

Joint West Sussex Minerals Local Plan

Engagement Event- Tuesday 8 July 2014

Summary of Outcomes

1. Background

- 1.1 This document summarises the engagement event held on Tuesday 8 July at the South Downs Centre Hall, Midhurst. The event focused on the first draft of Background Papers prepared in connection with the Joint West Sussex Minerals Local Plan.
- 1.2 Five Background Papers were presented to a targeted audience of district/borough and town and parish councils and key organisations known to have an interest in minerals planning issues in West Sussex. There were 39 attendees at the event.
- 1.3 This event is part of a wider informal engagement stage to support the early work on the Minerals Local Plan, aimed at gathering evidence, verifying facts and identifying areas of concern or support.
- 1.4 Event attendees were also encouraged to feedback any comments through response forms as part of a wider stakeholder engagement exercise being undertaken on the Background Papers running until 28th July 2014.

2. Aims of event

- 2.1 The aim of the event was to present the five Background Papers produced by West Sussex County Council and the South Downs National Park Authority (the Authorities), and to encourage informal discussion and feedback on the issues set out within them. The two overriding objectives of the event were to:
 - Check information to ensure the Authorities knowledge and understanding of minerals issues was up-to-date and robust; and
 - Identify potential issues, problems or concerns relating to the working of minerals in West Sussex.
- 2.2 The five Background Papers discussed at the event were:
 - Background Paper 1: Setting the Context - Spatial Portrait
 - Background Paper 2: Minerals in West Sussex
 - Background Paper 3: Site Identification and Assessment Methodology

- Background Paper 4: Safeguarding Minerals Infrastructure
- Background Paper 5: Safeguarding Mineral Resources

3. Structure of event

- 3.1 Following an introduction to the work on the Joint Minerals Local Plan to date, the event was split into two main sessions. The first session concentrated on Background Papers 1 and 2, and the second session focused on Background Papers 3, 4 and 5. A copy of the Event Programme is included in Appendix 1.
- 3.2 Attendees at the event were split into five groups with one facilitator from the Authorities assigned to each group to encourage debate, particularly around the key issues and key questions identified within the Background Papers. A copy of the list of attendees is set out in Appendix 2.

4. Key issues and next steps

- 4.1 The key issues discussed for each of the Background Papers are summarised below. This summary presents the key issues raised, however does not provide a response or comment by the Authorities on how the issues will be considered as part of the plan making process. The comments from this event will be considered alongside the comments from the public engagement on the Background Papers exercise, which closes on 28 July 2014. Responses received in relation to the Background Papers will be collated and set out in an outcome report, alongside the Authorities response, explaining how they will be taken into account in preparing the Minerals Local Plan.
- 4.2 Information on the next stages of the Minerals Local Plan process, and anticipated timing, is provided in the Minerals and Waste Development Scheme available at www.westsussex.gov.uk/mwdf/mwds.

5. Summary of comments

5.1 Background Paper 1: Setting the Context - Spatial Portrait

Expectations for the Minerals Local Plan

- A discussion was held about honesty, transparency and realism in what the Plan can achieve, and what can be achieved from the planning process for individual sites.
- There were general discussions about the desire to see lessons learned from previous plans and experiences of the current policy framework used to inform preparation of new policies.

Spatial strategy

- Request for a balanced approach to be taken in the spatial strategy for both aggregate and hydrocarbon extraction.

Background Mapping

- Comments suggested the need for an overlay map to show location of minerals and constraints to be included in the Background Papers and Site Study document.
- A suggestion was made that the map should show location of other development allocations with anticipated timings, in particular to avoid conflict between housing and potential mineral development. Sites around Chichester which have been left wet following mineral extraction were noted.

South Downs National Park

- The importance that the National Park designation plays in setting the context for the Plan and future mineral exploration and extraction was highlighted, with the problematic impacts of China Clay extraction on Dartmoor given.
- A suggestion was made that the South Downs National Park designation could be reflected in a definition of sustainability so it is clear how this will be viewed when planning applications are assessed.
- A concern was raised about the fact that the South Downs National Park Management Plan only has a policy on restoration and no overarching policies for the whole park to give consistency and additional protection for its designation.

