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18<sup>th</sup> March 2019

Dear Planning Services,

**West Sussex Joint Minerals Local Plan, Single Issue Soft Sand Review – Issues & Options Consultation (Reg.18)**

This is the formal response of CPRE Sussex to the above consultation. CPRE Sussex 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.

**Question 1**

**a) Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.**

CPRE Sussex is concerned that the scenarios are very limited and that no account has been taken of the following:

- Although Local Planning Authorities are allocating land for development in line with increased housing targets, there is no certainty that these targets will be achieved (for example, in Brighton and Hove a recent letter from Crest Nicholson in relation to the King Alfred site highlighted the impact of Brexit in creating uncertainty: [https://present.brighton-hove.gov.uk/Published/C00000912/M00008109/\\$\\$Supp30935dDocPackPublic.pdf](https://present.brighton-hove.gov.uk/Published/C00000912/M00008109/$$Supp30935dDocPackPublic.pdf) ) We believe that the 26.8% increase in Housing Developments forecast in the LAA is highly optimistic.
- The extent to which the use of marine-dredged material could or would reduce dependency on and therefore demand for land-won soft sand. Please see our answer to question 2b.

- Alternatives to building homes using traditional construction techniques, as advocated in a recent report by the Royal Institution of Chartered Surveyors (RICS) entitled 'Modern Methods of Construction A forward-thinking solution to the housing crisis?' and the extent to which their usage could or would reduce demand for soft sand. ([www.rics.org/globalassets/rics-website/media/news/news--opinion/modern-methods-of-construction-paper-rics.pdf](http://www.rics.org/globalassets/rics-website/media/news/news--opinion/modern-methods-of-construction-paper-rics.pdf) ) There are local examples such as Legal & General's modular homes (<https://www.legalandgeneral.com/modular/our-homes> ) Legal and General are developing the large strategic site North of Horsham. Please see our answer to question 1b.

Soft sand in Sussex is a finite resource and alternatives to its usage should be found. After all this is the 21st century and old assumptions and thinking need now to be challenged and changed for the sake of communities and the environment.

**b) Do you think that there are any other matters that should be taken into account when determining the need for soft sand?**

It is CPRE Sussex's view that soft sand in West Sussex is a finite resource and its extraction and processing, whether inside or outside of the South Downs National Park, despite the JMLP's sustainability objectives, will have significant adverse impacts on the environment, landscape and communities

We note that "soft sand is largely used to produce mortar, which is used in the construction of homes" (Single Issue Soft Sand Review – Issues & Options Consultation (Reg 18), January 2019, paragraph 2.7).

We believe that an assessment should be made as to the realistic potential for alternatives to building homes using traditional construction techniques, as for example Legal & General's modular homes (<https://www.legalandgeneral.com/modular/our-homes> ) and other timber-framed methods of construction.

The British Geological Society advises that an average of 60 tonnes of aggregates are required per home constructed using traditional techniques. Therefore, a modest swing towards timber framed construction over the lifetime of this plan could negate the effect of the projected growth of residential dwellings (assumption 1). Furthermore, timber is regarded as carbon neutral and doesn't require the long-term decimation of green landscapes

**Question 2**

**a) Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?**

No, CPRE Sussex does not consider that all 'reasonable alternatives' for soft sand supply have been identified. We suggest that promoting alternatives to traditional construction techniques, as for example Legal & General's modular homes, could reduce the need and therefore demand for soft sand (<https://www.legalandgeneral.com/modular/our-homes> )

**b) Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?**

Yes, in respect of Options D and E;

Option D: supply from alternative sources including marine-dredged material.

We note the advice at paragraph 3.20 that *“Marine dredged material is increasingly supplied to market but is not known to be directly substitutable for land won resource at this time”*, which is surprising given that *“A large amount of marine-won sand and gravel is exported to Brighton & Hove and East Sussex, where housing growth is predicted to grow by an estimated 61.75% (West Sussex and South Downs National Park JMLP Soft Sand Review Issues and Options (Regulation 18) SA Report Sustainability Appraisal including Strategic Environmental Assessment Main Report January 2019, paragraph 2.2.14)*

We note, too, the advice at paragraph 3.20 that marine dredged material *“may become more accessible and available over time, and an economically viable alternative to land-won soft sand extraction”*.

CPRE Sussex suggests that whether marine-dredged material either is, or could be a viable alternative to land-won soft sand, needs to be determined, and indeed should have been determined before the commencement of the present consultation.

After all, soft sand in West Sussex is a finite resource and its extraction and processing whether inside or outside of the South Downs National Park, despite the JMLP’s sustainability objectives, will have significant adverse impacts on the environment, landscape and communities

If marine.-dredged material is suitable for use in place of land-won soft sand, a decision to use it instead of the soft sand would significantly increase demand and therefore employment opportunities - and if it can be supplied in the requisite quantities would significantly reduce or obviate the need for sand extraction from sites inside and within close proximity to the National Park and render the allocation unnecessary

We question the untested view expressed in the SA Assessment that in respect of Option D it is difficult to quantify transport impacts, including the impacts on climate change. Again, this should have been done before undertaking the present consultation – and is surely no more difficult to assess than for the ‘potential’ sites identified in the present consultation.

