing by pass another impact has been seen with the move of the sixth form college to the Warren Road site creating constant traffic congestion which impacts the A24 and A27 junction at the Offington roundabout and so the traffic has moved to the A270 Long Furlong. We now have a Worthing bypass via A283.

The assessment has stated that the speed limit on the A283 is 50 when it is in fact 60, and that is on a road that previously stated it considered as one of the most dangerous roads in West Sussex and if as it is being

considered the closer of Ryden school in Storrington the children will be transported by bus along the A283 to Steyning Grammer school.

Any modifications to the A283 ay the Quarry entrance would have to be made to the East side of the road since the West side is in the South Down National Park.

Habitat

The entrance to the site will be on a bend and it is not acceptable to only remove a few of the mature trees that are located at the front of the site, as the view will not be sufficient for vehicles approaching or leaving the site.

This will result in an unacceptable loss of habitat and expose the site even more.

Flood risk

The site is higher than the Wiston pond which is inside the National Park how can a statement be made there will be no impact! In addition the trout farm next door is fed by chalk springs which will be polluted if not by the sand but by the vehicle run off.

Landscape

Your statement says there will be no unacceptable impact on the landscape this implies that the scar on the landscape visible from Chanctonbury which is acceptable. The views from the National Park are just as important as those within.

Depth of the quarry

The statement claims that the depth of the sand is from 5.2 to 15.4m but what it does not state is how far down does the sand belt start and how much top soil and clay will have to be used before it is reached

The last survey done by the National Geological Society in 1948 on the site found that the sand was to be found at a depth of 42 feet, all other surveys have been done by the developer and the land owner and will therefore be more favourable, perhaps this is an area that needs to be investigated by an non-bias organisation.

Post extraction reinstatement

Stated by yourselves that there is insufficient inert waste to fill this site which means more lorries bringing in waste from other locations in the county and as far any as London.(as we witnessed with the Small Dole site)

Questions not raised in your FAQs

What credit checks have you carried out onthe developers that you are engaging with, none in this case I suspect as the company concerned seems to have a had quite a chequred history in recent years. If they go into administration it will leave institutions like yourselves with the cost of clearing up the mess that has been left. The money that you would use for the reparations is council tax payers money.

This recommendation has be made and a plan proposed when the site facts are inaccurate especially the omission of grade 1 listed buildings like Wappingthorn Manor which is within a quarter of a mile from the site.

The operating hours that have been stated are 11 hours per day, 5.5 days a week in the winter months on this extremely busy road that is unlit and has 5 poorly defined and unlit pedestrian crossings. There is no mention of how this could be address though lighting the road will result in unacceptable light pollution as well as the flood lights on the site which will be needed to ensure the safety of the work force.

In my humble opinion the sand QUARRY proposal is a complete smoke screen as the real reason is to create a large hole in which waste can be dumped which as everyone knows is an extremely lucrative business but would have a devastating effect on the Historic town of Steyning and the

surrounding countryside.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

This plan is completely wrong for this area of beauty, on a very dangerous road (A283) and close to the historic town of Steyning. It should be completely rejected, it will cause hundreds of problems to the area and the people living near by.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 189 Respondent ID: 3811)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision seems to have been ignored in the inclusion of Ham Farm for quarrying sand

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Ham Farm should be removed from the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site is unsuitable and should be removed from the plan for the following reasons -

1. It is visible from the National Park and all trees on the southern boundary would need to be felled to provide sight lines for joining A283 from the site

2. There would be greatly increased traffic movements - especially HGVs on the already congested A283.

3. The site is already earmarked as providing maize for the Anaerobic Digester at Wappingthorn Farm (of which Ham Farm is a part). If the land is used as a quarry, digestive will need to be imported which is contrary to the planning permission.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Remove Ham Farm, Steyning from section 7 of the plan under Policy M11.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 190 Respondent ID: 3812)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

('some' given in answer to Q1.1 and Q1.2)

There should be a box for “some”. Many of the vision and S.O. points have been ignored by selecting “Ham Farm” (just a 16H field and for many years actually part of Wappingthorn Farm: the actual original farm house and associated buildings immediately adjacent to the proposed site are now known as Hammes Farm) as the only recommended site for soft sand extraction in Sussex. WSCC and the SDNPA need to reassess their policies.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

S.O.’s 3 and 4 – the SDNP has by far the largest quantity of soft sand and it should not be exempt from extraction and not be thought of as sacrament to the disadvantage of close sites not in the SDNP. Extensions to existing sites in the SDNP should be used, where possible as much infrastructure / regulations / transport etc is already in place.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

In the joint minerals plan it appears that the potential extraction of soft sand from the Ham Farm site – the existence of which is yet to be validated – might be 850,000. The owner has stated that it might be more in the region of 500,000. In versions 1 + 2 of the JMP there are many more possible sites with far larger potential extraction value, including ones that would be extensions, so already in adjacent operation. The development principles for this site are few and far between for this site and clearly have not been investigated. For instance in the spatial strategy, highlight 2, it does not state that it is adjacent to the SDNP. And it is also adjacent to listed buildings, waterways , a PROW footpath, ancient woodland and is also archaeologically sensitive. Only in key criteria are the above mentioned and some not.

B2.3 continued

1- This site is now part of Wappingthorn Farm owned by F de Boer and is already designated under DC/13/1958 for the production of maize – on it’s good grade 3 agricultural soil – for Anaerobic digester already sited at Wappingthorn Farm and as such is a “sterile” site, not for other uses.

2- Very little cognisance has been taken on the following points: -

a- The impact on the close neighbours of traffic noise.

b- The long working hours proposed and their loss of amenity.

c- Air pollution

d- Water pollution

e- Light pollution

f- Financial loss – one instance has already come to light.

g- High risk of flooding

h- Proximity of ancient woodland

i- A well used footpath to the north of the site

j- Neighbouring listed buildings

k- Distinct archaeology

l- Very little on and off site investigative work to verify claims by F De Boer and Dudmans as to the suitability of the site for soft sand extraction, both closely or generally.

3- Waterways: - there are waterways to the west, north and east of the site some of which feed the fish ponds at Alderwood, which is a thriving fishing business catching for the needs of many diverse users. It is also used as a nature reserve.

4- There is a restrictive covenant (known by F De Boer, but not declared) over the land.

5- The severe traffic implications of extra traffic (due to rise significantly) dismissed by WSCC include:-

a- The heavy traffic already using the road, especially at peak times – commuters, school coaches (2000 secondary school in Steyning to which the majority are bussed) busses and parents doing school runs (a primary and several pre schools).

b- The fact that the A283 and B2135 are very well used cycle routes and overtaking bicycles is a dangerous feat especially for slow, large, heavy vehicles thus regularly creating long tailbacks. There are a number of events, over several days, not just the weekends, which also cause long tailbacks.

c- Other vehicles not taken into account in WSCC's forecast of movements belonging to employees, various services and water extraction vehicles.

d- The number of lorries bringing "out of county" infill as there is not enough and will be less, in West Sussex as there is a policy to promote the reuse of as much waste as possible. The infill could come from as far afield as south London meaning more congestion on the roads of West Sussex.

e- If the use of the site was to be changed there would inevitably be even more traffic as F De Boer will have to bring in outside maize to feed the digester, with associated movements to distribute the digestate, plough, sow, spray, fertilize etc.

f- The proximity of the already dangerous crossroads – A283 / B2135.

g- The capacity of the roundabout at Washington and associated traffic problems already highlighted

h- The access to the proposed site and its proximity to the Hammes Farm access.

i- Turning right in or out of the proposed site with other traffic moving at up to 60mph.

6- The impact on the SDNP has not been assessed properly. A site just to the west of "Ham Farm" was dismissed by the SDNP landscape officer especially referring to "the cumulative impact of 3 sand quarries (in a row) on the view from the South Downs, especially from Chanctonbury Hill which is a well known and visited tourist destination. "Ham Farm" fits all the other criteria cited by the officers and would be just as visible – even more so if trees and vegetation were removed for road alterations.

7- S.O.'s 7, 8, 9, 10, 11, first part of 12, 13 and 14 will no longer stand should this proposed development remain in the Draft Mineral Plan

8- The impact of health, well-being and loss of amenity on the residents, businesses, schools etc of Steyning and the surrounding villages would be unacceptable.

For all the above reasons and by WSCC's failure in their Statutory Duty with regard to the NPPF and HDC's HDPPF, this site should be removed forthwith from the Joint Minerals Local Plan.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The removal of the 'Ham Farm' site from the WSCC and SDNPA's Joint Mineral Plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B3.1- I do not approve of fracking

B3.2- Not enough care with research and consultations.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 191 Respondent ID: 3813)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

You have not detailed any other alternatives

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Exploration of the use of marine sand which is also soft sand.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Please see attached comments

Comments on draft mineral plan from WSCC dated March 2016

In reply to the statements made in the frequently asked questions on your website here are my views.

A number of statements are based on inaccurate and out of date information and therefore raise several questions that make the inclusion of Ham Farm as a potential site an ill-conceived proposal.

I have issues regarding the following topics mentioned in the FAQs.

Transport

Regarding the most recent assessment carried out by independent consultants is dated April-May 2015 2 things have happened since then that directly affect the volume and nature of the traffic using A283.

1. Shoreham Air crash in August 2015 which introduced the need for the A283 to be used as a diversion route thought only to be temporary, not so. As residents we have seen a significant increase in the traffic volumes which neutralise the value of the comments made in the assessment.

2. As part of the Worthing by pass another impact has been seen with the move of the sixth form college to the Warren Road site creating constant traffic congestion which impacts the A24 and A27 junction at the Offington roundabout and so the traffic has moved to the A270 Long Furlong. Hence we now have a Worthing bypass via A283.

The assessment has stated that the speed limit on the A283 is 50 when it is in fact 60, and that is on a road that previously stated it kills

Habitat

As the entrance to the site is on a bend there is no way it is acceptable to only remove a few of the mature trees that as located at the front of the site, as the view will not be sufficient for vehicles approaching or leaving the site.

This will result in an unacceptable loss of habitat.

Flood risk

As the site is higher than the Wiston pond which is inside the National Park not sure how a statement can be made there will be no impact. In addition the trout farm next door is fed by chalk springs which will be polluted if not by the sand but by the vehicle run off, dust, and airborne particles.

Landscape

Your statement says there will be no unacceptable impact on the landscape this implies that the scar on the landscape visible from Chanctonbury which is an SSSI is acceptable. The views from the National Park are just as important as those within.

Depth of the quarry

Your statement claims that the depth of the sand is from 5.2 to 15.4m but what it does not state is how far down does the sand belt start.

The last survey done by the National Geological Society in 1948 on the site found that the sand was to be found at a depth of 42m feet, all other surveys have been done by the developer and the land owner and will therefore be more favourable by there very nature.

Post extraction reinstatement

As stated by yourselves there is insufficient inert waste to fill this site which means more lorries bringing in waste from other locations in the county and outside.

What is to stop the developer from bringing in asbestos waste from any development at the cement works site, my view is none because who in their right mind would check.

Questions not raised in your FAQs

What credit checks do you do on developers you are engaging with, none in this case the company concerned has more incarnations over the recent years than is acceptable in commerce. Just as they run out of money they go into administration leaving institutions like yourselves with the cost of clearing up the mess that has been left and the money that you would use for that reparation is our money as council tax payers.

How can a recommendation be made and a plan proposed when the site facts are inaccurate especially the omission of graded buildings like Wappingthorn Manor.

You have started the operating hours are 11 hours per day 5.5 days a week in the winter months on this extremely busy road that is unlit and has 5 poorly defined and unlit pedestrian crossings.

Not to mention operates the national speed limit for a single track road there is no mention of how this could be addressed though lighting the road will result in unacceptable light pollution.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

No changes reccomended to this ill concieved proposal other than complete rejection.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

See previous comments regarding site allocations.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 135 Respondent ID: 3814)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Re Exploration of oil in West Sussex

I have been asked to contact you by Action Aid to give weight to their campaign against the Exploration/Exploitation of oil in West Sussex.

I have no objection to the exploration for oil; unless you know the oil reserves how else can you plan.

It took several million years for oil to be formed; it is therefore irreplaceable.

Recently there has been great success in the production of solar electricity. Marine power has yet to justify it's huge potential. Both these sources are inexhaustale and free from pollution.

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02 - Ham Farm: Resident/Member of the Public (Response ID: 60 Respondent ID: 3917)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Objectives 1 to 4 are incompatible with 7, 8 and 9

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

A reduction in mineral production in rural areas which are unsuited to coping with the volumes of traffic and other pollution which would be involved

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Extraction of 850,000 tonnes of sand implies significant additional traffic, resulting in noise, exhaust and light pollution as well as traffic congestion on roads not suited for significant additional HGV use. This would cause significant damage to local amenities, wildlife and habitat, as well as delays and increased risk of accidents.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Do not include the proposed site in the plan

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

The policies in section 8 appear to be sensible. The development of Ham Farm, however, is not compatible with policy M12, M15, M17, M18, M29, M22, M23, and there is no evidence that it would not breach M16,

The change is simple - not to develop Ham Farn

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 299 Respondent ID: 3923)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The “Vision” and the Strategic Objectives are proposed in a far too black and white manner with the options of merely "yes" and "no" merely pigeonholing complex matters.

The proposed quarry at the Ham Farm site does not meet the Strategic Objectives; S07 to S011 (inclusive) are not met and on this basis there is a direct conflict with the Strategic Objectives.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

The Ham Farm site should be removed from the draft plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The only beneficiary of this project is the landowner of Ham Farm. For all local residents and those using the A283 (a narrow and windy road in places) this would be a disaster from a safety perspective as well as from air quality.

The South Downs National Park is a place of refuge and the increased traffic and scarred landscape will be a loss for all future generations. Ancient woodlands would be destroyed by quarrying operations.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Ham Farm should be deselected from the draft plan, as well as withdrawn from the Draft Minerals and Waste Plan

B3. ‘Mineral-specific’ and ‘Development Management’ Policies

B3.1 Do you support the ‘mineral-specific’ policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the ‘development management’ policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 43 Respondent ID: 3933)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I don't agree with vision 2.33 and Objective 3 about soft sand extraction within and outside the South Downs National Park. The current proposal is to quarry for soft sand at Ham Farm. This is right next door to a historic 16 century grade 2 cottage and Chanctonbury Ring. It will destroy the countryside and detract from its beauty and as a consequence tourism will be reduced. The local villages and towns need tourism and farming; not a quarry to improve their economic viability. The jobs that will be made from the quarry will be minimal and due to their specialist skill base will not come from the local area. The site is also not economically viable; it will require huge amounts of resource to do the testing and excavate the site, which most excavation or aggregate extraction businesses in this area haven't got. The infill costs alone of returning the site in 17 years time to how it was would be astronomical. It will only be sustainable if the taxpayer invests huge amounts of money, which could be better spent elsewhere. The local roads are also not able to sustain the huge lorry transportation requirements. The roads are already heavily congested and there are safety issues to consider. If sand has to be extracted it would be safer for the environment and more economical if it and other mineral resources required were marine extracted. I would like to invest in a tourism business that is environmentally sustainable and provide much needed jobs to the area, but will not invest if this proposal goes ahead.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would remove the current extraction of sand from the countryside. Sand and other minerals are much more viable from an economic, environment and safety perspective if they are taken from marine reserves.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The current proposal is to quarry for soft sand at Ham Farm. This is right next door to a historic 16 century grade 2 cottage and Chanctonbury Ring. It will destroy the countryside and detract from its beauty and as a consequence tourism will be reduced. The local villages and towns need tourism and farming; not a quarry to improve their economic viability. The jobs that will be made from the quarry will be minimal and due to their specialist skill base will not come from the local area. The site is also not economically viable; it will require huge amounts of resource to do the testing and excavate the site, which most excavation or aggregate extraction businesses in this area haven't got. The infill costs alone of returning the site in 17 years time to how it was would be astronomical. It will only be sustainable if the taxpayer invests huge amounts of money,

which could be better spent elsewhere. The local roads are also not able to sustain the huge lorry transportation requirements. The roads are already heavily congested and there are safety issues to consider. If sand has to be extracted it would be safer for the environment and more economical if it and other mineral resources required were marine extracted. I would like to invest in a tourism business that is environmentally sustainable and provide much needed jobs to the area, but will not invest if this proposal goes ahead.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would remove the current extraction of sand from the countryside. Sand and other minerals are much more viable from an economic, environment and safety perspective if they are taken from marine reserves.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I don't agree with the following paragraphs in Section 6:"The strategy for the provision of land won soft sand is to rely on

existing reserves, an additional site allocation beyond the South Downs National Park at Ham Farm20 (see Policy M12), and increasing levels of imports from other areas, in order to facilitate a 'managed retreat' from working soft sand within the South Downs National Park…6.2.17. This strategy accords with national policy as it will conserve the

landscape and scenic beauty of the National Park and has followed an assessment which demonstrates that, on balance, there are no exceptional circumstances and it is not in the public interest to allocatesites21.

6.2.18. In light of this it is considered that there are now insufficient reserves and opportunities for additional sites to allow for supplies sourced from within West Sussex to be maintained at historic levels. This means that there will be an increased reliance on imports of soft sand from other sources." This policy does not conserve the landscape or the local wildlife. Where is the assessment that demonstrates that there are no exceptional circumstances? What about the listed properties such as Horsebrook Cottage that are next door to Ham Farm, the historical context of the Chanctonbury Ring and the environmental issues that will impact on the Site of Special Scientific significance and ancient woodland? International countries have paid a massive price for sand mining such as Australia, India, New Zealand, Sierra Leone and the US which show disastrous environmental consequences and major habitat destruction. What about people's health and wellbeing; the recent boom in silica sand mining has caused concern from residents in US that include quality of life issues and the threat of silicosis. There are no specific details only general text about implementation or monitoring in Section 6,7 and 8 . Where is the detailed plan that counteracts issues such as noise, lights, hours of operation, damage and excessive wear to roads from lorry traffic, public safety concerns from the volume of traffic, possible damage and annoyance resulting from blasting, and concerns regarding aesthetics and land use changes. All the way through in terms of mitigation it says " no trends or targets identified", this is because there aren't any other quarries nearby to make an accurate assessment.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The Plan should be about ramping down the activity at existing sites and not putting forward new sites in areas of outstanding natural beauty. The aggregates and mineral industry in the UK, similar to the coal and steel industry is unsustainable in terms of economic viability. No where in the plan or policy can I see an economic

or risk impact assessment. In addition, no where in the document do you explain coherently what you are trying to achieve through this policy ie is it economy to the local area or national?

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 48 Respondent ID: 3934)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The chosen site for sand extraction is Ham Farm in Wiston and is totally unsuitable and not economically viable and will cause long term harm for generations in the area. The following are the main concerns;

1. Environment / Flooding - extracting 850,000 tonnes of sand in a small area and replacing it with other material will cause serious flooding as the structure of the sand and the air gaps between allows rainwater to be collected as a massive underground reservoir to dissipate naturally over time. No amount of drainage will meet this current natural draining facility. The wildlife currently enjoying this habitat will not suddenly return in 2033 once work has ceased, instead they will have a reduced area in which to live. The five young deer seen regularly in the large field won't return after operations commence. The existing ancient stream from which the 16th Century Horsebrook Cottage next to Ham Farm derived its name would suffer from the plant and machinery and quarrying operations as would the ancient woodland to the North.

2. Health - noise, dust, potential silicosis, stress will all be factors for the people in the area.

3. Financial - it isn't financially viable to extract the sand and replace it with 850,000 tonnes of alternative imported material and return the site back to its original state and habitat with the necessary mitigation measures and drainage. The areas that will need to be screened off due to neighbours, ancient woodland, hedgerows and access roads will be a significant portion of the 40 acre site, leading to a reduction in the quantity of quarried material. Ultimately the cost will outweigh the benefit for this site and the taxpayer will be asked to pay the delta, which is not acceptable.

4. Objectives - these need to align better with locality, i.e. tourism for the considerable local attractions such as Chanctonbury, Wiston estate, the South Downs Way, Steyning, Bramber. Quarrying sand will prevent tourism in the area and blight the view of Wiston from the South Downs National Park. I was intending to start a business which attracts tourists to this immediate area which would not be possible if these plans go ahead. Jobs attracted by quarrying will not come from the local area as they are too specialist and would therefore need to be recruited from a wider area.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Why can't marine mineral extraction be increased to mitigate the need for land-based mineral extraction?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The chosen site for sand extraction is Ham Farm in Wiston and is totally unsuitable and not economically viable and will cause long term harm for generations in the area. The following are the main concerns;

1. Environment / Flooding - extracting 850,000 tonnes of sand in a small area and replacing it with other material will cause serious flooding as the structure of the sand and the air gaps between allows rainwater to be collected as a massive underground reservoir to dissipate naturally over time. No amount of drainage will meet this current natural draining facility. The wildlife currently enjoying this habitat will not suddenly return in 2033 once work has ceased, instead they will have a reduced area in which to live. The five young deer seen regularly in the large field won't return after operations commence. The existing ancient stream from which the 16th Century Horsebrook Cottage next to Ham Farm derived its name would suffer from the plant and machinery and quarrying operations as would the ancient woodland to the North.

2. Health - noise, dust, potential silicosis, stress will all be factors for the people in the area.

3. Financial - it isn't financially viable to extract the sand and replace it with 850,000 tonnes of alternative imported material and return the site back to its original state and habitat with the necessary mitigation measures and drainage. Ultimately the cost will outweigh the benefit for this site and the taxpayer will be asked to pay the delta, which is not acceptable.

4. Objectives - these need to align better with locality, i.e. tourism for the considerable local attractions such as Chanctonbury, Wiston estate, the South Downs Way, Steyning, Bramber. Quarrying sand will prevent tourism in the area and blight the view of Wiston from the South Downs National Park. I was intending to start a business which attracts tourists to this immediate area which would not be possible if these plans go ahead. Jobs attracted by quarrying will not come from the local area as they are too specialist and would therefore need to be recruited from a wider area.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The plan needs to be amended to reject Ham Farm as an option.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Section 6 of the plan aims to remove land won soft sand from the South Downs National Park and increase from other reserves and imports as well as the site at Ham Farm. For reasons stated earlier the Ham Farm site is not suitable for sand extraction as it will have disastrous impacts on the environment and the local area as well as the health of the local residents, and being non viable financially.

In section 7.1.5 it mentions that residents and community groups have been consulted - which ones are these in relation to Ham Farm?

Paragraph 7.1.6 states that the elements of the principles used to identify a site. The first is "places where there are opportunities to restore land beneficially, for example a net-gain in biodiversity." There is no evidence that this is the case with Ham Farm, in fact the opposite is the case. The second is "places without a sensitive natural or built

environment and away from communities, in order to protect the amenity of residents and visitors to West Sussex." This is not the case with Ham Farm. The third is in regard to the lorry highway network but no measures are listed as to how the increased traffic and road damage/noise/fumes will be dealt with.

The word "mitigation" is used throughout sections 6, 7 & 8 but no proposals as to what these measures would be. For example how, exactly, is the loss of high quality agricultural land mitigated? (7.2.4.xiii) How is the risk of flooding (subject to a flood risk assessment) mitigated where the aquifer layer has been removed and replaced with an un-named imported material? (7.2.4.viii) It's a nonsense.

Furthermore the plan fails policy M12 Character under the three requirements stated. Policy M13 seeks to avoid quarrying in protected landscapes, but ignores the immediate surrounding area which is every bit as sensitive and of value to the local residents. This is clearly the case of NIMBY-ism on behalf of the South Downs National Park where they are happy to nominate land for this process provided it is outside of the designated landscape. Paragraph 8.3.4 states "Due to their nature and size, mineral developments can have significant impact on these designated landscapes, both during operations and following restoration." This will be the case with Ham Farm.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The plan deals with what the stakeholders want to achieve, but not the impact of how it will be achieved.

There is no economic assessment or risk impact assessment.

Who will benefit from the plan? It isn't clear in this regard.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 304 Respondent ID: 3944)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

It has not taken into account our obligations and legal duty to the Paris Climate change agreements. The only way to meet these targets and become a low carbon society is to move away from fossil fuels and into renewables. Methane emmisions from oil and gas extraction and production are 25 times more potent than carbon dioxide and are extremely high particularly with unconventional extraction and production. Fossil fuels should remain in the ground and it is widely accepted that all of all existing fossil fuels only a third can be burnt if we are to stay below the critical global warming of 2 percent.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

There are multitudes of alternative sources of energy. There is no place for oil and gas in a sustainable future. Priority and encouragement should be given to community projects such as Repower Balcombe and any other fossil free energy operations.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I am concerned this will lead to the prodution of silica (with all its health problems) which could be used for unconventional oil or gas production for which there is no place in a sustainable future.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Building sand only.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

The idea that energy security can only be met with fossil fuel production is short sighted and foolish. The best way is community base renewbale energy. The production of fossil fuels puts at risk our water supples and our food prodution security as well as being devistating to the countryside and the people that live there.

AONB's SSSI's and the South Downs National Park must be excluded from any Oil and Gas developement, exploration or production be it conventional, unconventional, fracking or acidisation. This should include any sites that may advance below them at any depth.

All mineral production should be rigourously supervised with an independent representative on site at all times, and the companies must not be able to monitor themselves. WSCC is responsible for the health and safety of residents. Bearing this in mind and the close proximity of villages to these sites no permissions should be given to oil and gas exploration or production.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

As well as considering the risk of exaserbating climate change, "Public Inerest" should take into account the risks to the health, safety, and environment of the people and animals that live there. Ie: Air quality, pollution risks, increased traffic and noise levels. Local people should have the final say on wether planning permission is given, they must have social licence.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 10 Respondent ID: 3954)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Various things have to be protected, but economic activity is essential.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 15 Respondent ID: 3955)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

It would be good to look at any issues relating to sustainability of this in general. Also it would be helpful with an Environmental Impact Assessment (EIA) was carried out to ensure all impact areas are considered.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

More of a focus on all areas of sustainability, particularly environmental sustainability.

Ensure all impact areas are considered through conducting an EIA

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

As the planned work will disrupt the landscape, it is important for there to be a timeline of expected works, which must certainly include mitigation methods. This should all be covered in an EIA. However here are just some of the impact areas for consideration:

Landscapes - As the planned work will disrupt the landscape, it is important for there to be a timeline of expected works, which must certainly include mitigation methods. This may include attempting to make the development more subtle by using more green material, planting trees, and ensuring that the site is hidden from view as much as possible.

Highways - It is important to determine how this development will impact current baselines. Mitigation plan is essential, as used in other similar developments. This may include limiting the amount of times the site is access via road each day.

Ecology - It is important to determine how this development will impact current baselines. Mitigation plan is essential, as used in other similar developments. This may include seeking expert opinion on how to best protect the soil quality, plant species, animal species, and any other factor requiring mitigation.

Geology - It is important to determine how this development will impact current baselines. Mitigation plan is essential, as used in other similar developments. This may include protecting surrounding geology and seeking expert opinion on correct mitigation levels

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see the plan focus much more on sustainability as a whole, but particularly ecological sustainability. It would also be good to see reference to an Environment Impact Assessment (EIA)

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

West Hoathly:

As the planned work will disrupt the landscape, it is important for there to be a timeline of expected works, which must certainly include mitigation methods. This should all be covered in an EIA. However here are just some of the impact areas for consideration:

Landscapes - As the planned work will disrupt the landscape, it is important for there to be a timeline of expected works, which must certainly include mitigation methods. This may include attempting to make the development more subtle by using more green material, planting trees, and ensuring that the site is hidden from view as much as possible.

Highways - It is important to determine how this development will impact current baselines. Mitigation plan is essential, as used in other similar developments. This may include limiting the amount of times the site is access via road each day.

Ecology - It is important to determine how this development will impact current baselines. Mitigation plan is essential, as used in other similar developments. This may include seeking expert opinion on how to best protect the soil quality, plant species, animal species, and any other factor requiring mitigation.

Geology - It is important to determine how this development will impact current baselines. Mitigation plan is essential, as used in other similar developments. This may include protecting surrounding geology and seeking expert opinion on correct mitigation levels

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

A greater focus on sustainability as a whole, particularly ecological sustainability.

More reference to an EIA being created

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Mineral Specific policies:

All mineral policies - It would be helpful to have some background on the rationale behind the policies. It would also be helpful to be able to read each policy in the question

Development Management policies

All development management policies - It would be helpful to have some background on the rationale behind the policies. It would also be helpful to be able to read each policy in the question

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

This should ideally follow an EIA layout (Scoping Report, and then Environmental Impact Statement)

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 57 Respondent ID: 3956)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 294 Respondent ID: 3960)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The strategic objectives are in park ok, but the site at Ham Farm conflicts with most of them.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Remove the Harm Farm site from the draft plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

- The noise and pollution from the quarry will have a major impact on residents and those passing through. Air quality will be severely impacted.

- It will cause devastating financial damage to those who live around the proposed site - the threat of the

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The 'Ham Farm' site should be removed and withdrawn from the plan with immediate effect.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 246 Respondent ID: 3963)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The West Sussex District (county) council are not taking into account our environment, our children's & families health and well being when putting The Joint Minerals Local Plan in place. Allowing anyone to extract natural oil & gas from the land in which we live will have detrimental effects on Climate Change.

WSCC should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I consider these areas to be areas of Outstanding Natural Beauty and should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see that the WSCC are acting in the communities best interest and to not allow any of the extraction process to go forward.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I consider these areas to be areas of Outstanding Natural Beauty and should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see that the WSCC are acting in the communities best interest and to not allow any of the extraction process to go forward.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

WSCC should function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 273 Respondent ID: 3966)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The plan in its present form will lead to considerable road congestion , have negative effect on landscape and the values of properties in the area

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Abandonment of plans to quarry in the Steyning / Wiston area

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

See comments above

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

As above

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 305 Respondent ID: 3970)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I strongly feel that the action taken should be to deselect the Ham Farm site from the draft plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Weston House is a grade 1 listed building and is less than 1000metres away.

I have experienced many happy days here most recently a wedding of two close friends.

This House will look down onto the sight and I want to support Wiston House in their campaign to deselect Ham Farm as a prospective sight.

As a frequent user of the A283 as mentioned to visit my friends in this area, I can appreciate that this is a dangerous and busy road. Fatal accidents take place on this stretch of road and this has mainly increased over the last few years due to natural population/residential/business growth in the area surrounding Brighton. A quarry would only lead to adding to this volume of traffic and I think should be avoided.

Needless to mention the effect to natural wildlife nearby!

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I strongly feel the Ham farm potential site should be deselected as soon as possible and withdrawn from the WSCC DMWP due to my reasons listed above.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 326 Respondent ID: 3985)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The somewhat misleadingly named "Ham Farm" site does NOT meet the strategic objectives, in particular S07 to S11 inclusive.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

The "Ham Farm" site should removed from the draft plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The local landscape will clearly be damaged by permitting a quarry and landfill at this site. It is one of the very few relatively unspoiled locations in the area, it is far too close to the South Downs National Park and will be clearly visible from the South Downs Way and Chanctonbury Ring - both important tourist attractions and a peaceful “escape" for all of us in the local area. A peaceful country walk for thousands of walkers and cyclists will be punctuated by the noise of heavy machinery!

- The threat local wildlife, flora and fauna is obvious to all especially with the influx of rats and other scavengers that usually follow landfill sites. This includes bats, toads, frogs, newts, fish, and the full range of British rural wildlife from hedgehogs to deer.

- Tourism in Steyning and district, as well as in the South Downs National Park is extremely important to the local economy - and will be seriously damaged

- The dust from quarrying activities will pose a serious danger to public health as will the additional heavy road traffic.

- The A283 is a very important route due to the very busy roads south of the South Downs. It is also a heavily used cycling route for both recreational cyclists and commuters. The additional heavy lorries will undoubtedly present a clear danger to cyclists.

- Health implications from dust (including silica dust) and pollution including of water, and additional vehicle pollution, are all obvious, I can clearly remember the respiratory complaints caused when the Southwark tunnels were dug. This will be a much longer term issue if it is allowed.

- This would be a very visible site, in an area of outstanding natural beauty!

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The Ham Farm site should be removed from the plan as a more inappropriate location for is hard to imagine

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 290 Respondent ID: 3989)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

In principal your 'Vision' and 'Strategic Objectives' are worthy but have not been interpreted correctly, you emphasize the environment whilst completely disregarding it.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site is not appropriate and should not be included in the Joint Minerals Local Plan for the following reasons;

Visual Impact: The site is only meters away from the SDNP and will be clearly visible from key viewpoints within it, the main screening is provided by a line of Ash trees adjacent to the road, not only will some of this need to be cleared to provide safe site lines for the access but the rest could be lost with the onset of Ash Dieback. Other sites that are possibly less visible and easier to screen have been discounted on the advise of the SDNPA Landscape Officer's report, the same should apply here too.

Highways and Access: Even the largely underestimated number of extra lorry movements will have a significant impact on the busy and dangerous A283, this road suffers from increasingly frequent congestion and accidents (in fact there was an accident involving a lorry and car directly opposite the proposed site entrance only this morning!) and when the road is blocked or heavily congested the traffic finds its way onto the single track roads through Ashurst. In addition there has been no mention of increased farm traffic as a consequence of the loss of this farm land with fuel for the Bio Digester at Wappingthorn Farm having to be sourced from further afield.

Extraction and Site Restoration: The proposed output of 850,000 Tonnes is too small to be considered viable and only amounts to less than two years consumption it is clear that once the infrastructure has been installed it will be only too easy for the site to be enlarged, destroying yet more prime farm land. It is not possible for the site to be restored to its current state meaning this farm land will be permanently lost. There are also major environmental concerns with the proposed 'inert landfill' that is not properly regulated and self policed on a site that is profoundly connected to aquifers and water courses.

I believe the assessments resulting in this site being put forward, in a rush to secure this final option, have not been carried out objectively and the Ham farm proposal should have been discounted at a previous stage of the process.