Local economic impacts

- Comment that micro-economic impact needs to be considered, for example local job creation from minerals extraction as opposed to local tourism economy impacts.

Site allocations and criteria based policies for non-allocations

- Concerns were expressed about the effect of additional demand for aggregates on communities already subject to previous or existing extraction, prolonging the impact of mineral extraction on these communities. This should be reflected in this Background Paper.
- Concerns were raised surrounding the allocation of aggregate minerals sites as opposed to oil and gas. Questions were asked about whether there would be specific policies tailored to oil and gas, or whether the same policies would apply across the board for development management purposes.

- Questions were raised about how additional sites outside the site allocations would be considered by the Plan.
- Questions were raised about whether there will be re-use of existing quarries or sites by the Plan.

Traffic impacts

- Concerns were raised around lorry routing along key rural routes across the county and through rural villages.
- Challenges were identified for how effectively lorry routing from sites is enforced, with a particular issue with routing agreement details not being passed to sub-contractors identified.
- The need for the highway authority to engage with minerals planning proposals at an early stage in the planning process as well as consult with neighbouring highway authorities on routing arrangements was identified.
- Lorry parking near active sites was identified as an issue for sites where vehicles arrive before sites open. It was felt that greater consideration should be given to lorry parking.

Consultation and engagement

- The role of community engagement and local knowledge as valid perspectives in minerals planning was highlighted. The importance of providing greater certainty to communities in terms of what will happen and when with future minerals planning was also identified.
- Concerns were raised about whether the Authorities are in liaison with neighbouring minerals planning authorities, in particular with respect to hydrocarbons and transport routing issues.
- It was felt that local champions would benefit from additional guidance to deal with oil and gas issues.
- A comment was raised about liaison with other organisations, for example the High Weald Areas of Outstanding Natural Beauty in West Sussex.

Site conditions

- Questions were raised regarding any extraction sites which are permitted and condition stipulations around when the operator must commence and complete work by.

Enforcement

- There were general concerns about the need for strong monitoring and enforcement of sites.

Restoration comments

- Comments identified that the Plan should seek to provide greater certainty about long term plans for restoration and policies which are flexible enough to bring forward different types of restoration.
- Comments were raised about how planning conditions can be enforced, especially as operators change, and where responsibilities lie for maintaining/restoring disused sites. There were concerns raised around enforcement of sites that are not being restored according to their restoration plans.
- Landfill was discussed in relation to restoration of mineral sites. The reduced availability of landfill material to enable restoration to 'land' (not water) was noted as an issue.
- The importance of ensuring emphasis on high quality restoration of land/environment post-extraction was highlighted. A question was asked about to what extent this can be a key aspect of the original planning application.
- The question of the future of Shoreham Cement Works was also identified.

5.2 Background Paper 2: Minerals in West Sussex

General

- There were limited specific comments about this paper, as it contained mainly factual information.

Demand data and apportionment

- Concerns were expressed about the quality of data used to underpin the Plan, particularly the anticipated aggregate shortfall, as this is reliant on data provided by operators which cannot be robustly audited leading to scepticism.
- Comments suggested an additional, expanded explanation of the new system for aggregate apportionment was needed with particular concerns raised about the sales led approach and about the mechanism for responding to changes in demand.
- Comments identified a need for greater understanding about the potential impacts of using recycled and secondary aggregate on the need for primary extraction.
- A question was asked about whether there will be forecasting of supply and demand, and how this will work

Oil and gas

- Requests were made that British Geological Survey study maps of shale resources, fault lines and aquifers are included.
- Concerns were raised around how the Plan will address groundwater contamination, specifically in relation to oil and gas.

