

West Sussex County Council and South Downs National Park Authority
Joint Minerals Local Plan Single Issue Review

Regulation 19 Sustainability Appraisal Non-Technical Summary

Prepared by South Downs National Park Authority
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I. Introduction

- I.1 This Non-Technical Summary of the Sustainability Appraisal Report has been prepared by the South Downs National Park Authority (SDNPA) as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Soft Sand Single Issue Review (SSR) which will be included in part of the West Sussex and South Downs National Park Joint Minerals Local Plan (hereafter referred to as the JMLP) which was adopted in 2018.
- I.2 This report summarised the SA document that supports the Single Issue Review Proposed Submission Regulation 19 document and it should be read in conjunction with that document.

About Sustainability Appraisal and Strategic Environmental Assessment

- I.3 The purpose of SA is to promote sustainable development by integrating sustainability considerations into the preparation and adoption of plans. This SA Report has been prepared to provide key stakeholders and members of the public with information on the process and the findings of the SA undertaken in preparing the SSR Reg19 document.

Scope of the JMLP and SSR

- I.4 As mineral planning authorities, West Sussex County Council (WSCC) and the South Downs National Park Authority (SDNPA) ('the Authorities') are required to plan for a steady and adequate supply of minerals in accordance with paragraph 207 of the National Planning Policy Framework 2018 (NPPF).
- I.5 The West Sussex Joint Minerals Local Plan (JMLP) was jointly prepared and adopted by the Authorities in July 2018. The Plan sets out strategic policies for a number of different types of mineral for the period to 2033 to ensure that a steady and adequate supply can be maintained.

Soft Sand Review

- I.6 During the examination hearings of the JMLP in September 2017, the Planning Inspector raised concerns about the soft sand strategy. The Inspector suggested modifications prior to adoption of the JMLP: to delete references to planning for a declining amount of sand extraction from within the National Park; to replace Policy M2 with new wording, requiring the Authorities to undertake a review to address the shortfall in soft sand to the end of the JMLP plan period (2033); and to remove the proposed Ham Farm allocation from Policy M11.
- I.7 Once adopted, the SSR will integrate into the JMLP to provide an up-to-date and robust policy for Soft Sand. The SSR covers the following three key matters:
- The identified need for soft sand during the period to 2033;
 - The supply strategy, that is, the options that can, either singularly or in combination, be used to meet any identified shortfall; and
 - The identification of potential sites and, if required, the selection of one or more of those sites to meet identified need.

Aims of the report

- I.8 This report is the Non-Technical Summary of the SA/SEA report for SSR Reg19 January 2020. It has been prepared in the spirit of the integrated approach to SEA and SA, and throughout the report, the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

2. Methodology

Key stages in the SA/SEA process

- 2.1 Figure 1 below sets out the main stages of the plan-making process and shows how these correspond to the SA process.
- 2.2 Figure 2 signposts how the legal requirements of the SEA Directive have been met as set out in the full SA Report.

Figure 1: Corresponding stages in plan making and SA

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

Figure 2: SEA Directive Requirements

SEA Directive Requirement	Where covered in this SA Report
<p>Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described, and evaluated. The information to be given is (Art. 5 and Annex I):</p> <p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.</p>	Chapter 3 Appendix I
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3
c) The environmental characteristics of areas likely to be significantly affected.	Chapter 3
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 Appendix I
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Chapter 3 Appendix I
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium, and long-term permanent and temporary, positive, and negative effects.)	Chapters 5, 6, 7, 8 Appendices of Assessments 2-6
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapters 5, 6, 7, 8 Appendices of Assessments 2-6
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 2 Chapter 4 Assessment Tables
i) A description of measures envisaged concerning monitoring in accordance with Art. 10.	Chapter 9 (related to full SA of JMLP)
j) A non-technical summary of the information provided under the above headings.	A separate non-technical summary document will be published to accompany this SA report.