I also consider the plan has been put forward without sufficient public consultation, it is astonishing that this site has been short listed to this stage while local communities are kept in the dark, let alone the immediate residents on its doorstep whose homes and livelihoods will be ruined, and only received an official notification after being forced to make their own inquiries and requests for information to WSCC a few weeks ago. The process should be extended and conducted in public so that proper consideration can be given to all available options including on and offshore production.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Further public consultation and scrutiny of the conclusions of the Daft Plan are needed to ensure this is the best way forward because I believe there are vested interests and that the resulting hole in the ground, in which to dump waste, not just the sand production is the main benefit for the proposed operator. Offshore production has now been labelled unsuitable but is perhaps just not as financially attractive as the sand itself is still a viable building product.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 21 Respondent ID: 3990)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The local roads cannot sustain this extra traffic movement. It will become an unnecessary eysore to the local landscapes.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

More local resident information and input is required before any plans are agreed. This has been kept too low key.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 29 Respondent ID: 3991)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

We do not require the sand extraction proposed in the paln.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

You should not put locations in the plan with the name pof the area incorrect.

I believe that section 12 Ham Farm is in fact Hammes Fram.

This is to the disadvantage of asll residents of Steyning who do not realise your proposals

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

You have the name of the farm wrong.

I think you refer to Hammes Frarm

Unless residents realise the location you are misinforming the residents.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

You need to start the process again.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 33 Respondent ID: 3992)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I object to this site being used because:

1)Very important: Access to and from the A283 would not be appropriate as it is already a very busy road, and more notably, the most dangerous road in the South. Cars and motorbikes travel on this single carriageway road at 60mph (or more!) From the proposed site to the A24, or to the A27, there are no suitable safe places to overtake slow moving lorries. There are already considerable tailbacks on this road when cars are unable to overtake cyclists and tractors. Cars will risk overtaking slow lorries on this road, particularly at peak periods, possibly at, or on the approach to blind bends, into oncoming traffic.

2)It is adjacent to Ancient Semi Natural Woodland (Great Alder Wood)

3a)The site lies near a Listed Building (Horsebrook Cottage).

3b)The NW corner of the site lies close to one of the putative alignments of the Sussex Greensand Way Roman road. It is possible that archaeological remains associated with the road may exist within the site.

3c)Deposits of River Terrace sands/ gravels have been mapped on the site. These may contain Early Palaeolithic flint tools, and contain microfossils relevant to understanding of ancient environment. A handaxe of Palaeolithic date has been reported from just north of the site. Its find-spot lies within the area of mapped River Terrace sands/ gravels. On a large site such as this, the possibility that other remains of ancient occupation may be present .

4) 50% of site at high risk susceptibility to ground water flooding

5)A number of residential properties are located in close proximity to the south eastern and north western boundaries of the site.

6) It is an area of natural beauty and would be an eyesore from the A283.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would not support using this site at all.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 47 Respondent ID: 3993)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This is not able to use alternative forms of transport and will necessitate lorries/additional traffic on an already very busy road

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 51 Respondent ID: 3994)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The proposal to allow sand extraction at Ham Farm Steyning and the subsequent use of the area for landfill is strongly opposed by the residents of Steyning. The A283 is already over congested and dangerous. The Steyning bypass is impossible to join at certain times of day. Adding use by heavy goods vehicles would be extremely detrimental to the area generally in terms of congestion, air pollution and road safety.

The proximity to residential areas is unacceptable, as is the desecration of an area of natural beauty. This would undoubtedly be a huge blot on the landscape.

Steyning is a vibrant community and a tourist destination. The proposed development is of no benefit to the community or the area, but no doubt someone sees it as a source of profit.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Disallow new sand extraction and subsequent landfill sites within two miles of residential areas. Prioritise protection of archaeological sites and wildlife sites which cannot be replaced.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This would be a blot on the landscape, visible from the top of the downs. It is too near residential areas. The existing road next to the site is already congested and dangerous and subject to flooding. The amount of traffic using the Steyning bypass would increase and it is already difficult to access the bypass from canons way at busy times of day.

Steyning is likely to be downwind of any subsequent land fill and this would blight the area for years to come.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Rule out the development of Ham Farm

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I would like to know why developing any of these sites is necessary and who exactly profits from this kind of development.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

More open consultation and publicity so that the local residents have an opportunity to protect their environment. Any development that does proceed should pay a dividend to local communities.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 55 Respondent ID: 3995)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

While I support both the vision and the strategic objectives, I do not support the decision to place one of the sites at Ham Farm in Steyning. This is too close to our town and will have a negative impact upon the people living there and those travelling to Steyning Grammar School from the surrounding villages and towns. There will be a considerable amount of disruption and pollution and the increased traffic will put our children at risk. This is not a suitable site. Please look elsewhere for a location that isn't close to any town or village.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like the location to be changed from Ham Farm to somewhere further away from Steyning and any other town or village.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

As previously stated, this site is too close to Steyning and will have a devastating impact on our town from both pollution and a potentially dangerous increase in traffic. This site is too close to our schools and homes.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see a proposed site that is further away from Steyning and any other town or village.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The Plan should change the site allocations - specifically the proposed site of Ham Farm, Steyning.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 58 Respondent ID: 3996)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The Port of Shoreham offers a better alternative to importation of clean sand and aggregates. Priorities are housing and road improvements.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 59 Respondent ID: 3997)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

We need aggregates fro building. Tghe right balance seems to me to have been struck

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Instead of inert infill is it geologically possible to use the removed clay which overlays the sand by replacing some of it afterwards to form a water-tight excavation thus allowing a water park? Recreational and thus tourist and employment possibilities for Steyning?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Please see earlier comment which i have put in the wrong section. I would like to see a water parkhere once the sand has been excavated if that is feasible

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

No inert landfill - water instead using some of the excavated clay to make the excavation water retentive

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 38 Respondent ID: 3998)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

There will be too much heavy lorry traffic, noise and pollution caused by this proposal

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

This proposal should not go ahead

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Too much heavy lorry traffic which will cause noise, pollution and congestion

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The proposed plan should be rejected

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 67 Respondent ID: 3999)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I am extremely concerned that the proposed quarry at Ham Farm Steyning has not taken into consideration the restricted single carriageway road access. This is already an accident black spot and with up to 70 vehicle movements per day there will be severe congestion on the A283 with vehicles turning in and out of the site.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Alternative road access would have to be constructed.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I have already outlined my objections in the previous section.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Alternative road access would be required. The single carriageway A283 would suffer severe congestion unless a roundabout was constructed.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 69 Respondent ID: 4000)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

How on earth did this get past two meetings before the local residents & businesses knew about it, seems to me it has been sneaked in by the back door!

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Extend the final date of the decision & note the comments made by local residents & local business.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

already commented

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

already commented

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 45 Respondent ID: 4001)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

In principle I would support this site providing certain assurances were given and included in the extraction permission. The A283 is a notorious accident prone road and certain conditions should be met before additional lorry movements are added. The entrance to the site is a particular concern and a system adopted at the Beeding cement works should be considered with traffic entering and leaving in one direction or the addition of a major roundabout should be looked at. Also the A283 road to the east known as the Wiston Bends is crumbling away and is a renown accident spot. If you come off the road here the vehicle ends up upside down in a stream!! I can actually confirm this with my experience of being a retired West Sussex Fireman serving for nearly 20 years on Steyning Fire Station. If there is any planning gain on the planning permission it should be used to upgrade and straighten this part of the road.

My final concern is the after use of the hole in the landscape left after extraction. History show the Shoreham/Upper Beeding cement works site has become a scar on the landscape through failure of local authority planning departments to add restoration clauses to every extraction permission given and there were many. It is essential we are given assurances that the extraction hole is not to be used for rubbish landfill site due to it's location at the edge of the South Downs Nation Park and directly opposite Wilton Park. Also restoration should be insisted upon as the project progresses and not left until the end of extraction to safe guard against the possibility of the extraction company going out of business and going into liquidation.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

See Above.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 71 Respondent ID: 4002)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

It is outrageous to consider using this area to create such a dangerous site. The traffic chaos is already out of hand because the A283 is used as an alternative route to the A27, and quite unsuitable for more heavy lorries. It is a country lane and very dangerous already.

Also, landfill here will be a stinking heap, as was known at the Washington sandpit. It will blight Steyning and be a health hazard.

Why do these faceless authorities want to spoil this beautiful area?????

So much for the South Downs National Park. No protection from them. Greed & more greed.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Cancel the whole outrageous plan.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

As this is already an industrially developed site, it is more suitable.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Quarrying & subsequent landfill is very unsuitable at this site. The whole area is already an accident black spot.

Outrageous plan.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

JUST CANCEL IT. Surely there is a more suitable brown field site.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

3.2

Can't believe anyone can even consider this as a good idea, however you look at it.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Make a better effort to find sites that don't ruin naturally stunning areas. What's next... Nuclear Power Station!!!!!

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 72 Respondent ID: 4003)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Go back to your drawing board.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

It is a ridiculous plan. End of.....

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Cancel the whole idea

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Can't believe it is being considered 3.1 & 3.2

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 46 Respondent ID: 4004)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The Ham Farm site is a bad idea because:

1) It will increase heavy traffic on the already bust A283.

2) It will mean a Landfill site less than a mile from Steyning Grammar School.

3) It is adjacent to an Area of Outstanding National Beauty and close to the South Downs National Park.

I can't believe there aren't better alternatives.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Find a better alternative.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Presented here are just a list of policy titles.

How can I be expected to have a view on those?

Where is the detail?

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 74 Respondent ID: 4005)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 76 Respondent ID: 4006)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 82 Respondent ID: 4007)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

A general comment:

Some of the various proposals included in the Plan will be conducted over a significant time period. At this stage assessments have been made on a variety of topics related to the workings of each site but I believe these can only be accurate at the time of each assessment. As work proceeds I hope that serious weight will be given to re-viiting and modifying assessments if and when necessary.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

See above

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

I do not subscribe to the knee-jerk reaction of some objectors because they seem to be basing their views on a lack of information. As someone said at a local Parish Council meeting "We have to get sand from somewhere!"

I have two concerns: first, the assessment of local traffic, the A283 and the addition of as many as 36/40 lorry movements per working day states that there will be no adverse effects. It may be true in 2016 but with as much as 850,000 tonnes of sand to be removed I calculate that the whole operation will take perhaps 18 years. By that time,, traffic conditions will be very different, so this is something which will need regular monitoring. I hope a contingency sum has been included in budgets to allow for modifications to the A283 at Ham Farm if necessary.

My own opinion is that the construction of a roundabout, with a spur to Ham Farm AND one opposite to serve Wiston Estate, would be prudent, practical and a great asset to the smooth ingress and egress from both sides of this busy road.

My second concern is that, once completed, the land will be restored to a level site which may or may not be suitable for agricultural use. The introduction of a lake for boating, fishing (an extension to nearby Alderwoods Ponds perhaps?) would do much to allay the fears of objectors and could be a valuable natural asset for the locality.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

See above.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

I believe it is essential to set out clearly the intention of the Plan to preserve and conserve the natural ambience of each location after it has been worked and, if possible, firm plans should be suggested for improvements to the locations post-working.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 70 Respondent ID: 4008)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I don't agree with 2.3.5 Mineral Resources. I don't think we should make a blanket policy to always protect economically viable mineral resources from other developments on or near the sites, as it depends what the alternative development is.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Please change 2.3.5 to be more nuanced, so perhaps to say we should give due regard to the importance of mineral resources when considering other developments.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The Ham Farm site in Steyning is totally inappropriate for inclusion. I have two main concerns:

Firstly, this site doesn't meet the second of your guiding principles: Places without a sensitive natural or built

environment and away from communities, in order to protect the amenity of residents and visitors to West Sussex.

The proposed site is in a sensitive natural environment. It is directly opposite Wiston Pond which is an area of great natural beauty. It is also very near Steyning, an extremely attractive small town that is very dependent on attracting tourists and visitors. I'm surprised this is even being considered on the boundary of the South Downs National Park.

The second, and most worrying concern, is transportation. The proposed site is situated on the A283, a small, congested and winding local road. This road is dangerous and has been the site of a number of accidents, as testified by the warning signs already displayed on the road. Your own accident locations map (https://www.westsussex.gov.uk/roads-and-travel/road-safety/accident-locations-map/) shows 1 fatal accident, 22 severe accidents and 49 slight accidents on the A283 between the A24 Washington roundabout and the A27 Shoreham junction.

At peak times this road is already very busy with people using it to travel to Worthing and towards Chichester. A large increase in lorry traffic will increase the risk of accidents and add to congestion on an already congested route.

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

This road is is not on the Lorry Route Network (LRN). In order to access either the A24 or A27 the lorries will have to use the A283. It is narrow, it dips, and winds around corners. It is dangerous for cyclists as there is insufficient room for cars to pass them. It is certainly not suitable for large numbers of lorries.

Situating the quarry at this location also runs counter to your strategic objective 11: to maximise the use of rail and water transport for the movement of minerals and to minimise lorry movements and the use of local roads for minerals. This site has neither rail nor water access and will definitely require the use of a local road for mineral transportation.

It is counter to your policy M20 Transport, in particular to

(b) transport links are adequate to serve the development or can be improved to an appropriate standard without an unacceptable impact on amenity, character, or the environment; and

(c) where the need for road transport is demonstrated:

(i) materials are capable of being transported using the Lorry Route network with minimal use of local roads, unless

special justification can be shown;

(ii) vehicle movements associated with the development will not have an unacceptable impact on the capacity of the

highway network;

(iii) there is safe and adequate means of access to the highway network and vehicle movements associated with the

development will not have a severe impact on the safety of all road users;

The A283 is not adequate to serve the development and, unless it is to be widened and straightened, the vehicle movements will have an unacceptable impact on the road capacity and they will have a severe impact on the safety of all road users.

For these reasons I cannot agree that this is a suitable site for mineral extraction.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Please remove Ham Farm as an included site in the plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I am not qualified to answer QB3.1.

The 'development management' policies set out in Section 8 of the Plan seem broadly sensible. However I cannot see that you are applying them appropriately given the inclusion of the Ham Farm site in Steyning in direct contradiction to section 8.9 Transport.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 87 Respondent ID: 4009)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

There are far, far too many "where possible", "exceptional circumstances", and other soft pedaling of the strategic objectives which makes them meaningless. Additionally, if the order of objectives is any representation of importance, strategic objective 2 should be the first 1 by far.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Get rid of the "exceptional circumstances" "where possible" nonsense. Either you mean to improve the health of communities and residents or you don't. Be honest about what this plan is actually going to allow so communities can contemplate and discuss the actual ramifications. Don't try and have it both ways.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This is extremely close to a very populated area, which will experience significant air pollution, noise pollution, and traffic. This is a completely inappropriate site which has only been chosen because it lies just outside the National Park.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Please remove this site from the plan, its totally inappropriate.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 100 Respondent ID: 4010)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I can't believe that an operation of this sort so near to Steyning would be conducive to keeping the character and future tourism possobilities that such a unique small town has. The Ham Farm site is too close to Steyning and the noise, heavy plant movements and air pollution (dust) that this industry produces would not be tolerable especially as there are several schools so near to the site. Let us not forget also the site is so near to one of the most stunning beauty spots in Sussex, (the South Downs as viewed from A283 at Wiston) and to walkers of the South Downs Way the sight of the quarry would definately detract from the local character. Let's keep Steyning special please.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Please don't iindustrialise Steyning.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 102 Respondent ID: 4011)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 103 Respondent ID: 4012)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site is on the edge of SDNP and I suspect will be seen from the Southdowns Way and associated high elevations.

It is very close to Steyning which means that the landfill following the extraction will have a serious impact on the town in a similar way to the site adjacent to Small Dole did for many years.

The road system adjacent to the site cannot support further traffic.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Removal of Ham Farm from the proposal.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 214 Respondent ID: 4013)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The Ham Farm site will detract from Steyning being a special place to live and visit, because all sand excavated will be transported by lorry. This does not contribute to a low carbon economy.

This plan is not seeking to source alternatives to extraction. Recycled materials are not being considered as it is cheaper to excavate a new site.

Previous sites are not currently being restored to the highest standards.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

The urgent need for development does not have to be so reliant on aggregates eg to meet the current short fall in housing the use of modular/prefabricated buildings is quicker, cheaper and does not require soft sand.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site is prime agricultural land and is used to grow maize for the local anaerobic digester. Existing access to this will be cut leading to more lorry movements by road & the necessity to import maize (planning consent was obtained for a self contained facility).

The A283 is a dangerous road with a 60mph speed limit. The road already suffers from numerous road traffic accidents. It is used not only by cars & lorries but increasingly by large tractors & trailers and cyclists too. Both the latter cause hold-ups and traffic queues. The site is planned on a bend in the road. Lorries turning in and

out of the site will cause additional congestion & will be a severe hazard to other road users who could be approaching at speed. There are frequent accidents at both the Horsham Road and Cannons Way turnings on to the A283. The A283 also has 5 footpaths which bisect it - pedestrians (including the elderly and many school children who must use some of the crossings on a daily basis) are at grave risk. Road signage is poor with many signs obscured by overgrowing vegetation. The risks will be increased by lorries travelling east to access the Dudman works at Shoreham Harbour. This road is also used as an alternative route if there are issues on the A27 eg following the Shoreham air crash and is congested on a daily basis.

Ham Farm will be an eye-sore from the South Downs National Park. Trees will have to be removed to allow lorries safe access when entering & leaving the site. This will leave nothing to obscure the site from the Downs. A huge dusty hole in the ground with frequent lorry movements 6 days a week will detract from the rural outlook from the Downs and will deter tourists. This will have a direct impact on the economy of Steyning. Many local businesses rely on tourism throughout the year. This is a beautiful rural area whose main industries are agriculture and tourism, not quarrying for sand.

The local environment will be affected by the dust, noise and the added pollution of the lorries and additional traffic generated by the site. There is no obligation for lorries to cover their loads. There has not been sufficient consideration to safeguarding water quality including local aquifers and ponds. Local fishing ponds, brown trout, bats and newts are at risk. Under road routes are in place for toads to cross the A283 to access Wiston Pond; their habitat is at risk from the Ham Farm development.

There is little to safeguard what is used to re-fill the pit with Dudman's having the responsibility to monitor this.The plan to revert the land to it's previous use eg prime farmland is flawed. Experience tells us that developers have little interest in this aspect and in practice this has not happened at other local sites.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Ham Farm is not the location to excavate sand,

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The better use of existing materials and detailing ways they can be recycled.

Using dredged sand resources before ruining the countryside by digging for easy to access new sites.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 221 Respondent ID: 4014)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Both the vision and the strategic objectives sound very good but are not reflected at all in the contents of the plan and the main extraction site chosen.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

There needs to be congruence between your vision and objectives and the sites you nominate, which does not exist at present

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This proposal is in a sensitive rural environment, in sight of the South Downs. It is not accessible by sustainable modes of transport. It is on the boundary of the protected SDNP and therefore under SDNPA local plan should be protected as any development there will adversely affect the SDNP.

The A283 is already categorised as a medium-high risk road and has a high accident record. It has become much busier in recent years as it has been used as the official by-pass route for the A27 when it was closed due to the Shoreham air crash. The volume of traffic has not reduced even though the A27 is re-open.

The track record of the proposed operator, Dudman, in restoring other local mineral extraction sites is very poor and these need to be fully restored before any confidence can be put in your objective SO13.

Far from protecting and enhacing the health of residents, buinesses and visitors, this site poses a risk to the popuation of Steyning where many young people attend the adjacent nursery and nearby secondary school. The local fishing business at Alderwood Pond and tourism businesses in and around Steyning will suffer due to the noise, loss of scenic amenity and pollution of watercourses. (SO7)

Steyning has a historic environment with several listed buildings very near to Ham Farm. This proposal will detract from their natural and historic environment (SO9). The adjacent anaerobic digester was only given planning permission on the understanding that the maize to feed it would be grown at Ham Farm, which would also use the digestate produced as fertiliser. If this site is used for sand extraction the HGVs on nearby roads and the A283 will increase baove what is predicted in your assessment of the site.

Your wish for sustainable modes of transport will not be met by restoring this site with inert landfill, which woud have to be transported in from out of county

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see Ham Fram removed as a potential site.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 223 Respondent ID: 4015)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

There is no mention in the proposal of the impact on the town of Steyning, situated less then a mile from Ham Farm.

Pollution: Pg 76 (x) - refers to air quality on Storrington High St, over 5 miles from the site. Air quality and pollution must be considered in the nearest town, ie. Steyning. As well as the impact of air and noise pollution on general residents, please note that Steyning Grammar School (2000 pupils) and Steyning Primary School (420 pupils) and their playing fields are located less then a mile from the site. There is also a pre school nursery, Elan, located within half a mile. All of these schools are even closer A283 where the extra traffic pollution will impact.

Road Safety: Pg 76 (xii) - refers to the traffic impact of at the A24 Washington roundabout, approx. 3 miles from the site. There is no reference to the blind bend that the site is situated on (A283). Please note that hundreds of children are transported along this road, by coach, to and from Steyning Grammar every day. The road is already known for its high incidence of accidents, it is often used as an alternative route when there are problems on the A27, adding slow moving lorries to this road is an unacceptable risk. Please also note the proximity of the site (less then half a mile) to the dangerous A283 Steyning Bypass/Horsham Road Junction. This junction is currently earmarked for improvement; proposed improvements will not have taken into account the additional traffic.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Remove this site from the plan. The five guiding principles have not been used the identify this site. It is very close to the community of Steyning and its schools. The existing highway network is not suitable for this type of traffic.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 232 Respondent ID: 4016)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I strongly object as a third generation Steyning resident now renting out my property as I prepare for retirement back in the village.

My grandparents worked as farmers and lived in Horsebrook Cottage whilst farming the land in question.They moved there 1925.... The area concerned is mentioned in the Domesday Book....the whole area is of spiritual and environmental significance. Its almost a farcical situation that this artery into the village and onto the downs can be under consideration.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like to see an alternative site..THIS SITE IS THE GATEWAY AND THE ARTERY TO THE VILLAGE .

It will become the hideous new "Shoreham cement work eyesore!"

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

My grandparents farmed this area and lived in Horsebrook cottage from 1925...the land is mentioned in the Domesday Book...This site is the gateway to the village ..it is the lungs and the artery to the downs. It will cause congestion on an already over congested main road....

It will become another UNSIGHTLY Shoreham cement Work Site

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The whole ridiculous scheme cancelled

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I will do all I can as a journalist to highlight the destruction of the South Downs and this ludicrous proposal

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 233 Respondent ID: 4017)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

1/ MORE TRAFFIC

More traffic on an already busy, dangerous road

2/ MORE NOISE POLLUTION

More noise pollution for the majority of Steyning residents

3/ MORE DUST POLLUTION

More dust pollution causing breathing difficulties for all

4/ MORE DANGER

More danger to residents of Steyning who already find it hard to exit Steyning on to the bi-pass

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 253 Respondent ID: 4018)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

S02 appears to have been ignored, alternative supplies available from marine or import

S05 Land based sand extraction reduces use of ports

S07 has not been considered. No protection, let alone enhancement is provided for residents, businesses or visitors.

S08 Ham Farm site is clearly visible from SDNP, who have a responsibility for protecting boundaries

S09 No protection provided

S10 Does not appear to have been considered

S11 Appears to be in direct conflict with draft plan

S14 Again in conflict with plan. Inevitable increase in carbon emissions from traffic and heavy machinery

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

New sites for sand extraction should not be considered. The detrimental effects on the landscape, local residents and communities far outweigh the possible benefits to the building trade, landowner and developer, particularly when alternatives are available.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

As a resident of Hammes Barn and owner of the Cow Shed Studio and Bullpen Cottage which adjoin the proposed site, it is not surprising that I, my family and the other residents of the Hammes Farm complex are totally against the proposed site. The pollution, dust, noise and traffic would be intolerable and the effect on our lifestyle considerable. We would probably move on, my tenants in Bullpen Cottage who have 2 small children would also move out and my wife's business of Botanical Art Tutor at the Cow Shed would cease.

The bigger effect on the landscape, although outside the official boundary of SDNP, would be to spoil a very pleasant, peaceful and quiet part the County.

Several other businesses and residents will also be adversely affected, as would the local tourist trade.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Ham Farm totally removed from plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 264 Respondent ID: 4019)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I don't fully reject all the SOs but the name of the 'Ham Farm site' misleading.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Deselect the Ham Farm site from the draft plan

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Historical properties: the amenity and financial values of Listed Grade II properties, other nearby Listed buildings, and numerous other nearby, will be destroyed. The threat of this quarry has ended one sale and makes all unsaleable.

Pollution; : quarrying activities will create noise pollutions from heavy quarry machinery and lorries (including incessant reversing "bleeping"), air pollution due to the fumes from both quarry machinery and lorries, and due to the smell of the activities and fume; and light pollution from powerful illumination at the quarry in low light or dark times, etc.

Water / Flooding: Southern Water advise that large amounts of water will have to be removed from site, as water replaces quarried sand. The large number of extra lorry movements required for this, have not been included by WSCC at all, so the overall traffic element is far worse than claimed. The neighbouring properties of Alderwood Ponds and Horsebrook Cottage both extract clean water from the water courses, which are numerous all around the site. These water courses will become contaminated. There is a serious risk of regular and heavy flooding to the site, neighbouring properties (which may also suffer subsidence), the main road, etc. “Inert Waste” does not have the good drainage characteristics of sand - and is therefore almost certain to prevent water draining through the ground and thus directly cause further flooding.

Health: Health implications from dust (including silica dust) and pollution including of water, and additional vehicle pollution. Additionally there is a large school nearby with their playing fields being particularly close to the proposed site. Air quality in a wide area will be badly affected.

Danger: - The A283 is narrow, winding, poorly cambered and badly edged in places, notoriously dangerous and heavily congested, with frequent very long tailbacks. Frequent accidents (fatal, serious, or simply minor and hugely inconvenient) occur that close the road for considerable periods, and cost the taxpayer large sums in emergency services attendance, and cost the public huge inconvenience and time. This is an honest first hand account of that road, as I have lived next door to the proposed site for 30 years, and regularly witnessed such accidents and heavy traffic. Most of this traffic has come about by natural growth over the years, plus the road

now being used by many more than previously, to avoid A27 congestion in Worthing. That natural growth will continue unabated without a quarry and landfill added in to the already huge volume.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I strongly believe that the 'Ham Farm' site is not at all appropriate, and the placement of the quarry would be destructive and dangerous! The 'Ham Farm' site should be withdrawn immediately from the WSCC DMWP.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 267 Respondent ID: 4020)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Yes. The opening line states: West Sussex Will be a place where minerals are produced in ways which conserve and

enhance the beautiful outdoors of West Sussex. I don't see how this quarry will do either of those things, quite the opposite. The second paragraph talks about how it won't detract from making it a special place to live - I quite disagree. It will be an eye-sore, noisy and polluting and turn people away. Look at what's happened at the Cement works, the same company Dudman have been quite happy to leave this as an eyesore on the community. I do not think that living next to the quarry will in any way enhance the area, or make it a special place to live. Further down it says " enhances the historic and natural environment"- how exactly do you work that out? It has nothing to do with the historical environment nor will it enhance the natural environment.

When you talk about 'market demand' for these minerals and sands, it seems to me that what you mean is how much money large aggregate companies can make from our local natural resources. It will not benefit me or my family. We are still renting in an area where we cannot afford to buy because the 'market demand' does not cater for local residents. These minerals and sands are not used to alleviate the housing situation to make it possible for local people to buy housing. When new houses are built they are still unaffordable. I have no doubt that the minerals and sands will be used for commercial enterprises and will be of no benefit to us at all.

"Mineral resources are finite and they must be protected to give future

generations the best possible chance of meeting their own needs. " Indeed. Which is why it would be far more sensible to look and develop alternative building materials that don't continually strip the land of its resources. Spend your money on that instead.

This quarry is only going to add to the already very congested and dangerous A283. We live right next to the proposed site, which is on a dangerous bend in the road as it is. To hear that 4 lorries an hour will be moving in and out of the site is a horrendous thought and blindingly dangerous. There will be 24/7 lighing on the site and the noise of moving lorries will be massively disturbing. There will be constant noise of engines and reversing vehicles. Not to mention the air pollution caused by their exhausts and the site itself. Would you want to live next to that?

You talk of the low impact on the natural habitat but these factors will affect animals just as much as us.

My family and I moved to Hammes Farm to live and clean and quiet life with our children, where they could be safe. My husband and I work full time, we've got 2 kids and incredibly busy lives. The thought of being constantly disturbed by the site is extremely worrying and with no respite for 10 years it is unacceptable. There is no where else for us to go. You will force us out of the area completely. We can barely afford the rent where we are and other properties in the area are prohibitively expensive. We are truly concerned about where we will end up if this project goes forward.

Transport - you say that water and rail will be used as much as possible. There is no railway in Steyning and the water is 5.5 miles away so this has no impact whatsoever on your proposal.

Furthermore, you are trying to make out that the site is far enough away from Steyning that it won't impact it. Of course it will. One mile down the road - it is the same road that takes people to Steyning and the traffic will affect all residents coming in and out of the village.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

See above.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Please see earlier comments.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Please see earlier comments

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

see earlier comments

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

see earlier comments

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 279 Respondent ID: 4021)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Both the Vision and the Strategic Objectives appear reasonable, however with regard to the Hammes Farm site it is the implementation of these that gravely concern me. The additional traffic which is certain to arise from the opening of this site

will create increased noise, air pollution, wear and tear on the road surface thus increasing the cost of maintenance. At certain times of the day those of us living in the Canons Way area have difficulty accessing the by-pass due to the heavy traffic; in the fairly short time that I have lived here (three and a half years) the traffic and the noise has greatly increased and this would only get worse. The only alternative to the by-pass would be to go through the town and that would be impossible - the High Street is already congested and causing it to be a one way street or not allowing parking would be totally impractical; there is no where else to go.

I believe that the worsening traffic flow, air quality and noise pollution would deter many visitors from coming to Steyning which would, in turn, be harmful to local businesses. In addition I believe that should the Hammes Farm project go ahead the residents of Steyning would be hard pressed to travel to other parts of the area.

I strongly oppose siting the project at Hammes Farm.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 300 Respondent ID: 4022)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Strategic Objectives are not met, in numerous regards, most specifically in respect of S07 to S011 inclusive.

The proposal of this site directly conflicts with these Objectives and it is entirely unsuitable.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Deselect the Ham Farm site from the draft plan

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

- The MWDP does not seem to properly follow NPPF (National Planning Policy Framework)

- Significant questions exist as to due process and whether these have been followed correctly by the County Council planners

- There are clear restrictive Covenan

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Simply remove "Ham Farm" as a potential site.

It is completely unsuitable.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 302 Respondent ID: 4023)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

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

This will produce noise, dust pollution and an increase in HGV traffic affecting a much wider area.

Strategic Objective 11: To maximise the use of rail and water transport for the movement of minerals and to minimise lorry movements and the use of local roads for minerals.

There are no quarries in West Sussex that are linked to railways, all movement is via road and that is not likely to change. Substantial additional heavy lorry movements will also be required to bring in inert materials to fill the hole left by the quarry. This will result in these lorries coming from all over the county creating extra pressure on our already busy roads.

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

There is not a good track record for WSCC here, the quarry at The Hollow, Washington and the cement works at Upper Beeding in our immediate vicinity highlight this point.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site may not be actually in the South Downs National Park but it sits immediately on its boundary line and will be an eyesore from the SDNP for many years to come.

The A283 is an extremely busy and dangerous road used by cyclists, agricultural machinery and many school buses in additional to the regular car and lorry use. There have been numerous accidents and several fatalities along the Bramber to Washington stretch. Lorries accessing and departing the site across the traffic flow on a 60 mph road is asking for further accidents. If the lorries were to travel to the Washington roundabout and back to save crossing the traffic flow, as has been suggested, that would further increase the current problems. The road clearly isn't up to the extra lorry movements and the increased danger to all its current users is unacceptable.

Alderwood Fisheries situated on the B2135 only a few yards from the A283 relies on water to top up the ponds in the summer from a small stream running adjacent to the proposed site. I understand that this is licenced by DEFRA and any pollution could have a disastrous impact on their business. Only a couple of hundred yards further up that road is a childrens nursery which has a lot of traffic to and fro.

Although not actually in the South Downs National Park the site's proximity to it will mean an eyesore viewed from it. There shouldn't be anything of this nature on SDNP borders. The fact that many mature trees are planned to be felled means that possible screening of the site won't exist.

Steyning is a historical and picturesque rural town which is home to scores of small businesses that rely on the tourism it's natural beauty attracts. Why would we want to spoil this when there are alternative sites that would have a lesser impact on the local area.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Further investigation into alternative sites which would have less of an impact on the area. Also investigation into the possibility of using sand dredged in and around Shoreham Harbour.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 293 Respondent ID: 4024)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

When compared to other site assessments the assessment of this site is inconsistent. It fails to reflect that it lies within the setting and would impact upon more than one listed building ie Wappingthorn Manor. And Wiston House. It also fails to reflect it is visible from Wiston House's Historic Parkscape. Nor does it reflect it is visible from and would impact upon one of the National Park's main route through the 'South Downs Way' And Chanctonbury Ring a local and important landmark in the National Park.

It is also queried how the cumulative impact it considered. Potentially for a use of this nature it is better to locate near each other especially long established quarries where surrounding residents bought in the knowledge there was a quarry and could therefore factor in the potential impacts and future operations. This is of particular importance now that national planning guidance has introduced viability - whilst to date this appears to only get assessed in terms of a developer however now 'viability' has been introduced regard to the impact upon the viability of surrounding land and properties should be taken into account. In respect of Ham Farm abutting the proposed mineral works there is a hall that has been in operation for over 10 years and provides a number of relaxing classes. The viability of these will be undermined by a minerals site next door. It was also impact upon the jewellery workshop.