Option E.

We note and support Option E - that *“the Authorities will also consider whether a combination of the options would provide the most robust and deliverable strategy for supply”*. However, we do not support option B either as a stand-alone option or as part of a combination of options. NPPF para 205 states that MPAs should *‘provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty and World Heritage Sites, scheduled monuments and conservation areas;’*

**c) Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand?**

It is CPRE Sussex's view that options D and E (If option E excludes option B) should be taken forward as part of the preferred strategy to meet the identified shortfall for soft sand, **if this need is confirmed**, for the reasons explained in our answer to Question 2b.

**Please give your reasons.**

Please see our reply to question 2b.

**Question 3**

**Do you have any comments on the draft SA of the options?**

The SA highlights that in relation to option D there is considerable uncertainty. We believe that more work is needed to fully understand this option. See our comments to question 2b.

**Question 4**

**Do you have any comments on the site selection methodology, as set out in the 4SR report?**

Whilst we accept the methodology, we do not agree with the scoring against the methodology. We note that the nine sites included in the shortlist, "*are still being assessed*", and "*their inclusion does not imply that the authorities consider that the sites are suitable for development either now or in the future*" (Single Issue Soft Sand Review – Issues & Options Consultation (Reg 18), January 2019), paragraph 4.7.) It is hard for a decision to be made about the appropriateness of a shortlisted site without a robust evidence base.

Please see our response to Question 5.

**Question 5**

**Do you have any comments on the nine potential sites identified in the table above?**

1. Ham Farm

CPRE Sussex is concerned that site assessments understate adverse impacts, as for example in respect of Ham Farm (4SR Report, pages 82 to 90) which we believe should be withdrawn for the following reasons.

The assessment of 'Landscape and visual designations' awarded a RAG Score of Amber, states that.

*"The site lies adjacent to the SDNP and has a medium sensitivity and moderate-high capacity to mineral extraction'. Cumulative impacts would need to be considered".*

And that “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 (tranquillity, remoteness) on visitors to the parkscape should this site come forward. Views to the south from the parkscape would not be affected”.

However, in addition the ‘West Sussex Minerals Landscape Sensitivity and Capacity Study for Potential Mineral and Waste Sites – Minerals Addendum May 2015’ (March 2016), page 82: ‘Site Characterisation’ 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”.*

We note, too, the statement in Table 6.2: Option A: Supply from sites within West Sussex but outside of the National Park that “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 (West Sussex and South Downs National Park JMLP Soft Sand Review Issues and Options (Regulation 18) SA Report Sustainability Appraisal including Strategic Environmental Assessment Main Report January 2019, page 32).

Clearly, a sand pit with associated plant at Ham Farm would be visually intrusive over considerable distances and visible from an important Public Rights of Way within the SDNP.

Accordingly, it is CPRE Sussex’s understanding of assessment criteria that the site has Medium-High sensitivity to extraction and an overall Low capacity for accommodating mineral extraction – and that it should therefore be assessed as Red or Red Amber, not Amber.

We suggest, too, that the assessment for Historic Environment Designations should be Red, not Red/Amber. This is because although it is stated, under ‘key criteria’, that “*there are a number of listed buildings within close proximity of the site*’, including “*numerous listed buildings to the south-west in the grounds of the Grade I listed Wiston House*”, the fact that Wiston House and the ‘numerous listed buildings’ are located inside the National Park is not acknowledged.

This omission matters greatly because the Revised NPPF at paragraph 172 stipulates that in National Parks the conservation and enhancement of cultural heritage are important considerations that should be given great weight.

Great weight should therefore be given to the adverse impacts that a sand pit at Ham Farm would have on the settings of Wiston House and the ‘numerous listed buildings’ within its curtilage, all of which within the National Park.

Please note 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”.*

We question, too, whether the impact that the extraction of sand, including dust and the noise emitted by on-site plant and generated by the ingress to and egress from the site of Heavy Diesel Vehicles would have on the National Park has been taken in to account and assessed, as it should.

## 2. Severals East and Severals West

We believe that the allocations at Severals East and Severals West should be withdrawn for the following reasons;

The SDNP guidelines (MM5) state that the authority *“will ensure minerals have been produced in a manner that protects and enhances the historic and natural environment, delivers net gains to natural capital, and contributes to a low carbon, circular economy”*. The proposed East and West Severals sites have been assessed as having a medium-to-high negative impact on the local environment with only the potential for low-to-medium extraction. The destructive impact of developing the sites for sand extraction cannot be justified when the landscape capacity has also been assessed as low-to-medium.