SEA Directive Requirement	Where covered in this SA Report
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	
<p>Consultation:</p> <ul style="list-style-type: none"> Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4). 	Chapter 2 Consultation on revised scoping report carried out in late 2018
<ul style="list-style-type: none"> Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). 	Consultation will take place in early 2020
<ul style="list-style-type: none"> Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	Not applicable
<p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Art. 7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> the plan or programme as adopted; a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures decided concerning monitoring (Art. 9). 	Will be carried out at the plan making stage indicated in Figure 1
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10).</p>	Will be carried out at the plan making stage indicated in Figure 1
<p>Quality assurance:</p> <p>Environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	The Authorities have undertaken all work in accordance with the relevant parts of the SEA Directive

2.3 The JMLP SA Report describes the process undertaken to date in carrying out the SA of the JMLP. Each policy option and site was assessed against each SA objective, and a judgement was made with regards to the likely effect that they would have on that objective. These judgements were recorded as a colour coded symbol, as shown below in Figure 3. (This is the same colour coding and symbol table carried forward to the SSR SA.)

2.4 The scoring was reviewed prior to the SA of the SSR Issues and Options (2019). No changes were made to the scoring system at that stage and the same scoring table has been used to assess all stages of the SA of the draft Pre-Submission Soft Sand Single Issue Review.

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

Symbol	Likely Impact of the Policy on the SA Objective(s)
++	Significant positive impact
+	Minor positive impact
0	Negligible or no impact
+/-	Mixture of positive and negative
-	Minor negative impact
--	Significant negative impact
?	Uncertain what effect it will have

3. Summary of review of Plans, Policies, and Programmes

Review of Plans, Policies, and Programmes

- 3.1 The most significant developments in terms of the policy context for the SSR are the adoption of the JMLP in 2018 which will provide a set of up-to-date development management policies for minerals development, the adoption of the South Downs Local Plan (2019) and the 2019 update to the NPPF.
- 3.2 A full list of the Plans, Policies, and Programmes considered is contained in Appendix I of the main SA Report.

Baseline Information

- 3.3 The baseline data focuses on key indicators which are readily available and can be updated to illustrate the environmental, social, and economic issues. The choice of baseline data has been informed by the previous stages in the SA process. Potentially a key limitation of the SA process is gaps in baseline data. Appendix 3 of the overarching report SA report for the JMLP provides an extensive discussion on the relevant baseline information for West Sussex and in particular the role of minerals development.

Key Sustainability Issues

- 3.4 An up-to-date set of key sustainability issues facing West Sussex was identified during the Scoping stage of the SA and was presented in the Scoping Report. Figure 4 of the main SA report describes the likely evolution of each key sustainability issue if the SSR of the JMLP were not to be adopted.
- 3.5 The table reflects the wider JMLP as the SSR will form part of the plan and is not a standalone document.

4. SA Framework

The SA Framework

- 4.1 The SA Framework contains a number of objectives and was developed by LUC, SDNPA and WSCC's Minerals and Waste Planning Policy officers for the SA of the JMLP. The objectives have been informed by the objectives previously identified in the March 2013 SA Report for the West Sussex Waste Local Plan, reviewed to be relevant to the Minerals Local Plan, reflect the review of relevant plans and programmes (as set out in Appendix 1) and baseline situation/key issues described in Chapter 3 of this report and Appendix 3 of the SA Report of the JMLP. The SA objectives developed for the SDNP Local Plan have also been taken into consideration.
- 4.2 The policies and sites allocations included in the Issues and Options document for the SSR (2019) have been appraised against the SA Objectives, which are included in Figure 5 of the main SA Report. Each SA Objective has a number of subsidiary questions, which help to provide decision-making criteria to use during the identification of potential effects from the JMLP and SSR.

Assumptions used in applying the SA Framework

- 4.3 SA inevitably relies on an element of subjective judgement. In predicting and assessing the likely sustainability effects of the JMLP and SSR, the SA team's analysis of the characteristics of West Sussex and the sustainability issues it faces has been drawn upon as well as the professional experience of the SA team of having undertaken numerous SAs of minerals local plans and site allocations.
- 4.4 In making SA judgements for the appraisal of each issue, option, and site the SA builds on the extensive data collated and the assessments produced by WSCC and SDNPA for each site and the JMLP.