Ideally the site in Storrington near Chantry Lane adjacent an existing mineral site should be allocated prior to the housing development taking place because once built it will prevent mineral extraction. When considering all sites and impacts on surrounding populations it is also considered the Buncton Manor Farm site is better than the Ham Farm site. It is larger and will have less impact on a larger historic conurbation (eg Steyning). It is also put forward by the Wiston Estate who own the site and employ many people within the National Park and surrounding area. This would therefore help the viability of the estate bringing wider social and economic benefits. Wiston Estate are also behind the Steyning Downland Scheme it's viability therefore would bring environmental benefits.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

See above eg Chantry Lane extension and Buncton Manor Farm instead of Ham Farm.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 27 Respondent ID: 4025)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The Ham Farm excavation is too close to the historic centre of Steyning.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 30 Respondent ID: 4026)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 36 Respondent ID: 4027)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Not happy

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Do not go ahead with it

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

None

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Another area

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

None

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 63 Respondent ID: 4028)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The Vision and Strategic Objectives are admirable however the devili s in the detail.

If extraction of mineral deposits occurs at the proposed site it is the way in which the land is returned to its original state that appears contentious. Land fill with 'inert' waste needs clarification.

Recognising that the A283 is a strategic lorry route the lorry movements associated with this site would seem to add considerably to traffic and with lorries entering and leaving the site some increase in danger.

Is this the thin end of the wedge for local development that will change the area permenantly.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Given that there is a strategic requirement fo extraction and scrapping the whole idea is probably difficult I would like to see clarification of my points above and committment to returning the land to potential agricultural or leisure use.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Again admirable principles again it is the detail of restoration and future benificial use that concerns me.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

I presume an environmental impact assessment is hidden in this somewhere.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 97 Respondent ID: 4029)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Traffic management needs careful consideration, given the volume of traffic on A283.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 31 Respondent ID: 4030)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

As stated, this is an area of outstanding natural beauty and it is disingenuous to state that this plan will enhance and protect the area. Baffling statement.

The road system is not suited to the inevitable increase of heavy duty trucks - it will exacerbate an already dangerous road, particularly during busy periods of use: school traffic from and too the satellite towns and villages will be particularly affected as indeed will noise, dust and carbon pollution within the local environs.

I see no reasons to commend this proposal other than to line the pockets of a few.

Agricultural land is diminishing as it is and needs protecting and preserving for changing needs of future generations.

When the digesters were approved in 2014, we were led to believe that this al d would be used to grow Maine that would feed the digester. Will this now have to be imported too? This development was granted a government subsidy and the land use was taken into account - or so we believed - at the time of approval being passed.

Who would be accountable for sanctioning the change of use?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

The whole thing should be scrapped without further ado. This proposal will be fought with vigour and overwhelming opposition by an outraged local population and users of the South Downs. In addition the neighbouring high wat table may well become contaminated by the post extraction landfill.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

See earlier comments

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Scrap it

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

For all the reasons stated previously.

This is unnecessary beaurocracy and sets out to obfuscate.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 309 Respondent ID: 4031)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 311 Respondent ID: 4032)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

- The site directly impacts on a number of Listed Buildings, some of which have not been acknowledged as listed in the plan. Wappingthorn Manor is located 120 meters from the boundary of the proposed site. Wappingthorn Manor is mentioned in the Dooms Day Book and is listed with English Heritage. WSCC have failed to update their plan to reflect that this building is in fact grade II listed.
- A stream and several water courses flow through or immediately bound the proposed site. Not enough attention has been paid to the potential impact of the site on the water courses or any potential contaminative pathways.
- The site is too proximate to the village of Steyning and particular to Steyning Grammar School and the Nursery school at Changtonfold. Sand quarrying is known to cause health complications especially in the young and will exacerbate conditions such as asthma. DEFFRA & DTI Research shows PM10 Particles can travel sufficient distances in dry and windy weather, both of these sites are down wind of the proposed site. To prevent PM10 particles being spread by lorry movements all vehicles should be damp sprayed and speeds restricted, this cannot be controlled on a public highway within the national speed limit.
- The A283 is undeniably a dangerous road. There have been a number of reported fatalities in the ½ mile stretch either side of the proposed entrance. The landowner Frans de Boer directly caused a serious accident through covering the road in mud around 10 years ago.
- The access to the site from the A283 is not suitable for lorry's turning across the opposite direction traffic. A number of trees and vegetation will have to be removed to create a visibility splay. Making this site even more visible from the A283 and beyond.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Ham Farm should be removed form the list of potential sites.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 312 Respondent ID: 4033)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Steyning is a picturesque village in the heart of the West Sussex countryside. It is famed for its wonderful views of the South Downs, beautiful walks and abundant wildlife. However, this idyllic setting is threatened by the proposed plans to create a sand quarry and landfill site on a local farm. Understandably, the local residents have strongly objected to these proposals, citing issues of increased traffic, noise pollution, water contamination and threats to wildlife. And rightly so. However, there is one issue which remains unconsidered……

what about the potential threat to the health of the residents in the local area? According to the Health and Safety Executive (www.hse.gov.uk/quarries), the main threats to human health associated with quarries include accidents associated with manual handling, transport, slips and falls. These would be expected to be more of an issue for those working in the industry (although they are still relevant to those living nearby to some degree.) However, the two that stand out as possible threats to the local community include 'asthma'

and 'silica.' This is concerning. Quarrying could cause respirable crystalline

silica to be produced and present within the air. This material is not visible to the human eye and therefore you would not be aware that you were inhaling it. If this is inhaled, gaining access to the deepest aspects of the respiratory system, it can lead to the development of a chronic respiratory condition called silicosis.

(Figure 1 - Histology image showing a silicosis nodule. The presence of these nodules impairs normal lung function - figure absent from online response)

Some may say "it's just a bit of dust, nothing to worry about." On the contrary.

Silicosis is a condition resulting in progressive, nodular, fibrosing pneumoconiosis. Essentially it causes a progressive fibrosis of the lungs. Fibrosis is the equivalent of scar tissue and if this is present within the

lungs, it stops adequate respiration from taking place leading to a progressive worsening of breathing difficulties. There is an increased risk of respiratory infections and the quality of life of patients progressively deteriorates as they may become short of breath just sitting in a chair. Is this something we want to see

present in the community in Steyning and how can the planners guarantee that this is not a risk to the community?

The other threat posed is asthma. Asthma is a chronic inflammatory condition of the airways. It is a very common condition, and a significant cause of mortality each year, including the younger members of the community. It has been increasing in frequency over the past few years. The condition is associated with shortness of breath, wheezing, chest tightness and coughing, all of which are caused by airway hyper-responsiveness to a stimulus which causes the airways to narrow.

Repeated exposure to gases and dusts can be one of the causes of this condition. Can the planners guarantee that we are not going to see an increase in the incidence of this condition, or the deterioration of those who already suffer with it? And what about the impact of these particles on those with other chronic respiratory conditions such as chronic obstructive pulmonary disease (COPD)? These are all issues that appear to have been neglected from the decision making process.

(Figure 2 Picture showing the changes in airway structure that can occur with asthma - figure absent from online response)

What does the published literature say about the impact of silica? Kawasaki (2015) investigated the effect of inhaled silica on the lungs. They identified that a particular immune cell called the macrophage is activated by the presence of silica, increasing the release of inflammatory chemicals and stimulating the formation of inflammation and fibrosis (the underlying pathologies of asthma and silicosis). Interestingly, the silica is thought to impair the ability of the macrophages to clear foreign material/microorganisms which can potentially cause infection [1]. Mazurek et al (2015) looked at the mortality associated with silicosis in the US from 1999-2013. The results indicated that deaths related to silicosis are seen in the 15-44 age group who have been exposed to silica. Deaths in the young were thought to be related to higher levels of exposure over a much shorter period [2]. What levels of exposure will Steyning experience? Shtraichman et al (2015) also identified an increased number of autoimmune diseases associated with patients with silicosis; a 7 fold excess prevalence compared to what is expected in the population normally [3]. Also, Millerick-May et al (2015) also identified that of 1072 patients with silicosis, 24% of these showed some level of associated kidney dysfunction [4]. These studies both indicate that other systems of the body are at risk due to the exposure, not just the respiratory system.

I do not pretend to be a respiratory specialist. I am a specialist registrar working in histopathology. Understanding the mechanism and evolution of

disease and its impact on the body is central to the work of a pathologist. However, over my years of training, I have also treated many patients with both asthma and lung fibrosis and I am aware of how debilitating these conditions can be both to the patients and their families. The uncertainty that surrounds the development of this quarry, and the lack of available literature to allay the concerns and doubts surrounding the health implications to the local community provides further support that this plan should not be allowed to proceed any further.

Dr Matthew Clarke BSc (Hons) MBChB (Hons) MRCS

References

1. Kawasaki, H. (2015) A mechanistic review of silica-induced inhalation toxicity. Inhalation toxicity. 27 (8):363-77

2. Mazurek, J.M., Schleiff, P.L., Wood, J.M., Hendricks, S.A., Weston, A.

(2015) Notes from the field: update: silicosis mortality – United States,

1999-2013. Morbidity and Mortality Weekly Report. 19;64(23):653-4.

3. Shtraichman, O., Blanc, P.D., Ollech, J.E., Fridel, L., Fuks, L., Fireman,

E., Kramer, M.R. (2015) Outbreak of autoimmune disease in silicosis

linked to artificial stone. Occupational medicine (Oxford, England). 65(6):444-50

4. Millerick-May, M.L., Schrauben, S., Reilly, M.J., Rosenman, K.D. (2015) Silicosis and chronic renal disease. American journal of industrial

medicine. 58(7):730-6.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 313 Respondent ID: 4034)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This prime agricultural land has already been allocated to the Anaerobic Digester plant (DC13/1958) for the production of maize. A road safety audit was undertaken in January 2014 by Wilbar Associates assessing the impact of the digester on the B2135. It concluded that there was a net reduction of traffic as 4500 tonnes of Maize was 'farm grown' being moved on internal farm tracks. If the proposed quarry is granted there will be a large increase in lorry movements to and from Wappingthorn Farm on the B2135 (part of Ham Farm and in the same ownership) as maize or other products will have to be imported. The entrance to Wappingthorn Farm provides for heavy vehicles to pass within 3ft of a house owned by a family with young children.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 227 Respondent ID: 4037)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The 'Vision' should emphasise that the supply of locally extracted local minerals via any transportation network, including the local ports and railheads, should not be for local development use only.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

1. Ham Farm has been designated as a source of maize for the local anaerobic plant. The plant will need to be supplied from elsewhere, which will be polluting, wasteful and contrary to the plan provided when the plant was developed. Ham Farm is over-looked and next door to the popular South Downs Way and South Downs National Park. It is, therefore, not possible that the land can be restored 'beneficially'.

2. Ham Farm and the surrounding are well known for many rare wild animals including bats, hedgehogs, adders; and the land feeds water into the various water course running down to the River Adur, which include otters and newts; there are also many varied and unusual insects, including Variable and White legged Damsel Flies. All these animal will be endangered by any development.

Ham Farm is over-looked and next door to the popular South Downs Way and South Downs National Park; is next to a historic and beautiful town of Steyning, which relies on tourism for much of its industry; most importantly, is next to Steyning Grammar School and its playing fields. The schools has over 2,000 students from all over the local area and many others that use the playing fields. All of these people will be negatively affected by various forms of pollution and congestion, which will endanger young people and the local economy.

3. There is no local, sustainable modes of transport and the existing highway network is already inadequate and dangerous. It is also used by bicyclists, horse-riders and other recreational users from all over the UK, who provide an important addition to the local economy.

4. Ham Farm development will not 'protect and enhance' the protected landscape, as it is over-looked by the well used South Downs Way and South Downs National Park, which is used by thousands of locals and tourists from all over the world, who will have their time here ruined by the visual, noise, air and water pollution from the development of Ham Farm.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The soft sand resource map in Appendix B of the Joint Minerals Local Plan shows there are large areas of Soft Sand deposits across West Sussex. It would be sensible to pick a site for extraction which is not next to a very large school, a National Park, a town which relies on tourism for its economy, and only has a narrow and congested road for transport.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

6.2.16 - The development of Ham Farm does is not a good example of 'managed retreat' from sourcing soft sand from the South Downs National Park for all the reasons mention before, especially that it will ruin the views from popular parts of the National Park and other local areas reliant on the tourism industry and will pollute areas on the National Park between Ham Farm and the River Ardur.

8.11 - There should be specific mention of a study of the effects on Steyning Grammar School and its playing fields concerning the health and safety of the pupils and their parents, including travelling to and from the school at peak times.

8.12 - Policies should emphasise that rare minerals, like soft sand, should only be extracted for local (i.e. West Sussex) development purposes.

8.13 - There should be a specific plan stated in the development principals for the use of the land after any extraction has taken place, including if it is to be used for landfill.

8.13 - There should be stated alternatives for what the land was being used for previously; e.g. Ham Farm was designated, in an earlier plan for a large local anaerobic plant, as a provider of maize for the plant. If this is not to continue, where is the maize to come from and what is the impact of transporting the large amounts of maize to the plant going to be?

8.14.2 There must be adequate time for local consultation on all the points above. What is the evidence concerning 'early communication between potential applicants and local communities will be encouraged at the earliest opportunity'.

8.13 (Policy M24 and Implementation and Monitoring) - There should be stated a robust and transparent plans for policing the planned development right the way through to the end of the reinstatement process - with serious penalties for non-performance for the companies, councils, and individuals involved.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The plan needs to include:

1. Where the minerals are going to be used; e.g. development in West Sussex.

2. What the land will be used for after the extraction has taken place, not just the details of reinstatement.

3. What the alternative is for the current use of the land.

4. The planned consultation process and the relevant timing.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 288 Respondent ID: 4038)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The Vision and Strategic Objectives have not been adhered to in the proposal of Ham Farm as a site for soft sand.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The inclusion of Ham Farm is contrary to the vision and strategic objectives as outlined below:

SO7: To Protect, and where possible, enhance the health and amenity of residents businesses and visitors.

The development of Ham farm site to extract sand would have a devastating impact on the residents and businesses directly adjacent.

The WSCC technical assessment of amenity identifies: "A number of residential properties are in close proximity to the site. These residents may be subject to high levels of harm from noise, dust and light associated with mineral extraction from the site."

This importation issue has been completely ignored demonstrating total disregard for the health and well-being of the residents and business owners.

SO9: To protect and, where possible, enhance the natural and historic environment and resources of West Sussex.

Ham farm is directly adjacent to, and highly visible from, the South Downs National Park. In the WSCC technical assessment the Ecosystem Services conclusion is that: " It is likely that there would be significant, but uncertain, negative effects on ... biodiversity, water resources and flooding". There can be no mitigation for this.

When concerns regarding these issues have been raised at local consultation meetings they have dismissed as being dealt with at the planning stage. However, if the site is submitted for planning the fact that it is proposed as suitable in the JMLP will have undue influence regarding approval. This therefore creates a circular argument which is a disingenuous approach by WSCC.

SO11: "... and to minimise lorry movements and the use of local roads for minerals transportation."

The A283 is recognised as a dangerous road. The significant increase in HGV traffic, combined with a dangerous access to the site can only lead to an increase in the number of accidents.

As the primary area for building development is in the Gatwick and Crawley region, the requirement for sand can be met from existing sites in Surrey, requiring less road transportation.

In the Mineral sites Selection report the Exceptional Circumstances Test identifies that: 3.51 ..... consultation with other minerals planning authorities has revealed that the demand for soft sand in West Sussex could be met from elsewhere. On these grounds potential sites within the SDNP were excluded. Given all the above points it would seem reasonable that the same consideration should apply to the Ham farm site.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Ham farm should be removed from the draft Joint Minerals Local Plan

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 42 Respondent ID: 4040)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

damage to the environment

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Very poor for the local community and environment.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

use the existing site in West Hoathly

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 35 Respondent ID: 4043)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

TUNNEL VISION LARGELY IGNORES FLUCTUATING DEMAND, ECONOMY OF SCALE AND MARKET FORCES.

CONTRACTORS ARE FREE TO SOURCE WHATEVER THEY NEED FROM WHEREVER SUITS THEM.

WEST SUSSEX HAS NO LAND BASED OPERATION OF WORLD SOURCED MATERALS.

SMALL DEMAND FOR SAY HAND-MADE BRICKS AND TILES FROM SPECIFIC CLAY, BUT POST WAR DEVELOPERS ALL TOO OFTEN USED SAND FACED FLETTON BRICKS FROM PETERBOROUGH AND CONCRETE TILES FROM WHEREVER.

CONCRETE AND MORTARS SUPPLIED PRE-MIXED FROM QUAYSIDES AND RAIL HEADINGS.

DEMISE OF COAL HAS REDUCED SUPPLY OF PFA AND RECOVERED GYPSUM MAJOR SUPPLY OF WHICH COMES FROM UNDER GROUND IN EAST SUSSEX.

W SX HAS NO MOTORWAYS AND FEW DUAL CARRIAGEWAYS SUITABLE FOR HAUL ROUTES.

RAIL IS NEARLY ALL TWIN TRACK UNSUITABLE FOR GOODS TRAFFIC AND FAST THROUGH TRAINS.

CEMENT AND STEEL ARE WORLD SOURCED USING CHEAPEST FUEL.

HARD AGGREGATES INCREASINGLY SUPPLIED FROM SEA QUARRIES, BEACH ROCK ARMOURING COMES IN BARGES FROM NORWAY AND SIMPLY FLOATED ASHORE AT HIGH TIDE.

SAND FOR BEACH RECHARGE AND LANDFILL BLOWN ASHORE BY HYDRAULIC CANNON.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

SELECTED SITES ARE EFFECTIVELY LANDLOCKED, ONLY EFFECTIVE OPTION IS TO DEVELOP QUAYSIDES ALONG SOUTH COAST AND UP-RIVER.

HARBOUR LOCKS ARE UNDERSIZED AND TIME CONSUMING FOR CURRENT COASTAL TRAFFIC.

APART FROM TRACK AVAILABILITY SC RAIL SUFFERS LIMITED CLEARANCE FOR INTER MODAL TRAFFIC.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

LANDLOCKED, POTENTIAL EYESORE, HIGH WATER TABLE AND LANDFILL PROBLEM.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

NOT WORTH EXPLOITING FOR ENVIRONMENTAL IMPACT

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

PROBABLY WORTH MENTIONING UNIQUE SOURCES OF MATERIALS FOR RESTORATION PROJECTS SUCH AS STONE, CLAYS AND FLINT.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

FAR TOO MANY WORDS FOR OPTIONS THAT ARE REALISTICALLY AVAILABLE.

TRANSPORT, MARKET AND NATIONAL INTEREST WILL DRIVE WHATEVER HAPPENS.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 13 Respondent ID: 4046)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

It is eminently sensible to devise a plan which identifies the source of minerals which will be needed to maintain life in West Sussex. It is also commendable to ensure that these sources are convenient to the maintenance of best life in the county.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

A good location, easily accessible to places where sand will be need for building

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 98 Respondent ID: 4047)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

This is just a wholly inappropriate location and the scale and impact on people, the infrastructure and the environment, not just on Steyning but the whole area, over such a long period, is completely unacceptable.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Please try very hard to come up with an alternative proposal or abandon a project like this in West Sussex entirely

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Please see previous comments

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Please see previous comments

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Please see previous comments

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 26 Respondent ID: 4052)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

we get too precious about the environment -we need employment as well

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

we residents use these minerals so they should be extracted locally x blow the NIMBY's

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

see previous comments

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Where the bricks sand etc we use in the county comes from

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 65 Respondent ID: 4053)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This will generate air, noise and light pollution; significantly increasing Heavy Goods Vehicle traffic through villages in the area and leaving a landfill of inert waste in its place.

This is an appalling and despicable suggestion and will destroy the rich beauty of this rural area.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 298 Respondent ID: 4060)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Needs mention of Road Safety and Traffic Noise. And more about Air Quality.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Re Ham Farm

I run FOXY Lady Drivers Club, a motoring club for women drivers based in Steyning. Our membership includes many local motoring mums and daughters. I have yet to find any female in favour of this development on our doorstep and have particular concerns re motoring safety which is the area I shall confine my comments too.

1) Local traffic concerns

The school is our biggest employer, has a large mobile workforce and a pupil catchment area that uses the busy A283, including many school buses and a busy nearby childcare facility and Business Park. There is an adjacent bus stop.

2) Increased traffic levels

Earlier traffic reports including one from the Environment Agency flagged up the A283's accident record near Washington. Traffic levels have increased since not decreased. This stretch of road is unable to cope with increased traffic levels, as one-off Wiston House events amply demonstrate. Whereas a steady flow of extra LGVs and associated traffic will slow too many road journeys for too many motorists, whether for business or personal purposes.

3) Air Quality

The Local Plan recognises air quality issues (P33) as a result of road transport but I cannot see this issue addressed. This also needs to address associated noise levels as a result of increased traffic levels on a local basis.

4) Road Safety

The Local Plan appears not to include the terms 'road safety' unless I have missed this within the 143 page document we are all supposed to digest. Other than 'safe parking' at the facility mentioned on P99? Where has road safety been identified and addressed here? If it hasn't, then this is a critical oversight and it needs to be recognised and addressed.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

We would like to see

1) The Benefits of this scheme for Steyning residents.

2) The main Beneficiaries of the Ham Farm proposal.

3) Other sites considered, including within partner counties.

4) Why marine extraction cannot be increased to meet predicted demand.

NB: As is, FOXY Lady Drivers Club cannot support this plan. On behalf of motoring mums and daughters in Steyning, we do not want or need extra, unnecessary traffic on this busy main road as this will adversely affect ALL our family lives and carries considerable potential road safety risk.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

This is not my area.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

I have spelled this out before. Please read what I have already said.

Additional Comments

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* * *

02 – Ham Farm: Resident/Member of the Public (Response ID: 101 Respondent ID: 4065)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 – Ham Farm: Resident/Member of the Public (Response ID: 99 Respondent ID: 4066)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 28 Respondent ID: 4068)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The residents of Steyning were not consulted about the proposed development of a major sand pit within our parish and knew nothing about it until this draft proposal was produced. The proposed sand pit at Hamme's Farm is directly opposite Wiston Pond and is an area of outstanding natural beauty. The future prosperity of Steyning is based on tourism and the impact of this sand pit in terms of truck movements and visual destruction will be enormous. As far as I am aware the belt of sand runs parallel to the South Downs for many miles in West Sussex and it should be possible to find an alternative site

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Find an alternative location for the sand pit in West Sussex that does not destroy a community or landscape.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

As previously stated Hamme's Farm is an unacceptable location for a sand pit because of it's impact on Steyning and the surrounding landscape. There will definitely be other more acceptable locations in West Sussex.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The proposed Hamme's Farm sand pit development should be removed from this document.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Minerals are required but the impact on communities and the beautiful Sussex landscape must have a very high priority.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Not as yet

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 32 Respondent ID: 4069)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Am opposed to any development/quarry/landfill being developed in Steyning.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 41 Respondent ID: 4071)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The plan will have a severe detrimental impact on the landscape and will not enhance the countryside. The location of Hammes Farm Steyning is just outside the SDNP and this area at one time had been considered for inclusion in the national park.

The quarry would be visible from SDNP, will have a detrimental effect on the amenity of the adjacent neighbours and the community of Steyning.

There have been numerous serious traffic accidents over the last few years on the stretch of the A283, leading from the Washington roundabout to Steyning, and the creation of new splay and junction to access the site will result in an unacceptable increase of daily lorry/plant machinery movements which would continue for years to come, creating additional hazards on this road.

The proposed site adjacent to Hammes Farm is within close proximity of listed buildings, acquifers and ancient woodland.There would be a high risk of water contamination into the local lakes and waypter systems.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Hammes Farm should not be considered a suitablevsite for the mineral plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Please see comments above

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Hammes farm proposal To be removed

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 49 Respondent ID: 4072)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Inappropriate location for quarry, opposite South downs National Park and AONB.

Unacceptable level of lorry movements, + consequent pollution.

Inappropriate site for landfill after quarry exhausted

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Alternative sites found

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 52 Respondent ID: 4074)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 53 Respondent ID: 4075)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

We don't want or need a quarry, Steyning is beautiful the way it is lets not make it look like the cement works near decre gardens,

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Scrap the thing all together, the people of Steyning will campaign against this planned "vision." its not a "vision" its a way of making rich people richer at our expense, no thank you.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

We dont need or want a quarry in steyning thank you!

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Scrap it

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 56 Respondent ID: 4076)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I wholeheartedly disagree with the vision and objectives

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

As a local resident I have concerns about the amount of extra traffic and the possible future use as landfill as in other ex-quarries in the area

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

This site to be removed from the consultation

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 61 Respondent ID: 4077)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Development of this site is totally unacceptable on the following grounds.

1. Visual impact

2. Air pollution

3. Dust Pollution

4. Noise pollution.

5. Traffic congestion .

7. Increase in potential for traffic accidents.

8. After extraction the sight will be used for landfill with its associated noise, smell and pollution.

9.Negative affect on adjoining properties.

Steyning is an area of great beauty and this development will benefit no one other than the developers and lining the pockets of WSCC.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Rejection

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 62 Respondent ID: 4078)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The development of the sand pit would add a great deal more traffic to this busy road which at commuter times is already difficult. When there are cyclists the poses a danger already when you wish to travel especially from Steyning as the amount of traffic in both directions is large and with the width of the road passing cyclists is a dangerous. Today for example the queues stretched almost a half a mile trying to pass a single cyclist at 8.15 am. This is not unusual and there is going to be an accident

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

You would have to widen the road

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

See above and the natural beauty of the area would be spoilt.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 66 Respondent ID: 4079)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The Strategic Objectives do not take into account the effect of transporting this volume of minerals. Nor do they reflect the environmental impact on local residents. Due to this the plan is incomplete.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

How will minerals be transported?

What effect will this transport have on already badly maintained local roads in West Sussex?

What environmental studies will be carried out before any site is chosen?

How will resident's opinions be assimilated into the plan?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Ham Farm is on a single lane, badly maintained and busy road. What impact will the construction and subsequent transport of materials have on the A283?

What environmental studies have been completed that detail the environmental impact on Steyning and it's residents from the construction, extraction and transportation from the site?

Without these studies, it seems to me that the plan is woefully incomplete.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Complete these studies and share with the local residents.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

No social and environmental impact studies?

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 75 Respondent ID: 4080)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I do not think it is appropriate to have a sand quarry near Steyning. Before any more quarries are considered, the existing quarry eyesores should be sorted out. The cement works between Steyning and Shoreham. The dangerous quarry adjacent to the Upper Horseshoe footpath.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see this plan to have a quarry at Ham Farm abandoned.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

02 - Ham Farm: Resident/Member of the Public (Response ID: 79 Respondent ID: 4082)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I object to the sand extraction & landfill plans in Steyning

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

No sand extraction

No landfill

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Ham Farm, West Sussex

- no landfill

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 80 Respondent ID: 4083)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I am against both the Excavation and landfill proposals for Ham Farm Steyning West Sussex.

As the local authority seems to feel it is more important to patrol the free car park to see whether motorists have displayed the time clock. Whilst ignoring the illegally parked vehicles on double and single yellow lines in the High Street.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I am opposed to both the Excavation and landfill proposals for Ham Farm Steyning West Sussex.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Landfill near residential villages is not acceptable de to the stench created in warm weather and not something any of the council officials would consider within close proximity of where they live.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

The plan for extraction and landfill and Am Farm Steyning should be abolished.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I am opposed to the extraction and landfill at Ham Farm Steyning

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

I am opposed to the extraction and landfill proposed for Ham Farm Steyning and protest to achieve the plans abolishment

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 89 Respondent ID: 4084)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I understand the need but just not here, there are plenty of other sites

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

There are other suitable places

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Not suitable due to area of outstanding environment/wildlife/peace/dangerous road

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Not this area, there are other suitable areas

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Not a suitable area due to environment/wildlife/dangerous road

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Area of outstanding beauty/environment/peace/dangerous road

Additional Comments

N/A

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02 - Ham Farm: Resident/Member of the Public (Response ID: 219 Respondent ID: 4085)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

This does not consider the full impact on this area

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Abandon any plans for further mineral extraction in this part of Sussex

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 222 Respondent ID: 4086)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Ham Farm is not suitable for this purpose. The A283 is not a suitable road for significant lorry movements. Ham Farm is adjacent to an area of outstanding natural beauty and a very large school.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Removal of Ham Farm from the plan

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 226 Respondent ID: 4087)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 228 Respondent ID: 4088)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The A283 is already a dangerous and busy road. This will just make it more so, or worse, drive traffic into the village where the streets are too narrow to deal with the current volume of traffic. This is a beautiful place which will be ruined by this quarry and the surrounding roads will be all the more dangerous.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Stop this plan. Period.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

As stated before, this will make a dangerous road even more so and drive so much traffic into the village it will not be able to cope and with large school sites, make the roads even more dangerous for children.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Do not use this site. Period.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 230 Respondent ID: 4090)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

We as a country should not be digging up green fields to extract minerals to build houses. There are very many other ways to build houses from renewable resources sand can be extracted as a by product from dredging at sea.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

In my view the site at Ham Farm can be seen from several places in the SDNP, it will have a huge impact on users coming to visit our area. Digging a quarry will have a negative impact on visitors and those who live in the area. The Thriving communities of Steyning and Wiston will be heavily impacted by extra traffic, pollution (light/sound/air/water), people will not want to visit somewhere that they firstly have to queue to get to, but secondly have to see such an eye sore.

We don't need to dig up areas of natural beauty with thousands of years of history to get sand to build from, when it is readily available else where.

This site cannot be restored to its current Greenbelt, virgin arable farm land status that it currently holds.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Residents next to this site will be effected by pollution from this site. There will be noise, we are told from 7am in the morning five and a half days a week, the traffic will be increased on the A283, this will affect all residents in Steyning. Firstly by having to queue to enter and exit the town, but they will also be affected by commuters that won't tolerate any waiting and so decide to cut through an already very busy high street, to save a few minutes.

There will be dust which is potentially harmful, especially to those with existing respiratory disorders. The site will be lit for security during dark hours, this will have a huge impact on wildlife and residents in the area.

The land is very prone to being water logged and so there will be a very real risk of flooding if the land is excavated.

You can very easily see the proposed site from several places in the SDNP, during the summer months. This will be even more obvious during the winter months where there is not foliage on the trees.

WSCC have no independent verification of what amount of sand is actually available for excavation, as they haven't done any sampling themselves.

Dust will be prevalent, air quality will be affected and this will impact on local residents, children at the local nursery, primary and secondary schools.

The A283 is known to be one of the most dangerous roads in West Sussex, increasing vehicle movements on a very dangerous part of it will heighten chance of more incidents. Particularly as the entrance to the proposed site is very close to a blind bend where traffic is often doing a minimum of 60mph.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Remove Ham Farm from the Plan.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 231 Respondent ID: 4091)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Dear Sir/Madam,

This is a letter of objection to the proposed development of a soft sand pit at Ham Farm near Steyning. It is not appropriate to locate an industrial operation so close to a quiet market town. I strongly object to the degradation of my environment, both to the residential area and to the countryside, which its creation and presence will cause.

Yours,

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 291 Respondent ID: 4099)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The ideals of the Vision and Strategic Objectives have not been fairly applied

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Please reconsider with the environment and landscape in mind.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

This site should never have been put forward, it will permanently ruin the local environment, increase the traffic causing more accidents and congestion.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

All the sites should be reevaluated as the system has not been impartial, even some sites within the national park should be reconsidered as sand extraction has been part of the economy and landscape of the area for generations.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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02 - Ham Farm: Resident/Member of the Public (Response ID: 296 Respondent ID: 4100)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Please confirm that you have added my comments to any forms you receive re the Ham Farm sand extraction plan and will keep me informed of developments. I do not have the time to wade through the form, nor can I find the detail I am looking for in hundred+ page reports. Paul Savill, 35 Goring Road, Steyning BN44 3GF

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The proposed development at Ham Farm is is wildly inappropriate for the Ham Farm site and the area at large. Particularly, the proposed development would be an act of vandalism on a gross scale.

Location

This is one of the most dangerous roads in Sussex and the stretch between Bramber Castle and Washington has hosted many casualties over the years. On top of that, Steyning Grammar School discharges all its out-of-town pupils onto this stretch of road.

Tourism

Steyning relies heavily on visitors attracted by its picturesque high street and its rural ambience.

I will leave others to comment on the environmental impact of the plan.

I have not completed the rest of the form because it is too difficult for a simple parishioner to grapple with and, as a working man, I simply don't have the time to unpick it.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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03: West Hoathly

03 - West Hoathly: Resident/Member of the Public (Response ID: 11 Respondent ID: 3929)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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03 - West Hoathly: Resident/Member of the Public (Response ID: 2 Respondent ID: 3931)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Brickmaking in West Hoathly/Sharpthorne should cease as it is a residential area.

The brick lorries cause an unacceptable hazard - I was forced off the road by one damaging my car. When I reported this I was subject to abuse. The roads are simply not adequate and the lorries go through residential streets are a real hazard.

Also, there is often an acrid smell in the air and so the pollutants coming from the brick works is unacceptable to the residents.

It is a brave council that does not take into account the possible harmful affects of the toxic fumes emanating from the site. It could lead to health issues, which presumably, if the council does not investigate fully, will be fully liable for. This could include possible litigation against the councillors personally.

We have noticed a number of cancer sufferers in the vicinity and are starting to question whether this is the result of the brickworks.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Close the brickworks and find a site away from a residential area.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Please see the previous comments: -

I object due to: -

1. Traffic Hazards - lorries going through residential roads. A danger to children and danger to other road users.

2. Possible health problems due to pollution emanating from the site - when the bricks are being cured.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Close the site - and certainly under no circumstances should it be expanded.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

My only objection is the brick works at West Hoathly - I feel they are dangerous in traffic and health as previously stated.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Closure of the West Hoathly Brickworks and a search for a new source away from a residential area.