- Clarification was sought on paragraph 4.24 in terms of the Authorities identifying the specific locations of proposed future hydrocarbon development, as opposed to paragraph 4.23 which states that the Authorities are not required to identify sites for hydrocarbon development.
- As sites for oil and gas will not be allocated there was concern raised about the cumulative impacts of neighbouring possibly different forms of development.

Regulatory framework

- There were conflicting views about the need for greater explanation of the regulatory framework in Background Paper 2.
- Comments were also made that reliance on other organisations (as explained in section 4.53 of the Background Paper) is not enough and that the Authorities should verify and establish at planning stages that key issues are resolved up front rather than at a later stage by a regulatory organisation or as a condition. This comment included a request for a changing in the wording of decisions such that planning permission is not awarded until regulatory conditions have been satisfied.

5.3 Background Paper 3: Site Identification and Assessment Methodology

Hierarchy of sites and the South Downs National Park

- Comments were made about the usefulness of including a hierarchy of acceptable sites linked to a strong spatial strategy.
- A question was posed about if or how the objectively identified minerals demand for West Sussex should be met by the National Park within West Sussex.

Assessment criteria

- Comments were made about the importance of a full assessment of criteria, not just a desktop assessment.
- Questions were raised around the weighting of individual criteria in making a decision for sites
- Comments were made about the need to ensure adequate transport infrastructure is in place. It was felt that greater clarity should be provided about the criteria used to assess cumulative severe impacts on the transport network.
- A comment was made about whether a policy condition can be included to require the minerals industry to demonstrate that “reasonable alternatives” have been considered in terms of minerals site applications for non-allocates sites.

- A question was asked about whether there will be separate site assessment processes for oil and gas sites as opposed to sand and gravel sites.

Site identification and terminology

- The need to look at sites not identified by industry or landowners was identified.
- The need to define “new” and “extension” sites and assess the impacts of both types of site was identified as important.

Quality of life and cumulative impacts

- The impact on the quality of life of future generations was identified as a key issue in the site assessment process.
- A question was asked about the separation of sites from adjacent developments, for example minerals sites.

Site restoration

- Comments about the need to give serious consideration to land restoration prior to allocation were made. Eversley Quarry was given as an example of good restoration for a site that was developed in a sensitive environment.

Consultation

- The need to include parish councils and communities as external consultees for the site assessment process was identified, particularly where neighbourhood plans are being prepared.

Monitoring

- A request was made for an additional Background Paper on monitoring sites and the implementation of the Plan involving a holistic approach with external monitoring agencies.
- The need to provide resources for parish councils to fulfil a role in monitoring of sites was identified.

5.4 Background Paper 4: Safeguarding Minerals Infrastructure

Transport infrastructure

- The issue of Shoreham Harbour safeguarding needing to be considered carefully given redevelopment aspirations and its role in being a major route for aggregate was identified.
- The importance of consultation with Network Rail to ensure continued transport of minerals by rail was identified.

- The issue of the need to support infrastructure improvements including to road networks to enable efficient movement of minerals was identified.
- A concern was raised that there was little detail on road transport infrastructure and its importance to the movement of minerals within this Background Paper.

5.5 Background Paper 5: Safeguarding Mineral Resources

Safeguarding

- The buffer used to initiate safeguarding consultations was generally considered adequate although it was noted that previous experiences with safeguarding should be used to test this.
- The need for districts to have clarification on “show-stopping” Mineral Safeguarding Areas was identified.
- The issue of minerals being a finite resource which will run out some time in the future was identified.

Recycled aggregates

- The importance of recycling of aggregate being given more emphasis was identified, including by additional reference to the Waste Local Plan. A question was also asked about the role that different sources of supply play in the minerals aggregate supply chain.

5.6 General comments

- Questions were raised about the Plan preparation process and the length of time expected until adoption anticipated in 2017.
- Some attendees were concerned that there was too much information to digest and suggested that executive summaries of the Background Papers should have been produced.
- Some attendees reported difficulties in accessing the Background Papers from the Minerals Local Plan website.
- Some attendees were concerned that executive summaries could be too simplistic and would overshadow the detail contained within the main text.