5. Assessment of Issues and Options

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

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

Summary

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

Issue 2: Supply strategy

- 5.3 The only source of land-won soft sand within West Sussex is within the Folkstone Formation, which is largely contained within the South Downs National Park. Paragraph 172 of the NPPF states “that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks ... which have the highest status of protection in relation to these issues”.
- 5.4 Against this national legislative and policy context, the Authorities have to consider all ‘reasonable alternatives’ for soft sand supply to meet the identified shortfall. ‘Reasonable alternatives’ are the available options to promote sustainable development, the likely significant effects of which are assessed through SA. The ‘reasonable alternatives’ should be identified at an early stage, in order to help develop the preferred strategy. The options below are considered to be the reasonable alternatives.

Summary of options

- 5.5 At the Issues and Options consultation this stage, the Authorities have identified the following options that could be used to meet the identified shortfall for soft sand:
- Option A: Supply from sites within West Sussex but outside of the National Park;
 - Option B: Supply from sites within West Sussex, including within the National Park;
 - Option C: Supply from areas outside West Sussex;
 - Option D: Supply from alternative sources including marine-dredged material; and
 - Option E: A combination of the above options.
- 5.6 The options and summary of the SA assessment are set out in Figure 4 below. The full assessment of Options A-D are set out in Appendix 3 of the main SA Report. Issue 3 ‘The identification of potential sites and, if required, the selection of one or more of those sites to meet identified need’ is considered in Chapter 7 Site Selection Process.

Figure 4: Summary assessments of SSR Options A to E

Option	Summary of Option	Summary of SA Assessment
Option A: Supply from sites within West Sussex but outside of the National Park	There are a number of currently active soft sand sites within West Sussex that fall outside the boundary of the SDNP. The Authorities also undertook a full desk-based assessment to assess whether there were any other potential sites that had not been promoted by landowners or operators when work on the JMLP was underway. In assessing Option A, the Authorities will consider the potential to identify sites outside the SDNP boundary within West Sussex the cumulative impact of any potential allocations with active sites in close proximity, and whether this option is able to meet the full supply requirement.	This option is unlikely to meet the supply requirements of the LAA. There would be a number of negative impacts including landscape and residential amenity. The location of potential sites outside of the SDNP are adjacent to the SDNP boundary as well as existing and historic mineral workings. Further assessment on the impact of this option on the SDNP is required. This option has the most cumulative impacts due to the location of current mineral workings. It should be noted that sites outside but in close proximity to, or experienced (for example, via views) from, the National Park have the potential to adversely impact on the landscape, including the setting and experiential qualities, of the National Park.
Option B: Supply from sites within West Sussex, including within the National Park	This option will consider the potential of each site on the 'shortlist' (see Issue 3, below) on its merits. Landscape assessments will consider the potential impact on the special qualities of the South Downs National Park regardless of whether the site is within or outside the National Park.	This option may meet the supply requirements set out in the LAA. There would be a number of negative impacts including landscape and residential amenity. The location of potential within and adjacent to the SDNP boundary means that further assessment on the impact of this option on the SDNP is required. It should be noted that sites outside but in close proximity to, or experienced (for example, via views) from, the National Park have the potential to adversely impact on the landscape, including the setting and experiential qualities, of the National Park.
Option C: Supply from areas outside West Sussex	Option C considers the potential of other Plan Areas to supply the wider market in the South East to compensate for any shortfall in supply from West Sussex, due to the constrained nature of the resource. Outside of this Plan Area, there are a number of counties that already supply soft sand to the wider market from the Folkestone Formation, as well as the Corallian Group (in Oxfordshire), and the 'Reading Beds'.	Seeking supply solely from areas outside of West Sussex increases uncertainty of the potential impacts and reduces control on impacts such as air quality. The nature of the minerals market means that soft sand will currently be transported through the Plan Area so some impacts may be neutral, depending on the origin of the material.