Additional Comments

N/A

* * *

03 - West Hoathly: Resident/Member of the Public (Response ID: 39 Respondent ID: 4048)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

03 - West Hoathly: Resident/Member of the Public (Response ID: 20 Respondent ID: 4051)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

03 - West Hoathly: Resident/Member of the Public (Response ID: 297 Respondent ID: 4059)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

the objectives should take into account obligations set out in the Paris climate change agreements. Urgent action has to be taken to reduce all sources of emissions that contribute to climate change and endanger health. The objectives in the WSCC document fail to acknowledge the serious adverse effect of methane which is known to be released into the atmosphere during hydrocarbon extraction and in particular during unconventional oil and gas extraction.

Energy security needs to be contributed to and gained by an urgent programme of producing energy generation facilities by means of wind and solar.

Independent scientific advice needs to be sought rather from those who represent or benefit from the hydrocarbon industry. Such independent sources other than those from the hydrocarbon industry can only truly represent public interest taking into account their health and protection of our environment and of course climate change.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Abandonment of gas and oil extraction and a programme of production of energy from renewables.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Residents are perhaps unlikely to appreciate the volume of heavy vehicle traffic resulting from transportation of water, oil/gas to and from the site. Access to the site via Top Road Sharpthorne, Station Road and Hamsey Road will be inadequate for the size of site vehicles and the burden of the extra volume of their traffic.

With the clay remove removed from the site, who will assure that the land profile will be fully restored once the project is completed?

More specific criteria need to be followed in the replanting programme as set out in High Weald AONB guidance.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Because of difficulty in access to the site plans for it should be withdrawn.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

due to the adverse impact on health, the environment and in particular water source protection areas, SSSI, etc,plans for hydrocarbon extraction need, in public interest, to be rejected.

I refer to answers in section B1.3 and B1.4.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Acknowledgement that WSCC policy urgently needs to change to fully comply and exceed obligations set out in the Paris Climate change agreement of December 2015

Additional Comments

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* * *

04: Chantry Lane

04 - Chantry Lane: Resident/Member of the Public (Response ID: 269 Respondent ID: 3979)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

With regard to strategic objective 2.3.13.Oil and Gas I consider it essential that WSCC makes every effort to ensure that the Government's gung ho approach to fracking does not prevail.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Chantry Lane Extension (SDNPA) (M/HO/2)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Proposal to extend Chantry Quarry

I oppose the proposal to extend the existing sand quarry in Chantry Lane as I consider it to be totally inappropriate.

The location is too close to the Village and although there is an existing access road to the quarry from the Village it is now considered to be inadequate and unsuitable for the traffic that would result from reopening the quarry meaning that an alternative road, as per the proposal of 2008 (738/Mlp), would be required.

The proposed road would be across a field within the South Downs National Park which was referred to at the hearing in Worthing on the proposed National Park Boundary as typical downland scenery enhancing the entrance to Storrington and would completely alter the landscape of the approach to Storrington on the A283, one of the major road arteries.

I consider the plan on page 246 to be misleading as it does not make clear that the proposed access road would be across the field to the east end of the quarry. The A283 is already a very heavily used road and more access points will increase hold ups and dangerous manoeuvers. The plan shows a simple Tee junction but the landscape, which includes significant slopes, would require major earthworks.

Strategic Objective 2.3.14. Mitigation and Restoration states-

"Minerals development results in a physical change to the land, often on a substantial scale. It is important that consideration is given, at the earliest possible stage, to how sites are reclaimed once workings have been finished. Land worked for minerals should be reclaimed at the earliest possible opportunity, and high quality restoration and aftercare

should take place.

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

Under the heading "Site specific information (operational considerations)" it is stated that-

"A draft redevelopment plan has been drawn up for Chantry Lane Industrial Estate and the Sand Quarry. This includes housing and employment or an educational campus. Consultation on the detailed proposals is planned with local and neighbouring parish councils, Horsham District Council, West Sussex County Council and The Highways Agency. The Storrington, Sullington and Washington Neighbourhood Plan Examiner's Report was received on 24 March 2016. Unfortunately the Examiner found that the Neighbourhood Plan cannot be progressed to Referendum. The Parish Councils are considering how they will move forward."

I find the site specific information to be misleading as it does not make clear that the employment would result from industrial units within the existing but redeveloped Sandgate Quarry and the educational campus would also be within the redeveloped quarry and would comprise a substantial number of buildings of various sizes all of which would be supported by a significant amount of parking facilities.

To my way of thinking restoration of the quarry as foreseen by Strategic Objective 13 would not be achieved by filling the quarry with industrial units, a substantial campus and various car parks and if an extension to the quarry is granted I consider it highly unlikely that the owner will eventually seek to restore it to anything other than another building development of the type proposed for the existing quarry.

It should also be noted that, as part of the consultation process of the Neighbourhood Plan strong objections have already been made to the access road proposed by the operator/owner to the existing quarry where the industrial units and campus would be developed. Also that the access road for the quarry extension would follow the same route. My concern is that the proposal for the quarry extension will be used as a means of gaining access to the existing quarry and facilitate its inappropriate "restoration".

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

At best I would like to see the proposal removed from the Plan. At worst I would like to see greater clarity over the proposed siting of the access road.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

05: Hambrook Grouping comments

05 - Hambrook grouping comments: Resident/Member of the Public (Response ID: 134 Respondent ID: 706)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(2 separate attachments attached submitted under response 135 also attached to this response)

Draft West Sussex Joint Minerals Local Plan (Regulation 18), April 2016

Mineral Sites Selection Report, April 2016

I attach comments on the above two reports *…(redaction)..* He has spent many hours reviewing the reports and highlighting the issues, we as local residents face if gravel extraction is permitted next to my house. We are therefore writing to express my strong support for *…(redaction)..* analyses and comments.

Draft West Sussex Joint Minerals Local Plan

Like *…(redaction)..*, I am very concerned about one particular aspect of the Draft Plan.

Paragraph 7.1.4 of the Draft Plan says: "Although the allocated sites are currently available for mineral uses during the Plan period, circumstances may change and they may not come forward as expected. Private sector businesses (and, therefore, commercial considerations) will determine whether extraction will actually take place. Therefore, the Plan allows, under the use-specific policies in the preceding chapter, for other sites that are acceptable in principle to come forward for mineral extraction. Such provision will provide additional flexibility and compensate for any allocated sites that do not come forward for minerals extraction. Accordingly, the fact that a site is not allocated in the Plan does not mean that a proposal for mineral extraction on an unallocated site will not get planning permission at some future date."

At the moment, the Hambrook sites are considered to be "acceptable in principle" in the Mineral Sites Selection Report (but see below).

Should Hanson submit a planning application, you might think that Policy M1 would be our first line of defence. This says:

"Policy M1: Sharp sand and gravel

Proposals for land won sharp sand and gravel extraction, including extensions of time and physical extensions to existing sites, will be permitted provided that:

(a) the proposal is needed to ensure that a landbank equivalent to at least seven years supply is maintained;"

The Draft Plan shows that the current landbank is equivalent to 35 years' supply, which is why no sites for sharp sand and gravel are allocated.

The risk is that Hanson will take encouragement from paragraph 7.1.4 and the fact that the Mineral Sites Selection Report says that the Hambrook sites are "acceptable in principle", and submit a planning application in order to test the strength of condition (a) in Policy M1.

Condition (a) is not worded very clearly. The current landbank is equivalent to 35 years' supply, which is "at least seven years supply". Adding to the current landbank would add to the 35 years and there would continue to be "at least seven years supply".

There is some alignment here: the Hambrook sites, although not allocated in the Plan, are declared to be "acceptable in principle" in the MMS Report; the Plan says that exploitation is a commercial matter and that sites not allocated in the Plan could get planning permission; and the policy which is supposed to prevent planning permission being granted unless the landbank falls to below seven years' supply does no such thing.

The MMS Report suggests that the working of the Hambrook sites could take between 15 and 23 years, with a system of conveyor belts linking the sites with the processing site at Woodmancote permanently in place for that period. As it stands, the Draft Plan invites Hanson to make the prospect a horrifying reality. The Draft Plan should be amended to safeguard against this possibility.

Mineral Sites Selection Report

The Mineral Sites Selection Report, published as background to the Draft Joint Minerals Local Plan, concludes that the sites forming the Hambrook Grouping are all "acceptable in principle". *…(redaction)..* has looked in detail at the assessments of the four sites nearest to our property- Common Road East, Common Road West, Funtington West and Slades Field. He concludes that:

• the four sites fail when tested against the Government Guidance, and the Vision, Guiding Principles, Strategic Objectives, and Development Management Policies in the Draft Plan;

• there are some very serious omissions from the report and many other errors and inconsistencies which tend, in general, to favour retention rather than rejection of the four sites;

• the overall conclusion that the four sites are 'acceptable in principle' is not supported by the assessment scores of the issues considered; and

• the full range of evidence properly considered indicates quite clearly that the sites are not acceptable.

I agree that the four sites should be declared unsuitable and therefore rejected.

Given the serious omissions, all of which favour retention of the sites, it is tempting to think that the author had some preconceived idea that the sites should be acceptable. The Report should have been checked by a senior officer but clearly this hasn't happened.

The report should be reworked to ensure that it presents a full and balanced assessment and this should be done as a matter of urgency to deter the operator from pointlessly seeking to progress these sites.

Of course, had the Local Aggregate Assessment been done correctly at the start of the process in late 2013, instead of late in 2015, there would have been no need to call for sites to be nominated and no need to prepare and publish the Mineral Sites Study. In this case, we would have been spared all the effort we have had to expend to defend our area from these very unnecessary intrusions.

* * *

05 - Hambrook grouping comments: Resident/Member of the Public (Response ID: 93 Respondent ID: 3275)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Draft West Sussex Joint Minerals Local Plan 2016

As you can see, my wife…*(redaction)..* affected by the proposed Funtington West Site. I wrote to you about thus on 18th September 2014 and again on 10th May 2015, for ourselves and for local residents.

So we greatly welcome the issue of the draft West Sussex Joint Minerals Plan 2016 (Regulation 18), and the fact that the Funtington West Site, and indeed all the other sites in Funtington Parish and the proposed site at Woodmancote, have now been excluded from the Plan.

We also support the Development Management Policies of the Plan, and, in our view, any inroads into the protection that these policies afford us, as local residents, would be completely inappropriate. We appreciate that, when the Plan is adopted, these Policies will guide the future planning process in respect of any planning applications that may be brought forward to win minerals from sites which are not included in the plan.

One issue we have with the plan is the Hambrook Grouping sites are considered to be "acceptable in principle", according to you Mineral Sites Selection Report. In fact, we think these sites are the only ones for sharp sand and gravel now considered to be "acceptable in principle".

We challenge the statement that the sites are "acceptable in principle". We assume "acceptable" means that the sites could be worked for the extraction of minerals. We simply do not consider that to be the case. And in our view the so-called 'RAG Assessments' of the sites in the Hambrook Grouping are not wholly balanced, inconsistent in places, and omit certain important impacts.

The uncertainty of the location of any local treatment plant and the means of moving the minerals to and from that plant, the impact on the landscape, the problems with transport and haul routes, noise and dust and other unacceptable environmental consequences, and the probable longevity of the workings are all underplayed, if these sites are considered to be acceptable.

The designation "acceptable in principle" implies to us that merely the detail needs to be examined, whereas, as far as we are concerned, all the issues of concern remain unsatisfied and unanswered.

Including the words "acceptable in principle" seems to us to be asking for a mineral operator or land owner to challenge the Plan. Worse, it seems to us that their case us virtually made for mineral working in any subsequent planning application, and for the Local Planning Authority to refuse an application on a site which is "acceptable in principle" leaves the authority open to a highly contentious and expensive appeal.

Arguably, all the sites should be declared "unsuitable", once and for all.

We hope you will take our concerns into account and, apart from that, we confirm our approval of the draft West Sussex Joint Minerals Local Plan 2016.

* * *

05 - Hambrook grouping comments: Resident/Member of the Public (Response ID: 112 Respondent ID: 3461)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Covering letter)

Draft West Sussex Joint Minerals Local Plan

I attach my comments on the Draft Plan.

I protest about one particular aspect of the Draft Plan.

Paragraph 7.1.4 of the Draft Plan says: “Although the allocated sites are currently available for mineral uses during the Plan period, circumstances may change and they may not come forward as expected. Private sector businesses (and, therefore, commercial considerations) will determine whether extraction will actually take place. Therefore, the Plan allows, under the use-specific policies in the preceding chapter, for other sites that are acceptable in principle to come forward for mineral extraction. Such provision will provide additional flexibility and compensate for any allocated sites that do not come forward for minerals extraction. Accordingly, the fact that a site is not allocated in the Plan does not mean that a proposal for mineral extraction on an unallocated site will not get planning permission at some future date.”

The allocated sites referred to here are an extension to West Hoathly claypit (clay) and Ham Farm, Steyning (soft sand).

Although probably written to provide flexibility in case the two sites above do not come to fruition, to my mind, the paragraph poses a risk for us.

At the moment, the Hambrook sites are considered to be “acceptable in principle” in the Mineral Sites Selection Report.

Should Hanson submit a planning application, you might think that Policy M1 would be our first line of defence. This says:

“Policy M1: Sharp sand and gravel

Proposals for land won sharp sand and gravel extraction, including extensions of time and physical extensions to existing sites, will be permitted provided that:

(a) the proposal is needed to ensure that a landbank equivalent to at least seven years supply is maintained;”

The Draft Plan shows that the current landbank is equivalent to 35 years’ supply, which is why no sites for sharp sand and gravel are allocated.

The risk that I see is that Hanson will take encouragement from paragraph 7.1.4 and the fact that the Mineral Sites Selection Report says that the Hambrook sites are “acceptable in principle”, and submit a planning application in order to test the strength of condition (a) in Policy M1.

Condition (a) is not worded very clearly. The current landbank is equivalent to 35 years’ supply, which is “at least seven years supply”. Adding to the current landbank would add to the 35 years and there would continue to be “at least seven years supply”.

There is some alignment here: the Hambrook sites, although not allocated in the Plan, are declared to be “acceptable in principle” in the MMS Report; the Plan says that exploitation is a commercial matter and that sites not allocated in the Plan could get planning permission; and the policy which is supposed to prevent planning permission being granted unless the landbank falls to below seven years’ supply does no such thing.

The MMS Report suggests that the working of the Hambrook sites could take between 15 and 23 years, with a system of conveyor belts linking the sites with the processing site at Woodmancote permanently in place for that period. As it stands, the Draft Plan invites Hanson to make the prospect a horrifying reality. The Draft Plan should be amended to safeguard against this possibility.

Mineral Sites Selection Report, April 2016

I also attach my comments on the MSS Report.

This report concludes that the sites forming the Hambrook Grouping are all “acceptable in principle”. I have looked in detail at the assessments of the four sites nearest to our property – Common Road East, Common Road West, Funtington West and Slades Field.

In summary, considering that:

• the four sites fail when tested against the Government Guidance, and the Vision, Guiding Principles, Strategic Objectives, and Development Management Policies in the Draft Plan,

• there are some very serious omissions from the report and many other errors and inconsistencies which tend, in general, to favour retention rather than rejection of the four sites,

• the overall conclusion that the four sites are 'acceptable in principle' is not supported by the assessment scores of the issues considered, and

• the full range of evidence properly considered indicates quite clearly that the sites are not acceptable,

I conclude that the four sites should be declared unsuitable and therefore rejected.

The report should be reworked to ensure that it presents a full and balanced assessment and this should be done as a matter of urgency to deter the operator from pointlessly seeking to progress these sites.

(attachment comments on plan)

DRAFT WEST SUSSEX JOINT MINERALS LOCAL PLAN (REGULATION 18)

COMMENTS BY *…(redaction)..* JUNE 2016

Executive Summary

I agree that the analyses of demand and committed supply for land-won sharp sand and gravel show clearly that there will be no requirement for any new land sites during the Plan period.

am pleased to see that the Common Road West, Common Road East, Funtington West, Slades Field and Woodmancote sites have not been included in the Draft Plan.

I now present my comments, chapter by chapter.

Chapter 1

I note that paragraph 1.7.3 in the Draft Plan says: "If substantive changes to the Draft Plan are required following consideration of the representations, the Plan will be redrafted and reconsidered by the Authorities and then subjected to a new consultation period for representations to be made about its 'soundness'."

I assume and expect that the new consultation period referred to here would be under Regulation 18 and would, in effect, be a repeat of the current consultation. That is, we would have an opportunity to comment on any substantive changes prior to the Regulation 19 consultation on the Submission Draft.

Chapter 3

Paragraph 3.3.4 says: "There are licences allowing the extraction of 9.7 million tonnes per year, however, over the last 10 years, just under half of the permitted tonnages have been taken and there is currently permitted capacity to supply an additional 6.3 million tonnes per year. If approved, five further dredging applications in this area could also deliver permits for an extra 2.25 million tonnes per year."

Is the total supply available (in millions of tonnes per year): (a) 9.7/2 + 6.3, or (b) 9.7 + 6.3, or (c) 9.7 + 6.3 + 2.25, or (d) something else?

Chapter 4

Paragraph 4.2.6 says: "Mineral extraction is a temporary activity and, once sites are restored, they can enhance the local environment and landscape."

The optimism of paragraph 4.2.6 is counter-balanced only a few pages later, in paragraph 4.4.9, which says: "Minerals can only be worked where they occur and their extraction can potentially cause conflict through loss or changes to valued landscapes."

Chapter 5

Paragraph 5.3.2 notes three dimensions to sustainable development by reference to paragraph 7 in the National Planning Policy Framework. However, the definition of sustainable development given in the Ministerial Foreword to the NPPF is not mentioned and appears to have been ignored. The Ministerial Foreword says:

"The purpose of planning is to help achieve sustainable development.

Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations.

Sustainable development is about change for the better, and not only in our built environment.

So sustainable development is about positive growth – making economic, environmental and social progress for this and future generations."

Extracting minerals from the land does not accord with this concept of sustainable development.

Paragraph 5.3.5 refers to the requirement in the NPPF that "mineral local plans should set out environmental criteria to ensure that operations do not have unacceptable adverse impacts..."

These criteria have not been included in the Draft Plan and should have been.

Chapter 6

Paragraph 6.2.9 says: "In light of the level existing reserves there are sufficient supplies of sharp sand and gravel to last for the Plan period. The strategy for the provision of land won sharp sand and gravel is therefore to safeguard existing permitted reserves and make provision for additional reserves only if needs cannot be met from other sources in West Sussex including landings of marine won aggregate landed at ports in West Sussex. Additional allocations for sharp sand and gravel sites are not required and so not included in the Plan but any proposal for the development of a site for the extraction of land won sharp sand and gravel that does come forward would be considered against Policy M1 below."

I agree with this statement.

Policy M1 in the Draft Plan says:

"Proposals for land won sharp sand and gravel extraction, including extensions of time and physical extensions to existing sites, will be permitted provided that:

(a) the proposal is needed to ensure that a landbank equivalent to at least seven years supply is maintained;"

Condition (a) is not worded correctly. The current landbank is equivalent to 35 years' supply, which is "at least seven years supply". Adding to the current landbank would add to the 35 years and there would continue to be "at least seven years supply". Condition (a) should be changed to something like: "the proposal is needed to ensure that the landbank does not fall below the equivalent of seven years' supply."

Policy M1 in the Draft Plan policy also provides no safeguards for communities. There should be a reference to other relevant policies, including Policy M18.

Chapter 7

Paragraph 7.1.4 of the Draft Plan says: "Although the allocated sites are currently available for mineral uses during the Plan period, circumstances may change and they may not come forward as expected. Private sector businesses (and, therefore, commercial considerations) will determine whether extraction will actually take place. Therefore, the Plan allows, under the use-specific policies in the preceding chapter, for other sites that are acceptable in principle to come forward for mineral extraction. Such provision will provide additional flexibility and compensate for any allocated sites that do not come forward for minerals extraction. Accordingly, the fact that a site is not allocated in the Plan does not mean that a proposal for mineral extraction on an unallocated site will not get planning permission at some future date."

The allocated sites referred to here are an extension to West Hoathly claypit (clay) and Ham Farm, Steyning (soft sand).

Although probably written to provide flexibility in case the two sites above do not come to fruition, the paragraph poses a risk for us.

At the moment, the Hambrook sites are considered to be "acceptable in principle" in the Mineral Sites Selection Report.

Should a planning application be submitted, it might be thought that Policy M1 would be our first line of defence. This says:

"Policy M1: Sharp sand and gravel

Proposals for land won sharp sand and gravel extraction, including extensions of time and physical extensions to existing sites, will be permitted provided that:

(a) the proposal is needed to ensure that a landbank equivalent to at least seven years supply is maintained;"

The Draft Plan shows that the current landbank is equivalent to 35 years' supply, which is why no sites for sharp sand and gravel are allocated.

The risk is that encouragement will be taken from paragraph 7.1.4 and the fact that the Mineral Sites Selection Report says that the Hambrook sites are "acceptable in principle", and a planning application will be submitted in order to test the strength of condition (a) in Policy M1. As noted above, condition (a) is not worded very clearly and should be amended.

WSCC's Guiding Principles in the Draft Plan

Paragraph 7.1.6 sets out five guiding principles that have been used in considering sites for inclusion in the Plan:

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

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

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

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

• Fifth element: The need to avoid the needless sterilisation of minerals by other forms of development"

Paragraph 2.6 in the Mineral Sites Selection Report gives a somewhat simplified version as follows:

• "Places where there are opportunities to restore land beneficially;

• Places without a sensitive natural or built environment and away from communities;

• Places that have good (and safe) access to the Lorry Route Network;

• The need to protect and enhance, where possible, protected landscapes, in the plan area;

• The need to avoid the needless sterilisation of minerals by other forms of development."

I note and agree with the emphasis in the "second element" on the aim of protecting the amenity of residents.

I note that, in the "third element", "good access" to the LRN is defined only in terms of capacity and safety and completely ignores the potential adverse impacts of HGVs on the amenity of residences and businesses. I consider that these latter impacts should be considered when judging whether or not there is good access to the LRN.

Chapter 8

Policy M18 in the Draft Plan should include an obligation on the part of the developer to conform with the requirements for the control of noise and dust as set out in the Technical Guidance to the NPPF.

Policy 15 in the Minerals Local Plan 2003 says: "Proposals for mineral working which would result in a change in surrounding groundwater levels will only be permitted if the effect on the adjoining land ...would not be significantly detrimental..."

This potential impact is not covered by any of the policies in the Draft Plan and a policy along the above lines should be included.

This potential impact has been omitted entirely and incorrectly from the Mineral Sites Selection Study Report.

Policy 56 in the Minerals Local Plan 2003 says: "...steps will be taken to ensure that proposed mineral extraction will have no adverse effect upon the water table which would be likely to cause significant environmental damage, flooding or adversely affect water resources."

This potential impact is not covered by any of the policies in the Draft Plan and a policy along the above lines should be included. In particular, this should specify that permission would be granted only if it can be shown that the water table under nearby houses gardens and business premises would not be adversely impacted.

This potential impact has been omitted entirely and incorrectly from the Mineral Sites Selection Study Report.

Policy 63 in the Minerals Local Plan 2003 says: “Where appropriate conditions controlling hours of work will be imposed on planning permissions involving mineral working, processing and ancillary operations, in order to safeguard residential amenities.”

This requirement should be included in Policy M23 in the Draft Plan.

Policy 64 in the Minerals Local Plan 2003 says: “Buffer zones to reduce the impact of operations upon the neighbourhood may be required, particularly in relation to residential areas and other noise sensitive uses.”

This requirement is specified in the Technical Guidance to the NPPF and should be included in Policy M18 in the Draft Plan.

(additional 36 page attachment provided commenting on Minerals Sites Selection Report)

* * *

05 - Hambrook grouping comments: Resident/Member of the Public (Response ID: 142 Respondent ID: 3592)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(2 separate attachments attached submitted under response 135 also attached to this response)

Draft West Sussex Joint Minerals Local Plan (Regulation 18), April 2016

Mineral Sites Selection Report, April 2016

…(redaction).. and we are therefore potentially affected by the conclusions reached in the above referred reports. I herewith attach comments on each of the reports prepared by my neighbour*…(redaction)..* I am writing to express my strong support for *…(redaction)..* analyses and comments.

Draft West Sussex Joint Minerals Local Plan

Like *…(redaction)..*, I am very concerned about one particular aspect of the Draft Plan.

Paragraph 7 .1.4 of the Draft Plan says: "Although the allocated sites are currently available for mineral uses during the Plan period, circumstances may change and they may not come forward as expected. Private sector businesses (and, therefore, commercial considerations) will determine whether extraction will actually take place. Therefore, the Plan allows, under the use-specific policies in the preceding chapter, for other sites that are acceptable in

principle to come forward for mineral extraction. Such provision will provide additional flexibility and compensate for any allocated sites that do not come forward for minerals extraction. Accordingly, the fact that a site is not allocated in the Plan does not mean that a proposal for mineral extraction on an unallocated site will not get planning permission at some future date."

At the moment, the Hambrook sites are considered to be "acceptable in principle" in the Mineral Sites Selection Report (but see below).

Should Hanson submit a planning application, you might think that Policy M1 would be our first line of defence. This says:

"Policy M1: Sharp sand and gravel

Proposals for land won sharp sand and gravel extraction, including extensions of time and physical extensions to existing sites, will be permitted provided that:

(a) the proposal is needed to ensure that a landbank equivalent to at least seven years supply is maintained;"

The Draft Plan shows that the current landbank is equivalent to 35 years' supply, which is why no sites for sharp sand and gravel are allocated.

The risk is that Hanson will take encouragement from paragraph 7.1.4 and the fact that the Mineral Sites Selection Report says that the Hambrook sites are "acceptable in principle", and submit a planning application in order to test the strength of condition (a) in Policy M1.

Condition (a) is not worded very clearly. The current landbank is equivalent to 35 years' supply, which is "at least seven years supply". Adding to the current landbank would add to the 35 years and there would continue to be "at least seven years supply".

There is some alignment here: the Hambrook sites, although not allocated in the Plan, are declared to be "acceptable in principle" in the MMS Report; the Plan says that exploitation is a commercial matter and that sites not allocated in the Plan could get planning permission; and the policy which is supposed to prevent planning permission being granted unless the land bank falls to below seven years' supply does no such thing.

The MMS Report suggests that the working of the Hambrook sites could take between 15 and 23 years, with a system of conveyor belts linking the sites with the processing site at Woodmancote permanently in place for that period. As it stands, the Draft Plan invites Hanson to make the prospect a horrifying reality. The Draft Plan should be amended to safeguard against this possibility.

Mineral Sites Selection Report

The Mineral Sites Selection Report, published as background to the Draft Joint Minerals Local Plan, concludes that the sites forming the Hambrook Grouping are all "acceptable in principle". *…(redaction)..* has looked in detail at the assessments of the four sites nearest to our property - Common Road East, Common Road West, Funtington West and Slades Field. He concludes that:

• the four sites fail when tested against the Government Guidance, and the Vision, Guiding Principles, Strategic Objectives, and Development Management Policies in the Draft Plan;

• there are some very serious omissions from the report and many other errors and inconsistencies which tend, in general, to favour retention rather than rejection of the four sites;

• the overall conclusion that the four sites are 'acceptable in principle' is not supported by the assessment scores of the issues considered; and

• the full range of evidence properly considered indicates quite clearly that the sites are not acceptable.

I agree that the four sites should be declared unsuitable and therefore rejected.

Given the serious omissions, all of which favour retention of the sites, it is tempting to think that the author had some preconceived idea that the sites should be acceptable. The Report should have been checked by a senior officer but clearly this hasn't happened.

The report should be reworked to ensure that it presents a full and balanced assessment and this should be done as a matter of urgency to deter the operator from pointlessly seeking to progress these sites.

Of course, had the Local Aggregate Assessment been done correctly at the start of the process in late 2013, instead of late in 2015, there would have been no need to call for sites to be nominated and no need to prepare and publish the Mineral Sites Study. In this case, we would have been spared all the effort we have had to expend to defend our area from these very unnecessary intrusions.

* * *

05 - Hambrook grouping comments: Resident/Member of the Public (Response ID: 92 Respondent ID: 3736)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Draft West Sussex Joint Minerals Local Plan 2016

I welcome the issue of the draft West Sussex Joint Minerals Plan 2016 (Regulation 18), and the fact that the Funtington West site, and indeed all the other sites in Funtington Parish and the proposed site at Woodmancote, have now been excluded from the Plan.

I am particularly concerned to make sure that Funtington West is excluded from any future mineral development. This is a large site, right on the edge of a village and bordering the National Park.

Due to the size and location of the Funtington West site, the key issues are of particular significance here, especially in terms of landscape visual impacts with the South Downs National Park, nature conservation and geological impacts, historic environmental designations, soil quality, services and utilities, amenity and cumulative impacts.

We support the Development Management Policies of the Plan, and, in our view, any inroads into the protection that these policies afford us, as local residents, would be completely inappropriate. We appreciate that, when the Plan is adopted, these Policies will guide the future planning process in respect of any planning applications that may be brought forward to win minerals from sites which are not included in the Plan.

One issue we have with the Plan is the Hambrook Grouping sites are considered to be “acceptable in principle”, according to your Mineral Sites Selection Report. In fact, we think these sites are the only ones for sharp sand and gravel now considered to be “acceptable in principle”.

We challenge the statement that the sites are “acceptable in principle”. We assume “acceptable” means that the sites could be worked for the extraction of minerals. We simply do not consider that to be the case. And in our view the so-called ‘RAG Assessments’ of the sites in the Hambrook Grouping are not wholly balanced, inconsistent in places, and omit certain important impacts.

The uncertainty of the location of any local treatment plant and the means of moving the minerals to and from that plant, the impact on the landscape, the problems with transport and haul routes, noise and dust and other unacceptable environmental consequences, and the probable longevity of the workings are all underplayed, if these sites are considered to be acceptable.

The designation “acceptable in principle” implies to us that merely the detail needs to be examined, whereas, as far as we are concerned, all the issues of concern remain unsatisfied and unanswered.

Including the words “acceptable in principle” seems to us to be asking for a mineral operator or land owner to challenge the Plan. Worse, it seems to us that their case is virtually made for mineral working in any subsequent planning application, and for the Local Planning Authority to refuse an application on a site which is “acceptable in principle” leaves the authority open to a highly contentious and expensive appeal.

Arguably, all the sites should be declared “unsuitable”, once and for all.

We hope will take our concerns into account and, apart from that, we confirm our approval of the draft West Sussex Joint Minerals Local Plan 2016.

* * *

05 - Hambrook grouping comments: Resident/Member of the Public (Response ID: 153 Respondent ID: 3759)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(2 separate attachments attached submitted under response 135 also attached to this response)

Draft West Sussex Joint Minerals Local Plan (Regulation 18), April 2016

Mineral Sites Selection Report, April 2016

I attach comments on the above two reports prepared by my neighbour, *…(redaction)..* I am writing to express my strong support for *…(redaction)..* analyses and comments.

Draft West Sussex Joint Minerals Local Plan

Like *…(redaction)..*, I am very concerned about one particular aspect of the Draft Plan.

Paragraph 7.1.4 of the Draft Plan says: "Although the allocated sites are currently available for mineral uses during the Plan period, circumstances may change and they may not come forward as expected. Private sector businesses (and, therefore, commercial considerations) will determine whether extraction will actually take place. Therefore, the Plan allows, under the use-specific policies in the preceding chapter, for other sites that are acceptable in principle to come forward for mineral extraction. Such provision will provide additional flexibility and compensate for any allocated sites that do not come forward for minerals extraction. Accordingly, the fact that a site is not allocated in the Plan does not mean that a proposal for mineral extraction on an unallocated site will not get planning permission at some future date."

At the moment, the Hambrook sites are considered to be "acceptable in principle" in the Mineral Sites Selection Report (but see below).

Should Hanson submit a planning application, you might think that Policy M1 would be our first line of defence. This says:

"Policy M1: Sharp sand and gravel

Proposals for land won sharp sand and gravel extraction, including extensions of time and physical extensions to existing sites, will be permitted provided that:

(a) the proposal is needed to ensure that a landbank equivalent to at least seven years supply is maintained;"

The Draft Plan shows that the current landbank is equivalent to 35 years' supply, which is why no sites for sharp sand and gravel are allocated.

The risk is that Hanson will take encouragement from paragraph 7.1.4 and the fact that the Mineral Sites Selection Report says that the Hambrook sites are "acceptable in principle", and submit a planning application in order to test the strength of condition (a) in Policy M1.

Condition (a) is not worded very clearly. The current landbank is equivalent to 35 years' supply, which is "at least seven years supply". Adding to the current landbank would add to the 35 years and there would continue to be "at least seven years supply".

There is some alignment here: the Hambrook sites, although not allocated in the Plan, are declared to be "acceptable in principle" in the MMS Report; the Plan says that exploitation is a commercial matter and that sites not allocated in the Plan could get planning permission; and the policy which is supposed to prevent planning permission being granted unless the landbank falls to below seven years' supply does no such thing.

The MMS Report suggests that the working of the Hambrook sites could take between 15 and 23 years, with a system of conveyor belts linking the sites with the processing site at Woodmancote permanently in place for that period. As it stands, the Draft Plan invites Hanson to make the prospect a horrifying reality. The Draft Plan should be amended to safeguard against this possibility.

Mineral Sites Selection Report

The Mineral Sites Selection Report, published as background to the Draft Joint Minerals Local Plan, concludes that the sites forming the Hambrook Grouping are all "acceptable in principle". *…(redaction)..* has looked in detail at the assessments of the four sites nearest to our property – Common Road East, Common Road West, Funtington West and Slades Field. He concludes that:

- the four sites fail when tested against the Government Guidance, and the Vision, Guiding Principles, Strategic Objectives, and Development Management Policies in the Draft Plan;
- there are some very serious omissions from the report and many other errors and inconsistencies which tend, in general, to favour retention rather than rejection of the four sites;

- the overall conclusion that the four sites are 'acceptable in principle' is not supported by the assessment scores of the issues considered; and
- the full range of evidence properly considered indicates quite clearly that the sites are not acceptable.