Appendix 1: Session Programme

Time	Programme Item	Officer
13.00- 13.30	Registration and refreshments <i>30 mins</i>	
13.30-13.35	Welcome and introduction <i>5 mins</i>	Tim Slaney, SDNPA
13.35 – 13.45	Presentation: Joint Minerals Local Plan <i>10 mins</i>	Alethea Evans, WSCC
13.45- 14.15	Group Session 1 <u>Background Paper 1:</u> Spatial Portrait <u>Background Paper 2:</u> Mineral Resources <i>30 mins</i>	Group Facilitators
14.10 – 14.25	Feedback: from Group Session 1 <i>15 mins</i>	Alethea Evans, WSCC
14.25 – 15.05	Group Session 2 <u>Background Paper 3:</u> Site Identification and Assessment Methodology <u>Background Paper 4:</u> Safeguarding Mineral Infrastructure <u>Background Paper 5:</u> Safeguarding Mineral Resources <i>40 mins</i>	Group Facilitators
15.05 -15.20	Feedback: from Group Session 2 <i>15 mins</i>	Alethea Evans, WSCC
15.20 –15.25	Presentation: Next Steps <i>5 mins</i>	Alethea Evans, WSCC
15.25	Close	

Appendix 2: Attendees

Officers attending

1	Alethea Evans (Chair)	Senior Planning Officer (WSCC)
2	Tim Slaney	Director of Planning (SDNPA)
3	Darryl Hemmings	Planning & Transport Policy Manager (WSCC)
4	Rupy Sandhu	Planning Officer (WSCC)
5	Jamie Dallen	Assistant Planning Officer (WSCC)
6	Claire Potts	Minerals and Waste Manager (SDNPA)
7	Peter Wilsdon	Minerals and Waste Planning Officer (SDNPA)

Delegates

1	Clive Needham	West Chiltington Parish Council
2	Jess Price	Sussex Wildlife Trust
3	Sylvia McCallum	Lynchmere Parish Council
4	Chris Watson	West Itchenor Parish Council
5	Steve Ankers	South Downs Society
6	Harold Keel	
7	Peggy Wood	Westhampnett Parish Council
8	Roger Smith	CPRE Chichester/South Downs
9	Andrew Shaw	High Weald AONB
10	Sarah Bain	National Trust Property Group
11	Diana Vanderklugt	Parham Parish Council
12	Martin Buckley	Graffham Parish Council
13	Liz Williams	Duncton Parish Council
14	Kevin Bottomley	Balcombe Parish Council
15	David Brittain	Fittleworth Parish Council
16	Roger Hobbs	Summersdale Residents Association
17	Andrew Shaxston	South Downs National Park Authority
18	Derek Stewart Smith	Graffham Parish Council
19	Mr Jeremy Bonnett	Lurgashall Parish Council
20	Mr Alan Smith	CPRE Chichester/South Downs
21	Josef Ransley	Kirdford Parish Council
22	Simon Oakley	Member West Sussex County Council/Chichester District Council
23	David Todd	Westhampnett Parish Council
24	Michael Brown	CPRE Chichester/South Downs
25	Michael Crawford	Stedham with Iping Parish Council
26	Mike Balmforth	Bampton Parish Council
27	Anthony Davies	Compton Parish Council
28	Iain Skinner	Forestry Commission
29	Gerard Conway	Cuckfield Society
30	Mike Allgrove	Chichester District Council
31	John Popplewell	Compton Parish Council
32	Helen Hollowood	Bampton Parish Council
33	John Havenhand	Findon Parish Council
34	Eddie Lintott	Stedham with Iping Parish Council

35	Claire Tester	Mid Sussex District Council
36	Cllr Carol Purnell	Chichester District Council
37	Judith MacDonald-Lawson	Easebourne Parish Council
38	John Mayes	Duncton Parish Council
39	Norman Webster	Mid Sussex District Council