Option	Summary of Option	Summary of SA Assessment
Option D: Supply from alternative sources including marine dredged material	<p>This option seeks to meet supply from alternative materials to land-won resources within the Plan Area. There are currently no known viable equivalents to land-won building sand in the South East. Marine dredged material is increasingly supplied to the market but is not known to be directly substitutable for land won resource at this time. There is evidence that some marine dredged material is being landed at wharves in West Sussex and sold as soft sand, but it is not known if this material is being blended with other, land-won sand, or is a direct substitute. The SSR will consider this Option in the context that this type of material may become more accessible and available over time, and an economically viable alternative to land-won soft sand extraction. However, this would be entirely dependent on the industry and market.</p>	<p>The SA considers that Option D is the most uncertain, particularly in the early stages of the Plan. It is unclear at present what amount of alternative material could be provided and where it would be sourced from. Although there could be less direct impacts on the landscape and biodiversity within West Sussex including the South Downs National Park, it is difficult to quantify likely that the transport impacts and also therefore impacts on climate change. It is unlikely that this option on its own could meet the supply required for the Plan period.</p>
Option E: Combination of Options A-D	<p>Option E was identified in the previous stage of SA as likely to be the most sustainable option. It will be difficult for any single option to meet the supply requirements set out in the most recently adopted LAA. Unless the Authorities decide not to meet the supply requirements, a combination of the options may be the most sustainable way to meet the requirements of national policy. All the potential combinations of Option E is considered below.</p>	

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

- 5.7 Through the Issues and Options assessments, Option E was considered to be the most sustainable overall. Option E is made up of each of the Options A to D. As such there are a number of potential combinations to assess.
- 5.8 Firstly, the options have been grouped spatially:
- Combinations with Option A (Sites in West Sussex but outside of the SDNP);
 - Combinations with Option B (Sites in West Sussex, including the SDNP).
- 5.9 Option A was then assessed in combination with:
- Option C (Supply from areas outside West Sussex);
 - Option D (Supply from marine or other sources);
 - Option C and Option D.
- 5.10 Separately, Option B was assessed in combination with:
- Option C (Supply from areas outside West Sussex);
 - Option D (Supply from marine or other sources);
 - Option C and Option D.
- 5.11 The combination of options to be considered is set out as follows.

Figure 5: Variations of Option E

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

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

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

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

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

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

- 5.14 This combination of options slightly increases the deliverability of the strategy however uncertainty in relation to how much material may be available to meet the need as set out in Issue 1 is high. Policies M2, M1 I, and future reviews of the JMLP should take account of the potential of material to be dredged from the south coast.

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

- 5.15 This combination of options slightly increases the deliverability of the strategy and reduces some of the uncertainty in relation to how much material may be available to meet the need as set out in Issue 1. All options that rely on material solely from outside of the SDNP increase uncertainty of supply and potential environmental impacts. Policies M2, M1 I, and future reviews of the JMLP should take account of the potential of material to be dredged from the south coast.

Option B (Inside West Sussex including the SDNP)

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

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

- 5.17 This combination of options slightly increases the deliverability of the strategy and reduces some uncertainty in relation to how much material may be available. Policies M2, M1 I, and future reviews of the JMLP should take account of the changing position of the availability and constraint on material in the wider South East.

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

- 5.18 This combination of options slightly increases the deliverability of the strategy and reduces some uncertainty in relation to how much material may be available. Policies M2, M1 I, and future reviews of the JMLP should take account of the changing position of the viability of marine material.

Preferred Option

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

- 5.19 This combination of options increases the deliverability of the strategy and reduces the uncertainty in relation to whether sites are deliverable and how much material may be available. Policies M2 and M1 I and future reviews of the JMLP should take account of the availability of material in the wider south east and the potential of material to be dredged from the south coast.

6. Assessment of Sites

- 6.1 Issue 3 concerns concerned the identification of sites to meet the supply identified in Issue 1 and the strategy identified in Issue 2. As two of the supply options relate to the allocation of sites within the Plan Area, the Authorities have undertaken work to identify potential sites to meet identified supply requirements to 2033. Following the Issues and Options (2019) consultation the Authorities revised all the pertinent technical assessments, including:
- HRA;
 - Transport Assessment;
 - Landscape Assessment;
 - Site Selection Report (4SR).
- 6.2 In total, 21 possible sites for extraction were identified at 'Stage 1' of the Site Selection Report. Nine sites have been shortlisted and have been subject of a 'Stage 2' assessment, taking account of all previous evidence and any new evidence that has been submitted as part of the 'Call for Sites' and in response to the Issues and Options consultation (2019).