I agree that the four sites should be declared unsuitable and therefore rejected.

Given the serious omissions, all of which favour retention of the sites, it is tempting to think that the author had some preconceived idea that the sites should be acceptable. The report should be reworked to ensure that it presents a full and balanced assessment and this should be done as a matter of urgency to deter the operator from pointlessly seeking to progress these sites.

Of course, had the Local Aggregate Assessment been done correctly at the start of the process in late 2013, instead of late in 2015, there would have been no need to call for sites to be nominated and no need to prepare and publish the Mineral Sites Study. In this case, we would have been spared all the effort we have had to expend to defend our area from these very unnecessary intrusions.

* * *

05: Hambrook Grouping comments (Funtingdon

05 - Hambrook grouping comments: Resident/Member of the Public (Response ID: 206 Respondent ID: 3790)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(2 separate attachments attached submitted under response 135 also attached to this response)

Draft West Sussex Joint Minerals Local Plan (Regulation 18), April 2016

Mineral Sites Selection Report, April 2016

I attach comments on the above two reports prepared by my neighbour, *…(redaction)..* I am writing to express my strong support for *…(redaction)..* analyses and comments.

Draft West Sussex Joint Minerals Local Plan

Like *…(redaction)..*, I am very concerned about one particular aspect of the Draft Plan.

Paragraph 7.1.4 of the Draft Plan says: "Although the allocated sites are currently available for mineral uses during the Plan period, circumstances may change and they may not come forward as expected. Private sector businesses (and, therefore, commercial considerations) will determine whether extraction will actually take place. Therefore, the Plan allows, under the use-specific policies in the preceding chapter, for other sites that are acceptable in

principle to come forward for mineral extraction. Such provision will provide additional flexibility and compensate for any allocated sites that do not come forward for minerals extraction. Accordingly, the fact that a site is not allocated in the Plan does not mean that a proposal for mineral extraction on an unallocated site will not get planning permission at some future date."

At the moment, the Hambrook sites are considered to be "acceptable in principle" in the Mineral Sites Selection Report (but see below).

Should Hanson submit a planning application, you might think that Policy M1 would be our first line of defence. This says:

"Policy M1: Sharp sand and gravel

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The Draft Plan shows that the current land bank is equivalent to 35 years' supply, which is why no sites for sharp sand and gravel are allocated.

The risk is that Hanson will take encouragement from paragraph 7 .1.4 and the fact that the Mineral Sites Selection Report says that the Ham brook sites are "acceptable in principle", and submit a planning application in order to test the strength of condition (a) in Policy M1.

Condition (a) is not worded very clearly. The current landbank is equivalent to 35 years' supply, which is "at least seven years supply". Adding to the current landbank would add to the 35 years and there would continue to be "at least seven years supply".

There is some alignment here: the Hambrook sites, although not allocated in the Plan, are declared to be "acceptable in principle" in the MMS Report; the Plan says that exploitation is a commercial matter and that sites not allocated in the Plan could get planning permission; and the policy which is supposed to prevent planning permission being granted unless the landbank falls to below seven years' supply does no such thing.

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Mineral Sites Selection Report

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I agree that the four sites should be declared unsuitable and therefore rejected.

Given the serious omissions, all of which favour retention of the sites, it is tempting to think that the author had some preconceived idea that the sites should be acceptable. The Report should have been checked by a senior officer but clearly this hasn't happened.

The report should be reworked to ensure that it presents a full and balanced assessment and this should be done as a matter of urgency to deter the operator from pointlessly seeking to progress these sites.

Of course, had the Local Aggregate Assessment been done correctly at the start of the process in late 2013, instead of late in 2015, there would have been no need to call for sites to be nominated and no need to prepare and publish the Mineral Sites Study. In this case, we would have been spared all the effort we have had to expend to defend our area from these very unnecessary intrusions.

* * *

06: West Hoathly Philpots Stone Quarry

06 - West Hoathly Philpots Stone Quarry: Resident/Member of the Public (Response ID: 218 Respondent ID: 3132)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Philpots Stone Quarry, West Hoathly

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Please explain why considerable quantities of stone material as sand and gravel, (estimated to be between 25,000 tonne and 50,000 tonne per year) are being produced locally in West Sussex and yet do not appear in the assessment of such locally produced minerals in West Sussex. I do not accept the answer previously given is that," These quantities are too small to be significant in the Local Plan".

All existing production sites should be enumerated together with estimated production rates.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

An up to date assessment of locally produced sand and stone to be included in the Local Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

The site is usually referred to as West Hoathly Ibstock Brickworks, Sharpthorne

The comments below refer to the sections so listed under 7.2.6 development principles in the draft Local Plan

(iii) planting of native trees and shrubs... including some evergreen species might allow the planting of Leylandii which are not native.You should refer to High Weald AONB guidance on avoiding such planting.

(ix) Please identify and add the name and location of the SSSI referred to in the text.

(xiii) This might imply that the site is subject to allowable intensification of production. If the proposed extension is to allow for 25 years of clay resources then this is not born out by the existing planning permission which allows production until 2028. The site extension only allows a further 2-3 years of production. Thus clay extraction is afforded until 2031 at the latest. This conflicts with Policy M5 (a) 1 6.5.6. Since the Minerals Plan seeks to provide for sites with 25 years production (i.e. to 2041) this site fails to provide the required resources.

(xv) access to the site by means of residential streets including Top Road Sharpthorne, Station Road and Hamsey Road is barely satisfactory at present. Another essential development principle is required In order to preclude intensification of brick making operations and the possibility of importation of clay from other production sides onto the site to make up a production shortfall.

(xviii) Progressive restoration of the site including further tree planting must be continually monitored and promoted including restoration of the original land profile in accordance with the Vision of this Local Plan and the extant planning permission and conditions.,.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Investigate and include comments to sections mentioned, (iii), (ix), (xv) and (xviii) in the revised text of Development Principles of this site.

Consider whether Development Principle is (xiii) achieved at all by this extension to the clay quarry.

Investigate whether the progressive restoration of the existing clay quarry is taking place in accordance with the extant planning permission.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Policy M7b: Hydrocarbon development involving hydraulic fracturing

Because much larger quantities of water based fluids (several times as much) are imported to a site than are removed from the site, as written condition M7(b) (ii) fails to protect against any significant adverse impact from the transportation of oil/gas and water. It should say ... (ii) no significant adverse impacts would arise from the transport of oil/gas and water based fluids BOTH TO AND FROM the site.

4.8 Transport

4.8.7 Please explain how as stated in this minerals local plan HGVs are "encouraged to use the Lorry Route Network" What mechanisms are available to encourage operators? If none exist, then this statement is meaningless as repeatedly reported to members of the public at County Local Committee Meetings and other public meetings.

3.3.6 Sandstone

"There are currently four active sandstone extraction sites in West Susses. For more information on these sites see the West Sussex AMR". Rather than referring to another information source, it would aid clarity to list the sites referred to together with the type of stone being produced and also to clarify what the AMR means. This comment should be read in the context of my comments in section B2 of this form which are repeated below:

Please explain why considerable quantities of stone material as sand and gravel, (estimated to be between 25,000 tonne and 50,000 tonne per year) are being produced locally in West Hoathly Philpots Quarry, West Sussex and yet do not appear in the assessment of such locally produced minerals in West Sussex. I do not accept the answer previously given is that," These quantities are too small to be significant in the Local Plan".

Additional Comments

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* * *

07: Wickford Bridge

07 - Wickford Bridge: Resident/Member of the Public (Response ID: 114 Respondent ID: 3739)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

But the summary above omits the strong statement in the draft plan's executive summary that "… to that end minerals resources will be safeguarded and exploited in a manner which sees a move away from activity within the South Downs National Park"

This a crucial conclusion and must not be lost.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

See above

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

The section on transport is very weak; For instance, if a site were to be proposed for Wickford Bridge then traffic, both incoming and outgoing would have to travel

(a) along the A283 to the A24 which would further compromise Storrington which is already traffic blighted and air quality polluted;

(b) along the A283 to the A29 along Lower Street which is already too narrow and then up Church Hill which is too narrow;

(c) along the A283 westwards to the A3 which involves Hallelujah Corner

(d) over Broomers Hill which is already HGV restricted

(e) through West Chilltington and its very narrow lanes

So more attention needs to be paid to traffic constraints.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Section 5.2 refers to a number of E.U directives that affect the National Park; however, these are only dealt with in passing. Specific detail needs to be given on how, both positively and negatively, these might affect development in the county.

Additional Comments

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* * *

08: General comments

08 - General comment: Resident/Member of the Public (Response ID: 332 Respondent ID: 588)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Many thanks for this information. What I must say that I am very disappointed about the way things are going,

First we cant afford anymore delay's or postpondments or the great project will never get going Soon we will have Holiday's then further postpondments and delays.

Why cant we bring meeting dates closer together so make up for lost delays and time, I do understand this is not the only job you have so mike what can we do to keep this project moving.

* * *

08 - General comment: Resident/Member of the Public (Response ID: 205 Respondent ID: 3789)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

My opinion on the plan

In my view, this plan is NOT acceptable. The policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

The current plan fails to:

- Reduce climate changing emissions
- Consider risks before an application is approved
- Protect the South Downs National Parkand other areas important to wildlife from drilling and fracking
- Consider how impacts of applications build up over time
- Keep noisy and polluting developments away from people's houses
- Consider fully the issues of concern to local people

* * *

08 - General comment: Resident/Member of the Public (Response ID: 23 Respondent ID: 3921)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A * * *

08 - General comment: Resident/Member of the Public (Response ID: 25 Respondent ID: 3926)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

It's a very long document and not easy to take in all the detail

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Don't know

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

This was well set out although I couldn't read it all in detail it would take to long

Additional Comments

N/A

* * *

08 - General comment: Resident/Member of the Public (Response ID: 14 Respondent ID: 3937)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Agree with the objectives

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Consideration to encourage use of non-fossil fuel lorries and low carbon footprint vehicles rather than diesel ones wherever possible.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

A deposit should be held by the council for the restoration of the site after it closes down, to be returned as the site is restored to protect against the collapse of the company doing the work.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Chapter 9: Action to be taken in the event of the withdraw before completing restoration of site.

Additional Comments

N/A

* * *

08 - General comment: Resident/Member of the Public (Response ID: 8 Respondent ID: 3953)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I am a little uneasy about SO9 To protect and where possible enhance the ....resources of West Sussex. I am not sure what is meant by resources in this context and how they can be enhanced by this policy.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

SO9 remove the word resources

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

08 - General comment: Resident/Member of the Public (Response ID: 18 Respondent ID: 3986)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Whilst there is no choice, as under government legislation, these minerals must be extracted, it needs to be done in such a way, as to cause as little as possible disruption, to the local residents and countryside.

Firm assurances should be put in place, to,

1) restrict heavy lorry movements to an absolute minimum.

2) keep noise pollution to an absolute minimum.

and,

3) reinstate the area, as far as possible, once extraction has finished.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

There should be another section to detail, restrictions and obligations, for environmental extraction, and interface with the residents, wild life etc.

Additional Comments

N/A

* * *

08 - General comment: Resident/Member of the Public (Response ID: 7 Respondent ID: 4045)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

So long as minerals are transported safely and, in special break-proof flasks if toxic, and so long as mining in the district is afterwards made good restoring the natural beauty of the district, I am satisfied.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Sand extraction sites would need to refilled with some other sand like material at the end of the site life.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

Sand extraction sites would need to refilled with some other sand like material at the end of the site life.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

08 - General comment: Resident/Member of the Public (Response ID: 17 Respondent ID: 4050)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

08 - General comment: Resident/Member of the Public (Response ID: 5 Respondent ID: 4062)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

* * *

08 - General comment: Resident/Member of the Public (Response ID: 24 Respondent ID: 4067)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Act in the best interests of West Sussex then the Nation then the world.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

None just apply the principles in B1.3

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

See my fundamental Principles at B 1.3

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

See my fundamental Principles at B 1.3

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

No

Additional Comments

N/A

* * *

08 – General comment: Resident/Member of the Public (Response ID: 316 Respondent ID: 4102)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

09: Oil and gas opposition / concern

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 136 Respondent ID: 920)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Re: West Sussex Mineral Joint Local Plan

Consultation Closing date 17th June 2016

Dear Sir or Madam,

In response to the West Sussex Mineral Joint Local Plan Consultation, I make the following proposed amendments to Policies M15 (adding (d)) and M16 (adding (d)) as follows:

Policy M15: Air and Soil

Proposals for mineral development will be permitted provided that:

(a) there are no unacceptable impacts on the intrinsic quality of, and where appropriate the quantity of, air and soil;

(b) there are no unacceptable impacts on the management and protection of such resources, including any unacceptable impacts on Air Quality Management Areas; and

(c) they are not located in areas subject to land instability, unless problems can be satisfactorily resolved, or are undertaken in a manner which could give rise to instability in future.

(d) The potential contamination of Fracking or other processes has been given thorough investigations to establish without any doubt there are no traces of Uranium, Arsenic, Lead, Cadmium and other heavy metals of a Toxic nature produced as a result of the breaking up of Shales.

Policy M16: Water Resources

Proposals for mineral development will be permitted provided that they would:

(a) not cause unacceptable risk to the quality and quantity of water resources (including ground, surface, transitional, and coastal waters);

(b) not cause changes to groundwater and surface water levels which would result in unacceptable adverse impacts on:

(i) adjoining land;

(ii) the quality of groundwater resources or potential groundwater resources; and

(iii) the potential yield of groundwater resources, river flows or natural habitats such as wetlands or heaths; and

(c) protect and where possible enhance, the quality of rivers and other watercourses and water bodies (including within built-up areas).

(d) Not cause the potential contamination of Water Resources by way of Fracking or an equivalent activity, and there has been thorough investigations to establish without any doubt there are no traces of Uranium, Arsenic, Lead, Cadmium and other heavy metals of a Toxic nature produced as a result of the breaking up of Shales, by way of Fracking or other processes.

These proposed amendments are given that Water used in extraction will need disposal, but where to the Land, Rivers, or Sea, whichever option is used will create a pollution problem of significance to wildlife as well as ultimately ourselves. Especially should any of our aquifiers be non reversibly contaminated.

Thank you in advance for your assistance,

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 3 Respondent ID: 2770)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I do not support and removal of gas or hydrocarbons by the Fracking method.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

No Fracking

B2. Mineral Site Allocations

B2.1 Name of site

Extension to West Hoathly Brickworks (Extension to) (M/MS/1)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

No gas or Hydrocarbon removal by Fracking

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Exclude anything that needs Fracking

B2. Mineral Site Allocations

B2.1 Name of site

Any site containing gas or hyrdrocarbons

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

No Fracking

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

No Fracking

B2. Mineral Site Allocations

B2.1 Name of site

Ham Farm, Steyning (M/HO/4A)

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

No gas or Hydrocarbon removal by Fracking

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Exclude anything that needs Fracking

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

No removal of Gas or hydrocarbons by fracking

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

It should not contain any removal of Gas or hydrocarbons by Fracking

Additional Comments

N/A

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 165 Respondent ID: 3772)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change. In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'. The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 167 Respondent ID: 3774)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

(Email 1 of 2)

I was horrified to hear that plans are being considered that could open the door to future drilling for fossil fuels in West Sussex.

As a natural science graduate and lifelong Chichester resident I'm doubly appalled that anything close to this could even be on the table.

Firstly because the South Downs has National Park status and secondly, fossil fuels should absolutely not be on the agenda. Our natural resources represent a great opportunity for planting trees to offset carbon production, not to contribute to the destruction of our environment . Only those completely blinded by greed could even consider producing more fossil fuels when the earth is on the brink of environmental catastrophe. I can't believe than, in such an educated and affluent area as Chichester, such retrograde ideas could be tabled.

Please note my vehement objections to any form of fossil fuel production and hopefully email me back to inform me that the whole thing has been a hoax because it really is unbelievable insanity.

(Email 2 of 2)

When the Greenland ice sheet cracks at its edge, releasing the melt water from the interior, the runoff will disrupt the gulf stream and plunge Europe into an ice age. Not hyperbole but a strong possibility. The process has happened before when the glacier over North America melted, creating the great lakes. The meltwater ran so quickly that it carved great channels which can be seen from space. Here's a fun fact: you can see identical channels caused by the melting of the ice on Mars!

When the Greenland ice sheet gives, the process will take only ten years. It's a tipping point. With this in mind, I hope you'll agree with me that any more use of fossil fuels is madness. Think what a president it would set if Sussex of all places advocated such suicidal greed.

Thanks for your kind attention.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 196 Respondent ID: 3784)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 337 Respondent ID: 3842)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

In addition to the e mail comments I have pasted below from Friends of the Earth, which I support in their entirety, I would like to make some additional comments.

I am not an environmentalist nor a "fractivist" - simply an ordinary UK citizen, mother & doctor.

I approached the issue of fracking with an open mind because I am a doctor who has an interest in the public health threat posed by climate change. However my own thorough research on the matter has convinced me that there needs to be a nationwide moratorium on fracking for the foreseeable future & at the very least a national conversation about it with a fully informed public. This is my general position. As far as the specific plan in West Sussex & South Downs currently being considered by you, I believe that the local situation means that fracking would most certainly not be in the best interests of the local community or in fact, the county as a whole.

I am a doctor (paediatrician) working in Norwich & have consulted a wide range of reports & research papers by a variety of authorities & experts on the subject of hydraulic fracturing. I have serious concerns.

A large group of senior & well-informed doctors have asked the Government for a UK moratorium on fracking. I share their position. The concerns range widely from serious public health issues, to an array of other impacts on local communities & ecosystems. You may have read Medact's report. If not I urge you to read it. There was also a letter in the British Medical Journal signed by senior doctors calling for a UK fracking moratorium. The Public Health England report which is widely quoted out of context, has by it's own statement very narrow terms of reference & does not address many aspects of public health impacts of fracking, nor is it in fact up to date with recent expert research, reports & opinion.

There are wide ranging public health concerns. What worries me greatly is that there are in addition to what is already known, much that has yet to be researched because many of the likely associations & risks will only become apparent over the course of some years to come. Cancer risks for example will not be clear. Children are particularly vulnerable to many of the risks owing to their physiology & growth, metabolism & size. They are not as equipped as adults to deal with small amounts of toxins & faster breathing rates make them more vulnerable to air pollutants. Additionally they are still developing & so are at increased risk of problems in a similar way that a developing baby is at risk in utero from various insults. Pregnant women, the elderly & people with chronic diseases are also more at risk from the public health hazards associated with fracking.

There is a long list of risks to the local environment, water, agriculture, tourism, the impact on communities - you will be familiar with all of these.

UK regulations have been assessed by some experts as inadequate despite our Government's assertions to the contrary. At present the regulations are piecemeal & have been largely taken from off shore regulations.

Another concern I have is flood risk. One fifth of the â€œPEDLsâ€ Petroleum Exploration & Development Licenses in the UK lie in areas at risk of flooding. Obviously, floods are devastating to the people affected as well as the economy. A simple internet search will show you the devastating consequences of a combination of fracking in flood risk areas: Colorado & Texas are two examples. Water contamination for one, was unavoidable. The UK is known to be at increased risk of flooding because of climate change; flood defences have been found to be inadequate for many regions of the UK & experts report that much more investment is required.

With regards to the climate impact of fracking: there is a report by the Parliamentary Committee for Climate Change which is due to be published (it was expected some weeks ago) & its findings will be crucial to be taken into consideration for your plan. The cumulative climate impact of a new fracking industry in the UK would not be insubstantial. The urgency & magnitude of climate action appears to be largely misunderstood by a wide section of the population & I reluctantly also say our Government. The Paris Agreement even if implemented only takes us part way to where we need to be to avert catastrophic climate change. This is not my "view" or opinion but the opinion of the world's scientific consensus. Methane leaks from fracking have been grossly underreported until recently. Only now is independent verification available (as opposed to industry's own estimates which have been relied upon by the USA's EPA & other authorities). What is clear now is that the concept of "clean fracked gas" is simply not credible. Methane is a very potent greenhouse gas. Over 100 years it is quoted at about 20+ times more potent than CO2. But over a shorter 20 year timescale, it is 72-105 times more potent. The 20 year timescale is highly relevant as we endeavor to avoid â€œtrigger pointsâ€ which would likely lead to catastrophic & unstoppable climate change. We have already breached the global carbon

budget to keep global temperature rise to 1.5 degrees. We are very close to breaching the carbon budget that would give us a reasonable probability of staying below 2 degrees. We have at best a few more years to transition to clean sources of energy & whilst politically this is undoubtedly challenging, there is no arguing with the laws of nature or physics. As you know it is imperative for the well being of people & the earth that we maintain global temperature rise below 2 degrees. Our current 1 degree rise is already demonstrating severe impacts around the world from devastating coral bleaching of the Great Barrier reef, to melting the Arctic at an alarming rate. What we all do matters. Commencing fracking as an industry in the UK makes no sense in terms of protecting the climate.

I find myself completely bemused why the question of fracking in this area is even being raised, never mind being seriously contemplated. Apart from the beauty of the region & the well-being of communities being seriously put at risk, this is putting prime land & water sources at risk as well, for an industry that delivers at best only very temporary benefits. Many of the jobs created will be "imports" from outside the area & aside from traffic & noise, rural areas affected by fracking have problems with social cohesion & crime.

As a final comment: with respect to the "national importance" of fracking, I would like to emphasise that whether you look at economics or energy security, fracking does not protect these. In any event, the serious concerns about public health surely should supersede any purported short term economic "gains"; & as a nation, we also have international responsibilities to cooperate with other countries to avert the current climate emergency. "Emergency" is not my word - but the word used by leading climate scientists about the situation we are currently facing.

Thank you for your careful consideration of my petition here to you & the other public responses you receive. For multiple & substantial reasons, I ask that you please redraft your minerals plan.

Pasted from e mail: Friends of the Earth (I am in accord):

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 343 Respondent ID: 3845)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change. I feel very strongly that our National Parks, as irreplacable World Heritage sites, deserve a guaranteed future that is free of mineral invasion.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.I believe that conservation will envision what this region needs in a safe way, and above all protect our water.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I would like the plan to prevent risk to communities.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 360 Respondent ID: 3861)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Allowing exploitation of fossil fuels in the Wealden landscape provides no benefit to local communities, the environment or national energy security as is evidenced by the history of fracking in the US, recognised by countries that are not supporting fracking and evidenced by many reports.

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 347 Respondent ID: 3879)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK - and through using renewables.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks. Perhaps you already know there are many many risks involved in hydraulic fracturing for example - poisoning the water supply with chemicals, the air by flaring off methane and land with the poisonous run off seeping in, not to mention increased traffic and pollution.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 354 Respondent ID: 3882)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I strongly object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 348 Respondent ID: 3886)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

I am also increasingly, as most of us are, aware that the established fossil fuel suppliers, in conjunction with banking and political entities are deliberately suppressing true clean energy technologies.....this must stop as continuing the burning of fossil fuels is harming our environment on both a local and global level.....we simply do not need to destroy any more countryside and the life that depends upon it.....us included !

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 358 Respondent ID: 3891)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

As someone who lives on the border of both West Sussex and the South Downs National Park, I wholeheartedly object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 342 Respondent ID: 3899)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

Please reconsider...this precious and beautiful part of the world deserves our protection...for the sake of our health and our childrens' future.

Thank you so much for looking into the alternatives.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 344 Respondent ID: 3900)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

As a long-term resident of West Sussex, I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

This is a retrograde plan in that leading authorities and companies are looking at alternative and renewable energy sources. They recognise that fossil fuels should remain in the ground and I therefore object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'. Economic growth is best served by investing in the future with clean technologies and not in the past with dangerous and damaging ones.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks. Once damage to the local environment has been caused, what guarantees can WSCC give that reclamation and reinstatement will be carried out, bearing in mind that many of these companies could be facing financial ruin over the life of this plan? Is an alternative fund backed by insurance being created to cover these eventualities and those of long term geological damage for instance?

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of local and international health and safety, community well-being and sustainable businesses

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 345 Respondent ID: 3901)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

If you are basing the minerals plan on the belief that oil and gas produced in security is 'part of a national commitment to maintain and enhance energy security in the UK'., then please remind yourselves of what happened to North Sea oil. Up until 2005 the UK was a net exporter.. Energy security clearly wasn't considered important then, nor will it be now as fossil fuels are sucked out of the ground to benefit the short term financial interests of a few.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 346 Respondent ID: 3902)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to this as a local resident and as an ex local parish councillor. We still do not know enough about fracking or the consequences and the pressure that Westminster elected representatives are putting on local authorities and local councils is out of line just because it doesn't fit with national party policy. This is not about NIMBY-ism. I simply think we don't know enough. Period. Therefore, it should take place anywhere.

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 349 Respondent ID: 3903)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I totally object to the draft plan for minerals for West Sussex and the South Downs National Park...This fails to comply with the legal duty that policies in the plan as a whole must "Contribute to the mitigation of and adaptation to climate change".

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth' when renewables are already contributing to the UK energy needs and will continue to do so, meaning that the demand for oil and gas will be ever dwindling.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK. The energy demand in the UK has actually be dropping year-one year according to the Governments own report.

I am very concerned that the plan seeks to 'minimise the risk' to communities. This obviously accepts that there will be risks

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the most certainly plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 350 Respondent ID: 3904)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

As our elected representatives, you surely must act in our best interest. And our best interest MUST be to live in as unpolluted environment as possible. One that is utilising the new technology available to move away from our reliance on fossil fuels.

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 351 Respondent ID: 3905)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I must object if the policies as they are currently drafted in the plan do not ensure that the activity both contributes to the achievement of sustainable development and simoultaneously reduces climate change emissions.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 352 Respondent ID: 3906)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I am so distraught at the disregard of our beautiful county, that I'm adding my own plea.

I agree with everything n this email and I ask you to remember there is unlimitedly more renewable power above the ground than fracking can ever produce.

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather lthan to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 353 Respondent ID: 3907)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

we need fresh water more than oil.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 355 Respondent ID: 3908)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

The vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'. WHAT? Growth of tumors maybe!

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

It may have escaped your attention but a little while back someone invented something that captures sunlight and turns it into electricity. My power at home is made this way!

I am concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, with bad consequences and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 356 Respondent ID: 3909)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

My primary concern is that the sort of development envisaged will only increase the present deleterious effects of climate change.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 357 Respondent ID: 3910)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change. National Parks should by definition be a pristine environment, where wildlife flourish and where visitors' can take time out of their hectic lives and improve their mental health. The proposed drilling will permanently despoil the pristine environment.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 362 Respondent ID: 3913)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I strongly object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 363 Respondent ID: 3914)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

if we stand any chance of keeping within the agreed temperature rise we need to stop extracting all fossil fuels NOW.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 364 Respondent ID: 3915)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

On the basis that we should be finding alternatives to fossil fuels rather than trying to squeeze out every last drop, I object to the draft plan for minerals for West Sussex and the South Downs National Park.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 323 Respondent ID: 3919)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Policies in the plan must contribute to the mitigation of and adaptation to climate change.

It is crazy to be considering further extraction of fossil fuel.

We need energy efficiency and sustainable renewable energy supplies not a mad unprotected dash towards more oil extraction or fracking.

The majority of climate scientists are all agreed that there is no possibility of limiting global warming to 2 degrees unless we adopt policies to leave fossil fuels in the ground.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Policies fail to recognise the risks to the environment and communities

Policies do not protect the county as they allow oil companies to continue to develop their dirty fuel exploration

Policies fail to take account of public health concerns

Policies fail to recognise the impact that oil exploration has on communities

Policies fail to recognise the problem of waste and other pollution eg light, ground water

WEST SUSSEX should be working towards developing renewable energy. All its policies should be related to this objective. We have to protect our National Park and our Areas of Outstanding Natural Beauty and SSSIs for our children and grandchildren to enjoy.

The plan is not strong enough to do any of these things.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The plan should be strengthened to prevent any risks to the public

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 292 Respondent ID: 3920)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I support some of the vision and strategic objectives.

I do not support the extraction or exploration of oil and gas within Sussex. There are too many risks associated with extraction of oil and gas to both local communities and to the environment.

Even when all the economic oil and gas has been extracted it is unclear as to who is responsible for monitoring the bore holes and ensuring that no leaks occur and that any remedial work is carried out to rectify any leaks or damage.

In addition I do not believe that the monitoring of the activities of the companies will be sufficient and given that they are in general both poacher and game keeper and limited in liability there is insufficient control and penalties to ensure that they stick to best practice.

So the question falls back to how pays for the monitoring and for cleanup if something goes wrong?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like a clear statement that any monitoring and enforcement should be paid in full by the company requesting a licence to extract minerals.

I would like a clear statement that the officers of the said company are liable jointly with the company requesting a licence and that the backers are also jointly liable.

Basically the polluter pays and this should be written into the licence and legal agreements.

I do not want the local or central government paying for monitoring, enforcement or cleanup.

I would like a statement that mineral extraction should be a last resort where there is no other viable option, such as extraction of minerals in a less sensitive area where there is little imposition on a community. Once the minerals are extracted the resource is gone for all future generations.

There should therefore be a presumption of conservation of resources.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

There is insufficient information to form a positive opinion as the link above does not provide access to the individual polices.

However I would say that I do not approve of drilling for oil/gas either conventionally or unconventionally.

"Policy M7a: Hydrocarbon development not involving hydraulic fracturing

"Policy M7b: Hydrocarbon development involving hydraulic fracturing"

The main sticking point is the impact on communities and the high risk of pollution and the lack of accountability of the companies involved. In addition I do not believe that the regulations or monitoring is sufficient.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

There should be a sections on the following:

Environmental Protection

Community Protection & engagement.

Monitoring during mineral extraction, and after including who is responsible and who pays for this.

Site restoration, who is responsible for this and who pays.

What happens if there is a pollution event, who is responsible, who pays.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 287 Respondent ID: 3922)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

We need a vision to prevent free for all exploration, however, I do not support any fracking in West Sussex.

We should be moving to a low carbon economy rather than taking risks to find more fossil fuels. We should be recycling more to avoid the need for so many minerals being used for a throwaway society - eg phones.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas extraction is particularly worrying because of the high levels of methane emissions associated with the process.

Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure? Food security should also be considered and whether minerals development may contaminate the land needed to produce food.

The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide

range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

see previous comments.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 265 Respondent ID: 3924)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

While I support much of this in terms of protecting our environment, conserving the beautiful outdoors, maximise the re-use of recycled aggregates, minimise the risk to people and property from flooding, safeguard water resources from contamination, and ensure the quality and quantity of the water environment is conserved and enhanced, minimise carbon emissions and to adapt to, and to mitigate the potential adverse impacts of, climate change and more, I find the wording of some of these objectives concerning.

For example, "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." I would like to see "energy security" distinctly and clearly aligned with renewable sources of energy, which are now perfectly able to meet such a role. The implications that hydraulic fracturing, for example, might be acceptable despite its flagrant violation of several of the other objectives because of reasons of "energy security" is scientifically, practically and ethically wrong.

The points below perfectly express my feelings on the Draft Plan:

1)The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas extraction is particularly worrying because of the high levels of methane emissions associated with the process.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3)The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure? Food security should also be considered and whether minerals development may contaminate the land needed to produce food.

4)The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters

and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5)Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

SO1: "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." To be changed to: "To promote the prudent and efficient use of minerals only where this meets all the strategic objectives of the Plan.

SO4: "To protect the South Downs National Park by only providing for silica sand in exceptional circumstances and when in the public interest." To be changed to: "To protect the South Downs National Park by not providing for silica sand in any circumstance."

SO5: "To protect and maintain the existing mineral development sites and infrastructure including capacity for importation of minerals via the ports of Littlehampton and Shoreham and the railheads at Chichester, Crawley and Ardingly." To be changed to: "To encourage a smooth transition of existing mineral industry to renewable energy industries, so that the local economy benefits as much as, if not more than, before."

SO6: "To safeguard potential economically viable mineral resources from sterilisation." - not even sure what this means!

SO12: "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." To be changed to: "To protect the environment and local communities in West Sussex from unacceptable impacts of any proposal for oil and gas development."

B2. Mineral Site Allocations

B2.1 Name of site

Lower Stumble, Balcombe

B2.2 Do you support the inclusion of this site within the draft Plan?

No Response

B2.3 Please detail any comments you have about this site and the development principles.

I would like to see Balcombe protectedf rom hydraulic fracturing.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would liket o see specific mention of hydraulic fracturing being banned from all land in West Sussex.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I do not support hydraulic fracturing in any way.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

I would like the plan to include a ban on hydraulic fracturing in the whole of West Sussex.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 16 Respondent ID: 3925)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I have concerns with the fracking process what safe guards will be put in place to check

the quality of groundwater resources or potential

groundwater resources; and

(iii) the potential yield of groundwater resources, river flows or

natural habitats such as wetlands or heaths.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

none

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

pre and post checks on any proposed fracking sites on water quality and geology.

Additional Comments

N/A

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 276 Respondent ID: 3927)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision should be looking to cut emissions of climate change gases. Emissions of methane need to be greatly reduced. Fossil fuels should remain in the ground. Unconventional methods of gas extraction generate high levels of methane.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I woul like to see more emphasis on sourcing energy from alternatives to fossil fuels, eg renewable means, solar and wind should be prioritised.

There should be an emphasis on people's health in relation to proposed drilling operations. Air quality is already poor in many parts of West Sussex and care should be taken to avoid pollution risks to both air and water.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Areas of outstanding natural beauty, national parks etc need greater protection from all types of mineral extraction.

Air and water quality should be continuously and independently monitored.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The Plan should take into account public opinion and the public interest in clean air and water. There must be provision for public comment on such activities, and for stopping these if any danger of contamination is evident.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 19 Respondent ID: 3928)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

S012 - I'm interpreting this as referencing fracking? An emotive subject so perhaps a clearer definition of what equates to "un acceptable impacts" would be helpful. I am not against the possibilities of fracking in the future, but the more rational and calm approach at the outset could help allay fears and protests later

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

S012 see above

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 320 Respondent ID: 3930)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

the vision should take into account the UK's obligations to meet thecZparus climate change agreements. This document says only that mineral production should contribute to a low carbon economy and look to minimise carbon emmisions .The document needs show we actively cut emissions of greenhouse gases and needs to cover and cut methane emmisions.