CPRE Sussex would draw your attention to;

- The Soft Sand Sites Selection Report which states in the RAG Score of the Landscape and Visual Designations section that the sites *‘have a medium-to-high sensitivity to extraction’*.
- Under the heading Key Criteria in the same section it is stated that there is *‘low-medium capacity for mineral extraction’*.
- The Soft Sand Sites Selection Report also acknowledges that the proposed application would destroy the tranquillity of this site located east and west of the single-track Severals Road. The area is characterised by plantations and ancient woodland with extensive public footpaths – including the Serpents Trail - crossing it. Public access will be negatively affected with the inevitable impact on rights of way.

- Should the site be approved, the remote ambience of the plantations and woodland will be lost, causing pollution and noise and damaging local habitats as well as disadvantaging walkers and families.
- The site is within a Biodiversity Opportunity Area. There is concern that the proposed development would adversely affect Severals Bog and the delicate balance of the area's ecosystem.
- There are serious access difficulties to both sites in an area that already has substantial lorry movements related to other sites.
- Permitting the application would exacerbate traffic congestion in Midhurst at the regularly log-jammed junction at Rumbold's Hill where the A286 from the south meets the A272 from the west.
- Access and egress on to the A272 from the affected villages on its south side will bring the associated problems of pollution, noise and danger to emerging traffic.
- The Bepton Road to the south of the Severals sites is unsuited to an increase in lorry movements.
- The uneven nature of the single track Severals Road which winds its way through plantations, is totally unsuitable for lorries and large vehicles. Access by lorries along this road is not viable and would be seriously damaging to the area. The impact of any sand extraction on either Severals site would have a severely negative impact on the listed Severals House and its neighbouring homesteads which have been assessed as being at '*high levels of harm*' under the Amenity heading of the same report.
- Quaggs Corner - which includes some listed properties - will also be adversely affected by sand extraction on the Severals West site, bringing a reduced quality of life to the tranquillity of this small community. Extending the Minstead West site will have further negative impacts on the area introducing increased noise, disruption and pollution.

In conclusion, we believe that the potential damage caused to the local environment and habitat by the extraction of soft sand on the sites of Severals East and West is severe. The present roads accessing the sites are unsuited to increased traffic. Moreover, greater traffic volumes on main roads will exacerbate existing traffic congestion in Midhurst at the junction of the A286 and A272. It is our belief that the overall impact of sand extraction on the sites would cause unjustifiable and unnecessary damage to an area of tranquil public space and rare habitats within the SDNP. We therefore request that these sites are withdrawn from the shortlist.

### 3. Buncton Manor Farm

As the Site Selection Report findings show, Buncton Manor Farm is totally unsuitable for sand extraction due to its close proximity to the National Park and ancient woodland. It will be clearly visible from the South Downs and will severely impact on enjoyment of the landscape. It is also very close to residential properties and will adversely affect those residents. Furthermore, the site is not available for 6 to 10 years and would take 10 to 15 years to complete. Therefore, its contribution to the sand shortfall being considered under this review up to 2033 could be minimal.

#### 4. Coopers Moor

The Site Selection Report shows this site to be unsuitable on a number of key criteria not least of which is its impact on the National Park.

#### 5. Duncton Common

This site is adjacent to Coopers Moor, nearly 5 times the area and potentially 5 times more damaging. It is unacceptable for the same reasons. As the Site Selection Report shows it will impact the National Park, severely harm wet heathland, BAP habitats and ancient woodland. CPRE Sussex would not support the allocation of this site.

#### 6. East of West Heath Common

This site records 6 amber and 1 red/amber RAG scores out of 12 criteria. It is in the centre of the National Park, has a high/medium sensitivity and low capacity to mineral extraction. CPRE Sussex would not support the allocation of this site.

#### 7. Minsted West

This site lies within the SDNPA and as the Landscape Study 2011 records, the site could not accommodate development without adverse impacts on the landscape quality of the surrounding area. Accordingly, the Site Selection report finds the site has a red/amber score on the 3 most important criteria. CPRE Sussex would not support the allocation of this site.

### Question 8

#### **Do you have any comments on the SA of the potential sites?**

CPRE Sussex draws attention to:

*“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).

It is our view that the extraction of soft sand from the ‘potential sites’ identified within and adjacent to the National Park cannot be undertaken without causing unacceptable harm to its

unique landscapes and tranquility and without being detrimental to communities and visitor experience.

This understanding is confirmed by Table 7.2 Summary of SA of Sites: SA Objective 5. To protect, and where possible, enhance the landscape, local distinctiveness and landscape character in West Sussex (West Sussex and South Downs National Park Joint Minerals Local Plan Soft Sand Review Issues and Options (Regulation 18) SA Report Sustainability Appraisal including Strategic Environmental Assessment Main Report January 2019, page 36).

Accordingly, none of the 'potential sites' are acceptable to CPRE Sussex 'in principle'.

### **Question 9**

**Do you have any comments on the proposed site selection strategy and guiding principles?  
Are there any other factors that should guide the selection of allocated site(s)?**

Timelines - Buncton Manor Farm for instance will as previously noted not be available for 6 to 10 years and will take 10 to 15 years to complete.

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The signature is written in a cursive, flowing style.

**Kia Trainor**  
**Director, CPRE Sussex**