Figure 6: Summary of site assessment scoring

SA Objective	Buncton Manor Farm	Chantry Lane	Coopers Moor	Duncton Common	East of West Heath	Ham Farm	Minsted West	Severals East	Severals West
1. To protect and, where possible, enhance health, well-being and amenity of residents, neighbouring land uses and visitors to West Sussex.	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?
2. To protect and, where possible, enhance recreation opportunities for all, including access to the countryside, open spaces, and Public Rights of Way (PROW).	-	0	0	-	+?	-?	-	--?	--?
3. To protect, sustain, and where possible, enhance the vitality and viability of the local economy.	+	+	+	+	+	+	+	+	+
4. To conserve minerals resources from inappropriate development whilst providing for the supply of aggregates and other minerals sufficient for the needs of society.	+	+	+	+	+	+	+	+	+
5. To protect, and where possible, enhance the landscape, local distinctiveness, and landscape character in West Sussex.	--	-	--	--	-	-	--	--	--
6. To protect, conserve and enhance biodiversity including natural habitats and protected species.	-?	0	-?	--?	-?	-?	--?	--?	--?
7. To protect and conserve geodiversity.	0	-?	0	0	0	0	-?	0	0
8. To conserve, and where possible, enhance the historic environment.	--?	-?	--?	--?	-?	-?	--?	-?	-?
9. To protect and, where possible, enhance soil quality, and minimise the loss of best and most versatile land.	-	0	0	0	0	--	-	0	0
10. To reduce air pollution and to protect and, where possible, enhance air quality.	-?	-?	-?	-?	-?	-?	-?	-?	-?
11. To protect and, where possible, enhance water resources, water quality and the function of the water environment.	?	?	-	--?	?	?	-	--?	--?
12. To reduce vulnerability to flooding, in particular preventing inappropriate development in the floodplain.	-?	0?	-?	-?	-?	0?	-?	-?	-?
13. To minimise transport of minerals by roads. Where road use is necessary, to reduce the impact by promoting use of the Lorry Route Network.	-	--	-	-	0	-	-	--	--
14. To reduce the emissions of greenhouse gases.	-?	-?	-?	-?	-?	-?	-?	-?	-?

7. Site Selection Process

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

- 7.1 Following the SA of Need, Strategy and Sites as set out in the previous chapters, the SA considered the approach to choose the most sustainable sites. As the options include sites within the SDNP, the SA considers whether those sites can be considered ‘a reasonable alternative’ due to the potential additional constraints on developing those sites. The Authorities have prepared a Major Development Background Paper which assesses each site in the SDNP and sets out a framework for the assessment of major development in the context of the SDNP.

Looking for sites outside the SDNP in the first instance

- 7.2 National policy directs planning authorities to look for sites for non-energy minerals outside of designated landscapes in the first instance. The two sites put forward through the I&O 2019 are Ham Farm and Buncton Manor Farm. The Guiding Principles of the JMLP guide development towards site extensions before new sites.
- **First principle:** Places where there are opportunities to restore land beneficially, for example a net-gain in biodiversity.
 - **Second principle:** Places without a sensitive natural or built environment and away from communities, in order to protect the amenity of businesses, residents and visitors to West Sussex.
 - **Third principle:** the new sites should have good access to the Lorry Route Network (LRN). Access from the site to the LRN should be acceptable ‘in principle’, that is, there should not be any technical issues, with regard to highway capacity and road safety, that cannot be overcome.
 - **Fourth principle:** The need to protect and enhance, where possible, protected landscapes in the plan area, particularly ensuring that any major minerals development will only be considered within designated landscapes in exceptional circumstances and in the public interest.
 - **Fifth principle:** A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments.
 - **Sixth principle:** The need to avoid the needless sterilisation of minerals by other forms of development.

Proposed Allocations

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

Figure 7: Proposed Allocations

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

- 7.4 Proposals to develop allocated sites in the SDNP, where they are determined to be major development, will need to demonstrate exceptional circumstances and that development of those sites is in the public interest. The Authorities have determined that these circumstances may exist due to constrained supply in the wider south east region, however, a decision can only be made when it is clear what the development proposals are and against the circumstances when the proposals come forward. The SA considers that the potential impacts of each site could be mitigated at the application stage and the development principles for each site should follow the recommendations of the technical assessments, including the requirement for project level appropriate assessment for each of the proposed allocations.