Your vision says we should aspire to source more minerals from alternatives to extraction. In the case of hydrocarbons we can source energy from alternatives to fossil fuels.

Your document refers to need for energy security. We can get this from consistent investments in renewables.

And in any case we can get oil and gas we may need in the meantime from countries with which we have a stable relationship .

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

You talk about public interest but you need to take more account of the environment , health wellbeing and public opinion.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Sites in ares of natural beauty and South Downs national park

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Take genuine account of public opinion and the environment and developing renewables.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 317 Respondent ID: 3932)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The second part of strategic objective 12 should not be allowed to trump the first - otherwise it is meaningless

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Greater emphasis on environmental and health issues. Presumption against oil and gas extraction as this runs counter to objective 14 on climate change - such impacts cannot be mitigated.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

1)The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This

document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas extraction is particularly worrying because of the high levels of methane emissions associated with the process.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3)The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure? Food security should also be considered and whether minerals development may contaminate the land needed to produce food.

4)The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5)Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 237 Respondent ID: 3935)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I agree with the points below and I am totally against oil and gas exploration - they need to stay in the ground if we want to avoid catastrophic consequences to our ecosystem. I also believe that this type of extraction cannot be carried out safethy without negative consequences to health:

1) The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3) The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

4) The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5) Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Please do not allow this to take place for the above reasons. I want to leave a healthy planet to the next generation - the money could be much better spent by investing in renewables.

B2. Mineral Site Allocations

B2.1 Name of site

All sites

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

We should not be considering this anywhere!

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Reject the plan

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Your plan would make it easier for hydrocarbon extractors to exploit where we love living.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Ban hydrocarbon extraction

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 234 Respondent ID: 3938)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I do not see how hydrocarbons an be produced in West Sussex, whilst at the same time conserving and enhancing the environment. NO STUDIES have ever been done which prove that unconventional hydrocarbon extraction is safe. How do you expect the public to get behind this plan, when we are unsure of the long term effects to the environment and the people living in West Sussex. As a doctor, new treatments have to go through vigorous testing to check they are safe before they can be implemented - surely the same kinds of research should be done into hydrocarbon extraction before we embark on it.

'2.3.13 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' If this is indeed what you intend, then unconventional hydrocarbon extraction should not be allowed at all in West Sussex. I do not believe that you would be able to guarantee the safety of the sites and surrounding areas for the years to come. Having seen the increase in traffic during the exploration in Balcombe, these companies do not care about local residents. We were promised that no heavy vehicles would drive past the school at drop off and pick up , yet this was regularly flouted. Not only that, they were often speeding. They drilled past their allotted times and

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like to see the oil and gas section removed from this document. Someone has to stand up to these companies - only when it is too late and there have been irreversible damage to our environment and peoples health, will local and national government realise what a disasterous decision this would be.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 244 Respondent ID: 3939)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Under Mineral Specifications, I agree for the most part. I am not in agreement with Policy M7b- hydrocarbon development involving Hydraulic Fracturing.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 274 Respondent ID: 3940)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

My comments pertain to the plans for potential extraction of oil and gas in West Sussex.

The first point I would like to make is to question the use of the word "unacceptable" - used in SO12. There is no clarification of this term. What is acceptable to one person may be unacceptable to others. What are the criteria for acceptability - numbers affected, intensity of the impact, proximity, financial impact? Who will be the final arbiter on what is acceptable?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

S012 A definition of acceptability and how it should be determined should be included.

SO14: There should be explicit reference to carbon emission targets signed up to by the UK government at COP21 in Paris in December 2015. Fossil fuel extraction also releases significant amounts of methane into the environment with much more severe impacts on global warming.

With an goal of protecting energy security, there should be an explicit statement to prefer the local development of renewable energy sources over fossil fuel extraction to minimise the adverse impacts on human health, traffic movements and climate (as set out in SO7).

There should also be reference the need to reduce air pollution to keep to National Air Quality Objectives, given that these are regularly breached at present.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 275 Respondent ID: 3941)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

You claim this is a vision of West Sussex 'by 2033', that the plan shows 'direction of travel'. Much could be damaged and 'restored' between now and 2033. We should insist on meeting aims and standards now, constantly, and right up until 2033. The oil industry could drill wells across the Sussex Weald, test, extract, 'restore' and be gone by 2033. (Unlike conventional wells, fracked and acidised wells decline rapidly in production, and more must be drilled – hence many wells, individual ones quickly spent and cosmetically restored.)

If the objective is 'to minimise and mitigate potential impacts' and 'to ensure that there would be no unacceptable harm' to character, health and amenity, businesses, visitors to West Sussex, to historic and natural environment, and 'to ensure that mineral extraction contributes to a low carbon, circular economy', well, WSCC cannot favour fracking or acidising or any intensive-extensive oil and gas exploration..

Throughout the proposal there should be more emphasis on the green economy and a true move towards a low-carbon economy. I do not consider natural gas to be 'low carbon'.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Bullet 1 Remove 'enhance'. The idea that mineral extraction could 'enhance the beautiful outdoors of West Sussex' cannot have been thought through. Just because the NPPF used the term 'enhance', this does not mean that their poor logic should be blindly adopted. This bullet mentions 'conserving' and 'enhancing' only the National Park – why does it not also include the AONBs, SSIs and other special places?

Bullet 2 'Minimised' is a vague term – how is this defined? It could mean a deterioration by 2033, worse traffic inconvenience, pollution and danger than today, the deterioration simply being kept to someone's idea of 'a minimum'.

Bullet 4 This point needs writing in plainer English. 'Alternatives to extraction of indigenous resources' is ambiguous. We would like to see SSIs included here.

Bullet 5 We repeat that we would not like to see hydrocarbons transported by rail.

Bullet 6 Again we question the use of the word 'enhance'. How can mineral extraction 'enhance the historic and natural environment'? Circular economy yes, but there should be more emphasis on this throughout the rest of this document. Low carbon – are energy conservation and low carbon practices truly going to be encouraged? It would be good to see a clearer intention to do this throughout this document. Low carbon – we agree that this should be an aim. But how can a low carbon vision be reconciled with the prospect of extracting more hydrocarbons in West Sussex? Particularly, with reference to unconventional or tight oil, shale oil, and oil from micrite and other 'tight' calcium-rich strata, whether by fracking or by hydrofluoric/hydrochloric mixture acidisation

Bullet 7 No indeed, please don't build over our reserves of silica sand. It's a rare resource that we should keep for vital uses and future generations. Equally, please do not allow this very special sand to be squandered on fracking.

Bullet 8 Note that restoration of oil pads is not simply a question of 'grassing over' – however much biodiversity they introduce. The cement and metal components of wells deteriorate over time. All wells leak eventually. Wells are for ever. Out of sight, out of mind, they are still there, gently crumbling and corroding.

Between 10 and 90 per cent of the fracking fluids used returns to the surface. Fracking flushes out and releases other liquids and contaminants from underground – salts, heavy metals, various hydrocarbons, radioactive substances. The portion that does not flow back to the surface remains down there, and will migrate underground over time. It may find its way via the well bore or via manmade or natural cracks and faults (of which we have so many in West Sussex) to our aquifers, or to the surface. Please be aware that restoration of oil sites is not as simple as the industry might suggest. Anyway, what exactly are these 'highest standards'? Who will pay in the event of contamination once the oil company has abandoned the well and the shell company set up to carry out the project vanished in a puff of pollution?

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Onshore oil and gas contribute minimally to our energy security, and would contribute minimally even if a new fracking/acidising industry is allowed to develop. It is not true that our energy security is at risk – except from the current government's withdrawal of support from renewables and energy conservation. Oil is in world-wide glut. We do not need 'extreme' oil, extracted at great expenditure of enery and at risk to our health, environment, landscape and climate, by fracking or hydrofluoric/hydrochloric mixture acidisation. The vast majority of scientists worldwide agree that we need to move away, and fast, from all the uses of hydrocarbons listed here. West Sussex does not have to be a dinosaur just because central government tells it to be a dinosaur. Let's look forward. Let's tell central government (and the media) that West Sussex instead wants to support energy conservation, new-build carbon-neutral houses, low-carbon transport, battery development and renewables.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

It should include a plan for 'green development'. Monitoring of health impacts of emissions are not dealt with.

Consideration must be given to the Downs as a protected dark skies region.

The public do not want oil/gas development in West Sussex. They should be listened to.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 306 Respondent ID: 3945)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I do not agree that the Council should be trying to extract hydrocarbons which only add to the alarming rate of climate change. We should be aiming to be a county that relies 100% on renewable forms on energy - look how much coast line we have, we could put wind turbines on - see what's they're doing off Worthing - an amazing project!

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like to see no hydrocarbon extraction/exploitation in West Sussex at all.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

My specifics concerns are listed/detailed below. My overriding feeling is that the vision and plan does not aim high enough in terms of cutting our greenhouse emissions and seeking out more forms and sources of renewable energy. We are a county with a huge hills/downs network, miles of coastline, lakes, reservoirs, rivers, we MUST be planning more renewable energy production. I feel utterly let down by West Sussex Council for their appalling facilitation of exploratory fracking and fracking sites in the county, we must stop fracking, stop fossil fuel extraction and save the planet for our children's generation. This is the council's responsibility.

1) The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3) The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

4) The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5) Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 239 Respondent ID: 3948)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

1) The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3) The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

4) The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5) Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No Response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Exclusion of all hydrocarbon extraction by fracking

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Yes

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Exclusion of all hydrocarbon extraction by fracking

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 277 Respondent ID: 3949)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

With regard to section 4.8.7 you say that HGVs are encouraged to use the Lorry Route Network, but avoid explaining how this is to be accomplished.

Local experience suggests that this is insufficiently robust.

Also, re section M7b Your written condition fails to protect against any adverse impact from the transportation of very large quantities of water-based fluids being imported to the site.

M7b should say, "... no significant adverse impacts would arise from transport of oil/gas and water based fluids to and from the site"

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 262 Respondent ID: 3950)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

1) The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3) The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

4) The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5) Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 254 Respondent ID: 3951)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Renewable s are the way forward, reclamation of aggregates is also possible. We are obligated to meet climate change agreements.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

We must meet our climate change agreements. Fossil fuels add to emissions. We need to ensure we do not release methane as it is 4 times higher a potent green house gas than carbon dioxide. Unconventional oil and gas extraction releases high levels of methane.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No Response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

WSCC should support renewable energy production as a high priority.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Regarding energy security the best long term solution is renewable s, every effort shoul be made to increase and promote this. It is possible to purchase from abroad whilst developing a strong renewable source.

Air pollution in the UK is causing deaths, renewable s do not add to this problem but oil and gas do.

Food security is important the oil and gas industry have a bad record of contaminating land.

Water is becoming shorter across the globe as well as locally. Industrial methods of extracting oil and gas such as fracking use massive amounts of water which is irreversibly polluted, the water table itself is also at risk with this form of extraction.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Public interest should mean democracy.

Public interest is preserving the environment for future generations.

Public interest is reducing climate change.

Public interest is reducing pollution to keep us healthy.

National Air Quality requires that we reduce air pollution, fossil fuel and oil and gas extraction increase pollution.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 255 Respondent ID: 3952)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

1)The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is

known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas extraction is particularly worrying because of the high levels of methane emissions associated with the process.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3)The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure? Food security should also be considered and whether minerals development may contaminate the land needed to produce food.

4)The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5)Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 247 Respondent ID: 3957)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 248 Respondent ID: 3958)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 249 Respondent ID: 3959)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 238 Respondent ID: 3962)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

1) The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is

known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3) The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

4) The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5) Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 260 Respondent ID: 3964)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

1) The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3) The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

4) The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5) Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I do NOT back any form of fracking as there are too many RISKS & down sides to fracking .What ever so called safe guards are put in they are NEVER followed to the letter when ever making money is concerned rules are bent or broken if it's expedient to make a bit more money.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

NO TO FRACKING!!!!

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

NO TO FRACKING!!!!

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 280 Respondent ID: 3965)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

in the vision there is no mention of renewable sources of energy. I do not believe in the assurances of the companies that have the contracts to extract gas and oil using the fracking method of extraction.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

No changes, I do not accept the plan in it's entirety.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 68 Respondent ID: 3968)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

We shouldn't use fracking under any circumstances as the potential risks, particularly to groundwater supplies, are well documented. Land where fracking has taken place often cannot be returned to its original state and it makes little difference where the extraction point is, if the reserve being exploited is under the National Park that land will be affected too.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

A decision to remove any fracking type activities from the plan and a commitment to prevent that type of activity from taking place across Sussex.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

There should be no fracking activities as detailed earlier in my response.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 12 Respondent ID: 3969)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

No

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Mineral specific (section 6) policy M7b do not support fracking in any way shape or form

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 240 Respondent ID: 3971)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision should take into account the UK's obligations to meet the Paris climate climate change agreements. As a county (and as a country) we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that minerals production should contribute to a low carbon economy and should aim to minimize carbon (dioxide) emissions. There is no mention of the need to minimize emissions of the hydrocarbon gas methane into the atmosphere. Methane ("natural gas") is a much more potent greenhouse gas than carbon dioxide (>100 times more potent). Obviously no new fossil fuel developments should be taking place as fossil fuels should remain in the ground and unburned. Moreover unconventional oil and gas extraction is particularly worrying because recent research shows that this is the source of increasing quantities of methane escaping and leaking into the atmosphere from on-shore wells. This leakage happens both during extraction and after the well has been exhausted and capped. Please see the March 2016 research paper "A large increase in U.S. methane emissions over the past decade inferred from satellite data and surface observations" written by a team in the Earth Sciences Dept of Harvard University, http://onlinelibrary.wiley.com/doi/10.1002/2016GL067987/full. The period covered, 2002-14, is the decade in which the USA has been expanding its unconventional oil and gas drilling at breakneck speed.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. Hydrocarbons are not needed because we can easily source energy from alternatives to fossil fuels. This document should highlight the provisions by West Sussex CC to encourage planning applications for renewable energy production using our natural resources of wind and sun. Solar and wind sources are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

The document frequently refers to the need for energy security. There is an assumption that energy security can only be obtained from oil and gas, and that extraction of these fuels is therefore necessary. I challenge this assumption. We can achieve security by making investment in renewables in a steady and planned way, as other countries such as Germany have done. Why should we not continue to buy oil and gas from countries with which we have a stable relationship, while developing our own infrastructure of renewables? Electricity produced from wind and sun has increased enormously in and around the UK in the last twenty years and has accelerated recently despite cuts in Government subsidies. Big renewable energy companies, such as Dong Energy, see the potential of the waters around our island in the NE Atlantic.

Food security should also be considered. Damage to acquifers in or close to areas where hydrocarbons are discovered and extracted could have very serious consequences, contaminating land needed to produce food. The contaminants include oil-based carcinogens such as benzene and polyaromatic hydrocarbons, and radiochemical hazards, such as the radioactive elements radium and strontium. Shales in deep formations often contain radioisotopes. Water used for fracking will come back to the surface laden with these or similar radioactive elements. This has caused enormous damage in the Marcellus shale in Pennsylvania where the shale exploitation is subject to very few environmental controls (https://www.theguardian.com/environment/2013/oct/02/dangerous-radioactivity-fracking-waste-pennsylvania).

The document often uses the phrase, 'in the public interest'. WSCC should of course consider the public interest. This means taking into account our environment, our health and well-being, and the accelerating risk of climate change. The policy should consider pollution risks to air and water and how this can effect the

health of humans and animals in the local area. Before any drilling starts the County Council should commission studies to establish baseline values of soil, water and air pollutants. Air pollutants such as methane (and other light hydrocarbons), hydrogen sulphide, sulphur dioxide, nitrogen oxides and other well-head and flare gases should not be permitted to exceed National Air Quality Objectives. WSCC should show that it does respond to public opinion (consultation responses, petitions, letters and other representations) by applying the full force of available environmental protections available, co-ordinating with other agencies and refusing to licence activities which will never be capable of meeting tight UK environmental and Health and Safety laws.

NO drilling should be allowed under Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas. They should be protected from oil and gas developments of any kind and from "stimulating" processes such as hydrofluoric/hydrochloric mixture acidisation, and fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to soil or water is found or if air emissions exceed National Air Quality Objectives.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Please answer to Q 1.3 and 1.4

Additional Comments

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* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 257 Respondent ID: 3975)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

There is no need to incorporate short term energy security into the strategic thinking. Current supplies of fossil fuels are more than adequate for our purposes, and any future decline on fossil fuel availability will be more than counteracted by decreases in per capita energy uses, and increases in renewable energy resources.

Additionally, leaving existing fossil fuel reserves in the ground will preserve them until such a time as they can be extracted completely cleanly, at which time their value will be significantly higher due to global scarcity.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

The strategic objectives should contain a moratorium on all fossil fuel exploration and exploitation in West Sussex, especially where extraction would require hydraulic fracturing, or any other kind of geological manipulation. The risk of exploiting any existing reserves far outweighs the potential benefit. Exploitation will inevitably degrade the local environment and create issues for future generations, over and above the global atmospheric impacts of extracting and burning fossil fuel sources.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Regarding section 6.7.3, the strategy should be a moratorium on the construction of any new hydrocarbon extraction sites within the county. This is the only reliable way of achieving the strategic objective in 6.7.2.

The proposed strategy does not do enough to eliminate unacceptable impacts. The strategy would permit low-volume hydraulic fracturing to operate within the South Downs National Park. This is completely unacceptable. It would also permit high volume hydraulic fracturing at any unprotected sites in the county. This could put large populations at risk from environmental contamination.

Section 6.7.4 show that the proposed strategy is clearly in conflict with the government's commitments, which prohibit all forms of hydraulic fracturing within National Parks, not just high volume processes.

Any provision for oil and gas development in West Sussex should be restricted to areas with no current protection, and all forms of hydraulic fracturing or other geological manipulation should be prohibited. Ideally, no further development should take place. The county should promote the use of solar panels on existing buildings to generate electrical power in one of the sunniest areas of the UK. Hydrocarbon fuel requirements can be met via electrolytic generation of hydrogen, which can be used to manufacture hydrocarbons using renewable carbon sources as a feedstock. West Sussex is well positioned to provide renewable carbon sources, i.e. coppiced timber and agricultural residues.

Permitting any kind of hydraulic fracturing within the country is unnecessary and a mistake due to the known and unknown risks posed to the local environment, resources, and population.

The current proposed strategy contains dangerous loopholes, such as the implicit acceptance of low volume hydraulic fracturing in National Parks and the acceptance of lateral drilling from unprotected areas into protected areas, which is not covered by the restriction on surface developments. This loopholes appear to allow effectively unrestricted hydrocarbon exploitation, while providing the appearance of a controlled process.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 324 Respondent ID: 3982)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Both the vision and the strategic objectives contain positive and laudable statement that I would find difficult to argue with. They are quite general though. The first statement promising to produce minerals "in ways which conserve and enhance the beautiful outdoors of West Sussex" is an example. This does not take into account that producing minerals is something that could conflict directly with conserving and enhancing the countryside. When such a conflict occurs, which will be the priority? What safeguards are there that these are not just fine words that may amount to nothing when an economic opportunity or some other pressure emerges?

I also have a particular concern about the inclusion of the supply of oil and gas. Burning fossil fuels and their contribution to climate change is such an urgent global problem. I would like to see a strong commitment to developing alternatives to fossil fuels rather than an assumption that fossil fuel resources will be exploited. I would especially want to see a commitment to not exploiting unconventional or tight sources of oil and gas as these require a great deal of energy and other resources in their extraction.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

This has been included in my statement above.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I can see that M7a and M7b relate to hydrocarbon development and I have already outlined my objection to this. I would like to see a commitment to leaving such resources in the ground.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 9 Respondent ID: 3983)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Special attention should be given in the plan to the potential development of shale gas and oil resources. The protection of water supplies is in a separate section and this should be a key part of any decision to go ahead with such eploration and extraction.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Oil shale resources should be explicitly mentioned in the Oil and Gas objective and in the water resources objective.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Policy M7b (a) (iii) "can be minimised, and/or mitigated, to an acceptable level" is far to weak in relation to water supplies. No development should be permitted unless damage to the water supply can be avoided. Any water polution is unacceptable. Minimising damage or mitigating it is not sufficient.

Policy M7b (c) No exploration, appraisal and production of oil and gas, involving hydraulic fracturing should be permitted underneath or in close proximity to the South Downs National Park, AONBs, Source Protection Zone 1 and Sites of Special Scientific Interest UNDER ANY CIRCUMSTANCES. Allowing such activity on the basis

that the company concerned takes special care to avoid harming the setting, etc is just not good enough. Such special care might be "demonstrated" but accidents can and do happen. The nature of fracking makes it very hard to be sure no damage is being done.

Policy M14 (a) seems to allow any development if there is an overriding reason to do so. It offers little protection because "overriding reason" is not defined.

Policy M14 (b) is meaningless. If heritage assets are unknown how can the planners be sure they won't be adversely affected?

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 256 Respondent ID: 3984)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

Yes

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I object to 'Will have contributed to the supply of minerals, in particular OIL and GAS' This I presume would involve Fracking or extracting oil and gas from the ground.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I fully support the extraction of minerals and stone/sand if sensitively carried out in West Sussex but would strongly object to the extraction of oil and gas as I consider that to be environmentally damaging and taking resorces away from investment in renewables.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 284 Respondent ID: 3987)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

VISION: The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

ALSO: Para.1 - How can minerals be produced in ways which CONSERVE and ENHANCE the beautiful outdoors of West Sussex? Please explain the thinking behind this statement.

How does Para.3 "Will have contributed to the supply of minerals in particular.....oil and gas" square with Para.6 "contributes to a low carbon, circular economy". Surely the one precludes the other.

Para.4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

STRATEGIC OBJECTIVES: I agree with SO2,7,8,9,10,11, and 13.

SO1 - You have not convincingly outlined your basic reasons for the production of minerals in West Sussex, whether or not it may be carried out in a prudent and efficient manner.

SO3 - The qualifications "where possible.....over the plan period", render the objective "to make provision for soft sand....from OUTSIDE the South Downs National Park" unenforceable.

SO4 - "only provide for silica sand in exceptional circumstances and when in the public interest" provides loopholes in the same manner as those in SO3.

SO6 - The meaning of this is not clear and requires further explanation as to the meaning of "sterilisation' in this context.

SO12 - "whilst recognising.....in the UK" provides loopholes in the same manner as in SO3 and S04.

SO14 - Emissions of carbon only are mentioned, thus omitting those of methane, a vastly more potent greenhouse gas than carbon.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

With respect to the Vision I would like to see the issues I have highlighted to be addressed, and appropriate changes to the Strategic Objectives outlined above to be implemented.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Section 6.7:

Policy M7(i) refers to surface development in the protected areas. Fracking involving drilling beneath these areas can lead to hydrocarbons and the associated drilling fluids reaching the surface via previously undetected natural faults.

Policy M7(ii) Contains similar loopholes to those in Section B1.3(SO3,SO4 and SO12).

Changes:

Replace "surface development" with "development" in M7(i)

Remove the words from "unless" to the end of the paragraph.

Section 8.6:

Policy M17(a)ii and iii contain loopholes as mentioned before which would enable development in protected areas.

Policy M17(b) and (c) contain similar loopholes.

Changes:

Remove M17(a)ii and iii in their entirety.

Remove words from "unless the benefits" to the end of the paragraphs in M17(b) and (C)

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

No developments , especially those involving hydrocarbons, should be permitted to commence without a thorough Environmental Assessment, which should preceded by a separate assessment to obtain baseline data with which to compare any assessments undertaken after any work, including preliminary work, is undertaken.

Additional Comments

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* * *

09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 252 Respondent ID: 4041)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The extraction of Clay, Chalk, Stone are damaging enough, and questionably unsustainable, but the extraction of Hydrocarbons can in no way be considered sustainable given the polluting effects of the burning of elements once turned into fuel has. This would be completely counterproductive to the country trying to keep within its carbon reduction targets to reduce CO2 emissions to avoid catastrophic climate change, which we are now heading towards for future generations to deal with.

Mineral exploitation does not suggest sustainability. These two concepts are not compatible.

A move away from South Downs National Park is a good thing. But this is not the only highly valued place of beautiful countryside that needs to be protected from exploitation. What about Areas of Outstanding Natural Beauty at Pagham Harbour in Chichester, and The West Sussex part of the High Weald? In addition, what about the 78 sites of Sites of Special Scientific Interest across the county? Are all these to be potentially lost to your exploitation plans?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like to see the following in Section 2 of the plan:

The words 'Hydrocarbons' and 'exploitation' removed from the plan.

A commitment to 'safeguard' all Areas of Outstanding Natural Beauty, and all Sites of Special Scientific Interest within the county of West Sussex.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

None.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

None.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

None.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

A chapter on sustainability and enhancing the natural environment, and a commitment to not exploiting the natural environment for material or financial gain by any local authority or business within the county. That is not to say that minerals should not used, but a commitment that extraction and use will only be carried out if they can done in minimal disruption and destruction to the local wildlife and local communities, or not at all.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 295 Respondent ID: 4049)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Please Stop using obfuscation and rapid consultations to try and sneak fracking in.

Section 2.

in reference to section 2 of the plan I wish you to consider the references to oil and gas. In particular the following ammendments...

2.2 the vision

please consider:

adding a strong commitment to using minerals to promote renewables of wave, wind and solar to reduce carbon and moving away from, divesting and reducing the use of hydrocarbons.

removing oil and gas from the vision statement. Hydrocarbons are not going to reduce carbon. The clue is in the name hydrocarbon.

adding the word "conventional" before oil and gas.

adding a commitment to divest from hydrocarbon extraction investment.

2.3.13 oil and gas.

adding

strict regulation and oversight with mandatory environmental impact assessments and

possibly health impact assessments.

adding

the use of liability bonds in case of accidents or breaches of regulations.

adding

Moving strategically away from investment in oil and gas towards renewables.

i refer specifically to

2.2 the vision

2.3.13 oil and gas.

We do not want fracking and unconventional oil and gasl extraction in the downs, you do not have any social license to do so. Please stop this madness. Solar, wind and wave are things that should be the priority.

Stop trying to sneak in fracking.

Just do some basic research on what happens to places that try to sneak fracking in.

i refer you to my blogspot http://frackingvideos.blogspot.co.uk/

in particular http://frackingvideos.blogspot.co.uk/2015/03/human-canaries-in-coal-mine.html

another deep strategic concern is adequate fresh water storage and protection.

given the insane amount of new builds being pushed through that take no account of private new builds, adequate fresh water and sewage infrastructure.

It was not that long ago that we were facing a hose pipe ban and "drought" I have deep concerns over the quality of fresh water management. This is linked with my deep concerns over the competence of those in charge of flood management.

Where are the liability bonds in case of environmental (specifically but not exclusively water) contamination from fracking?

Where are the environmental impact assessments? to provide baseline before contamination.

Where are the health impact assessments to provide baseline data before additional health issues.

Onshore fracking near residential areas and fresh water aquifers is deeply irresponsible and morally reprehensible.

also refer to

pg 23 of the plan and section 3.3.10 on shore hydrocarbons.

pg 58 to 62 section 6.7 hydrocarbons

Appendix B: Petroleum Exploration and Development Licences

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Section 2.

in reference to section 2 of the plan I wish you to consider the references to oil and gas. In particular the following ammendments...

2.2 the vision

please consider:

adding a strong commitment to using minerals to promote renewables of wave, wind and solar to reduce carbon and moving away from, divesting and reducing the use of hydrocarbons.

removing oil and gas from the vision statement.

adding the word "conventional" before oil and gas.

adding a commitment to divest from hydrocarbon extraction investment.

2.3.13 oil and gas.

adding

strict regulation and oversight with mandatory environmental impact assessments and health impact assessments.

adding

the use of liability bonds in case of accidents or breaches of regulations.

adding

Moving strategically away from investment in oil and gas towards renewables.

i refer specifically to

2.2 the vision

2.3.13 oil and gas.

We do not want fracking and unconventional oil and gasl extraction in the downs, you do not have any social license to do so. Please stop this madness.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No Response

B2.3 Please detail any comments you have about this site and the development principles.

I am concerned with you trying to sneak on shore fracking and oil and gas extraction into places near residential areas / fresh water aquifers and or areas of natural beauty.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I am concerned with you trying to sneak on shore fracking and oil and gas extraction into places near residential areas / fresh water aquifers and or areas of natural beauty.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

section 6 and 8 of the plan

m7a: should be ammended with ...

special consideration will be made to avoid unconventional oil and gas extraction near

residential areas or fresh water aquifers.

professional 3d seismoligical reports will be used to consider potential fault lines

before any drilling takes place.

environmental impact assessments will be taken before any drilling takes place.

strict monitoring by the environmental agency representives throughout the key stages of

the process.

6.3 silica sand

i hope everything will be done to ensure that the environment and health is not impacted

by this extraction. If this extraction is to happen then add

strict regulation environmental and health monitoring to ensure no clouds of sand near

residential or school areas and establish baseline data.

pg 58 to 62 section 6.7 hydrocarbons

suggested ammendments:
6.7.2 the strategic objective is to avoid and reduce oil and gas extraction in this area wherever possible. special consideration will be made to avoid oil and gas extraction near residential areas or fresh water aquifers.

6.7.3 The strategy is to promote renewables and avoid oil and gas extraction wherever possible in particular non conventional oil and gas extraction.
The strategy is to avoid oil and gas extraction within 5 miles of residential areas with an emphasis towards ecourageing off shore development.

6.7.19 community engagement,
the community should be consulted and allowed to reject applications.
6.8 processing minerals
there will be problems with the location and monitoring of associated gas compressors and treatement.
please add...
gas and oil treatment will be in industrial zones and not residential.
liability bonds will be used in case of accidents or regulation breaches.
strict monitoring by the environmental agency representives throughout the key stages of the processing.
6.9
[the best safeguard for oil and gas is to keep it in the ground.]
please add...
oil and gas are not to be prioritised over other uses of the land such as agriculture or residential.
6.9.11.
Sterilisation of oil and gas is to be considered as a potentially positive action.
policy m9 be ammended to state
residential and agriculture usage could be considered a higher priority over oil and gas extraction.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.
content of the plan.
somewhere in the plan, maybe 2 the vision and /or 6.7 oil and gas

special consideration will be made to avoid unconventional oil and gas extraction near (within 5 miles) of residential areas or fresh water aquifers.

professional 3d seismoligical reports will be used to consider potential fault lines before any drilling takes place.

environmental impact assessments will be taken before any drilling takes place.

health impact assessments will be considered if unconventional oil and gas is to take place anywere near (within 5 miles) of residential or water supplies.

strict monitoring by the environmental agency representives throughout the key stages of the process.

gas and oil treatment will be in industrial zones and not residential.

liability bonds will be used in case of accidents or regulation breaches.

strict monitoring by the environmental agency representives throughout the key stages of the processing.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 241 Respondent ID: 4054)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

No Fracking in Sussex!

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

No fracking anywhere in Sussex

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

No fracking in Sussex

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

No fracking in Sussex

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 242 Respondent ID: 4055)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

If this SO plan is a vague/veiled opening salvo to later accommodate fracking in West Sussex then I wholeheartedly disagree/do not support this SO, if I am mistaken please clarify or be more specific and exclude any possibility of Fracking.

SO1. 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.

SO12: To protect the environment and local communities in West Sussex from unacceptable impacts of any proposal for oil and gas development, whilst recognizing the national commitment to maintain and enhance energy security in the UK.

Please confirm Fracking is not in the West Sussex SO in any way shape or form?

I believe Fracking is juxtaposed to;

SO10: To minimise the risk to people and property from flooding, safeguard water resources from contamination, and ensure the quality and quantity of the water environment is conserved and enhanced.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Be specific, positively exclude fracking in West Sussex.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Don't know

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Wholly Object to; Policy M7b: Hydrocarbon development involving hydraulic fracturing

Drop this Policy.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 243 Respondent ID: 4056)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change.

With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

We should not allow any form of "fracking" in West Sussex, this would be harmful to public waters, lands and has potential health risks to habitat and humans alike.

Solar and wind are better opportunities for West Sussex and should be prioritised over fossil fuels.

We need to look to countries like Denmark as an example. We too can set an example for the UK if we copy such forward thinking countries with solar and wind generation.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Would like to see more solar, wind or wave current energy farming in our area.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

As I stated earlier, let West Sussex be an example for the UK and have us try our hardest to take the sustainable and renewable route. This will benefit us in the long term. I write this to remind everyone the dangers of any notions of gas extraction and/or "fracking" in our area.

Frack Free Sussex has more details.

Thanks much

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 286 Respondent ID: 4058)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

Don't know

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

1) The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is

known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas extraction is particularly worrying because of the high levels of methane emissions associated with the process.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be heavily prioritised over fossil fuels.

3)The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure? Food security should also be considered and whether minerals development may contaminate the land needed to produce food.

4) The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5) Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 4 Respondent ID: 4063)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Yes

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

It is too vague about future mineral specific issues.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

It should contain language that Fracking should never to allowed in the area.

Additional Comments

N/A

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 50 Respondent ID: 4073)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

We should make it clear that if we contributed to the supply of oil and gas, this should not be via fracking

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

A strategic objective to ensure the supply of oil and gas, this should not be via fracking

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

N/A

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 229 Respondent ID: 4089)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

With specific reference to the oil and gas aspects of the strategic objectives, but also including the minerals, which markers will you be using to decide what the market is demanding?

As the market is being manipulated by the policies of the central conservative government in subsidising the oil and gas industries and removing subsidy from the solar industry, they would seem to be a vector in the market rather than an impartial judge of it.

Who then will provide you with sound and impartial judgement about what is wanted?

Having only just found out about this consultation with 4 days to go before it closes, have you done everything reasonable to ensure as wide a consultation as possible from the people who will be affected by these objectives?

Why is the vision set so far into the future? No one knows what new developments will occur between now and 2033, what new technologies will emerge, what new demands on minerals will grow. Mobile phones, the internet, fast electric cars have all happened in the metaphorical blink of an eye.

The methodology for extracting oil and gas are destructive to the environment, infrastructure, health, flora and fauna, despite the best assurances from the effectively self-regulated gas industry. Arguments that it is a bridging fuel are nonsense and without logical basis, and the cost in subsidy, clean up costs, provision of water where watercourses are polluted, health costs, environmental costs are incalculable and not costed in by the gas companies themselves. Why would they? After all, they are not financially or legally liable, WSCC tax payers are. I would settle for a vision that included the county council working on behalf of the people who elect it rather than the private companies that lobby it.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Energy Security is not achieved by polluting extraction of un-renewable resources. Security comes from knowing you can get more of what provides your energy. The oil and gas industry cannot promise an unending supply. In the effort to sustain this illusion the extraction techniques have become more extreme and more destructive to the environment. In addition, a consensus of scientific study suggests that the pollution caused by burning oil and gas is hastening global warming. The methane vented from fracking wells is an even greater pollutant than carbon monoxide.

What security is given if the very method of securing energy raises the atmospheric temperature beyond the ability to sustain human life?

Given the popularity and success of solar power, and the promise of greater employment it brings over oil and gas extraction, and this despite no subsidy, would it not be more securing of our continued energy to encourage investment in this technology? With a considerable stretch of coast, and great universities to foster technological advance, we could become a centre of excellence in renewables. There are already people who have invented turbines that run in a city's water pipes to create electricity, people who have invented solar roads. This says more about energy security than what I read in your plan, and it is happening now, throughout the world.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

(Section 6) Whilst much is made of managing minerals to ensure a ten year supply, there is nothing planned about new industries and methods that are already existant or are emerging. This could be down to the fact that when industries are small I suspect they would not get a seat at the committee table. This ensures that the choice consumers get is limited to what has always been done rather than what is available. I would like to see less talk of 'land-won' (a misnomer if ever I heard one) and more encouragement and support for straw bale building, hempcrete building, and any other emerging technologies that are truly sustainable as they are recycling waste and energy efficient and renewable. Ensuring that emergent technologies have some mechanism to join the committee and therefore take part in the discussions is essential if we are to build smarter.

(section 8) I was broadly in support of the policies set out here, but was puzzled by the graph on p81. The last box representing intervention levels, which talks about permission against advice. It was not clear whether this was saying it was a policy to intervene where incorrect planning had been given, or that intervention could happen despite being against advice. Please clarify.

Section 8.3.7 is is similarly troubling. As national need, and potential economic benefit are highly influenced by what we believe rather than what can be shown, how do you propose to discover more reliable figures than those produced by a dogma driven politician with family interests, or the head of a firm whose share price and therefore likely take home pay will be affected by the outcome. Besides which, neither of the two examples I provide will have to live with the consequences if their guess is wrong, nor with the mess created in them finding out they were wrong. They are also not who you represent, and not who elected you to manage things on their behalf.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

For a plan that is looking ahead to 2033, there is some reassuring (common sense) talk of protecting the character of West Sussex and re-cycling aggregates, but equally there are caveats and text that suggests that market forces or promised economical benefit may override concerns about character.

It also contains no provision, discussion, encouragement of any other industry or technology, and for a plan that purports to look into the future it would seem it is short sighted in that.

There is no mention of any measure of environmental pollution, yet global warming affects everyone on the planet. The trend around the world is leaning more towards solar and wave technologies for this reason. Any talk of energy security has to include the ability to survive on this planet to have any meaning.

Nurturing new technologies and methods that prove to be an improvement to energy provision or energy saving, and ensuring there is a healthy awareness and representation amongst those setting down policy, is surely not outside the remit of this discussion. After all, if we can find better ways to do things we may be able to better preserve the character and use less of what are non-renewable resources. To be truly representative of the people you serve, this consultation should have been better advertised. Vision is affected by belief, and what you believe can change according to who you listen to. I believe that we can achieve a transition to a more efficient truly sustainable energy sector that employs more people and preserves and improves the environment. It is just a matter of being more open-minded in our vision to what is seemingly impossible as well as supporting it with practical steps. This document is short on imagination and on the practical steps to preserve what currently exists. I would wish for more from people who claim to represent me.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 250 Respondent ID: 4092)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision MUST take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as remaining fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 251 Respondent ID: 4093)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 263 Respondent ID: 4095)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Don't know

B1.2 Do you support the Strategic Objectives?

Don't know

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

1) The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas is particularly worrying because of the high levels of methane emissions associated with the processes.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3) The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure?

4) The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5) Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

There should be a clear statement that bans all oil and gas exploitation in the region.

There should be a much greater commitment to renewable sources of energy.

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

high volume hydraulic fracturing should be banned from the whole region

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 271 Respondent ID: 4096)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

1)The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is

known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas extraction is particularly worrying because of the high levels of methane emissions associated with the process.

2) Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

3)The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure? Food security should also be considered and whether minerals development may contaminate the land needed to produce food.

4)The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5)Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 283 Respondent ID: 4097)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I am so afraid for the future of humanity as our politicians and public bodies do not seem to taking the risks posed by climate change and pollution seriously. We can't afford any more oil or gas extraction, we should have ceased our dependence on thirty years ago.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

We should be investing ONLY in renewable energy. We should be protecting our natural heritage. We should be protecting our water.

These are priceless treasures that once destroyed we won't get back.

The technology is there to invest in renewable energy, it is only greed and the lack of vision and political will that is lacking.

STOP being in denial about climate change and pollution. Start acting for the common good - the good for all of us on these islands and this planet.

B2. Mineral Site Allocations

B2.1 Name of site

All sites

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Just STOP! Keep our natural heritage and our clean air and water and keep the minerals in the ground.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see an environmental impact assessment done where NO greenhouse gases or fossil fuels were extracted mined or burnt. All energy should be clean renewables. We must leave our natural sites alone and hope that more of our natural species don't die off.

I am so tired of public bodies pretending they are acting in the common good when they are busy accelerating our destruction.

Climate change is real. Pollution is real.

NO MORE FOSSIL FUELS!

Please go for green energy.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

Same as I have been saying so far. Green, no fossil fuels. For our children. Please.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The plan should not include anything to do with fossil fuels. We are in the middle of a global environmental catastrophe which we should have acted on thirty years ago. I do not understand why you are even considering this. Fossil fuels need to go, we should only be considering renewable, clean options. We need to protect our water, protect our natural heritage.

It is incredibly stupid to poison the air we breath and the water we drink, how can you say you are acting in the public interest if you are adding to climate change and threatening our precious water supply!

What is wrong with our politicians and public servants when they aren't waking up to the problem and thinking of creative ways to solve it. I do not understand why clean, renewable energy isn't a priority. We have a beautiful country, why aren't we taking care of it?

There are so many species in decline, so much threatened now by global warming and climate change and here we are with our obsession with fossil fuels! Please don't do this. Please have some vision! Only look into renewable, clean forms of energy.

Thank you.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 285 Respondent ID: 4098)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The vision should observe Britain's obligations to meet the Paris climate change agreements so emissions of gases should be reduced that contribute to climate change. It should cover the need to minimise emissions of methane as this is known to be a potent greenhouse gas. In view of climate change no fossil fuel developments should be happening as these fuels must remain unburnt. Fracking is a major concern because of the high

levels of methane emissions associated with the process.

Point 4 of the vision states that w should aspire to source more minerals from alternatives to extraction of indigenous resources. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. The document should set out how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources in a less destructive way than oil and gas. Solar and wind are clear opportunities in the county.

We can achieve energy security from consistent investment in renewables as other countries have shown, and we can purchase energy from other countries rather than take high risks.

WSCC must always consider the public interest, which means taking into account what is best for the environment, our health and well being, and the increasing risk of climate change. WSCC must consider pollution risks to air and water and how this can affect the health of humans and animals in the locality by looking at independent scientific study and taking independent scientific advice. All emissions arising must be considered in relation to the National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. WSCC must consider pubic opinion and observe it in its decisions and actions.

AONB's, the South Downs National Park, SSSI's and the like must be afforded the same degree of protection from oil and gas developments of any kind including fracking. Protected areas should be genuinely protected from developments directly adjacent to, or under them at any depth due to the many unknowns and the risks. Robust and continuous independent monitoring of air and water for a wide range of pollutants must take place before during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response ID: 307 Respondent ID: 4101)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I trust West County Council will really honor their commitment to looking after their public interest; including public health and wellbeing. I am deeply concerned about air pollution from the mining of hydrocarbons and how this effects human health. I understand that commitments have been made through the Paris agreement on climate change and that person's placed in positions of civic responsibility should ensure that emissions of gases that contribute to climate change be reduced Surely we should be investing in solar and wind farming and ensuring that a good infrastructure in these areas is put in place to safeguard us and future generations. In addition I would trust that Areas of Outstanding Natural Beauty in West Sussex should be properly protected, including being protected from activities adjacent to and below the area itself.

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Ensure public health is a priority by safeguarding against air and water pollutants. Any pollution level found to exceed safe levels should be immediately following by a full ceasing in mining activity. Following Paris agreement on climate change solar and wind farming should be a priority in West sussex and a proper infrastructure be put in place as quickly as possible. I trust West Sussex County Council will honor their responsibility to safeguard public interest; public health and wellbeing being top priority and properly protecting Areas of Outstanding Natural Beauty (obviously protecting them from activity adjacent to the area too and activities beneath the area!).

Additional Comments

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09 - Oil and gas opposition/concern: Resident/Member of the Public (Response IDs: 366-744 – identical responses)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

No Response

B2.2 Do you support the inclusion of this site within the draft Plan?

No response

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

Dear Sir or Madam,

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:
- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;
- The policies are a 'yes, if' approach that fails to recognise the risks;
- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;
- The policies fail to take account of cumulative impact and indirect impacts;
- The policies fail to take account of public health concerns and the production of waste;
- The policies fail to implement a distance from residential development;
- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

10: Balcombe, oil and gas opposition

10 - Balcombe, oil and gas opposition: Resident/Member of the Public (Response ID: 201 Respondent ID: 3788)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

As a long-term residents of Balcombe, my wife and I strongly support the comments submitted by FFBRA and NoFibs Balcombe about the Draft

Plan. In our opinion WSCC should represent and defend the interests of the residents and Council Tax payers as opposed to those of commercial enterprises whose sole interest is profit - at the expense of despoiling much of the magnificent beauty of the Sussex Weald and jeopardising the valuable tourist trade.

* * *

10 - Balcombe, oil and gas opposition: Resident/Member of the Public (Response ID: 365 Respondent ID: 3916)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

I am also concerned about the effect of onshore oil and gas extraction on protected species, I know that people reported finding dead bats near to the Balcome drill site, these are protected and you are breaking the law by killing bats.

Sussex has many bat species and they would be adversely effected by the noise, lighting and vibrations from drill sites. Bats rely on echolocation to find food and they detect prey by tiny vibrations in the air, drilling noise and vibrations would cause harm to bat species because it would stifle their ability to find food.

Sussex is also home to many dormice, these are a protected species and would be adversely effected by onshore oil and gas sites, the noise, light, pollution and disruption of industry would harm this sensitive species.

If I find out that your council have acted in a way that causes harm to protected species then I will be contacting the police to inform them.

Sussex is not suitable for onshore oil and gas extraction for many reasons.

* * *

10 - Balcombe, oil and gas opposition: Resident/Member of the Public (Response ID: 314 Respondent ID: 3918)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The strategy to not plan for any additional capacity for the exploitation of minerals should be extended to include Areas of Outstanding Natural Beauty (AONBs) and Sites of Special Scientific Interest (SSSIs) as well as the South Downs National Park..

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

The strategy to not plan for any additional capacity for the exploitation of minerals should be extended to include Areas of Outstanding Natural Beauty (AONBs) and Sites of Special Scientific Interest (SSSIs) as well as the South Downs National Park..

B2. Mineral Site Allocations

B2.1 Name of site

Lower Stumble, Balcombe

B2.2 Do you support the inclusion of this site within the draft Plan?

No Response

B2.3 Please detail any comments you have about this site and the development principles.

Lower Stumble is upwind of the village of Balcombe which is less than half a mile away and the village is higher than the top of any flare or vent stacks that can be used.

Permission should never have been given to drill a second well so close to the original Balcombe -1 well which was drilled in 1986. This old well is in an unknown condition.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

I would like to see West Sussex County Council equipped to take responsibility for the safety of the human beings living near current, future or abandoned oil or gas wells. The environment agency and the health and safety agency deny this responsibility and both suggest that it is the responsibility of the local planning authority.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

6.7.3 The definition of high volume fracturing referred to in section 6 is clearly absurd since the oil industry is proven not to need liquid volumes above the levels specified for the majority of oil wells that have been fracked already in the USA. Affectively you are enabling wells to be fracked provided that the word "fracking" is not used because the company can hide its intent behind this new definition during the planning process. You are effectively enabling practical, real world fracking to take place at any depth below three hundred metres with this definition under the guise of "well stimulation" in the planning application.

8.5 It is totally unproven that widespread oil or gas drilling using any form of well stimulation including fracking can be carried out without risk to the long damage of water resources.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Protection of public health should be a paramount for any mineral workings and it should be a requirement that any mineral extraction proposal must prove that it will have no impact on public health now, or in the future. It should be borne in mind that abandoned oil wells will remain a hazard for hundreds or even thousands of years.

Additional Comments

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10 - Balcombe, oil and gas opposition: Resident/Member of the Public (Response ID: 308 Respondent ID: 3946)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The vision is “to see a move away (for the exploitation of minerals) from activity within the South Downs National Park”. And “with regard to the production of minerals from within the South Downs National Park, the strategy is to allow existing sites to be worked and not to plan for any additional capacity.”

i would like to see this strategy extended to include Areas of Outstanding Natural Beauty (AONBs) and Sites of Special Scientific Interest (SSSIs).

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I would like to see the strategy "to not plan for any additional capacity for the exploitation of minerals to be extended to include Areas of Outstanding Natural Beauty (AONBs) and Sites of Special Scientific Interest (SSSIs).

B2. Mineral Site Allocations

B2.1 Name of site

No site given

B2.2 Do you support the inclusion of this site within the draft Plan?

Don't know

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B2. Mineral Site Allocations

B2.1 Name of site

Lower Stumble, Balcombe

B2.2 Do you support the inclusion of this site within the draft Plan?

No Response

B2.3 Please detail any comments you have about this site and the development principles.

Lower Stumble, Balcombe should not be drilled for oil or gas. This site is completely unsuitable because the top of the flare will be below the level of the village - and the village is in the direction of the prevailing wind. If flow testing of this site goes ahead, this will risk the health of the residents as pollution will drift across the village.

Also the site is close to the Ardingly reservoir which serves as a water source for the surrounding area.

Also the new well has been drilled 30 metres away from an old well (drilled and acid fracked in 1986). The condition of this old well has not been examined by the HSE since 1987.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Fracking in West Sussex should be banned. West Sussex should challenge the environment permits that have been given to Cuadrilla in respect of Lower Stumble and have them withdrawn.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

I would like the use of hydraulic fracturing to be prohibited in West Sussex.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Consideration of the impact of mineral exploitation on the health of residents and on tourism and agriculture should be included.

Additional Comments

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10 - Balcombe, oil and gas opposition: Resident/Member of the Public (Response ID: 322 Respondent ID: 3947)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I find it difficult to understand the "Vision and Strategic Objectives" because of strange language such as 2.1.1 "direction of travel". What does this mean? The language used is "gobbledegook". It looks as if you have tried to pad out this document with meaningless buzz words.

I shall fill in the remaining sections but also refer you to the response by the Frack Free Balcombe Residents Association with which I fully agree.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

Lower Stumble, Balcombe

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

I value my health and the site is a quarter of a mile upwind of my house. From my research into oil/gas exploitation in other countries and the fact that many countries have banned any use of fracking techniques, I conclude that this site, if so developed, would be a grave danger to human health.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

No exploitation of minerals in the parish of Balcombe.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

6.7.8 The statutory bodies (EA, HSE and DECC) have not adequately controlled Cuadrilla and their sub-contractors but have allowed Cuadrilla to self regulate. Furthermore the statutory bodies do not appear to

have adequate technical knowledge in order to control drilling companies. In fact the statutory bodies appear to be controlled by the industries that they are meant to be regulating.

Policy M13 Protected Landscape (c)

Whether or not it is in the public interest should include an assessment of health impacts. Health is much more important than mere cash.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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10 - Balcombe, oil and gas opposition: Resident/Member of the Public (Response ID: 318 Respondent ID: 4103)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

Yes

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I support all the Strategic objectives apart from 2.3.13 oil and gas because it is contrary to and incompatible with so many other strategic objectives.

It is a really good vision, but the oil and gas objective 2.3.13 is going to taint the vision.

It would be better to extend the example set by aggregates and favour renewable sources of energy over oil and gas. I would much rather seen wind farms and solar PV arrays than more extraction of oil and gas.

Oil and gas extraction is not “protecting and enhancing the historic natural environment”, nor “contributing to a low carbon circular economy”

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

The vision states we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

change 2.3.13, to have no oil and gas in the plan - make it one that states a strategic objective of creating energy supply from renewable sources, which is then consistent with the vision and other strategic objectives..

B2. Mineral Site Allocations

B2.1 Name of site

Lower Stumble, Balcombe

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

There should be no extraction from this site. The previous operator broke several conditions of operation, the roads and pavements have been badly damaged, the local residents were consulted and the majority oppose it. There was also no adequate gas modelling for emissions of methane and sulphar dioxide. It is an AONB too.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

state no hydrocarbons to be extracted.

"public interest" is too lose - which public and which aspect of interest / short term profit interest or short and long term health interest?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

Yes

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

section 6 is fine apart from 6.7 because the government is trying to redefine fracking so that practically no activity actually qualify as fracking. It makes a mockery of everything. Be bold and brave and sensible and back a low carbon economy, like the vision states and develop a renewables based energy production and economy. money and jobs and energy security CAN be provided through renewables.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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10 - Balcombe, oil and gas opposition: Resident/Member of the Public (Response ID: 321 Respondent ID: 4104)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

The production of oil and gas (or, in West Sussex, oil) is not consistent with conserving and enhancing the 'beautiful outdoors of West Sussex, in particular the special qualities of the South Downs National Park, for the benefit or current and future generations'. The production and transportation of minerals WILL detract from West Sussex having thriving communities and being a special place to live and visit. Exploration for, and exploitation of, hydrocarbons will diminish the ability of the area to produce food for the British people, and will destroy the livelihoods of people working in the tourism business. The net effect will be loss of jobs, not gaining jobs.

WSCC must think of protecting the livelihoods of its electors, not destroying them.

The idea of restoring hydrocarbon sites is just not possible. Sure, they can be made to look pretty, but the long-term effects of contaminated fluids underground will be to poison our aquifers and potentially contaminate our landscape, as the cement and metal corrode and decay over the years.

2.3.1 We should NOT be promoting the production and use of hydrocarbons. We have a commitment to lower our use of carbon. Further pursuit of hydrocarbons goes directly against that binding commitment.

2.3.6 Many reports have been written about the health impacts on local communities of the pursuit of unconventional oil and gas. These are all urging that such processes should be suspended until there is clear evidence that communities will NOT be harmed. WSCC should not encourage such exploration. They should be prudent, aware of the likely health impacts on residents, and impose a moratorium on unconventional oil and gas exploration until the health impacts in the UK have been fully investigated.

2.3.8 The South Downs National Park, High Weald AONB and Chichester Harbour AONB and their settings shpul;d indeed be conserved and protected. This will be best done by forbidding the exploration and exploitation of hydrocarbons in these areas.

2.3.9 To talk of enhancing the biodiversity and geodiversity of the County while permitting the exploration and exploitation of hydrocarbons is laughable. The exploration and exploitation of hydrocarbons will only contribute tot he degradation of these areas.

2.3.11 There is indeed a need to ensure water resources are not adversely impacted. And the best way to do this would be to prohibit the exploration and exploitation of hydrocarbons.

2.3.13 Energy security in the UK would be much more protected by investing in sources of energy other than hydrocarbons. Hydrocarbon exploration and exploitation will have very unacceptable impacts on the West Sussex countryside and population.

2.3.14 If any hydrocarbon exploration and exploitation IS permitted, companies undertaking such works should be obliged to make a large sum of money available for later restitution of damage, in order to avoid such restitution being paid for by the tax-payers of West Sussex.

2.3/15 To minimise carbon emissions within West Sussex, the first and best step will be to prevent the further search for unnecessary hydrocarbons.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Exploration and exploitation of hydrocarbons in West Sussex cannot be permitted.

B2. Mineral Site Allocations

B2.1 Name of site

Lower Stumble, Balcombe

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

Balcombe is a site that has unsuitable transport links. The road that would be used for all the heavy transport passes within 5 metres of the village primary school, including an outdoor class area.

There is an old well at Balcombe. No work has been done to discover if this old well has already contaminated the underground aquifer, or whether th new well, drilled in 2013, has impacted on the the old well.

The dangers to the health of the nearby population and water supply are too great to allow this site to be further exploited.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Cessation of exploration work at Balcombe.

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

6.7.3 Neither hydraulic fracturing nor acidising should be allowed in the High Weald AONB.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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* * *

11: Broadford Bridge, Billingshurst, oil and gas opposition

11 - Broadford Bridge, Billingshurst, oil and gas opposition: Resident/Member of the Public (Response ID: 289 Respondent ID: 3942)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

Bullet point 4

Bullet point 3 I object to the vision that the minerals plan will contribute to the supply of oil and gas 'to support growth'. We do not need to invest in Oil and Gas to support growth. Instead we should invest in our renewables industry, particularly solar, which has seen many companies go out of business since the governments announcements last year.

Point 4 of the vision states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritised over fossil fuels.

Bullet point 6 of the vision mentions a low carbon economy.

The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide.

See this from Bill McKibben:

" To the extent our leaders have cared about climate change, they've fixed on CO2. Partly as a result, coal-fired power plants have begun to close across the country. They've been replaced mostly with ones that burn natural gas, which is primarily composed of methane. Because burning natural gas releases significantly less carbon dioxide than burning coal, CO2 emissions have begun to trend slowly downward, allowing politicians to take a bow. But this new Harvard data, which comes on the heels of other aerial surveys showing big methane leakage, suggests that our new natural-gas infrastructure has been bleeding methane into the atmosphere in record quantities. And molecule for molecule, this unburned methane is much, much more efficient at trapping heat than carbon dioxide."

Complete article below:

http://www.thenation.com/article/global-warming-terrifying-new-chemistry

Local plans will not be found sound unless they tackle climate change proactively:

To be found sound, Local Plans will need to reflect the principle of addressing climate change and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with: the provisions and objectives of the Climate change Act 2008 and co-operate to deliver strategic priorities which include climate change.

Paragraph 93 in the NPPF states that the planning system "has a key role in helping shape places to secure local reductions in GHG emissions" and Para 94 encourages the development of "proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations."

in national planning practice guidance for England " In addition to supporting your delivery of appropriately sited green energy, effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment."

SO4 Define 'public interest'

The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

This applies also to SO14

SO12 Define 'unacceptable?'

The government's 'energy security' argument should not be dogmatically followed.

The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure? I object to the vision that the minerals plan will contribute to the supply of oil and gas 'to support growth'. The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy efficiency programme for the UK. Food security should also be considered and whether minerals development may contaminate the land needed to produce food.

Wise words from John Ashton, a career diplomat who served as Special Representative for Climate Change from 2006-2012, under three successive UK Foreign Secretaries,

'We are entitled to a government that is on our side, in return for the taxes we pay.' John Ashton had prepared the speech for a meeting in Sussex on Saturday 16th April about the health implications of fracking. 'In the matter of unconventional oil and gas,' he said, 'we do not have a government that is on our side. We have a government that is the enemy of the people.'

'As for the climate, it is perfectly clear. You can be in favour of fracking and other methods of getting ever more oil and gas out of the ground. Or you can be in favour of dealing with climate change. But you cannot be in favour of both at the same time. Those who claim otherwise are either deceiving themselves or trying to deceive you.'

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Point 3

Oil and gas should be removed. It should recommend investment in the renewables industry to support growth over oil and gas.

Bullet point 4 should say:

Applying this to hydrocarbons we must produce energy from alternatives to fossil fuels. West Sussex must encourage and develop planning applications for renewable energy production. Renewable energy applications for land use should be prioritised over fossil fuels.

Bullet point 6 should say:

A low carbon economy is part of trying to limit gases linked to climate change. West Sussex should play its part in contributing to the UK's promises on climate change. Therefore, we should also look to reduce and cut emissions of any gases known to cause climate change - this includes methane which is a much more potent greenhouse gas than carbon dioxide and is known to be contributing significantly to climate change world wide.

SO4 should say:

Public interest should mean taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice.It must take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the majority opinions of the public in whose interest they claim to act.

So12 should say:

To protect the environment and local

communities in West Sussex from the negative impacts of any proposal for

oil and gas development whilst contributing to the nation's energy security through significant investment in our renewables energy infrastructure as a safer alternative that will have less negative impacts on our environment in the long term.

so14 should say:

Local plans will not be found sound unless they tackle climate change proactively:

West Sussex has a key role in helping shape places to secure local reductions in GHG emissions.

To be found sound, Local Plans will need to reflect the principle of addressing climate change and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with: the provisions and objectives of the Climate change Act 2008 and co-operate to deliver strategic priorities which include climate change. This should include mimimising both carbon emission and as well as methane emissions. In addition to supporting your delivery of appropriately sited green energy, effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment."

B2. Mineral Site Allocations

B2.1 Name of site

Lower Stumble, Balcombe

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

No oil or gas development should be allowed to continue. The development does not meet the objectives you set out.

1)It is not possible to restore land beneficially after drilling has taken place. Underground geology has been compromised and will remain so. During work in 2013 a bright green tracer dye was seen coming in large quantities from a culvert in the ground (it could not have simply been poured on top of the water. This tracer dye is most likely to be fluorescein used as an industrial tracer for liquids. The EA still do not know what it is or how it got there. It is an indication that the well was compromised in some way. Work should not be allowed to go ahead.

2)It does not comply with point 2, it is in a sensitive environment and close to a community which strongly objects

3)It is not close to the existing highway network and sustainable modes of transport will not be used...instead multiple huge passing the school whose playground is only a metre from the road. Absolutely unacceptable.

4)Will not happen, an unconventional oil development here will neither protect or enhance the natural landscape. Instead it will be put at great risk.

THERE WERE 889 WRITTEN OBJECTIONS and a petition of 5 and a half thousand saying NO. There is no social license.

The vast majority of the community says no to oil and gas development. Of the 3 surveys undertaken within the village all found the majority did not wish work to go ahead. There is no social license. The precautionary principle has not been applied.

All gasses likely to be present have not been included in Cuadrilla's application, particularly Sulphur Dioxide.

The EA did not fully consider the health implications of emissions in Balcombe. PHE made clear comments that air quality monitoring data was missing from Cuadrilla. They also suggested that sulphur dioxide emissions data was discounted on the assumption that none will be present in the extracted gas. They suggest that the planning authority may wish to seek assessment of sulphur dioxide emissions from flaring activities. It notes the potential for 'raw emissions' and odour problems and that further discussion is suggested with the environmental health department of the local authority. It suggests that wider emissions monitoring may be required. We're not sure whether any of these discussions have taken place. What we do know is that FFBRA gained access to the 1980 conoco drilling reports which prove that Sulphur dioxide will be present, yet this gas has STILL been ignored. PHE also sugests that the applicant is limited in its consideration of VOC's and that baseline air quality monitoring should take place. Cuadrilla proposed very little in this regard and even lost air samples taken during testing.

Calculations provided provided by Professor Dunne (an expert in chemical physics who has worked in drill simulation) suggest that Sulphur Dioxide Emission could exceed air quality directives by 3 times. PAH's could be 24 times the amount the national air quality objectives and particulate matter could be 4 times the amount allowed according to national air quality objectives particularly for residents closest to the site. Based on this alone, work should not be allowed to continue.

When assessing air quality an accurate account of traffic movements in and out of the site must be taken into account.

There was insufficient monitoring of traffic as picked up by PHE(Public Health England) in Balcombe. No quantitative assessment of vehicle emissions has been conducted. This is particularly pertinent when you consider the way that traffic emissions was calculated. It looked like there would be less extra traffic than there actually will be. Under M20 there needs to be a new clause that developers must provide meaningful traffic statistics and not be allowed to use definitions of HGVs which include estate cars for example. In the Planning Officer's Lower Stumble report Jane Moseley used the 1.5 tonnes definition (and therefore includes parents in estate cars dropping kids off to school and light delivery vans as HGVs), she calculated the increase in traffic of HGVs as "unlikely to exceed 10% for the bulk of the operation". She then used this to support here conclusion that "It is concluded that the number of vehicles required to carry out the development is not significant enough to raise concerns regarding highway capacity or safety." If the definition of HGV was changed to 7.5 tonnes and over, the increase would have been significant and would have provided reasons for the councillors to reject the application.

Insisting that developers use 7.5 tonnes as the definition of an HGV would also align with people's understanding as this is the size that requires drivers to obtain a special HGV license.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

Lower Stumble should be removed as a site for consideration.

B2. Mineral Site Allocations

B2.1 Name of site

Broadford Bridge

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

No social license. Roads cannot support work.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

3.3

Last paragraph. No new site should be set up in the South Downs National Park. What is an exceptional circumstance? This area is a NATIONAL PARK and should be protected at all costs from development.

3.3.10

This paragraph lists where oil production has previously been in place. It also lists new proposals to development and notes the 14th licensing round. What it does not do but SHOULD, is mention that the new sorts of development proposed are substantially different in character than previous developments as they are relying on horizontal drilling and unconventional forms of extraction which are not comparable to previous developments that have taken place. These are often referred to as extreme forms of extraction because of the more complicated processes they involve. The sorts of development are also proving highly controversial because of the health risks and pollution problems associated with these technologies.

4 Spatial context.

This should be included:

From national planning practice guidance for England " In addition to supporting your delivery of appropriately sited green energy, effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment."

Oil and gas developments should take into account the cumulative effect of emissions and the fact that too many in too close a proximity will create a poisonous range of gasses in the air, found in Australia and America as 'gas field haze'. Very large proximity limits should be set so that oil and gas development cannot take place within 4km of any dwelling. Scientific study should be looked into in this.

'...the cumulative impact of many wells can lead to a high level of risk to human health…Emissions of NOx, hydrogen sulphide, formaldehyde, benzene, particulate matter and ozone are the more significant airborne hazards associated with fracking…exposure to diesel fumes or to silica may also cause various conditions and diseases. As well as catalysing development of ground level ozone, methane can combine with particulate matter to form gas field haze which is linked to respiratory disease and other harms. P.14 'Health and Fracking' (medact)

According to Sussex resident Professor Lawrence Dunne (an expert in chemical physics who was on the panel at the meeting):

'No long-term study has been done anywhere in the world on the health effects of chronic exposure of human populations to the emissions from gas/oil extraction. Hence, the long-term risk is not known. However, it is known that extended exposure to the radioactive and chemical emissions typically associated with gas/oil operations poses a serious mortality and morbidity risk. The risk to residents living within a few hundred metres of a well pad may be very significant.

'Of very considerable concern is the potential use of extremely toxic hydrofluoric acid for the extraction of tight-oil in the Sussex Weald. Very few politicians and councillors appreciate the risks involved.'

Air quality will be affected by toxins emitted by the flaring of gases. Although not 'fracking', the emissions from the flare can be compared to emissions from oil and gas operations near communities in other countries. It is important to make reference to studies of these, in order to be informed about real and potential risks to human health. Coburn, Schultz, Herrick & Kwiatkowski (2012) documented substances that affect the endocrine system with reproductive and developmental effects. The endocrine system is susceptible to chemical impacts at very low concentration. Polyaromatic hydrocarbons are not dependent upon dose and there are no safe limits of exposure. Prenatally exposed children have been found to have lower IQ scores (Perera, Zhigang, Whyatt et al 2009; Edwards Jedrychowski, Butscher et al 2010).

Below are some salient points I picked out of the various research papers referenced:

Research of Dr Theo Colborn an Endocrine Specialist of Florida University (sep 2012):

This exploratory study was designed to assess air quality in a rural western Colorado area where residences and gas wells co-exist. Sampling was conducted before, during, and after drilling and hydraulic fracturing of a new natural gas well pad. Weekly air sampling for 1 year revealed that the number of non-methane hydrocarbons (NMHCs) and their concentrations were highest during the initial drilling phase and did not increase during hydraulic fracturing in this closed-loop system. Methylene chloride, a toxic solvent not reported in products used in drilling or hydraulic fracturing, was detected 73% of the time; several times in high concentrations. A literature search of the health effects of the NMHCs revealed that many had multiple health effects, including 30 that affect the endocrine system, which is susceptible to chemical impacts at very low concentrations, far less than government safety standards. Selected polycyclic aromatic hydrocarbons (PAHs) were at concentrations greater than those at which prenatally exposed children in urban studies had lower developmental and IQ scores. The human and environmental health impacts of the NMHCs, which are ozone precursors, should be examined further given that the natural gas industry is now operating in close proximity to human residences and public.p.2

Bamberger and Oswald (Cornell University 2012 From 'Impacts of Gas Drilling on Human and Animal Health' Published in 'New Solutions Vol 22 (1) 51-77) :

Communities living near hydrocarbon gas drilling operations have become de facto laboratories for the study of environmental toxicology. The close proximity of these operations to small communities has created a variety of potential hazards to humans, companion animals, livestock and wildlife (p.52)

Animals, especially livestock, are sensitive to the contaminan

the environment by drilling and by its cumulative impacts. Documentation of

cases in six states strongly implicates exposure to gas drilling operations in

serious health effects on humans, companion animals, livestock, horses, and

wildlife.(…)Without complete studies, given the many apparent adverse impacts on human and animal health, a ban on shale gas drilling is essential for the protection of public health)p.72

Conclusion of an independent health survey commissioned by a GP in Australia in TARA region

McCarron report 2013 From the executive Summary P.2

"A fully funded comprehensive medical assessment of residents currently living in proximity to unconventional gas development should be carried out as a matter of urgency.