Cumulative impact of sites

- 7.5 The sites put forward for allocation are:
- Ham Farm
 - East of West Heath
 - Chantry Lane Extension
- 7.6 Two sites are in reasonable proximity (Ham Farm, Chantry Lane Extension) and one site is some distance away. The potential for cumulative impacts needs to consider existing minerals development as well as the impact of the combination of sites proposed.
- 7.7 The two extension sites will need to be carefully controlled through the planning application process to ensure that the impact of extended working in these areas is minimised. The extended working area does allow for greater potential in restoration schemes and greater impact on landscape projects in the wider area.
- 7.8 The SA recommends that any allocation policy considers the requirement for further information at the appropriate stage.

8. SA of Proposed Policy Wording

Background to policies and summary of appraisal

- 8.1 During the examination hearings of the JMLP in September 2017, the Planning Inspector raised concerns about the soft sand strategy. The Inspector suggested modifications prior to adoption of the JMLP: to delete references to planning for a declining amount of sand extraction from within the National Park; to replace Policy M2 with new wording; and to remove the proposed Ham Farm allocation from Policy M11.
- 8.2 Policy M2 required the Authorities to prepare a new strategy for soft sand in West Sussex which robustly considered reasonable options and potential site allocations. The Authorities are proposing to replace both Policy M2 and Policy M11 in the JMLP through the SSR as the strategy proposed new site allocations. Full appraisals, including supporting text of each policy, are set out in Appendix 6.

Policy M2 recommendations

- 8.3 The SA assessments indicate that the most sustainable strategy is likely to be a combination of the options that allows for all potential sites and sources to come forward, where they are available, over the plan period. The SA recommends that Policy M2 clearly sets out a hierarchy of decision making, ensuring that sites only come forward in relation to the need at the time of the application and applicants are signposted to the NPPF requirement to seek sites outside of designated landscapes in the first instance. Policy M2 should be clear that sites allocated in Policy M11 have precedence over windfall sites and that sites should be well located to the Lorry Route Network if other modes of transport is not viable. The JMLP contains a number of DM policies which can control and ensure mitigation of any impacts from development and the policy should clearly reference this or provide further information in the supporting text. As the strategy allows for allocations in the SDNP, M2 should be clear that any application will be considered in the context of major development and applications outside of the SDNP also must assess the potential impact they would have.
- 8.4 The final proposed text for JMLP Policy M2: Soft Sand is set out in Section 8 of the main SA Report.

Policy M11 recommendations

- 8.5 As stated above, the SA assessments indicate that the most sustainable strategy is likely to be a combination of the options that allows for all potential sites and sources to come forward, where they are available, over the plan period. Policy M2 incorporates a hierarchy of decision making and the SA recommendations set out above.
- 8.6 The requirements for M11 are assessed in this context. Policy M11 should be clear that sites will be assessed in the context of all the policies within the JMLP, and other relevant policies in the development plan. The adopted policy includes a series of 'Development Principles' for the allocation at West Hoathly Brickworks. It is recommended that these are included of all soft sand allocations and that these follow the outcomes of the technical assessments and the HRA.
- 8.7 The final proposed text for JMLP Policy M11: Strategic Minerals Site Allocations is set out in Section 8 of the main SA Report.

9. Monitoring

Background

- 9.1 The main SA report for the JMLP and the adopted JMLP set out a number of suggested indicators for monitoring the potential effects of implementing the JMLP. At this stage it is not proposed to update the indicators put forward as part of the adopted JMLP, except where required by the proposed indicators for policies M2 and M1 I. Indicators included in the supporting text for each policy are set out in Section 8 of the main SA Report.

10. Next steps

- 10.1 This report and the main SA Report will be available for consultation alongside the Pre-Submission Draft SIR JMLP between January and March 2020.
- 10.2 Following this stage any comments on the SA will be submitted to the Secretary of State along with the Proposed Submission JMLP. The SA and any comments will then be considered by an independent planning inspector who will examine the SIR and check that the SA has been undertaken in accordance with the regulations and that the SIR has taken account of the SA as appropriate. The SA Report will be updated to reflect any changes the Authorities make to the SIR or changes that are made through the examination process.