3) Health impact assessments must be an integral part of any and every unconventional gas development. No new permit should be issued without one, and health impact assessments should be carried out for every development already in place.

4) Comprehensive air and water monitoring (an open, ongoing and unlimited

information loop) is essential. If we are looking at possible non beneficial human

health impacts we need to look at all the gases and volatiles both natural and

derived emitted via well drilling, gas and pipeline valves, leaking wellheads,

flaring, and other processes involved in gas collection/purification/refining to

export specifications. This monitoring is urgently required. It must be

independent, unbiased, fully funded and available for public scrutiny preferably

in real time and in electronic form."

In conclusion:

Planners must look at the WHOLE story when looking at hydrocarbon developments and take the precautionary approach by not allowing new work to take place in an area of land that is too built up to take the risk and must leave a good (defined - I suggest 4k) distance from residents.

4.8.8

Issues of air quality must take into consideration all the above. If large scale hydrocarbon development gets going as the industry would like to see, we will have a massive problem with air pollution.

4.9.4

Minerals development causing dust pollution is a ridiculous understatement, particularly in the case of hydrocarbons, see above.

4.10 Climate change

With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas extraction is particularly worrying because of the high levels of methane emissions associated with the process.

A low carbon economy is part of trying to limit gases linked to climate change. West Sussex should play its part in contributing to the UK's promises on climate change. Therefore, we should also look to reduce and cut emissions of any gases known to cause climate change - this includes methane which is a much more potent greenhouse gas than carbon dioxide and is known to be contributing significantly to climate change world wide.

6.7.1/2

AS before The government's 'energy security' argument should not be dogmatically followed.

The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. I challenge this assumption. We can get security equally from consistent investment in renewables, as other countries have shown. What is the problem with buying oil and gas from countries with which we have a stable relationship, as we do, while we develop our own renewables infrastructure? I object to the vision that the minerals plan will contribute to the supply of oil and gas 'to support growth'. The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy efficiency programme for the UK.

6.7.2.3.4

6.7.2

Acceptability MUST be judged with the use of public and local opinion. Petitions, consultation responses and letters must be used as a barometre to judge what is 'acceptable'.

6.7.3

'exceptional circumstances' and 'public interest'. What are exceptional circumstances? There should be NO circumstances under which it is allowed in these areas. 'Public interest' . Previous permissions around Balcombe made a mockery of democracy and the purpose of public consultations. There were 889 written objections and a petition of 5 and a half thousand. I wonder if WSCC has ever had such public interest in a planned development? If WSCC is to retain any credibility in using these procedures, as it correctly does, they must not be a paperwork exercise alone. Public interest should be judged using local opinion as it's core. Petitions, consultation responses and letters must be used as the evidence to show public opinion and, therefore judge if the public if these developments are in the public interest.

Acidisation, should be considered in exactly the same way as fracking is as far as permission to develop goes ahead. The risks to geology water and air are all still present, and by your definition, much, highly destructive work could take place which falls out of the (current) definition of fracking (but is acidisation) and is to all intents and purposes still a form of fracking.

6.7.4

West Sussex should take a stronger approach to protecting its sensitive areas than the very weak government line. Unconventional oil and gas development should not be allowed to take place in or under these areas (by placing the drill heads outside and drilling horizontally below the protected area.) The likely-hood of contamination through fault lines and air into these areas is too high. As explained in the previous point, we must protect these areas from acidisation too.

Public interest' must be defined by local opinion and national public opinion. Through all the channels of our democracy, letters, communications, petitions, consultations and those mechanisms that have been set up to ensure that we live in a healthy democracy.

Miii

WSCC must look to INDEPENDENT SCIENTIFIC advice to decide what is acceptable. NOT those paid for and provided by the government and industry who clearly (for flawed economic reasons) are pursuing these policies. We should look to the local opinions of the people tempered with the national opinions of the people, to decide what is acceptable. WE should look to independent medical and scientific advisors to consider what is safe for the health of our landscape, water, wildlife air and people.

Mi-M111V

What is described here is simply not possible. Hydrocarbon development should not be continuing in West Sussex. It is not compatible with Vision points 1,6,and 9.

Bi,i,ii,c

Simply not possible, should not be allowed, not compatible with vision 1,6 and 9.

Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas, SPAs, SACs, Ramsars, SSIs, NNKs, NGRs, LNRs, SNCI's, RIGs (all those that you list under giodiversity and biodiversity should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth.They should also be protected from exploration activities of any kind. The default position should be not to begin to extract any new hydrocarbons ANYWHERE. If work is allowed, robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives. Proximity rules based on independent scientific evidence should be set as to how close this work is allowed to residences. This should be at least 4 kilometres. The precautionary principle should be applied, this work has already caused residents problems in England (under so -called gold plated standards) and should not be allowed to continue.

6.7.7

What utter poppycock. Of course the end game should be considered. It is short sited and ridiculously naive not to consider the end game when planning permission is originally given. You wouldn't build a car park without consideration of what it was going to be designed for would you i.e the later development of a cinema? It is of the utmost importance that the possible final goal is looked at, because, in the end, if that is not possible, there is no point polluting and destroying land for no reason. This particular rule was clearly written by people working for the industry, not clear minded sensible people and has NO place in a document of this kind. West Sussex County Council must be aware that once a site has been industrialised all the later stages become more and more possible and permission 'creeps' in, which is exactly what the industry want to see happen. This document must work for the good of the people and the local area over and above the industry and a ridiculous government policy that is found to be extremely unpopular by the people. West Sussex County Council must demonstrate some backbone in not rolling over to government policy when they know it is indefensible.

6.7.8

Again, ridiculous idea. With so many agencies involved how can this possibly protect us?

For example of the HSE did not visited Balcombe - despite the fact that it should have done. The integrity of the wells, therefore cannot be guaranteed. The EA did not make unannounced visits, despite the fact that they are supposed to.

The EA did not fully consider the health implications of emissions in Balcombe. PHE made clear comments that air quality monitoring data was missing from Cuadrilla. They also suggested that sulphur dioxide emissions data was discounted on the assumption that none will be present in the extracted gas. They suggest that the planning authority may wish to seek assessment of sulphur dioxide emissions from flaring activities. It notes the potential for 'raw emissions' and odour problems and that further discussion is suggested with the environmental health department of the local authority. It suggests that wider emissions monitoring may be required. We're not sure whether any of these discussions have taken place. What we do know is that FFBRA gained access to the 1980 conoco drilling reports which prove that Sulphur dioxide will be present, yet this gas has STILL been ignored. PHE also sugests that the applicant is limited in its consideration of VOC's and that baseline air quality monitoring should take place. Cuadrilla proposed very little in this regard and even lost air samples taken during testing. Yet YOU allowed further work to go ahead.

Calculations made by Professor Dunne (an expert in chemical physics who has worked in drill simulation) suggest that Sulphur Dioxide Emission could exceed air quality directives by 3 times. PAH's could be 24 times the amount the national air quality objectives and particulate matter could be 4 times the amount allowed

according to national air quality objective. PHE also commented that cumulative effect on emissions had not been taken into account (because emissions increase was perhaps not very much- an idea that was based on flawed traffic movement studies by WSCC).

There should be NO assumption that other bodies involved are doing their 'jobs' properly, but instead, extra checks to ensure that they are to protect us. When intelligent members of the public pick up on profound problems that the agencies involved have not adhered to, they should be listened to.

The operators can also not be assumed to be undertaking monitoring and controls properly, but checked every step of the way. No one has still been able to say why a massive load of bright green tracer dye was coming out of a culvert in the ground up near the site. That should have been cause to pause and thoroughly investigate if nothing else. The EA took 2 days to react and then went to the wrong stream! The height of the flare in Lower stumble is lower than the height of the village, yet none of the agencies involved seem to have picked up on the obvious health problems here.

6.7.9

The Environment agency's protections are clearly not stringent enough. Full IEA's are only required if the development is over a certain size. These guidelines were written down before unconventional oil and gas were developed and are clearly not appropriate as hydrocarbon developments can take place just within this, as is the case at Balcombe where no EIA was carried out. Therefore we must set a higher level of protection by conducting our own EIA's using independent scientific advisors on all hydrocarbon developments.

6.7.11.Health of humans must also be considered.

6.7.12

When considering landscape and visual amenity, we should also consider deep within the ground, paying particular attention to geology and fault lines and the great potential for fluid to travel.

http://www.davidsmythe.org/fracking/fracking.htm

6.7.14

There should be no night time light interference

6.7.16 Disused wells leak over time. Concrete fails. They should be monitored for perpetuity. The companies should pay for this.

There should be no drilling close to or under protected areas

6.7.19

No work should be allowed to go ahead where there is no social license. If the community have been surveyed, responded to consultations or voted on the application and the majority of the local community and large numbers (larger than for most planning decisions) are saying no, then developments should not be allowed.

8.3.5

Exceptional circumstances' and 'public interest'. What are exceptional circumstances? There should be NO circumstances under which it is allowed in these areas. 'Public interest' . Previous permissions around Balcombe made a mockery of democracy and the purpose of public consultations. If WSCC is to retain any credibility in using these procedures, as it correctly does, they must not be a paperwork exercise alone. Public interest should be judged using local opinion as it's core. Petitions, consultation responses and letters must be used as the evidence to show public opinion and, therefore judge if the public if these developments are in the public interest.

M15

Well said. Precludes unconventional oil and gas development.

Oil and gas developments should take into account the cumulative effect of emissions and the fact that too many in too close a proximity will create a poisonous range of gasses in the air, found in Australia and America

as 'gas field haze'. Very large proximity limits should be set so that oil and gas development cannot take place within 4km of any dwelling. Scientific study should be looked into in this.

'...the cumulative impact of many wells can lead to a high level of risk to human health…Emissions of NOx, hydrogen sulphide, formaldehyde, benzene, particulate matter and ozone are the more significant airborne hazards associated with fracking…exposure to diesel fumes or to silica may also cause various conditions and diseases. As well as catalysing development of ground level ozone, methane can combine with particulate matter to form gas field haze which is linked to respiratory disease and other harms. P.14 'Health and Fracking' (medact)

According to Sussex resident Professor Lawrence Dunne (an expert in chemical physics who was on the panel at the meeting):

'No long-term study has been done anywhere in the world on the health effects of chronic exposure of human populations to the emissions from gas/oil extraction. Hence, the long-term risk is not known. However, it is known that extended exposure to the radioactive and chemical emissions typically associated with gas/oil operations poses a serious mortality and morbidity risk. The risk to residents living within a few hundred metres of a well pad may be very significant.

'Of very considerable concern is the potential use of extremely toxic hydrofluoric acid for the extraction of tight-oil in the Sussex Weald. Very few politicians and councillors appreciate the risks involved.'

Air quality will be affected by toxins emitted by the flaring of gases. Although not 'fracking', the emissions from the flare can be compared to emissions from oil and gas operations near communities in other countries. It is important to make reference to studies of these, in order to be informed about real and potential risks to human health. Coburn, Schultz, Herrick & Kwiatkowski (2012) documented substances that affect the endocrine system with reproductive and developmental effects. The endocrine system is susceptible to chemical impacts at very low concentration. Polyaromatic hydrocarbons are not dependent upon dose and there are no safe limits of exposure. Prenatally exposed children have been found to have lower IQ scores (Perera, Zhigang, Whyatt et al 2009; Edwards Jedrychowski, Butscher et al 2010).

Below are some salient points I picked out of the various research papers attached:

Research of Dr Theo Colborn an Endocrine Specialist of Florida University (sep 2012):

This exploratory study was designed to assess air quality in a rural western Colorado area where residences and gas wells co-exist. Sampling was conducted before, during, and after drilling and hydraulic fracturing of a new natural gas well pad. Weekly air sampling for 1 year revealed that the number of non-methane hydrocarbons (NMHCs) and their concentrations were highest during the initial drilling phase and did not increase during hydraulic fracturing in this closed-loop system. Methylene chloride, a toxic solvent not reported in products used in drilling or hydraulic fracturing, was detected 73% of the time; several times in high concentrations. A literature search of the health effects of the NMHCs revealed that many had multiple health effects, including 30 that affect the endocrine system, which is susceptible to chemical impacts at very low concentrations, far less than government safety standards. Selected polycyclic aromatic hydrocarbons (PAHs) were at concentrations greater than those at which prenatally exposed children in urban studies had lower developmental and IQ scores. The human and environmental health impacts of the NMHCs, which are ozone precursors, should be examined further given that the natural gas industry is now operating in close proximity to human residences and public.p.2

Bamberger and Oswald (Cornell University 2012 From 'Impacts of Gas Drilling on Human and Animal Health' Published in 'New Solutions Vol 22 (1) 51-77) :

Communities living near hydrocarbon gas drilling operations have become

de facto laboratories for the study of environmental toxicology. The close

proximity of these operations to small communities has created a variety of

potential hazards to humans, companion animals, livestock and wildlife (p.52)

Animals, especially livestock, are sensitive to the contaminants released into

the environment by drilling and by its cumulative impacts. Documentation of

cases in six states strongly implicates exposure to gas drilling operations in

serious health effects on humans, companion animals, livestock, horses, and

wildlife.(…)Without complete studies, given the many apparent adverse impacts on human and animal health, a ban on shale gas drilling is essential for the protection of public health)p.72

Conclusion of an independent health survey commissioned by a GP in Australia in TARA region

McCarron report 2013 From the executive Summary P.2

"A fully funded comprehensive medical assessment of residents currently living in proximity to unconventional gas development should be carried out as a matter of urgency.

3) Health impact assessments must be an integral part of any and every unconventional gas development. No new permit should be issued without one, and health impact assessments should be carried out for every development already in place.

4) Comprehensive air and water monitoring (an open, ongoing and unlimited

information loop) is essential. If we are looking at possible non beneficial human

health impacts we need to look at all the gases and volatiles both natural and

derived emitted via well drilling, gas and pipeline valves, leaking wellheads,

flaring, and other processes involved in gas collection/purification/refining to

export specifications. This monitoring is urgently required. It must be

independent, unbiased, fully funded and available for public scrutiny preferably

in real time and in electronic form."

Planners must look at the WHOLE story when looking at hydrocarbon developments and take the precuationary approach by not allowing new work to take place in an area of land that is too built up to take the risk.

Indeed there have already been disturbing reports from around onshore oil developments in this country that residents have already suffered, particularly from leakages of gas. Those near Horse Hill have experienced strange smells, headaches and nosebleeds:

http://www.getsurrey.co.uk/news/surrey-news/staff-animals-horse-hill-equestrian-11003757

These symptoms are similar to those experienced at a conventional oil site in West Newton in East Yorkshire in 2014, and have much in common with effects experienced by those living among oil and gas developments in Australia and America:

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When assessing air quality an accurate account of traffic movements in and out of the site must be taken into account. There was insufficient monitoring of traffic as picked up by PHE in Balcombe. No quantitative assessment of vehicle emissions has been conducted. This is particularly pertinent when you consider the way that traffic emissions was calculated. It looked like there would be less extra traffic than there actually will be.

Someone between the EA and WSCC was not doing their jobs properly.

8.5.3

Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

M18 In deciding what is an acceptable impact on public health, independent science and doctors should be consulted and all the gases involved tested and considered.This monitoring should continue in perpetuity afterwards. Many cases have shown how wells have failed afterwards, this is why the default should be against hydrocarbon extraction and for looking for alternatives.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas extraction is particularly worrying because of the high levels of methane emissions associated with the process.

Response 4.

The document often uses the phrase, 'in the public interest'. In all respects WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

My other comments are within the text of the document.

Under M20 there needs to be a new clause that developers must provide meaningful traffic statistics and not be allowed to use definitions of HGVs

which include estate cars for example. In the Planning Officer's Lower Stumble report Jane Moseley used the 1.5 tonnes definition (and therefore includes parents in estate cars dropping kids off to school and light delivery vans as HGVs), she calculated the increase in traffic of HGVs as "unlikely to exceed 10% for the bulk of the operation". She then used this to support here conclusion that "It is concluded that the number of vehicles required to carry out the development is not significant enough to raise concerns regarding highway capacity or safety." If the definition of HGV was changed to 7.5 tonnes and over, the increase would have been significant and would have provided reasons for the councillors to reject the application.

Insisting that developers use 7.5 tonnes as the definition of an HGV would also align with people's understanding as this is the size that requires drivers to obtain a special HGV license.

Sorry for repetition but some points on the plan are covered by the same research and arguments. I avoided referencing all over the document in case it is split up for those readers into the sections.

Additional Comments

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* * *

12: Cocking Down oil and gas opposition

12 - Cocking Down oil and gas opposition: Resident/Member of the Public (Response ID: 338 Respondent ID: 3896)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I live, and have lived all my life, in Heyshott, at the foot of the South Downs and close to one of the exploratory fracking and oil drilling sites on Cocking Down. This is a stunningly beautiful area and is sacred to me.

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

13 - Horse Hill, Surrey / West Sussex border, oil and gas opposition

13 - Horse Hill, Surrey/West Sussex border, oil and gas opposition: Resident/Member of the Public (Response ID: 361 Respondent ID: 3912)

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No response

B1.2 Do you support the Strategic Objectives?

No response

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B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I object to the draft plan for minerals for West Sussex and the South Downs National Park as it fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change.

I live under 1 mile from the proposed unconventional oil site at HorseHill. I have watched closely the differing spin put out from the drill companies, stressing in local radio that there will be no noticeable change (we are all aware that there would be no noticeable number of new jobs for the area with a second company admitting only 11 jobs would be treated per well, these would be specialised jobs from exporianced staff provably brought in from Scotland or the US. This is the complete opposite to how they have spun at the national level, their output figures from 3 levels across 200m depth have been added together in the attempt to produce in interesting output figure. To my understanding it is only possible to exploit 1 depth at a time so the ukog figure of 1600 barrels needs to be devided by 3. Completing this output to that recently do cussed by igas red arguing their Lingfield proposal calculates producing 0.4% of uk output whereas ukog seem for feel the levels stated, numerically 6x that of lingfield, to be 20% of uk usage (note the difference between output and use. U.K. Priduces only a small % of out use. Under eu law any output would need to be sold on the open European market.

I have also personally evperianced the complete disregard for local life but the aggressive and abusive tanker drivers used, the footpath along side of the well sere has been moved in to a hedge, the blackthorn, brambles and nettles have already grown to make this path now only passable with difficulty.

I also experienced significant health effects I believe as a result of jogging on the above footpath while the first flow test was on going. There had been no warning that many cubic meters of acid would be pumped in to the well on that day and following running through this vented gas I suggested respiratory problems and repeated headaches. for more than a month. Other members of my family also experienced headaches and nose bleed at this time.

I have witnessed personally the user disregard

In particular, I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

14: Markswells Wood, Forestside, oil and gas opposition

14 - Markswells Wood, Forestside, oil and gas opposition: Resident/Member of the Public (Response ID: 169 Respondent ID: 3776)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I am writing to add my name to the list of people objecting to the draft plans for the extraction of minerals from the Markwells Wood site in the South Downs National Park. I am a local resident in the area, living 850m from the site, as the crow flies.

You, no doubt, will have been sent various versions of the Friends of the Earth letter. I agree with the reasons for their objections, I can see no point to my reiterating and listing them again.

I sincerely hope that you will listen to the loud combined voice of ecologically minded people and accept that prospecting, mining and burning more hydrocarbons is not a safe path for the UK and planet to follow.

* * *

14 - Markswells Wood, Forestside, oil and gas opposition: Resident/Member of the Public (Response ID: 170 Respondent ID: 3777)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I strongly object to the draft plan for minerals for West Sussex and the South Downs National Park. I live on Stansted Park, close to the Markswell woods site. Consequently I have a personal interest in this plan as well as a more general concern about the increasing use of fossil fuels and the increasing dangers of climate change.As advised by Friends of the Earth I believe the present plan fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change. My personal view is that a technology that requires a great deal of energy to release either gas or oil would need to ensure a large net gain of energy to justify adding to our greenhouse gas emissions. The Open University quotes the proportion of energy gained for fracking oil to be in the region of 1:2.5. I feel this is too small a gain for the substantial harm that the increase in carbon dioxide and methane released into the atmosphere will cause.

In addition I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'. The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK. Moreover, the speed with which wide-ranging and imaginative renewable energy technologies are being developed and refined shows, in my opinion, that these are another, less harmful, opportunity for economic growth. Their high costs are falling rapidly, and these costs can only continue to fall.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks. I understand that all technologies have an element of risk, and that these are calculated. I would like to know in some detail what the risks and their likelihood are for these new proposals.

While I concede that these proposals are on an entirely different scale I would like to know what the risks are to myself and to my community and the likelihood of them occurring.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

At a more personal level I am also concerned about how the local infrastructure would cope with this industry. For example, our rural roads already present a hazard because they are narrow and collisions are an ever present danger. The Roads are full of potholes and we regularly have to buy new tyres because of them. These roads will not support the extensive traffic that will be caused by the fracking industry.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

14 - Markswells Wood, Forestside, oil and gas opposition: Resident/Member of the Public (Response ID: 340 Respondent ID: 3830)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I strongly object to the draft plan for minerals for West Sussex and the South Downs National Park. I live on Stansted Park, close to the Markswell woods site. Consequently I have a personal interest in this plan as well as a more general concern about the increasing use of fossil fuels and the increasing dangers of climate change.

As advised by Friends of the Earth I believe the present plan fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change. My personal view is that a technology that requires a great deal of energy to release either gas or oil would need to ensure a large net gain of energy to justify adding to our greenhouse gas emissions. The Open University quotes the proportion of energy gained for fracking oil to be in the region of 1:2.5. I feel this is too small a gain for the substantial harm that the increase in carbon dioxide and methane released into the atmosphere will cause.

In addition I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK. Moreover, the speed with which wide-ranging and imaginative renewable energy technologies are being developed and refined shows, in my opinion, that these are another, less harmful, opportunity for economic growth. Their high costs are falling rapidly, and these costs can only continue to fall.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks. I understand that all technologies have an element of risk, and that these are calculated. I would like to know in some detail what the risks and their likelihood are for these new proposals. The Open University (again) quotes the calculated risk of a major nuclear incident as once every 25 years. This happens to be roughly the time between the Chernobyl and Fukushima disasters. Personally, I find that level of risk unacceptable. While I concede that these proposals are on an entirely different scale I would like to know what the risks are to myself and to my community and the likelihood of them occurring.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

At a more personal level I am also concerned about how the local infrastructure would cope with this industry. For example, our rural roads already present a hazard because they are narrow and collisions are an ever present danger. The

roads are full of potholes and we regularly have to buy new tyres because of them. These roads will not support the extensive traffic that will be caused by the fracking industry.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development. * * *

14 - Markswells Wood, Forestside, oil and gas opposition: Resident/Member of the Public (Response ID: 339 Respondent ID: 3897)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I strongly object to the draft plan for minerals for West Sussex and the South Downs National Park. I live on Stansted Park, close to the Markswell woods site. Consequently I have a personal interest in this plan as well as a more general concern about the increasing use of fossil fuels and the increasing dangers of climate change.

As advised by Friends of the Earth I believe the present plan fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change. My personal view is that a technology that requires a great deal of energy to release either gas or oil would need to ensure a large net gain of energy to justify adding to our greenhouse gas emissions. The Open University quotes the proportion of energy gained for fracking oil to be in the region of 1:2.5. I feel this is too small a gain for the substantial harm that the increase in carbon dioxide and methane released into the atmosphere will cause.

In addition I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK. Moreover, the speed with which wide-ranging and imaginative renewable energy technologies are being developed and refined shows, in my opinion, that these are another, less harmful, opportunity for economic growth. Their high costs are falling rapidly, and these costs can only continue to fall.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks. I understand that all technologies have an element of risk, and that these are calculated. I would like to know in some detail what the risks and their likelihood are for these new proposals. The Open University (again) quotes the calculated risk of a major nuclear incident as once every 25 years. This happens to be roughly the time between the Chernobyl and Fukushima disasters. Personally, I find that level of risk unacceptable. While I concede that these proposals are on an entirely different scale I would like to know what the risks are to myself and to my community and the likelihood of them occurring.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

At a more personal level I am also concerned about how the local infrastructure would cope with this industry. For example, our rural roads already present a hazard because they are narrow and collisions are an ever present danger. The roads are full of potholes and we regularly have to buy new tyres because of them. These roads will not support the extensive traffic that will be caused by the fracking industry.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

14 - Markswells Wood, Forestside, oil and gas opposition: Resident/Member of the Public (Response ID: 341 Respondent ID: 3898)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No response

B1.2 Do you support the Strategic Objectives?

No response

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

I strongly object to the draft plan for minerals for West Sussex and the South Downs National Park. I live in Forestside, close to the Markwell's Wood site and on the main access route for the traffic coming through the forest. Consequently I have a personal interest in this plan as well as a more general concern about the increasing use of fossil fuels and the increasing dangers of climate change.

As advised by Friends of the Earth I believe the present plan fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change. My personal view is that a technology that requires a great deal of energy to release either gas or oil would need to ensure a large net gain of energy to justify adding to our greenhouse gas emissions. The Open University quotes the proportion of energy gained for fracking oil to be in the region of 1:2.5. I feel this is too small a gain for the substantial harm that the increase in carbon dioxide and methane released into the atmosphere will cause.

In addition I object to the vision that the Minerals Plan will contribute to the supply of oil and gas 'to support growth'.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK. Moreover, the speed with which wide-ranging and imaginative renewable energy technologies are being developed and refined shows, in my opinion, that these are another, less harmful, opportunity for economic growth. Their high costs are falling rapidly, and these costs can only continue to fall.

I am very concerned that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks. I understand that all technologies have an element of risk, and that these are calculated. I would like to know in some detail what the risks and their likelihood are for these new proposals. The Open University (again) quotes the calculated risk of a major nuclear incident as once every 25 years. This happens to be roughly the time between the Chernobyl and Fukushima disasters. Personally, I find that level of risk unacceptable. While I concede that these proposals are on an entirely different scale I would like to know what the risks are to myself and to my community and the likelihood of them occurring.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

At a more personal level I am also concerned about how the local infrastructure would cope with this industry. For example, our rural roads already present a hazard because they are narrow and collisions are an ever present danger. The roads are full of potholes and we regularly have to buy new tyres because of them. These roads will not support the extensive traffic that will be caused by the fracking industry.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

* * *

14 - Markswells Wood, Forestside, oil and gas opposition: Resident/Member of the Public (Response ID: 310 Respondent ID: 3980)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

concern about the increasing use of fossil fuels and the increasing dangers of climate change

peace and respect of natural beauty and countryside in the local area

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

Not going ahead with explotation of gas and oil

B2. Mineral Site Allocations

B2.1 Name of site

Markswell Wood

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

local resident and meetings in village hall

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

not going ahead and certainly not shale gas exploitation

B2. Mineral Site Allocations

B2.1 Name of site

All sites

B2.2 Do you support the inclusion of this site within the draft Plan?

No

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. 'Mineral-specific' and 'Development Management' Policies

B3.1 Do you support the 'mineral-specific' policies set out in Section 6 of the Plan?

No

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

Additional Comments

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14 - Markswells Wood, Forestside, oil and gas opposition: Resident/Member of the Public (Response ID: 328 Respondent ID: 3981)

B1. Vision and Strategic Objectives

B1.1 Do you support the Vision?

No

B1.2 Do you support the Strategic Objectives?

No

B1.3 Do you have any views about the Vision or the Strategic Objectives in Section 2 of the Draft Plan?

I strongly object to the draft plan for minerals for West Sussex and the South Downs National Park. I live at Stansted Park, close to the Markswell Woods site. I have seen the destruction of the environment and disturbing consequences of oil and gas development in the US on human health and am concerned that there haven't been enough due diligence in the UK. I am also have concerned about the increasing use of fossil fuels and the increasing dangers of climate change.

As advised by Friends of the Earth I believe the present plan fails to comply with the legal duty that policies in the plan as a whole must contribute to the mitigation of and adaptation to climate change. Technology that requires a great deal of energy to release either gas or oil would need to ensure a large net gain of energy to justify adding to our greenhouse gas emissions.

B1.4 Based on your views, please set out below any changes you would like to see in Section 2 of the Plan.

I object to Policies M7a and M7b for the following reasons:

- The policies fail to take account of the need to tackle the causes of climate change in terms of the reduction of greenhouse gas emissions caused by fossil fuels;

- The policies are a 'yes, if' approach that fails to recognise the risks;

- The policies do not protect the South Downs National Park, Area of Outstanding Natural Beauty or Sites of Special Scientific Interest as they allow development to go ahead in these places with minimal safeguards;

- The policies fail to take account of cumulative impact and indirect impacts;

- The policies fail to take account of public health concerns and the production of waste;

- The policies fail to implement a distance from residential development;

- The policies fail to ensure that the planning impacts identified by affected local communities have been fully addressed.

1)The vision should take into account the UK's obligations to meet the Paris climate change agreements. Therefore, as a county we should be looking to cut emissions of gases that contribute to climate change. This document only mentions that mineral production should contribute to a low carbon economy and look to minimise carbon emissions. It should also cover the need to minimise emissions of methane as methane is known to be a much more potent greenhouse gas than carbon dioxide. With climate change in mind no fossil fuel developments should be taking place as fossil fuels need to remain unburnt. Equally, unconventional oil and gas extraction is particularly worrying because of the high levels of methane emissions associated with the process. Fracking is also bad news for the climate. Natural gas is 80 percent methane, which traps heat 86 times more effectively than CO2 over a 20-year period. Newly fracked wells released 2.4 million metric tons of methane in 2014 — equivalent to the annual greenhouse gas emissions of 22 coal-fired power plants.

2) Point 4 states that we should be 'aspiring to source more and more minerals from alternatives to extraction of indigenous resources'. In the case of hydrocarbons we can easily source energy from alternatives to fossil fuels. This document should signpost where provisions are set out for how West Sussex can encourage and

develop planning applications for renewable energy production by using our natural resources (in a less destructive way than oil and gas). Solar and wind are obvious opportunities for West Sussex and should be prioritized over fossil fuels.

3)The document frequently refers to the need for energy security and implies that oil and gas extraction is therefore necessary. We can get security equally from consistent investment in renewables, as other countries have shown.

4)The use of the phrase, 'in the public interest' is questionable. The WSCC should of course consider the public interest. This means taking into account our environment, our health and well being, and the developing risk of climate change. It should consider pollution risks to air and water and how this can effect the health of humans and animals in the locality by looking to independent scientific study and taking independent scientific advice. All emissions created should be considered in comparison with National Air Quality Objectives and operations should not be allowed if they are likely to exceed them. It should also acknowledge the need to take into account public opinion in terms of consultation responses, petitions, letters and other representations. WSCC should then function as part of a democracy by listening to and acting on the opinions of the public in whose interest they claim to act.

5)Areas of Outstanding Natural Beauty, South Downs National Park, Sites of Special Scientific Interest and Water Source Protection Areas should be afforded the same degree of protection from oil and gas developments of any kind including 'hydrofluoric/hydrochloric mixture acidisation, as well as fracking. Protected areas should be protected from developments directly adjacent to, or under them at any depth. They should also be protected from exploration activities of any kind. Robust, continuous independent monitoring of air and water for a wide range of pollutants must take place before, during and after activities. Work must be immediately suspended where any contamination to water is found or if air emissions exceed National Air Quality Objectives.

6) Fracking has the potential to pollute water supplies and there is a “paucity” of long-term studies on the topic.

7) Proper regulation is impossible due to lack of funding at the national and local level.

8) I am also concerned about how the local infrastructure would cope with this industry. Our rural roads already present a hazard because they are narrow and collisions are an ever present danger. These roads will not support the extensive traffic that will be caused by the oil and gas industry.

In my view, the policies as they are currently drafted in the plan do not ensure that the plan meets the test of contributing to the achievement of sustainable development.

B2. Mineral Site Allocations

B2.1 Name of site

B2.2 Do you support the inclusion of this site within the draft Plan?

B2.3 Please detail any comments you have about this site and the development principles.

B2.4 What changes, if any, would you like to see to the Plan based on your comments above?

B3. ‘Mineral-specific’ and ‘Development Management’ Policies

B3.1 Do you support the ‘mineral-specific’ policies set out in Section 6 of the Plan?

No response

B3.2 Do you support the 'development management' policies set out in Section 8 of the Plan?

No response

B3.3 Please detail any comments you have about the 'mineral-specific' and 'development management' policies of the Plan, clearly labelling which policies you are commenting on. If you answered 'no' to B3.1 and B3.2, please explain why and set out any changes you would like to see to the Plan.

B4. Content of the Plan

If you have comments on what the Plan should contain, please provide details.

The Minerals Plan assumes that oil and gas produced in West Sussex is part of 'a national commitment to maintain and enhance energy security in the UK'. This is not evidence-based. Oil and gas are part of international and European markets, and research such as that by Professor Michael Bradshaw shows that energy security would be delivered more successfully by an energy-efficiency programme for the UK. Moreover, the speed with which wide-ranging and imaginative renewable energy technologies are being developed and refined shows, in my opinion, that these are another, less harmful, opportunity for economic growth. Their high costs are falling rapidly, and these costs can only continue to fall.

I am worried that the plan seeks to 'minimise the risk' to communities rather than to prevent or avoid risks. I understand that all technologies have an element of risk, and that these are calculated. I would like to know in some detail what the risks and their likelihood are for these new proposals.

I am also concerned that the plan fails to recognise the precautionary approach, in particular to the development of unconventional hydrocarbons, given that only one well has been test-fracked in the UK, and that led to a moratorium.

We should be looking at the situation in the US and all the environmental and public health issues involved in oil and gas production before allowing the practice here in the UK

Additional Comments

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